



Waste Management Plan

AxTRF Operational Management Plans to be used in conjunction with the Visy Management System

AxTRF

Alexandria Dry Recyclables Transfer Facility
85 Burrows Road, Alexandria NSW
[aka. 112-120 Euston Road – no site access from Euston Road]

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Document control

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Glossary/Abbreviations

AxTRF/Facility/Site	The dry recyclables facility approved as SSD-10364 on 22 April 2020
AxTRF management plans	The OEMP and its supporting management plans, including this NMP
Conditions	The conditions of consent for the approval of SSD-10364 dated 22 April 2020
DPIE	Department of Planning, Industry and Environment
Development approval	SSD-10364 for Visy DRF/AxTRF
DRF	Dry recyclables facility
EIS	Environmental Impact Statement for Visy Dry Recyclables Facility dated November 2019
EPA	Environment Protection Authority
EP&A Act	Environmental Planning & Assessment Act 1979
EPL	Environmental Protection License
FCM	Fully commingled recyclable material
FEL	Front End Loader
HSE system	Visy's Health, Safety and Environment System within VMS
MRF	Materials recovery facility
OEMP	Operational Environmental Management Plan (this plan)
P&C	Source-separated paper and cardboard
Planning Secretary	The Secretary of the Department of Planning, Industry and Environment
PME	Powered Mobile Equipment, including forklift and FEL
POEO Act	Protection of the Environment Operations Act 1997
RTS	Response to Submissions for Visy Dry Recyclables Facility dated February 2020
SSD	State Significant Development
Stage 1	Operation as a recyclable material transfer facility for up to 110,000 tpa FCM and 45,000 tpa P&C
tpa	Tonnes per annum
TRF	Recyclable material transfer facility
Visy	Visy Industries Australia Pty Ltd ABN 74 004 337 615
VMS	Visy Management System incorporating HSE System
Waste Regs	Protection of the Environment Operations (Waste) Regulation 2014
WMP	Waste Management Plan (this plan)

1 INTRODUCTION

1.1 Overview

Visy is an integrated packaging, paper and resource recovery company operating in Australia for over 70 years and with over 120 sites throughout Australasia and has provided recycling services to eastern Sydney and beyond since the late 1990s.

In 2020 Visy received approval (SSD-10364) to develop the Visy Alexandria Dry Recyclables Transfer Facility (AxTRF; the facility/site) to replace the St Peters facility. In accordance with the approval, Visy has prepared this Waste & Litter Management Plan (WLMP) as an Attachment to the Operational Environmental Management Plan (OEMP).

This WMP utilises waste assessment and management measures identified for the facility in preceding documents and waste management experience Visy has garnered from other resource recovery sites (i.e. St Peters Recyclable Transfer Facility, Taren Point Resource Recovery Facility, Smithfield Resource Recovery and Manufacturing Precinct). It also includes waste requirements from the facility's Environmental Protection Licence (EPL) 21359.

This WMP is for Stage 1 of the facility which involves:

- Transfer facility for up to 110,000 tonnes per annum (tpa) of fully commingled recyclable material (FCM) from kerbside collections to Visy's network of material recovery facilities (MRFs); and
- Baling operation for up to 45,000 tpa of source-separated paper and cardboard (P&C) from commercial businesses for transfer to Visy's network of recycled paper machines.

This WMP addresses the specific environmental conditions for waste management from SSD-10364, which are (in summary):

- **B1.** Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.
- **B4.** Operational Waste Management Plan – Must be prepared prior to commencement of operation to the satisfaction of the Planning Secretary and must include:
 - The type and quantity of waste to be generated during operation
 - Handling, storage and disposal of all waste streams generated on site, consistent with relevant regulations
 - Materials to be reused or recycled, either on or off site
 - Include a Contingency Waste Management Plan that details procedures in the event of a machinery breakdown or processing downtime
 - Include a Litter Management Plan; and
 - Include the management and mitigation measures [in OEMP Attachment B].
- **B6.** All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.
- **B7.** All wastes to be taken off site must be assessed 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 facility that may lawfully accept the waste.

- **B8.** All waste classification and sampling data must be retained for the life of the development in accordance with the requirements of the EPA.
- **B9.** Suitable measures must be implemented to manage pests, vermin and declared noxious weeds on the site and ensure these measures are working effectively so that these undesirables are not present in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.

Under condition B5, operation must not commence until this WMP is approved by the Planning Secretary and the WMP must be implemented for the duration of operation.

To distinguish between recyclable material destined for further processing and non-recyclable material to be discarded, Visy Recycling typically uses the term 'product' to refer to recyclable material collected from household kerbside collections and commercial source separated collections.

