Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) | SSD 10446

CONSTRUCTION WASTE MANAGEMENT PLAN

Prepared for Coombes Property Group | 10 March 2025

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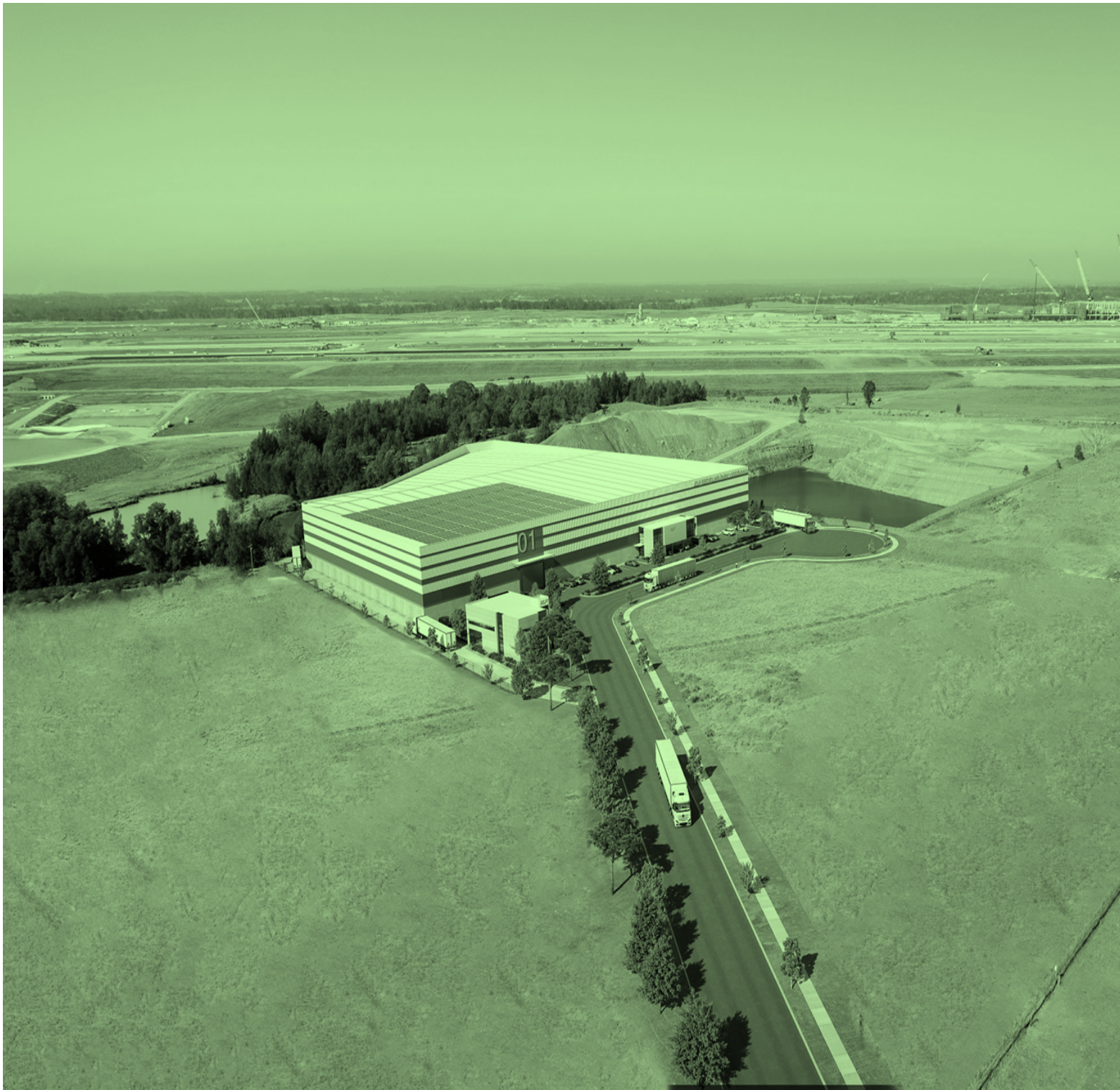

Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799)

SSD 10446 | CONSTRUCTION WASTE MANAGEMENT PLAN

Prepared for Coombes Property Group
14 March 2025

PR371

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0	30 August 2024	For Coombes Property Group review	Element Environment	Coombes Property Group
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1 INTRODUCTION

The site is located at 275 Adams Road, Luddenham NSW (Lot 3 in DP 623799, 'the site') within the Liverpool Local Government Area. The Advanced Resource Recovery Centre (ARRC) is approved by State significant development (SSD) consent DA 10446 (the DA).

The adjoining existing shale/clay quarry is approved by SSD consent DA 315-7-2003, issued by the NSW Minister for Planning under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

The site is owned by CFT No 13 Pty Ltd, a member of the Coombes Property Group (CPG).

1.1 Project description

The broader site at 275 Adams Road is approximately 19 hectares (ha). The approved development footprint for ARRC is approximately three hectares of the total site area. Immediately to the south of the proposed ARRC, there is an existing operational shale and clay quarry on the site which occupies approximately six ha of the total site area.

