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WORKING FOR THE FUTURE

Integrated Management Plan
Tomago Resource Recovery Facility

REMONDIS Australia Pty Ltd

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2022-06-02	Original Issue	H. McCarthy	S. Smith
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Contents

1.0 Purpose

This Integrated Management Plan (IMP) is designed to identify and implement the Health, Safety, Environmental and Quality Management System requirements applicable to the site activities at the Tomago Resource Recovery Facility, which will ensure that the operations management systems are subjected to ongoing development and review, and targeted performance is achieved.

2.0 Scope and Context

This plan is designed to meet the requirements of ISO 45001, ISO14001 & ISO9001 standards and provides a management strategy / framework to effectively manage the business system requirements. REMONDIS manages the business system in accordance with an integrated management system that has been certified to the three standards.

2.1 Scope of Operations

The Tomago Resource Recovery Facility provides the base of operations for all REMONDIS commercial waste services in the Upper and lower Hunter, Newcastle, Lake Macquarie and the Central Coast areas. There is also a small satellite operation at Orange. A large part of the commercial work undertaken is conducted in the upper Hunter region at the various mine sites and much of this total waste management work is facilitated by the 'Integrated Services' team who provide specialised services to the mining industry.

The Tomago Resource Recovery Facility has an environmental protection licence, 21636 for the following activities:

- Recovery of general waste
- Recovery of hazardous and other waste
- Recovery of waste oil
- Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste
- Waste storage – other types of waste
- Waste processing (non – thermal treatment)

There are three main buildings located across the site:

1. Building one contains administration offices and is connected to a large warehouse which consists of a cardboard baling plant, refuse derived fuel plant, and a laboratory.
2. Building two consists of a processing area for Nespresso which will separate the coffee and aluminium from coffee pods used, mines waste consolidation, scrap metal processing, offices and the driver lunchroom.
3. Building three consists of a workshop capable of carrying out full service and repairs of the truck fleet.

There is also a substantial truck parking area at the site with ancillary additional infrastructure including:

- Site Weighbridge
- Stormwater Treatment
- Fuel bay
- Truck wash

Commercial operations include Front Lift, Rear Lift, Prime Mover and Trailer, Tanker (Rigid Body & Trailer), Hiab and Industrial Vac trucks. Workshop mechanics work on a two-shift system, providing services from early morning through to late evening.

Operations run over the full seven-day week dependent on the scheduled and one-off work requirements and potentially 365 days a year. Truck movement generally starts from 05:00.

2.2 Landscaping

The site landscaping is in accordance with the State Significant Development (SSD) Approval for the site, reference SSD-10447 which requires that the landscaping on site is maintained and management in accordance with *Planning for Bushfire Protection 2017* (B52 (c)).

2.3 Security

The Tomago site is fully fenced, and site access is controlled by entry and exit through an automated gates and a weighbridge fitted with a boom gate system. The site has installed video surveillance.

3.0 Leadership

REMONDIS provides leadership and direction with a Management System designed to meet the requirements of ISO 9001:2015, 14001:2015 and 45001:2018 standards.

3.1 Policies

REMONDIS has developed a set of national corporate policies that apply to all REMONDIS operations. These are available on the L Drive and in the Donesafe Document Management System, and include:

- RE-HSEQ-PO-001 Health and Safety Policy
- RE-HSEQ-PO-002 Environmental Policy
- RE-HSEQ-PO-003 Quality Policy
- RE-HSEQ-PO-006 Risk Policy
- RE-HSEQ-PO-007 Communication Consultation Policy
- RE-HSEQ-PO-008 Security Policy
- RE-LEG-PR-001 Whistle Blower Protection Policy
- RE-LEG-PO-003 Anti-Slavery Policy
- RE-P&C-PO-001 Industrial Relations Policy

4.0 Consultation & Participation of Workers

REMONDIS has documented the requirements for communication and consultation in the Minimum Standard reference number RE-HSEQ-ST-009 Communication and Consultation.

A documented monthly toolbox talk is conducted. Content and participation are recorded and displayed on the HSE communication board. All workers are inducted as per the site specific and REMONDIS requirements.

The workers across both sites were also consulted on the appointment of Health and Safety Representatives. The results of this consultation saw Benjamin Jones appointed as the HSR for the Drivers group on site.

All workers are encouraged to notify their immediate supervisor of any issue that is or may affect health, safety, environment, or quality in accordance with RE- HSEQ-ST-015 Hazard, Near Miss and Incident Reporting Standard.

5.0 Legal and Regulatory Compliance

REMONDIS is responsible for the ensuring compliance with all licences and permits. REMONDIS shall comply with all applicable regulatory and legislative requirements.

REMONDIS retains membership of several industry associations providing subscriptions to notification newsletters and alerts.

5.1 Register of Workplace Specific Licenses and Permits

In performing the work REMONDIS shall comply with all necessary licenses and permits as required. Copies of these approvals will be maintained on the company internal share drive and can be accessed via the Document Control Master file managed from Mascot. A summary of the site-specific requirements is summarised in the table below.

Table 1: Tomago Site Approval Documentation

Reference	Scope	Regulatory Authority
21636	Environment Protection Licence for the Tomago Resource Recovery Facility	NSW EPA
7356	Environmental Protection Licence for the transport of Category 1 and 2 trackable waste in NSW	NSW EPA
5058805	NSW Dangerous Goods Vehicle Licence	NSW EPA
SSD-10447	State Significant Development approval	NSW Department of Planning, Industry and Environment

6.0 Organisational Responsibilities and Authorities

All REMONDIS workers and contractors are given information during the induction process regarding their specific duties and responsibilities. The following table provides an overview of the general HSEQ requirements and are to be read in conjunction with the specific details provided through the induction process and individual position descriptions.

Table 2: Tomago Responsibilities and Authorities

Role	Responsibilities	Authorisations
State/Service Line Manager	The development and implementation of the Business Unit Management Plans Ongoing review and resourcing of Business Unit Management Plans Establishing HSEQ performance targets	Assess employee/contractor HSEQ work practices Inspect workplaces and plant for their compliance to HSEQ requirements Instruct employees/contractors in HSEQ work practices, including insisting on attending training or workshops, etc. Delegate resources for the provision of training, information or equipment for employees/contractors to work safely and in an environmentally responsible manner. Instruct employees/contractors to comply with REMONDIS policies & procedures as well as external requirements Apply disciplinary procedures to enforce HSEQ work practices Remove unsafe plant from service Make purchasing decisions for plant and substances to eliminate or reduce HSEQ risk
Site Manager	Implementation of the business unit management plans at depot level with particular focus on ensuring adherence to HSEQ policies and procedures and environmentally responsible work practices Providing feedback to senior Line Managers and the HSEQ Manager on an ongoing basis with respect to specific HSEQ objectives and performance targets	Assess employee/contractor HSEQ work practices Inspect workplaces and plant for their compliance to HSEQ requirements Instruct employees/contractors in HSEQ work practices, including insisting on attending training or workshops, etc. Delegate resources for the provision of training, information or equipment for employees/contractors to work safely and in an environmentally responsible manner.