The project involves the development of the ARRC.

The following will be built as part of the project:

- Sealed site access via Adams Road
- Internal sealed roads
- Hard surfacing for the warehouse floor and external areas
- A 13,230 m^2 metal clad fully enclosed warehouse, with a maximum elevation of 16 m
- Two site offices with the larger office (400 m2) located in the outside parking area and the smaller office (140 m2) located over the car parking area on the western side of the ARRC warehouse
- Surface water drainage system

It will also include the installation of:

- Marked traffic and pedestrian areas
- Approximately 47 parking spaces for staff and customers located to the west and north-west of the ARRC warehouse
- Two weighbridges: an inbound and an outbound weighbridge
- Two ticket booths, one for incoming and one for outgoing vehicles
- A wheel wash for outbound vehicles
- Awnings attached to the warehouse at each warehouse entry/exit point
- Separate underground tanks for firewater supply and containment, and a fire suppression system
- A stormwater management system including rainwater tanks and an onsite detention basin
- An on-site surface water management system consisting of a water treatment plant, onsite leachate and water detention areas
- An on-site wastewater management system comprising of a septic tank
- Connection to services
- Fencing and signage at the front of the site
- Landscaping

The construction phase outlined above is expected to take around 18 months.

Once operational the ARRC will process up to 600,000 tonnes per annum (tpa) of waste for recycling. It will dispatch up to about 540,000 tpa of recycled product.

1.2 Purpose

This CWMP is part of a suite of management plans required for the construction of the ARRC. Together, these plans describe the proposed overall management system for the project. This plan is intended to guide the management of waste generated during construction. This CWMP will be implemented for the entire duration of the construction works, approximately 18 months, to ensure consistent waste management practices.

1.3 Relevant regulations, standards and guidelines

The requirements of the following documents have also been addressed in this document:

- NSW *Protection of the Environment Operations Act 1997* (POEO Act)
- Protection of the Environment Operations (Waste) Regulation 2014
- NSW *Waste Avoidance and Resource Recovery Act 2001* (WARR Act)
- Waste Classification Guidelines Part 1: Classifying Waste, NSW EPA (2014)
- Waste Classification Guidelines Part 4: Acid Sulphate Soil, NSW EPA (2014)
- Managing Urban Stormwater: Soils and Construction (Landcom, 2004)
- NSW EPA Resource Recovery Orders and Exemptions (as applicable)
- DCCEEW, National Waste Policy Action Plan, 2019, accessed 21 May 2024

1.4 Conditions of consent

This section addresses the construction waste-related conditions of consent in SSD 10446 and the waste management plan requirements provided by NSW Environment Protection Authority (EPA).

Construction waste-related conditions of consent are provided in Table 1.1 along with the CWMP reference within the document.

Table 1.1 Conditions of consent

Condition		CWMP reference
Safety and Efficiency of Western Sydney Airport		
B1	The Development must not have any impact on the safety or efficiency of the operations of the Western Sydney International (Nancy-Bird Walton) Airport.	Section 3.8 Section 3.9
Waste Management		
Construction Waste Management		
B64	Prior to the commencement of construction of the Development, the Applicant must prepare a Construction Waste Management Plan for the Development to the satisfaction of the Planning Secretary. The Plan must form part of a CEMP in accordance with condition C2 and must:	This plan
B64(a)	Detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and	Section 2.3 Section 2.4 Section 2.5
B64(b)	Be implemented for the duration of construction works.	Section 1.2 Section 3
B65	The Applicant must:	
B65(a)	Not commence construction until the Construction Waste Management Plan is approved by the Planning Secretary.	Section 1.4
B65(b)	Implement the most recent version of the Construction Waste Management Plan approved by the Planning Secretary.	This plan
Statutory Requirements		

Condition		CWMP reference
B76	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Section 2.4 Section 3.7
B77	The Applicant must assess and classify all non-liquid and liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a waste management facility or premises lawfully permitted to accept the waste.	Section 2.4 Section 3.1 Section 3.7
B78	The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of EPA.	Section 4.2
Environmental Management		
Management Plan Requirements		
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	Section 1.3
C1(a)	Detailed baseline data	Section 2.2 Section 2.3 Section 2.5
C1(b)	(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;	Section 1.3 Section 2.1 Section 3.9
C1(c)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria	Section 3 Section 3.9
C1(d)	a program to monitor and report on the: (i) impacts and environmental performance of the Development; and (ii)effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 4.1 Section 4.2
C1(e)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible.	Section 3.10
C1(f)	a program to investigate and implement ways to improve the environmental performance of the Development over time.	Section 4.4
C1(g)	a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and	Section 4.5 Section 4.6
C1(h)	a protocol for periodic review of the plan.	Section 4.4

2 CONSTRUCTION WASTE MANAGEMENT

2.1 Project objectives and targets

The Construction Waste Management Plan (CWMP) aims to ensure that all waste generated during the construction phase of the ARRC is managed effectively, sustainably, and environmentally aware.

Waste generated from construction activities will be managed with the following objectives:

- Facilitate detailed consideration of waste elimination, waste generation and waste recovery options for each stage of construction from design to end use, operations and maintenance.
- Maximise resource recovery and beneficial re-use or re-processing of construction waste and any excavated materials to reduce waste to landfill and promote the circular economy to reduce impacts on natural resources, e.g., recycle virgin excavated natural material or excavated natural material.
- Prevent environmental pollution associated with waste storage, handling, transport and disposal.
- Verify proper waste disposal to a licensed facility and traceability of waste disposal.
- Recover, through reuse and recycling (diversion), a greater than 90% (by weight) of all waste (excluding soil) generated on-site.

2.2 Waste impact

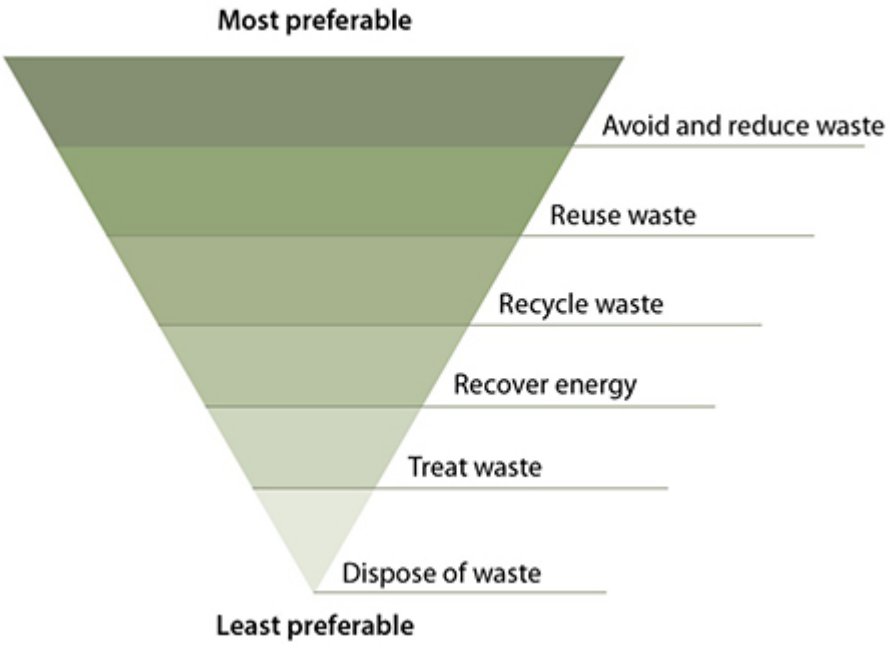
Table 2.1 below details the key aspects and potential impacts associated with the consumption of materials and the generation of waste during construction.

Table 2.1 Indicative construction waste stream

Activity	Waste type	Potential impact
Site clearing and grubbing including the removal of vegetation	Generation of vegetation waste	Increased waste from improper practices or failure to implement waste hierarchy
Bulk earthworks	Generation of virgin excavated natural material (VENM)	Increased waste from improper practices or failure to implement waste hierarchy
	Generation of excess spoil	Excess volumes of excavated material requiring storage or disposal
Road upgrade	Generation of asphalt, concrete, timber and packaging materials	Increased waste from improper practices or failure to implement waste hierarchy
Compound and warehouse construction	Packaging materials including scrap metals timber and cardboard	Increased waste from improper practices or failure to implement waste hierarchy
General office/administration, amenities including food and human waste	Generation of office waste	Increased waste from improper practices or failure to implement waste hierarchy
	Generation of food and domestic waste	Litter from inappropriate disposal of domestic waste from construction personnel
	Generation of grey and septic waste	Inappropriate disposal of grey and septic wastes leading to regulatory non-compliance or environmental harm
Waste transport and disposal	Unlicensed waste contractors transporting waste	Potential illegal dumping of waste

2.3 Waste management strategy

The waste management strategy will be implemented throughout the construction works. It is guided by the Waste Hierarchy, as shown in Figure 2.1, prioritising waste avoidance, reuse, and recycling over disposal. Waste will be managed to minimise the volume of waste transported to landfill, consistent with the objectives and targets of this plan.



Source: NSW EPA Waste Avoidance and Resource Recovery Act 2001

Figure 2.1 The waste hierarchy

Avoid and reduce waste

- Minimise the production of waste materials in the construction process by including the following:
- Assessing and considering the resultant waste from different design and construction options.
- Purchasing materials that will result in less waste and minimal packaging are pre-cut or fabricated.
- Not over-ordering products and materials.

Reuse waste

- Ensure that, wherever possible, materials are reused either on-site or offsite.
- Identify all waste products that can be reused.
- Put systems in place to separate and store reusable items.
- Identify the potential on-site and offsite reuse applications and facilitate reuse.

Recycle waste

- Identify all recyclable waste products to be produced on-site.
- Provide systems for separating and stockpiling of recyclables.
- Provide clear signage to ensure recyclable materials are separated.
- Process the material for recycling either onsite or offsite.
- When needed some unsorted waste will be sent to specialised waste contractors for further separation and recycling at an offsite location.