Role	Responsibilities	Authorisations
	Ensuring that HSEQ audits / inspections, induction training and activity specific training are undertaken in accordance with the business unit management plans or as the need is identified Ensuring that specific HSEQ requirements of clients are met by the business unit/division.	Instruct employees/contractors to comply with REMONDIS policies & procedures as well as external requirements Apply disciplinary procedures to enforce HSEQ work practices Remove unsafe plant from service Make purchasing decisions for plant and substances to eliminate or reduce HSEQ risk
Employees/Subcontractors	Adherence to business unit HSEQ policy requirements, specific HSEQ instructions and site rules as appropriate Using personal protective clothing and equipment where required Reporting of workplace hazards, incidents and near misses to their immediate supervisor Participating in scheduled training programs	Raise any concerns of hazardous work to supervisor/leading hand/HSR Request access to any policy/procedure/safe work instructions or legislation Request the election of health and safety representatives
HSEQ staff	Assisting Managers and Supervisors in implementing the management plan at unit level & ensuring adherence to safe and environmentally responsible work practices. Ensuring that scheduled HSEQ audits/inspections are carried out Developing training programs and co-ordinating the provision of training Provision of technical advice to Managers and Supervisors Developing HSEQ procedures and policies Monitoring the implementation of HSEQ objectives and Business Unit performance and targets. Reviewing HSEQ management system compliance and Business Unit Plans.	Assess employee/contractor HSEQ work practices Inspect and audit workplaces and plant for their compliance to HSEQ requirements Instruct employees/contractors in safe and environmentally responsible work practices, including insisting on attending training or workshops, etc. Delegate resources for the provision of training, information or equipment for employees/contractors to work safely and environmentally responsibly. Instruct employees/contractors to comply with REMONDIS policies & procedures as well as external requirements Remove unsafe plant from service Make purchasing decisions for plant and substances to eliminate or reduce HSEQ risk

7.0 Interested Parties

Table 3: Tomago Interested Parties

Stakeholder Group	Relationship	Name	Materiality Assessment	Party's Needs or Requirements
Clients	Customers	Individual contracted parties	Very high	On time, compliant and reliable solid waste services
Business owner and director	Business owner	REMONDIS Australia Pty Ltd	Very high	Achieve HSEQ objectives set and financial results
Neighbour and community	Proximity. Sharing road infrastructure	Varley Tomago Aluminium Redicrete Compass Pools	Low HSEQ risk. Raises complaints	Comply with SSD, odour, noise and dust potential impacts.
	Proximity. Sharing road infrastructure	Pedestrians and vehicles	High HSEQ risk	Legal compliance, Road courtesy and no spills
Regulators	Authority	NSW EPA	Very high	General compliance under the Protection of the Environment Operations Act 1997 (NSW)
	Authority	RMS/ Police	Very high	Compliance with Road Transport Regs.
	Authority	Safework NSW	Very high	Compliance with WHS Act

External Provider/Supplier	Contractor	Various	Very high	Getting paid on time, site access (RE site and destination site) – opening hours. On-site compliance.
Employees	Dependent	72 employees	Operate business	Competitive pay Workplace security Safe workplace and equipment Good workplace culture and conditions

8.0 Objectives and Targets

8.1 Corporate Objectives and Targets

REMONDIS Australia is committed to conducting our business in a way to ensure we are meeting the needs of the present without comprising the ability of future generations. The Sustainability Strategy sets the objectives and targets for REMONDIS Australia for the period from 1st January to 31st December across the environment, social and governance aspects of our business. This document also sets the objectives and targets for performance consistent with ISO9001, ISO14001 and ISO45001.

The operations conducted at the Tomago Resource Recovery Facility will aim to meet all relevant objectives and targets as set out in the Sustainability Strategy.

8.2 Site Specific Objectives and Targets

The site-specific objectives and targets have been set for the period 1st January to 31st December.

8.2.1 Nespresso Aluminium Coffee Capsule Recycling Service Agreement

Measure	Description	Observation Period/ Review Frequency	Definition	Rating
Quality of packaging aluminium after processing - aluminium	% Of aluminium in initial mass	"Observation period: 3 months. Review frequency: every 3 months "	> 82.6%	Excellent
			77.5% - 82.6%	Good
			72.5% - 77.4%	Satisfying
			61.20% - 72.4%	Below expectations **
			< 61.20%	Unacceptable *
** Corrective action plan to be presented by the supplier and validated by NN within 10 working days after evaluation (See paragraph 13 of the Service Agreement) * Corrective action plan to be presented by the supplier and validated by NN within 5 working days after evaluation (See paragraph 13 of the Service Agreement)				
On time report delivery	% Of monthly reports delivered within the first five business days of the month following the month to which the report relates.	"Observation period: 3 months. Review frequency: every 3 months "	100%	Excellent
			> 90%	Good
			>= 66%	Satisfying

Measure	Description	Observation Period/ Review Frequency	Definition	Rating
			< 66%	Below expectations **
			<= 33%	Unacceptable *

**Corrective action plan to be presented by the supplier and validated by NN within 15 working days after evaluation (See paragraph 14 of the Service Agreement)

*Corrective action plan to be presented by the supplier and validated by NN within 10 working days after evaluation (See paragraph 14 of the Service Agreement)

Report accuracy	% Of monthly reports which are free of errors impacting on the accuracy and reliability of the data provided		100%	Excellent
			> 90%	Good
			>= 66%	Satisfying
			< 66%	Below expectations **
			<= 33%	Unacceptable *

**Corrective action plan to be presented by the supplier and validated by NN within 15 working days after evaluation (See paragraph 14 of the Service Agreement)

*Corrective action plan to be presented by the supplier and validated by NN within 10 working days after evaluation (See paragraph 14 of the Service Agreement)