2.4 Disposal location

Waste generated during construction will be disposed of at licensed facilities equipped to handle specific waste types. General waste bins will be allocated on-site, and authorised contractors will transport the waste. Waste tracking will ensure compliance with the EPA Waste Classification Guidelines.

Waste generated during the project will be directed to the waste management facilities listed in Table 2.2. While this is not an exhaustive list, these facilities are located near the construction site and are licensed to handle general solid waste, as well as construction and demolition waste. Other licensed facilities may be used depending on which contractors deliver the work. This ensures compliance with regulatory requirements and the project's environmental objectives.

Table 2.2 Nearby waste facilities

Facility Name	Accepted Waste Types	Address	EPL
KLF Group	Construction and demolition waste	16 Grand Ave, Camellia NSW 2142	12700
Erskine Park Waste Transfer Station	General solid waste, construction and demolition waste	85-87 Quarry Road, Erskine Park NSW 2759	20986
BINGO Eastern Creek Recycling Ecology	General solid waste, construction and demolition waste	1 Kangaroo Avenue, Eastern Creek, NSW 2766	13426 20121
Cleanaway Eastern Creek Solids Waste Services	General solid waste, construction and demolition waste	Unit 2, 1A Raffles Glade, EASTERN CREEK, NSW 2766	21070

Note: It's advisable to contact these facilities directly to confirm acceptance of specific waste types and to inquire about any requirements or restrictions.

2.5 Key waste streams, estimated quantities and service requirements

Construction waste generated during the ARRC development may include various construction and demolition (C&D) materials, recyclable materials, and a minor proportion of residual waste. Active site management during construction will ensure all waste and recyclable materials are handled appropriately. Any materials that cannot be recycled or reused will be disposed of at a licensed landfill facility. KLF Group will provide waste management services for construction waste generated during construction. Opportunities for optimising reuse or recycling of waste are provided in Table 2.4.

The estimated construction waste generation during the 18 months of construction is shown in Table 2.3 and Table 2.4.

Table 2.3 Estimated construction waste generation volume

Waste Category	%	Volume, m3	Office	Site Estab.	Piling	Earthworks	Structure	Fit Out	External Works	Landscaping	Road Upgrade
Recyclable											
Concrete	7.5%	82.5	YES	YES	YES	NO	YES	NO	YES	YES	YES
Brick	3.0%	33	YES	NO	NO	NO	YES	YES	YES	NO	NO
Asphalt	4.5%	49.5	NO	NO	NO	NO	NO	NO	YES	NO	YES
Timber	23.5%	258.5	YES	YES	NO	NO	YES	YES	YES	NO	NO
Metals	13.5%	148.5	YES	YES	YES	NO	YES	YES	YES	YES	YES
Green Waste	2.0%	22	YES	NO	NO	YES	NO	NO	NO	NO	NO
Fill	2.0%	22	NO	NO	YES	YES	YES	NO	NO	NO	NO
Plaster-board	4.5%	49.5	YES	NO	NO	NO	NO	YES	NO	NO	NO
Paper/cardboard	17.5%	192.5	YES	YES	NO	NO	YES	YES	YES	YES	YES
Plastic	16.50	181.5	YES	YES	NO	NO	YES	YES	YES	YES	YES
SUB TOTAL	**94.5%**	**1039.5**									
Non-Recyclable											
Non-Recyclable	5.5%	60.5									
TOTAL	**100%**	**1100**									

Table 2.4 Key Waste Types and Opportunities for Diversion

Waste type	Site Requirements (where practicable)	Opportunities for optimising reuse or recycling
Generation of vegetation waste	Mulch or chip on site. Trucked off-site. Stockpile separately.	▪ Cleared vegetation will be reused or recycled to the greatest extent practicable via mulching or chipping ▪ Offsite disposal of excess mulch per the Mulch Exemption/Order 2016 or disposal at the licensed waste facility
Generation of virgin excavated natural material (VENM)	Reuse on site. Stockpile separately. Removed from the site by trucks.	▪ Balance cut and fill earthworks, where possible, to minimise waste generation. ▪ Waste soil tested and classified. ▪ Reuse off-site under a resource recovery exemption, Development Approval or licence (beneficial reuse/recycle). ▪ Where reuse/recycle cannot be achieved, soil will be sent off-site for disposal at the licensed facility.
Generation of excess spoil	Reuse on site. Stockpile separately. Removed from site by trucks	▪ Balance cut and fill earthworks, where possible, to minimise waste generation. ▪ Waste soil tested and classified. ▪ Reuse off-site under a resource recovery exemption, Development Approval or licence (beneficial reuse/recycle). ▪ Where reuse/recycle cannot be achieved, soil will be sent off-site for disposal at the licensed facility. ▪ Disposal off-site (if contaminated) at the licensed facility.
Generation of asphalt, concrete, timber and packaging materials	Separate. Stockpile or place in a skip. No runoff of contaminants.	▪ Separation for re-use/recycling on-site or sent offsite for recycling. ▪ Reused in temporary works, site levelling or establishing walkways, driveways or stabilised areas. ▪ Collection by licensed waste contractor for offsite disposal.
Packaging materials including scrap metals timber and cardboard	Separate. Stockpile or place in a skip.	▪ Collection by licensed waste contractor for offsite disposal
Generation of office waste	Secured and unsecured Bins Separate in containers provided	▪ Recycled off-site (co-mingled recycling). ▪ Collection of non-recyclables by licensed waste contractor for offsite disposal.
Generation of food and domestic waste	Separate in containers provided with lids	▪ Collection of non-recyclables by licensed waste contractor for offsite disposal.
Generation of grey and septic waste	Septic tanks provided	▪ Collection of non-recyclables by licensed waste contractor for offsite disposal.
Hazardous liquid waste (residual or expired chemicals), if required	Chemical storage area	▪ Collection by licensed waste contractor for offsite disposal.

3 MITIGATION MEASURES

Below are requirements to mitigate the effects of waste generation and effectively implement the waste hierarchy. The construction contractor is responsible for implementing mitigation measures to minimise the waste impact associated with the construction phase until its final completion.

3.1 Waste identification and classification

The EPA guides the classification of waste into groups that pose similar risks to the environment and human health. Definitions of classifications are as per the *Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014),* where six waste classes are used:

1. Special waste;
2. Liquid waste;
3. Hazardous waste;
4. Restricted solid waste;
5. General solid waste (putrescible); and
6. General solid waste (non-putrescible).

All waste generated by the ARRC construction during the construction phase will be classified and managed per *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014) and disposed of accordingly.

3.2 Prevention

- Detailed determination of types and quantities of packaging materials required before ordering/purchasing to minimise wastage.
- Procure materials to favour suppliers who can reduce bulk packaging and minimise waste generation.
- Proactive coordination of site activities (where possible) to minimise waste by utilising unused materials.
- Earthworks to minimise the demand for imported fill or the need to export/dispose of excess spoil.
- Store supplies in a secure location that is protected from the weather.
- Laydown areas must be kept tidy and organised so that stored items are not damaged and can be readily and safely accessed when needed by the construction operation.

3.3 Reuse and recycling

- Waste within site offices will be segregated on-site, with colour-coded bins provided for mixed recyclables, organic waste, landfill waste, and paper.
- Where possible, reuse excavated materials as fill on other parts of the Project in preference to off-site beneficial re-use or disposal per *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014).

3.4 Storage/Handling

- All general solid waste generated will be stored in waste containers provided at suitable locations within the construction site boundary and sent for disposal to the licensed waste management facility, as per EPA requirements;
- Waste will be stored in an environmentally safe manner;
- Waste will not be stored or allowed to come in contact with any incompatible waste, where possible;

- Storage of fuels and chemicals is in a secure bunded area. The capacity of the bunded area is to be at least 110% of the largest container stored within as per EPA requirements;
- An emergency response spill kit shall be located adjacent to the bunded area;
- Storage containers and locations for the various waste streams shall be clearly labelled to ensure that mixing of wastes is avoided, and
- Advice shall be sought from the site's Project Environment Manager on the nature of a waste if it is unknown.

3.5 Contaminated soil management

If additional excavation is required, unexpected contamination in the subsurface may occur. In such cases, the Unexpected Contamination Procedure outlined in the Construction Environmental Management Plan (CEMP) will be immediately implemented to ensure appropriate management and compliance with regulatory requirements.

Should contamination be identified, further sampling and analysis will be conducted to classify the excavated material in accordance with the *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014). Any soil requiring off-site disposal will be transported to a licensed waste facility per regulatory requirements. Corrective actions and additional controls will be implemented as necessary to mitigate environmental risks and ensure compliance with the project's environmental obligations.

3.6 Concrete washout areas

Effective concrete washout areas will contain concrete slurry and liquids when the chutes of concrete mixers and hoppers of concrete pumps are rinsed out after delivery to a site. The lined trap system, portable trays, or concrete washout bags will consolidate solids for easier disposal or reuse and prevent runoff of contaminated liquids.

- A lined trap system is excavated in an area with stormwater overflow protection consisting of impervious plastic sheeting. The goal is to retain the liquids.
- Concrete washout bags specifically manufactured to contain all liquid will be used.
- Portable trays can hold liquid and solid concrete washout materials and easily move around the site as needed. This option is sustainable by reducing the generation of additional waste, such as plastic.

3.7 Waste disposal

- All waste (including contaminated spoil) requiring off-site disposal will be classified and disposed of per the *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014). Wastes that cannot be reused or recycled will be disposed of offsite at a licensed waste management facility, or premises lawfully permitted to accept the materials following classification. Ensure NSW EPA waste tracking and licencing requirements are complied with.
- Details of waste types, volumes and destinations are to be recorded in the Waste Tracking Register (refer Appendix A).

3.8 Airport safeguarding

Western Sydney International (Nancy-Bird Walton) Airport (WSI) is expected to begin operations in late 2026 (source: https://wsiairport.com.au/makeWSIyours).

It is anticipated that construction activities will be completed prior to the commencement of airport operations.

Waste material can be carried by the wind to the WSI, and foreign object debris has the potential to damage aircraft engines, which can have a devastating effect on safety.