8.2.2 Hunter Water Total Waste Management Agreement

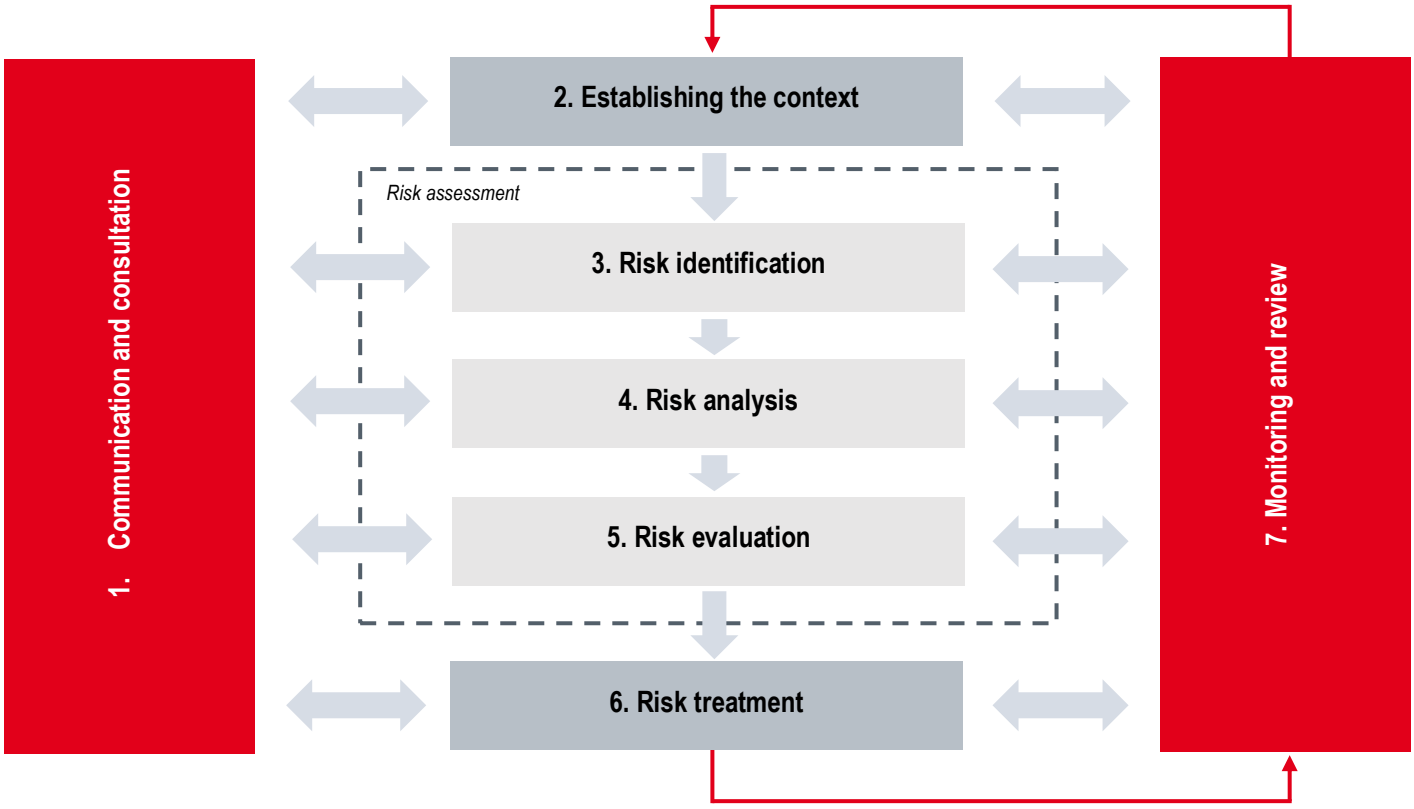
KPI Metric	Performance Measured
Safety Performance	High Potential Incidents (HPI) Lost Time Injuries (LTI) Medical Treatment Injuries (MTI) Restricted Work Injuries (RWI) First Aid Injuries (FAI) Notifiable Incidents reported to SafeWork NSW
Customer Service	Number of customer complaints Complaints rectified in agreed time periods
Value for Money/ Innovation	Waste cost reductions as benchmarked with previous period / pre-contract service request data Demonstrable whole of life cost improvement

KPI Metric	Performance Measured
Reporting	All reporting to be submitted in accordance with KPI reporting requirements, including in scope, accurate and in agreed timeframes
Response Times	Work Orders completed in contracted timeframes: Planned works Reactive Works Emergency Works
Sustainability	Sustainability managed to tender assessment Number of demonstrable positive sustainability initiatives implemented Waste diverted from landfill Education / innovation to support waste reduction / increased recycling Recycling income stream generation Waste end markets facilitating positive local economic opportunity

9.0 Risk Management

REMONDIS has considered the requirements for the identification, assessment, treatment, monitoring and review for potential Health, Safety, Environment and Quality hazards across the business consistent with the guidance in ISO31000 and the process set out in the Figure below.

Figure 6: ISO 31000 Risk Management Process Steps



Risk assessments will be conducted across all relevant site operations/tasks and activities considering any of the potential HSEQ aspects of these. For the purposes of the environmental risk assessment the likelihood of the environmental risk presenting as either an environmental aspect or impact was also considered, as defined below:

Environmental Aspect Element of an organisation's activities, products or services which can interact with the environment.

Environmental Impact Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations activities or products.

A risk assessment of the potential health and safety and environmental aspects and associated impacts has been completed for all activities and the premises from which the Tomago Resource Recovery facility operates and documented in 022-ENV-RA-001 Tomago Environmental Risk Register which is saved here:

L:\Company_Shared_Files\03-Integrated_BMS\03 Workplace Documents\NSW 022 Tomago\05 Risk Management

This document will be updated annually or on the occurrence of any HSEQ incident.

In this risk assessment key controls identified as reducing the risk were considered. These are further discussed below for each of Health and Safety, Environment and Quality.

10.0 Hazard, Near Miss and Incident Reporting

All hazards, near misses and incidents shall be reported in accordance with RE-HSEQ-ST-015 Hazard & Incident Reporting Minimum Standard and entered in Donesafe Reporting System. These are assessed for their relative severity using the REMONDIS Risk Matrix from RE-HSEQ-ST-014 HSEQ Risk Management Minimum Standard.

10.1 Hazards

In identifying a potentially hazardous situation it is expected that actions are taken to avoid the potential harm from occurring. Wherever possible hazards should be reported directly by the staff member either directly into Donesafe, or where system access limitations prevent this, using the provided form Hazard and Incident Report Form (RE-HSEQ-FO-020) and later entered into Donesafe.

If this is not possible, hazards can be reported in writing using the Hazard and Incident Report Form (RE-HSEQ-FO-020) available from supervisory and operations staff and Managers and must be entered into Donesafe Reporting System as soon as practical.

10.2 Near Misses and Incidents

Wherever possible near misses and/or incidents should be reported directly by the staff member either directly into Donesafe, or where system access limitations prevent this, using the provided form Hazard and Incident Report Form (RE-HSEQ-FO-020) and later entered into Donesafe.

Where this is not possible, incidents can be reported in writing using the Hazard and Incident Report Form (RE-HSEQ-FO-020) available from supervisory and operations staff and Managers. Incidents must be entered into Donesafe Reporting System within 24 hours.

For Category 1-3

Supervisors conduct a simple incident investigation for actual results of insignificant-moderate. The results of the investigation are to be reviewed with the relevant Site management and documented in Donesafe Reporting System.

For Category 4 -5

For an actual or most credible potential rating of Major or higher an ICAM is to be conducted. The appointment of the ICAM Investigator is at the discretion of either the National HSEQ Management and/or the National Environment and Sustainability

manager detailed investigation needs to be conducted. The results of the ICAM are to be reviewed with the Site Management and the REMONDIS Management team and documented in Donesafe Reporting System, unless restricted by legal privilege and/or privacy concerns.

11.0 Contractor Management

All contractors, sub-contractors, and suppliers are required to provide evidence that they conduct their work in a safe and legal manner. They are selected and managed according to requirements set out in RE-HSEQ-ST-004 Contractor Management Minimum Standard.

12.0 Health and Safety Controls

12.1 Chemical Substances

All chemicals will be stored, handled and disposed of in accordance with the requirements of the Safety Data Sheets and where applicable, as per the Protection of the Environment Operations (Waste) Regulations and the Australian Dangerous Goods Transport guide.

12.2 Drugs and Alcohol

The use of alcohol or drugs on a work site is an offence and will not be tolerated. All employees shall report for duty in a condition capable of safely carrying out their duties. Supervisors shall ensure that all persons that work at or visit the workplace shall be informed of the company's Drugs and Alcohol procedure, during induction and then at regular intervals during toolbox talks. Random drug and alcohol screening will be conducted in accordance with REMONDIS' Drug and Alcohol procedure, RE-HSEQ-ST-012 Drug and Alcohol Testing Minimum Standard.

12.3 Fatigue Management

Having a Fatigue Management Standard (RE-COR-PR-002) in place is part of the overall risk management process for REMONDIS.

There are employees on site who drive heavy vehicles and therefore must comply with the Fatigue Management Standard. This includes driving within their required hours and keeping all appropriate records.

The supervisor will review the records provided by the drivers to ensure that they are working within their fatigue management limits.

12.4 Emergency Planning

An Emergency Management Plan has been created which includes various emergency situations and the appropriate procedures to follow. This is documented at: 022-HSEQ-MP-002 Tomago Emergency Management Plan and includes relevant natural disasters and other emergencies. The Pollution Incident Response Management Plan, 022-HSEQ-MP-004 Pollution Incident Response Management Plan Tomago, has also been developed for the site.

12.5 First Aid

A first aid kit will be in the site office and will also be provided to operators/drivers for storage in their vehicles. A qualified First Aider will be responsible for minor treatments and contents replacement. Reference RE-HSEQ-ST-019 First Aid Minimum Standard.

An injury treatment book is to be maintained and the First Aider must record all treatments, no matter how insignificant (RE-HSEQ-FO-031 First Aid Record Form).

All Incidents are to be reported using the Hazard and Incident Report Form (RE-HSEQ-FO-020).

12.6 Return to Work

Injuries are reported as per requirements in Section 10.2 or via the Hazard and Incident Report Form (RE-HSEQ-FO-020). Workers' compensation claims are forwarded to the site or corporate return to work coordinator. Alternative duties will be arranged through consultation with the injured workers, treating doctor, REMONDIS Staff, and rehabilitation professionals when required.

12.7 Confined Spaces

Confined Spaces Identification (RE-HSEQ-FO-007) assists in classifying a potential confined space consistent with the requirements of AS2865 – 2009 Confined Space Requirements & Risk Control.

Confined spaces shall only be entered by those employees or contractors that are trained and hold the appropriate license or ticket in accordance with the requirements of the Australian Standard for confined spaces.

An entry permit (RE-HSEQ-FO-002) must be completed prior to entry along with a risk assessment, gas monitoring and a suitable emergency response plan. Further requirements can be found in RE-HSEQ-ST-010 Confined Spaces Entry Minimum Standard.

12.8 Permits to Work

REMONDIS operates a permit to work system as per RE-HSEQ-ST-021 Permit to Work Minimum Standard. All permits to work must be completed for the relevant activities on site. Any contractor or sub-contractor performing any work on a REMONDIS workplace is required to complete an Authority to Work Permit (RE-HSEQ-FO-001) prior to commencing the task.

12.9 Manual Handling

All employees are trained in appropriate manual handling methods during their induction and provided with refresher training on a regular basis.

12.10 Traffic Management

Light vehicles are permitted only in the light vehicle parking, entry from School Drive, permitted in front of the office facility and signposted accordingly.

Heavy vehicles and mobile plant access all other areas of the site. The REMONDIS depot operations entry from Cormack Road are separated using security fencing, only accessible by REMONDIS staff with a site swipe card.

Customer vehicles enter from the School Drive Eastern entry via a weighbridge. There is a single inbound/outbound weighbridge at the site and all access is restricted to ensure that vehicles must cross these to enter and exit the site.

Pedestrian walking paths are clearly line marked at the Tomago site. Zones of potential vehicle/plant interaction are line marked with yellow diagonal line marking to indicate mixed use

12.11 Standard Operating Procedures

Standard operating procedures exist for activities on site and must be utilised by the site as the safe system of work.

12.12 Personal Protective Equipment

R RE-HSEQ-ST-007 Personal Protective Equipment Minimum Standard sets the minimum requirements for REMONDIS workers. Approved PPE will be accessible to all personnel at all times.

All PPE shall be in sound and serviceable condition and be replaced on a fair, wear and tear basis.

12.13 Isolation / Lockout

RE-HSEQ-ST-005 Lockout Tagout Isolation Minimum Standard sets the standard for isolation requirements to effectively control potential energy risks to staff. All appropriate employees are trained in the correct lockout procedure. Lock out/Tag out tags will be provided and used by all staff on all plant/equipment prior to commencing a task that requires a person to enter the vehicle or access a high-risk part of the plant/equipment.

12.14 Electrical Safety

An electrical risk register is available for the site which lists all the electrical equipment on site and their last testing & tagging date. Any unsafe equipment will be immediately removed from service for disposal or repair, in accordance with the REMONDIS Electrical Safety Standard (RE-HSEQ-ST-011).

12.15 Plant and Equipment

No personnel will operate a plant/equipment for which they are not trained, licensed or competent to use. High risk plant/ equipment used on site has a pre-start checklist which is completed each day prior to use. All appropriate JSEA/SWMS and standard operating procedures are adhered to when using the plant/equipment. Copies of these items shall be kept on site within the filing system and registered on the license matrix.

12.16 Hygiene

All personnel involved in water treatment operations are to exercise constant high levels of hygiene, including washing hands and face prior to eating, drinking or smoking. Toolbox TBT-50 Hygiene sets out the minimum expected requirements in relation to Hygiene.

12.17 Smoking

Smoking is only permitted in outdoor designated smoking areas. Persons are prohibited from smoking at company-controlled workplaces as prescribed below: -

- With-in all office buildings
- In vehicles used for the transport of employees including sedans carrying passengers
- In any other company vehicle
- Crib rooms/Amenities
- Enclosed buildings or structures, e.g., confined spaces, enclosed workshops
- In potential flammable or explosive atmospheres
- Restricted areas as sign posted.

All Supervisory Staff shall monitor and enforce the smoking policy at the workplace.

12.18 Mobile Phone / iPod / MP3 Players

The use of mobile phones is prohibited on site when operating plant or equipment. Personal Mobile phones should be left in the crib room and can be used when staff are on their required breaks.

The use of iPod/MP3 players or any equipment that requires the use of earphones is prohibited.

12.19 Noise

Where noise monitoring results show an exceedance of the safe working levels, hearing protection will be supplied to all personnel working in the area. Training on the use and purpose of the PPE will be provided.

Audiometric testing for each employee that is required to wear hearing protection on a regular basis will be carried out bi-annually by an external consultant.

12.20 Pre Employment Medicals

All REMONDIS employees who are to work on site for a period in excess of one week over the duration of a Contract will have to complete a pre-employment medical examination with a REMONDIS preferred provider, prior to commencing work on the site.

An Occupational Physician will carry out the medical examination. "Fitness for Duty" reports prepared by the Occupational Physician for REMONDIS employees will be forwarded to the Safety & HR Team prior to commencing work on the site. Any risks and/or restrictions identified in the report will be assessed by the site designated HSEQ Advisor and the Site Manager, to determine if the employee can perform the inherent duties safely and to manage and minimise the risk and/or restriction identified.