In response to concerns raised by the airport authorities, the following mitigation and management measures will be implemented:

- All trucks entering or leaving the site will have their loads fully covered.
- Lightweight packaging material will be stored in the provided containers with lids.
- Misting water sprays to minimise the likelihood of lightweight materials from becoming airborne (soil stockpiles).
- Careful management of any food waste from contractors, ensuring disposal in bins that are inaccessible to birds and vermin
- Daily litter patrol of the site and regular cleaning of the site ground to ensure all waste is appropriately stored and secured.
- All staff will undergo training on the risks associated with Foreign Object Debris (FOD) prior to starting work.

3.9 Summary of mitigation measures

Table 3.1 Project-specific waste management mitigation measures

Mitigation Measure	Methodology	Timing	Responsibility
Classify waste according to EPA guidelines	Use Waste Classification Guidelines Part 1 (EPA, 2014) to classify waste into categories.	Ongoing throughout construction	Contractors Site Manager
Minimise packaging waste	Determine types and quantities of packaging before ordering to avoid excess.	Before procurement of materials	Contractors Construction Manager
Favour suppliers with minimal packaging	Select suppliers who reduce bulk packaging and offer reusable options.	During supplier selection	Contractors Construction Manager
Coordinate site activities to minimize waste	Plan activities to use leftover materials where possible.	Ongoing throughout construction	Contractors Site Manager
Minimise earthworks waste	Balance cut and fill to reduce imported fill or excess spoil disposal.	During earthworks phase	Contractors Construction Manager
Store supplies securely	Use weather-protected, secure storage areas for materials.	Ongoing throughout construction	Contractors Site Manager
Maintain organised laydown areas	Keep laydown areas tidy and accessible to prevent material damage.	Ongoing throughout construction	Contractors Site Manager
Segregate office waste	Provide colour-coded bins for recyclables, organics, landfill, and paper.	Ongoing throughout construction	Contractors Site Manager
Reuse excavated materials on-site	Assess suitability per EPA guidelines and redistribute as fill where possible.	During earthworks phase	Contractors Construction Manager
Store general solid waste appropriately	Use designated waste containers within site boundaries.	Ongoing throughout construction	Contractors Site Manager
Ensure safe waste storage	Store waste to avoid environmental harm and incompatibility.	Ongoing throughout construction	Contractors Site Manager
Store fuels and chemicals in bunded areas	Use bunds with 110% capacity of the largest container.	Ongoing throughout construction	Contractors Site Manager
Provide spill kits near bunded areas	Place emergency spill kits adjacent to bunded storage.	Ongoing throughout construction	Contractors Site Manager
Label waste storage containers	Clearly label containers to prevent the mixing of waste streams.	Ongoing throughout construction	Contractors Site Manager
Seek advice on unknown waste	Consult the Project Environment Manager for the	As needed	Contractors Site Manager

	classification of unknown waste.		
Implement Unexpected Contamination Procedure if needed	Follow CEMP procedure, classify per EPA guidelines, and dispose accordingly.	If contamination is found	Contractors Site Manager
Use concrete washout bags or lined trap system for concrete washout	Employ bags designed to contain all liquids.	During concrete works	Contractors Site Manager
Use portable trays for concrete washout	Utilise movable trays to contain washout materials effectively.	During concrete works	Contractors Site Manager
Classify and dispose of waste per EPA guidelines	Follow Waste Classification Guidelines for off-site disposal.	Ongoing throughout construction	Contractors Site Manager
Record waste details in the Waste Tracking Register	Log types, volumes, and destinations of waste.	Ongoing throughout construction	Contractors Site Manager
Cover truck loads entering/leaving the site	Ensure all trucks have fully covered loads to prevent debris escape.	Ongoing throughout construction	Contractors Site Manager
Store lightweight materials securely	Use containers with lids for packaging materials.	Ongoing throughout construction	Contractors Site Manager
Use misting sprays on stockpiles	Apply water sprays to minimise airborne materials.	Ongoing, especially during dry conditions	Contractors Site Manager
Manage food waste to prevent wildlife attraction	Dispose of food waste in bins inaccessible to birds and vermin.	Ongoing throughout construction	Contractors Site Manager
Conduct daily litter patrols	Inspect and clean the site daily to secure waste.	Daily	Contractors Site Manager
Train staff on Foreign Object Debris (FOD) risks	Include FOD awareness in site induction and toolbox talks.	Before starting work and ongoing	Contractors Construction Manager

3.10 Contingency measures

Table 3.2 sets out the contingency measures for handling various waste-related scenarios that might occur on-site. These include things like debris blowing off-site, fire risks from poor waste handling, waste quantities exceeding what was planned, build-up of combustible materials, spills or leaks from storage containers, and failure to follow waste management rules.

These contingency measures are vital for keeping the construction site safe, protecting the nearby Western Sydney International (Nancy-Bird Walton) Airport (WSI) and the surrounding environment.