12.21 Health Monitoring

Table 5: Tomago Health Monitoring Requirements

Hazard to be Monitored	Location	Employees Exposed	Record	Frequency	Responsible Person
Hepatitis A	Operations	All	Record of Vaccination	Commencement of employment then to immunity stage	Site Manager
Hepatitis B	Operations	All	Record of Vaccination	Commencement of employment then to immunity stage	Site Manager
Tetanus	Operations	All	Record of Vaccination	Commencement of employment then every 10 years	Site Manager
Noise	Operations	Those employees that are required to wear hearing protection in their daily tasks.	Audiogram	Within 3 months of employment and every two years thereafter	Site Manager
Fitness to Drive	Operations	Heavy Vehicle Drivers	Commercial Drivers Medical (to NTC Standard)	Annual for drivers 50 and over Every 3 years for drivers 49 and under	Site Manager
Coal Dust Exposure	Operations	Heavy Vehicle Drivers working in Coal Mines	Order 43 Medical	Every 3 years	Site Manager

13.0 Environmental Controls

This section outlines the key controls in ensuring that the Tomago Resource Recovery Facility operates responsibly and consistently with the conditions outlined in Environmental Licence 21636 and the SSD-10447. This section is the Operating Environmental Management Plan as required by the SSD-10447 and the relevant requirements for the SSD-10447 are mapped to the relevant parts Environmental Monitoring of Section 13.0 in Appendix 2.

13.1 Monitoring and Recording

Routine monitoring for the site is conducted as part of the monthly groundwater monitoring program discussed in Section 13.5

Additionally, a monthly site inspection will be conducted and recorded in Donesafe. This has been tailored to reflect the requirements of the site and its environmental licence.

13.2 Environmental Reporting

Records will be kept at the site for all the requirements of the annual return, and in line with condition R.1 of the EPL licence for the site. This will be done in accordance with the RE-HSEQ-ST-028 Environmental Licence Management Procedure

13.3 Air Quality

An air quality impact assessment (AQIA) report was issued by Trinity Consultants Australia in November 2020 (Air Noise Environment, Air Quality Assessment – Proposed Resource Recovery Facility & Truck Parking Depot, 17 November 2020, Report Version 03.3.) to assess impacts during the development approval phase. An addendum report was also issued on 31 March 2021 (Report letter to Rylan Loemker (Jackson Environment and Planning) from Sally Fergus (Trinity Consultants Australia), Re: Tomago Resource Recovery Facility and Truck Depot – Air Quality Information Request Response, 31 March 2021) to respond to an information request from the NSW EPA.

The assessment included air dispersion modelling for a range of pollutants including odour, particulate matter, sulfur dioxide and various volatile organic compounds. The modelling results showed compliance with the relevant ambient air quality criteria defined by the NSW EPA.

This was further verified in the conduct of an Air Quality Verification Report by Trinity Consultants Australia documented in 217402.0137.L01V01 Issued Air Quality Verification Report. This Air Quality Verification report found that:

> "*The results show predicted compliance with the odour criterion of 2 OU at the nearest sensitive receptors by a large margin. The revised modelling results also show that odour predictions are higher than those presented in the AQIA. This is partly due to consideration of odour emissions via the ridge vent on Building 2. The ridge vent is considered a line source with a peak-to-mean ratio of 6 (compared to a previously considered ratio of 2.3 for a downwashed point source). While the results are higher, compliance with the 2 OU is still predicted by a large margin, particularly at the nearest sensitive receptors (predictions are 10% or less of the odour limit).*
>
> *Overall, it is concluded that the proposed OCU, which will include the use of FiltaCarb FC75 Activated Carbon system venting internally into Building 2 (which is ventilated through a ridge vent), is a suitable design with respect to minimising odour from the food de-packaging facility."*

REMONDIS engaged The Odour Unit as a suitably qualified and experienced person to prepare the 022-ENV-MP-003 Tomago Air Quality Management Plan. This plan considers the significant emissions sources, identified control measures to ensure that air quality if managed to reduce any potential impact to the surrounding environment. This section should be considered with the 022-ENV-MP-003 Tomago Air Quality Management Plan and summarises the key controls for each potential impact on air quality.

13.3.1 Odour Control

In addition to the industrially zoned location of the site, the restriction of the waste types for receival and handling at the Tomago Resource Recovery Facility largely controls the actual and potential odour impact at the site.

For the product destruction unit, currently forecast to process Nespresso pods only, REMONDIS has designed and installed an odour control unit, Bioaction – FiltaCarb FC75 Activated Carbon system"

- The OCU will be connected to key odorous points along the food de-packaging unit i.e., receival containers
- The OCU will be located within Building 2 adjacent to the food de-packaging unit
- Exhaust details:
  - Location – within building at OCU location, 2.2 m above ground, discharge horizontally in two directions (via T-shaped outlet)
  - Flow rate – 5 Litres per second
  - Diameter – 170 mm of each opening

Waste oil for recovery may also generate odour in the handling activities, accordingly REMONDIS has designed and installed and odour control unit for this activity, the FiltaCarb FC75 Activated Carbon system installed in building 2

To further control odour the Tomago site has implemented the additional controls of:

- all processing activities will be conducted inside the buildings
- availability of spill kits to allow for prompt containment of spills which could be odorous

13.3.2 Dust Control

The activities at the site with regards to both the loading and unloading of waste as well as the processing activities have the potential to generate dust. To mitigate this risk the following controls have been implemented:

- all processing activities will be conducted inside the buildings
- the site is hardstand
- weekly street sweeper conducted by a third party
- trucks entering and leaving the premises that are carrying loads will be covered

13.4 Noise Control

A Noise and Vibration Impact Statement was prepared as part of the development approvals for the site, which can be found here: https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10447%2120201203T064750.614%20GMT

The site is in an industrial zoned area and therefore noise is not considered to be high risk. However, to minimise any risk:

- all processing activities will be conducted inside the buildings
- occupational noise monitoring will be conducted following the commissioning of all equipment
- equipment which is used intermittently will be shut down when not in use

Occupational noise monitoring conducted following commissioning of all equipment was conducted and is documented in "2022.12.15 Noise Survey" saved: L:\Company_Shared_Files\01-Business_Units\022-Tomago\9.0 Safety, Toolbox Talks, JSEA\9.15 Noise Surveys. The following recommendations were made:

- Hearing protection will need to be applied with diligence for specific tasks undertaken by the Boilermaker in the mechanical workshop / hot fabrication area. Audiometric Screening (see recommendation 5 below) would be a useful tool to monitor the stability of hearing for the Boilermaker. Class 4 Hearing protection that enables swift application and removal would promote compliance. Such protection might take the form of earmuffs, multiple-use silicon earplugs (e.g. Howard Leight AIRSOFT corded plugs) or custommoulded earplugs (eg Earmold Sydney). Hearing protection should be easily accessible and multiple-use earmuffs and earplugs should be maintained by individuals rather than shared, for hygiene purposes. Rotating staff between high noise and low noise tasks will also reduce overall noise doses for individuals. NB the hearing protection readily available at the time of this survey was adequate in the form of Class 5, SLC80 26dB 'Zero' National Breastcare Foundation Australia disposable earplugs; UVEX com4-fit Class 4, SLC80 22dB disposable earplugs and National Breastcare Foundation NBC F62H Class 5, SLC80 32dB earmuffs.

- Noise exposure was at safe levels for drivers of vehicles measured during this survey. However, there was high noise for approximately 43 minutes during the operation of the power take-off (PTO) pump on the Rigid Tanker #1190. It would be advisable for the driver to apply suitable Class 3 hearing protection whilst in the vicinity of the operating PTO on Rigid Tanker #1190.
- High level impact noise is generated when trucks dump waste glass in the MRF. Whilst not measured during this survey, the noise was heard from the yard area outside of the Truck Operations Office. It is recommended that Truck drivers planning to dump glass waste signal the intent to dump to all within the MRF prior to proceeding to tip the load. The driver should also apply the minimum of suitable Class 3 hearing protection whilst dumping occurs. It is noted that this task of tipping glass is not continuous, rather sporadic and dependant on orders for waste glass collection, received from clients.
- Appropriate training in the correct application of suitable hearing protection and the dangers of overexposure to high level noise should be provided to all new employees and repeated regularly (every year) with current employees who are to be working in the mechanical workshop / hot fabrication area or operating Vehicle #1190 Rigid Tanker PTO pump; or on the glass collection route. Instruction on maintenance / replacement of earmuffs should also be included, to ensure that people do not keep using earmuffs that are damaged or worn out (e.g. cushions on earmuff have flattened out or hardened, causing poor fit and leakage of noise into the ear). Half-yearly issue of hygiene kits (set of new cushions and attenuating foam inserts) to those who prefer earmuffs may be useful here.
- Controlling the purchasing of new items of equipment to ensure, wherever possible, that noise emissions from any particular item are not in breach of WHS Regulation 2017. This would involve the measurement of the noise emissions from any new item of equipment (where practical) before/at time of purchase, prior to commencement of use at REMONDIS.
- We recommend assessment of the employees' noise exposure / testing of the noise levels and exposures of employees every 5 years and / or if significant increases in noise are reported by personnel and / or there are any changes to the plant and equipment. This is to ensure that noise exposure experienced by the staff is monitored. This will also enable appropriate control measures to be implemented, as required by WHS Regulation 2017. This would involve a follow up Noise Survey in the future.
- The new RDF line within the MRF will require surveying once fully operational. Noise levels within the MRF with both the Baler and the RDF operating may be significantly different from that shown in this report.
- Biennial Audiometric screening & education in line with WHS Regulation 2017 and Australian/New Zealand Standard AS/NZS 1269.4 (2014) to monitor the hearing thresholds of employees who are regularly exposed to hazardous noise at REMONDIS is recommended: this would include the Boilermaker and possibly the drivers of glass waste trucks. Monitoring the hearing of these employees will provide the means to measure the effectiveness of any noise control initiatives implemented and/or hearing protection provided by REMONDIS to the employee. The screening and education program also allows individuals to discuss hearing status and hearing protection options with a professional audiologist on a one to one basis.

13.5 Water Quality

A water management plan has been developed for the site, reference, "022-ENV-MP-002 Tomago Water Management Plan." All required ground/surface/storm water management risks and controls have been considered in this plan which includes consideration of leachate, firewater and potential spills.

13.6 Waste Receival, Processing and Storage

13.6.1 Waste Receival – Onsite Weighbridge

The site has a National Measurement Institute calibrated weighbridge which serves as the entry and exit point for vehicles on and off site. This ensures that only the waste which can be accepted on site is transported in. In addition, the weighbridge is fitted with video surveillance to aid monitoring.

13.6.2 Waste Receival – Ensuring Compliance with Waste Received

The site will only receive waste which it is authorised to receive under the conditions of the environmental protection licence. All employees will be trained on the relevant procedures in the 022-ENV-PR-004 Tomago Waste Monitoring Program. To minimise the risk of the receiving of unauthorised waste:

- access to the site is limited to the weighbridge for REMONDIS staff and contractors.
- customer and education sales staff will be expected to review the regulated waste codes prior to the acceptance of waste to Tomago
- rejected Loads Register maintained by REMONDIS at the weighbridge and documented in 022-ENV-FO-001 Rejected Load Form in the event of a rejected load the waste will be removed from site within 48 hours or as soon as reasonably practicable
- the site is not licenced to receive or store asbestos waste

13.6.3 Waste Handling

The activities on site involve cardboard bailing, product destruction, waste oil recovery, waste separation and recycling. Each activity has its own process and operating protocols. This is outlined in the

- 022-ENV-PR-004 Tomago Waste Monitoring Program
- 022-ENV-PR-002 Construction Waste Management Plan

The site conducts the following activities to resource recover different waste streams

13.6.4 Refuse Derived Fuel (RDF)

The site produces RDF as part of its activities. The controls and management procedures to mitigate the risk from this activity are described in 022-ENV-MP-001 Energy from Waste Management Plan.

13.6.5 Waste Storage

Waste will be stored indoors in separately bunded areas depending on the type of waste and where it will be processed. This is outlined in the

- 022-ENV-PR-004 Tomago Waste Monitoring Program

- 022-ENV-PR-002 Construction Waste Management Plan

Please refer to these procedures for the management of these wastes.

13.7 Hazardous Chemicals

Hazardous chemicals are located onsite either from the receipt of hazardous chemical waste under the EPL or from the chemicals and fuels needed for site operations. To mitigate the risk to the environment from hazardous chemicals:

- all activities with regards to hazardous chemicals will be conducted inside the buildings and in engineered bunded areas
- a register of the chemicals located onsite is maintained in ChemAlert
- quick breaks are installed on diesel and Adblue hoses
- chemical spill kits located in areas in liquid waste and chemical storage areas
- spill training conducted with operational site
- 022-HSEQ-MP-004 Pollution Incident Response Management Plan Tomago developed and available onsite

13.8 Litter

To mitigate the risk of litter on the site, loose waste loading and unloading will be conducted inside the facility buildings. The site is also sealed which helps facilitate the easy clean-up of waste. In addition,

- a perimeter fence has been established around the site to ensure that in the unlikely event of waste leaving the building that it does not leave the site
- routine housekeeping will be conducted to ensure the removal of litter from the ground
- all REMONDIS vehicles and contractor vehicles will be covered as per the requirements of the Heavy Vehicle Load Management, for REMONDIS documented in RE-COR-PR-005 Load Restraint Standard

13.9 Fire

As a waste facility there is a risk of fire from incompatible waste being mixed, or from the operations of the equipment resulting in spontaneous combustion. To minimize the risk of fire at the site the following controls have been implemented:

13.9.1 Administrative Controls:

The following administrative controls are in place at Tomago:

- designated fire wardens
- designated hot load areas and hot load training conducted with staff
- 022-H&S-PR-001 Fire Safety Management Plan
- 022-HSEQ-MP-002 Tomago Emergency Management Plan
- 022-HSEQ-MP-004 Pollution Incident Response Management Plan Tomago

13.9.2 Engineering, Isolation, Elimination

Considering the hierarchy of controls and the significance of a potential fire, REMONDIS has put in place these higher order controls for the prevention and mitigation of fires:

- onsite smoke detectors
- onsite thermal cameras
- thermal surveys conducted on electrical equipment
- spark arrest equipment fitted on mobile plants
- each building is bunded providing onsite fire water retention within the buildings.
- drain wardens will be purchased prior to operations commencing to isolate the site stormwater drains in the event of a fire (and where safe to do so).

The combination of these controls helps to proactively reduce the risk of fire at this facility to as low as is reasonably practicable.

13.10 Onsite Waste Generation

Waste generation from the site will be managed in a way that maximises the source separation of the waste. The following opportunities for source separation are available at the site.

Administration Building:

- Paper and Cardboard
- Container Deposit Scheme
- Food and Organic Waste
- Co-mingled recycling

Workshop:

- Oil
- Coolant
- Batteries
- Steel
- Tyres

13.11 Utilities

13.11.1 Power Usage

The monthly site inspection will examine instances where there has been found to be excessive power usage without reason and implement controls. This will be documented in Donesafe.