Table 3.2 Contingency measures

Item	Trigger/ response	Condition		
		Green	Amber	Red
Debris blown off-site	Trigger	▪ No debris observed off-site.	▪ Minor debris observed off-site (e.g., small packaging materials).	▪ Significant debris blown off-site (e.g., large materials).
	Response	▪ Continue normal operations.	▪ Notify the Site Supervisor, recover debris and dispose correctly. ▪ Increase litter patrols, secure storage areas, and toolbox work force.	▪ Stop work in affected areas, retrieve debris immediately, notify the Project Environment Manager and WSI authorities, and review storage methods.
Waste quantities exceeding estimates	Trigger	▪ Waste quantities within estimated volumes.	▪ Waste quantities moderately exceed estimates (e.g., 10-20% over).	▪ Waste quantities significantly exceed estimates (e.g., >20% over), risking storage capacity or disposal arrangements.
	Response	▪ Continue normal waste management practices.	▪ Review waste generation processes, adjust storage and disposal plans, and update the Waste Management Plan.	▪ Stop activities generating excess waste, reassess waste management strategies, secure additional storage or disposal options, and notify the Project Environment Manager.
Non-compliance with waste management procedures	Trigger	▪ Full compliance with waste management procedures.	▪ Minor non-compliance identified (e.g., incorrect segregation in one bin).	▪ Significant or repeated non-compliance (e.g., multiple instances of incorrect disposal, failure to classify waste).
	Response	▪ Continue monitoring.	▪ Correct the issue, toolbox workforce and increase supervision.	▪ Stop related activities, conduct a thorough investigation, implement corrective actions, retrain all staff, and notify the Project Environment Manager and DPHI if required.

4 COMPLIANCE MANAGEMENT

4.1 Monitoring

Monitoring and inspection of CWMP management activities will be undertaken following Table 4.1.

Table 4.1 Waste management monitoring

Type of monitoring	Frequency	Responsibility	Records
Check truck load covering	Daily	Construction Contractor	▪ Site Diary/Notes
Visual inspection for litter	Daily		
Visually monitor concrete washout areas	Daily (during concrete pours)	Construction Contractor	
Check waste storage areas	Weekly	Construction Contractor Project Environmental The ER (optional)	▪ Weekly environmental inspection checklist
Visually verify waste segregation			
Inspect bunded areas and spill kits			
Visually check material stockpile areas.			
Review of records ▪ Waste Management Register is being maintained ▪ Waste classification Reports ▪ Site induction ▪ Records of attendance (toolbox talks)	Monthly	Project Environmental The ER (optional)	▪ Waste management register ▪ Disposal dockets ▪ Waste Monthly Report provided by the waste management company indicating recovery/recycling rates ▪ Waste classification Reports

Visual inspections and checklists will monitor waste during the construction phase of the Project to ensure that all related activities are undertaken in a manner that reduces waste generation and maximises reuse and recycling.

The monitoring is intended to assess both the impacts and environmental performance of construction waste management and the effectiveness of the implemented management measures. Findings from weekly inspections and compliance checks will be reviewed to identify any trends, deficiencies, or opportunities for improvement. Additional measures will be implemented where required to enhance performance and ensure compliance with Condition C1(d).

4.2 Waste recording and reporting

The Contractor will maintain a Waste Tracking Register to identify all waste generated on-site and how the waste is managed. The register shall document the following (refer to Appendix A):

- Date of waste collection
- Waste type
- Waste classification
- Quantity
- Management method (re-use, re-cycle, disposal etc.)
- Waste contractor

All relevant documentation, such as dockets and receipts, will be retained within the register and be provided to CPG or the ER when requested during regular inspections and audits.

The Waste Tracking Register will be used for compliance tracking and as a tool for continuous improvement. Analysis of recorded data will help assess the effectiveness of waste minimisation, reuse, and recycling strategies.

All sampling and waste classification reports will be provided to CPG and kept for the life of the Development in accordance with the EPA's requirements.

4.3 Staff training

All contractors will undergo a Site-specific induction outlining environmental and safety controls to be implemented during the project's construction phase. The induction provides necessary awareness of waste management and the proper waste recycling and disposal procedures on site. Records of the training conducted will be kept on-site.

Toolbox talks will be held to identify environmental issues and controls when works commence in a new area of the site or a new activity and when environmental issues arise on site (waste inappropriately managed).

The toolbox talk will include but not be limited to:

- Identification of the environmental issues and risks for the area (housekeeping, littering); and
- Outline the mitigation measures for the works to improve compliance with the project waste management requirements.

Daily pre-start meetings will refresh knowledge of waste management requirements onsite.

4.4 Review

This plan will be reviewed and improved per the Conditions of Consent and the CEMP. Continuous improvement will be achieved by evaluating environmental management performance and effectiveness against environmental policies, objectives, and targets.

The CEMP and associated sub-plans will be regularly reviewed as part of a continual improvement process to ensure they remain current and relevant to the Project. The Principal Contractor's responsible for advising CPG when a change to the CEMP or plan is required to enable the Project to continue or improve.

Where an amendment is required, CPG will make it and, if necessary, agree with the Planning Secretary prior to the work that it relates to being conducted.

The independent Environmental Representative will also be consulted regarding the potential change before submission of the revised plan.