13.11.2 Water Usage

The monthly site inspection will examine instances where there has been found to be excessive water usage without reason and implement controls or repairs to damage. Incident and broken equipment is recorded in Donesafe. The inspection will be conducted documented in Donesafe.

13.12 Contaminated Soil

The site had significant soil contamination prior to the redevelopment into its current use. All potential future disturbances of onsite lead and zinc contaminated soil will be managed through 022-ENV-PR-002 Long Term Environmental Management Plan. The controls outlined under section 13.4.2 Groundwater management are also relevant to the control of contaminated soil onsite.

13.13 Natural Heritage

To understand the full extent of the potential impact on flora and fauna of site operations the Federal Government Protected Matters Search Tool was also used for the site address; 21D and 21F School drive Tomago, NSW 2322

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Importance (Ramsar	1
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	None
Listed Threatened Ecological Communities:	4
Listed Threatened Species:	43
Listed Migratory Species:	18

Table 6: Endangered and critically endangered potential species

Species ID	Scientific Name	Common Name	Class	Simple Presence	Presence Text	Threatened Category
4325	Euphrasia arguta	null	Plant	May	Species or species habitat may occur within area	Critically Endangered
82338	Anthochaera phrygia	Regent Honeyeater	Bird	Likely	Foraging, feeding or related behaviour likely to occur within area	Critically Endangered
744	Lathamus discolor	Swift Parrot	Bird	Likely	Species or species habitat likely to occur within area	Critically Endangered
847	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew	Bird	Likely	Species or species habitat likely to occur within area	Critically Endangered
856	Calidris ferruginea	Curlew Sandpiper	Bird	Likely	Species or species habitat likely to occur within area	Critically Endangered
19162	Rhodomyrtus psidioides	Native Guava	Plant	May	Species or species habitat may occur within area	Critically Endangered
15763	Rhodamnia rubescens	Scrub Turpentine, Brown Malletwood	Plant	May	Species or species habitat may occur within area	Critically Endangered

89189	Uperoleia mahonyi	Mahony's Toadlet	Frog	May	Species or species habitat may occur within area	Endangered
77037	Rostratula australis	Australian Painted Snipe	Bird	Known	Species or species habitat known to occur within area	Endangered
11768	Rhizanthella slateri	Eastern Underground Orchid	Plant	May	Species or species habitat may occur within area	Endangered
768	Callocephalon fimbriatum	Gang-gang Cockatoo	Bird	Likely	Species or species habitat likely to occur within area	Endangered
75184	Dasyurus maculatus maculatus (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)	Mammal	Likely	Species or species habitat likely to occur within area	Endangered
1001	Botaurus poiciloptilus	Australasian Bittern	Bird	Known	Species or species habitat known to occur within area	Endangered
85104	Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)	Mammal	Known	Species or species habitat known to occur within area	Endangered
855	Calidris canutus	Red Knot, Knot	Bird	May	Species or species habitat may occur within area	Endangered
87152	Commersonia prostrata	Dwarf Kerrawang	Plant	Likely	Species or species habitat likely to occur within area	Endangered
12533	Cynanchum elegans	White-flowered Wax Plant	Plant	Likely	Species or species habitat likely to occur within area	Endangered

13.13.1 Weed Management

The surrounding landscape was designed specifically to reduce bushfire risk in accordance with the State Significant Development approval. The above controls should help to mitigate the growth of weeds on the surrounding landscape. The monthly site inspection documented in Donesafe may consider the growth of any weeds and reassess the necessary controls to reduce them.

13.13.2 Biodiversity Offsets

Due to the nature of the construction the SSD required REMONDIS to purchase Biodiversity offset credits which were purchased and surrendered prior to the construction of the site.

13.14 Cultural Heritage

A cultural heritage assessment was done in advance of the site development. There was no Aboriginal sites or potential archaeological deposits that were identified during the survey. If however a suspected Aboriginal object is found on site the area will be immediately cordoned off and Heritage NSW will be contacted.

REMONDIS developed a specific Aboriginal cultural heritage induction prior to the construction activities which was provided to the principal contractor in advance of any construction being conducted.

13.15 Pollution Incident Response

To ensure that our emergency responses consider the risk of pollution in any emergency event, REMONDIS has developed and published on our website a Pollution Incident Response Plan for the Tomago RRF, 022-HSEQ-MP-004 Pollution Incident Response Management Plan Tomago. This is routinely tested (annually) and is to be updated as a result of any drills/incidents to improve the plan and reflect learnings over time.

The PIRMP is published here: https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rrf/

14.0 Quality Controls

14.1 Records

In support of controls identified by this Integrated Management Plan all quality records shall be held within the share drive or in hard copy according to the Document and Record Management Minimum Standard (RE-HSEQ-ST-001). Records to be included, but not limited to, are:

a) Information on applicable laws or other requirements.

b) complaint records.

c) training records.

d) process information.

e) product information.

f) inspection, maintenance and calibration records.

g) pertinent contractor and supplier information.

h) audit results.

i) Management System Reviews.

j) Management plans.

k) Other registers as required (e.g., Calibration, Equipment, Vehicle Registers).

15.0 Training, Skills and Competency

The Workplace Manager shall ensure that all staff performing duties required by this Plan are properly trained. Where a need is identified, arrangements shall be made for the appropriate training via inductions, work briefings and awareness training.

The Workplace Manager shall identify training, competency and assessment needs based on statutory requirements and those identified during risk assessment.

All relevant statutory competencies and certificates must be held by those personnel who perform work. Copies of competencies and certificates will be held by REMONDIS Australia, and information entered into the relevant training database.

Site specific training will be undertaken at toolbox talks, including risk assessment, operating equipment and hazardous substances. Furthermore, external training will be arranged as required.

15.1 Induction

The Workplace shall ensure that:

- Induction information manual/s is/are developed and issued for all inductions to Staff, Employees, Labour Hire, Contractors and visitors,
- All Staff, Employees, Labour Hire, Contractors are inducted at the Workplace prior to being permitted to commence work.
- Induction records for Staff, Employees, Labour Hire, Contractors operating within the project are maintained.

The Induction records for each site are saved within the HSEQ Management System filing under Training & Induction.

15.2 Documented Information

In support of controls identified by this Integrated Management Plan any record that is created specifically for the site shall be held within the shared drive for REMONDIS.

REMONDIS uses a number of systems which are the primary source of the records including:

- DoneSafe
- Sage People
- HRIS

16.0 Communicating with the Community

REMONDIS understands there may be both positive and negative community interest in our project. We have established a special purpose website for this facility which includes the required published information regarding this site at: https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rrf/

We are committed to communicating transparently with the community. Where a particular topic is the subject of repeated enquiries, REMONDIS will provide factual responses publicly on this facility website. To date, no repeated enquiries from the community regarding this project have been received.

16.1 Environmental Complaints

REMONDIS has established a national complaints line, 1300 110 638 which is advertised on our REMONDIS Australia website. This line is available 24/7 for any member of the public to make a complaint regarding any aspect of REMONDIS' environmental performance.

Complaints received are treated as an environment hazard/incident and reported consistent with the procedures outlined in Section 10 and consistent with RE-HSEQ-ST-015 Hazard, Near Miss and Incident Reporting Standard.

17.0 Performance Evaluation

17.1 Internal & External Audits

Audits are carried out in accordance with REMONDIS Internal & External HSEQ Auditing Minimum Standard (RE-HSEQ-ST-002). Audits are scheduled according to risk and previous internal audit results.

17.2 Non-Conformance

Non-conformance is considered an incident under the REMONDIS system of management and is tracked through the requirements of RE-HSEQ-ST-015 Hazard, Near Miss and Incident Reporting Minimum Standard.

17.3 Management Review

An annual calendar review of the HSEQ performance will be carried out in accordance with REMONDIS Management Review Minimum Standard (RE-HSEQ-ST-002). This process is designed to identify areas for improvement and to ensure the activities continue to be conducted in a safe and environmentally friendly manner.

18.0 Continual Improvement

REMONDIS is committed to improving the suitability, adequacy and effectiveness of the Integrated Health, Safety, Environment and Quality Management Systems to drive optimal operational performance.

Appendix One: Mapping of this plan to the requirements of the ISO standards

ISO 9001 / 14001 / 45001 Clause		Corporate BMS Policy/ Procedure
4	**Context of the organisation**	
4.1	Understanding the organization and its context	Section 2.0
4.2	Understanding the needs and expectations of interested parties	Section 7.0
4.3	Determining the scope of the management system	Section 1.0 and 2.0
4.4	HSEQ management and its processes	All sections in this procedure.
5	**Leadership**	
5.1	Leadership and commitment	Section 3.0
5.2	Policy	Section 3.1
5.3	Organizational roles, responsibilities and authorities	Section 6.0
5.4 (ISO45001)	Participation and consultation	Section 4.0
6	**Planning**	
6.1	Actions to address risks and opportunities	Sections 9.0, 10.0, 11.0, 12.0, 13.0, 14.0
6.2	Objectives and planning to achieve them	Section 8.0, Section 14.4
7	**Support**	
7.1	Resources	Section 6.0
7.2	Competence	Section 15.0
7.3	Awareness	Section 15.0
7.4	Communication	Section 15.0
7.5	Documented information	Section 15.2
8	**Operation**	
8.1	Operational planning and control	Sections 9.0, 10.0, 11.0, 12.0, 13.0, 14.0
8.2 (ISO 14001 & ISO 45001)	Emergency preparedness and response	Section 15.0
8.2 (ISO9001)	Requirements for products and services	Section 14.0
8.3 (ISO9001)	Design and development of products and services	
8.4 (ISO9001)	Control of externally provided processes, products and services	
8.5 (ISO9001)	Production and service provision	
8.6 (ISO9001)	Release of products and services	
8.7 (ISO9001)	Control of nonconforming outputs	Section 17.2
9	**Performance evaluation**	
9.1	Monitoring, measurement, analysis and evaluation	Sections 9.0, 10.0, 11.0, 12.0, 13.0, 14.0
9.2	Internal audit	Section 17.1
9.3	Management review	Section 17.3

ISO 9001 / 14001 / 45001 Clause		Corporate BMS Policy/ Procedure
10	**Improvement**	
10.1	General	Section 18.0
10.2	Nonconforming and corrective action	Section 17.2
10.3	Continual improvement	Nominated throughout plan where gaps noted. Documented in corrective actions identified in Donesafe and in the Risk Register.

Appendix Two: Mapping of this plan to the requirements of the SSD-10447

SSD-10447 Reference		Relevant Section of this plan/BMS Reference
B8.	**Energy from Waste Management Plan – Eligible Waste Fuels**	
	Prior to the commencement of operation, the Applicant must prepare an Energy from Waste Management Plan (EfWMP) for the handling and distribution of eligible waste fuels, to the satisfaction of the Planning Secretary. The EfWMP must form part of the OEMP and be prepared in accordance with condition C5. The EfWMP must: (a) be prepared by a suitably qualified and experience person(s), in consultation with the EPA (b) detail procedures for the handling and management of eligible waste fuels for energy recovery, including: (i) procedures to ensure full and ongoing compliance with Table 4 the NSW Energy from Waste Policy Statement 2020; (ii) how the Applicant will compile and calculate percentages of incoming waste streams every three months and retain this information for submission to the EPA on request; (iii) a procedure for providing evidence to the EPA that incoming material was previously going to landfill; and (iv) a procedure for the management of out of specification waste.	This is a separate management plan, 022-ENV-MP-001 Energy from Waste Management Plan. Referenced in this document in Section 13.6.4.
B26	**Water Management Plan**	
	Prior to the commencement of operation of the development, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and EPA; (c) provide details of: (i) water use, metering, disposal and management on-site; (ii) the number and location of piezometers on-site; (iii) the water licence requirements for the development; (iv) the management of wastewater streams on-site including leachate and fire water;	This is a separate management plan, 022-ENV-MP-002 Tomago Water Management Plan. Referenced in this document in Section 13.5
	(d) contain a Surface Water Management Plan, including; (i) a program to monitor: • surface water flows and quality; • surface water storage and use; and • detention basin operation;	
	(e) contain a Groundwater Management Plan, including:	

SSD-10447 Reference		Relevant Section of this plan/BMS Reference
	(i) baseline data on groundwater levels and quality; (ii) a program to monitor groundwater levels and quality on a monthly basis; (iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.	
B36.	**Air Quality Management Plan**	
	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) for the development, to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) detail and rank all significant emission sources from the development; (c) identify the control measures, including proactive and reactive mitigation measures that will be implemented for each emission source; (d) include the following for each emission source: (i) risk assessment; (ii) key performance indicator; (iii) monitoring method; (iv) location, frequency and duration of monitoring; (v) record keeping; (vi) response mechanism and contingency measures; and (vii) compliance reporting.	This is a separate management plan, 022-ENV-MP-003 Tomago Air Quality Management Plan. Referenced in this document in Section 13.3.
	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	
C5.	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This document is the Operational Environmental Management Plan for the site, it forms part of the Integrated Management Plan under REMONDIS' ISO certified management systems.
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;	Please see Table 2, Tomago Roles and Responsibilities
	(b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental	Section 16.0

SSD-10447 Reference		Relevant Section of this plan/BMS Reference
	performance of the development;	
	(ii) receive, handle, respond to, and record complaints;	Section 16.1
	(iii) resolve any disputes that may arise;	Where this relates to environmental matters, the procedures outlined in Section 15.1 apply.
	(iv) respond to any non-compliance;	Section 17.0
	(v) respond to emergencies; and	These documents are separate management plans referenced in this document as below: ▪ 022-HSEQ-MP-002 Emergency Management Plan ▪ 022-HSEQ-MP-004 Pollution Incident Response Management Plan Tomago
	(c) include the following environmental management plans: (i) Energy from Waste Management Plan (see condition B8); (ii) Water Management Plan (see condition B26); and (iii) Air Quality Management Plan (see condition B36).	These documents are separate management plans referenced in this document as below: ▪ 022-ENV-MP-001 Energy from Waste Management Plan. Referenced in this document in Section 12.6.4. ▪ 022-ENV-MP-002 Tomago Water Management Plan. Referenced in this document in Section 12.5. ▪ 022-ENV-MP-003 Tomago Air Quality Management Plan. Referenced in this document in Section 12.3.