It is a requirement that the CEMP and all associated plans are reviewed and updated within three months of the following events:

- The submission of an environmental incident report
- The submission of an audit report
- The approval of any modification to the conditions of consent
- A direction of the Planning Secretary

4.5 Incidents

In the event of a safety / environmental incident or unpredicted impacts relating to waste and resource recovery operations, all personnel must report the incident or event to the Contactor Site Supervisor and Construction Manager.

All incidents will be managed and reported according to the CEMP.

4.6 Complaints

Complaints may be received directly from stakeholders or indirectly via the dedicated phone number or website. Complaints handling will be undertaken per the CEMP.

4.7 Non-Compliance, non-conformances and corrective actions

Non-compliance may be identified via internal and external audits, site monitoring, inspections and observations, environmental incidents and emergencies, complaints and management reviews.

Non-compliance, non-conformances and resulting corrective actions will be managed per the CEMP.

APPENDIX A WASTE TRACKING REGISTER EXAMPLE

Date	Waste Type	Has the waste been "pre-classified" under the waste classification guideline?	Waste Classification	Management method	Quantity (t/m^3)	Waste Provider	Docket No
March-25	Timber	Y	N/A	Recycle	$3m^3$	KLF	1357

SYDNEY NEWCASTLE CENTRAL COAST MACKAY

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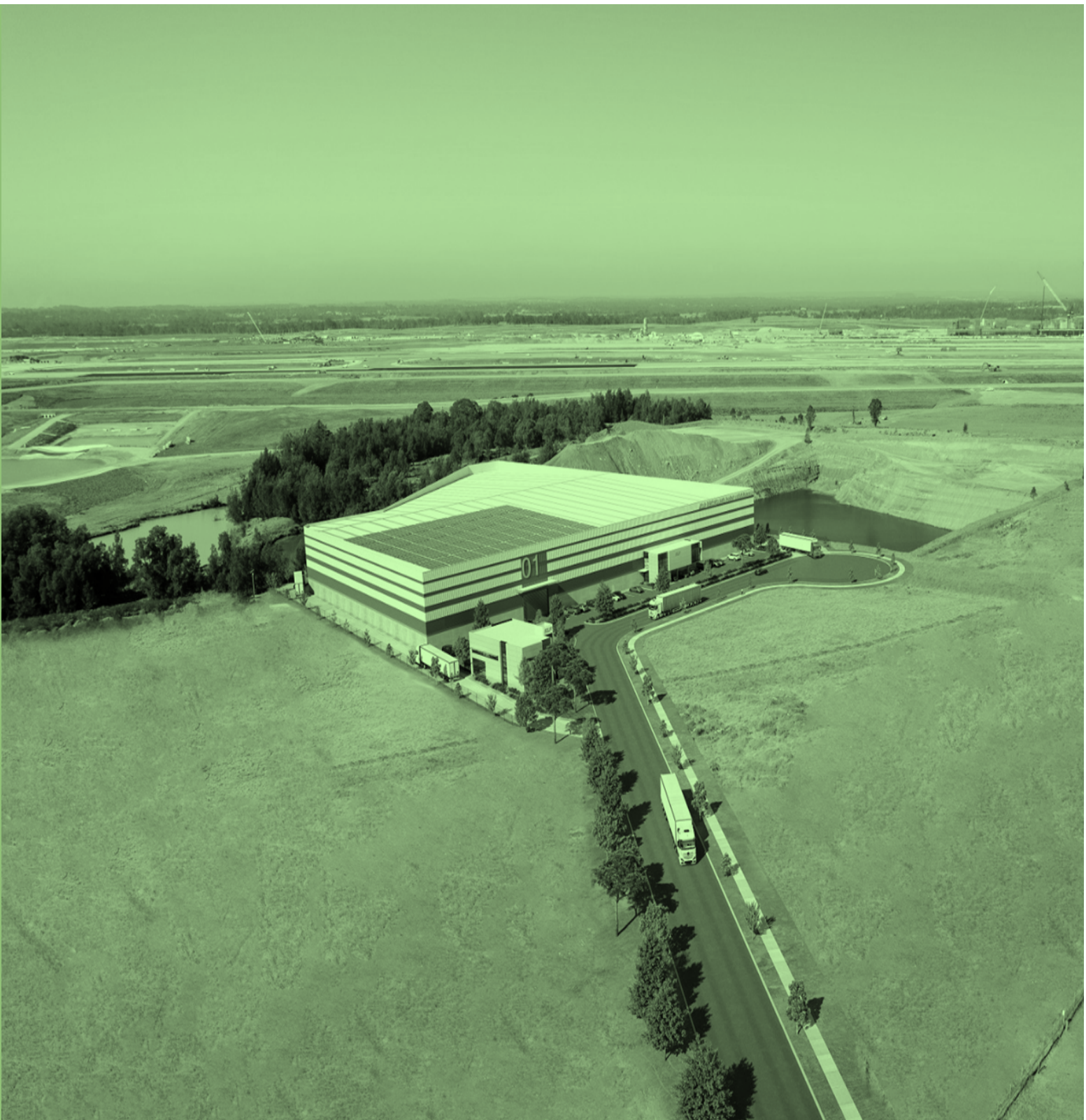


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