1.2 Site Management Plans

This WMP forms part of the AxTRF operational management plans that have been developed in accordance with the conditions of approval, the management and mitigation measures for the development presented by Visy, and the Visy Management System (VMS). AxTRF management plans comprise:

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

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

The OEMP includes a Register of Statutory Operational Control Measures and Implementation which lists the key management and mitigation measures for the facility and identifies each measure as a design and/or operation control. Design controls are implemented into the facility operation on an ongoing basis as they are incorporated into the facility design, layout and infrastructure. Operation controls are implemented through their inclusion in AxTRF management plans and site VMS requirements.

AxTRF management plans should be used in conjunction with VMS which is described in the OEMP. They are available to all staff and subcontractors via the site management system document control which includes a hard copy onsite and are made available to the public via Visy's website.

The site management team are responsible for the implementation, monitoring and review of AxTRF management plans as described in the OEMP.

1.3 Site overview

An overview of the site in the context of neighbouring premises and key features is provided in the OEMP. The site is located in an IN1 General Industrial zone within the City of Sydney. AxTRF operations are completely contained within the approximately 7,700m² operations building. Rapid doors at the Burrows Road entry and exit open only to permit truck passage and close immediately after. There is also a two-storey office building on the site and a car park.

2 ENVIRONMENTAL OBLIGATIONS

2.1 Legislative requirements

As a modern recyclables facility, AxTRF is designed and operated to meet a number of relevant national, state and local government requirements. The OEMP provides an overview of the key environmental obligations which underpin the facility design for the areas of:

- Planning legislation – Facility assessed under *Environmental Planning and Assessment Act 1979* (EP&A Act) through an Environmental Impact Statement (EIS) and granted approval with conditions through SSD-10364.
- Environment protection legislation – Facility operates under *Protection of the Environment Operations Act 1997* (POEO Act) and *Protection of the Environment Operations (Waste) Regulation 2014* (Waste Regs) as a resource recovery and waste storage facility with conditions through EPL 21359.
- Waste and resource recovery strategies – Facility contributes to waste strategy targets and provides a strategically located modern dry recyclables facility as part of Visy's integrated closed loop recycling and manufacturing model to create value from waste.
- Fire safety requirements – Facility assessed against *Fire Safety in Waste Facilities* guideline through consultation with Fire and Rescue NSW to ensure adequate provision for fire safety and safe fire brigade intervention.

2.2 Environmental Protection Licence (EPL)

The facility EPL 21359 is issued and administered by the Environment Protection Authority (EPA) under the relevant Environment protection legislation (see above). The POEO Act contains a list of activities that require an EPL. EPLs are a central means to control the localised, cumulative and acute impacts of pollution in NSW and aim to, amongst other things:

- Ensure the community has access to relevant and meaningful information about pollution
- Rationalise, simplify and strengthen the regulatory framework for environment protection
- Promote pollution prevention and cleaner production
- Reduce to harmless levels the discharge of substances likely to cause harm to the environment
- Reduce the use of materials and increase the re-use or recycling of materials.

The EPL specifies the facility can receive up to 155,000 tpa of waste material of the following two waste types (as defined in the POEO Act) for the activities of resource recovery and waste storage:

- Paper or cardboard
- Paper, plastics glass and metal.

2.3 Visy Management System

The OEMP provides an overview of VMS which requires Visy sites to determine their environmental monitoring processes to ensure compliance with regulatory obligations using the VMS structure of Plan, Do, Check, Act approach.

3 WASTE CONTROLS

The facility EIS includes detailed information on waste and waste management at the facility to ensure that all waste received, stored, handled, processed and dispatched from the facility is appropriately managed to support recycling, prevent escape of litter from the site, safely dispose of hazardous waste, and prevent pests and vermin at the site.

This section includes information on the facility waste assessment from the EIS.

3.1 Objectives and Performance

AxTRF waste objectives and performance are included in the overall Objectives and Performance Indicators from the OEMP as shown in Table 1.

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

Objectives	Performance Indicators
<ul style="list-style-type: none"> • Operation in accordance with development approval and AxTRF management plans. • Identify potential environment impact sources and implement control measures. • Engage with neighbours to inform of site activities. • Maintain reasonable levels of noise amenity for surrounding businesses and residents. • Contain litter within the site boundary. • Minimise traffic impact to Burrows Road. • Respond quickly and effectively to issues or complaints. • Monitor environmental performance in line with VMS and AxTRF management plan requirements. 	<ul style="list-style-type: none"> • Full compliance with all requirements. • Effective and practical environmental control measures implemented. • No impact to neighbouring businesses or surrounding residents from operation. • Appropriate actions undertaken to investigate issues and/or effectively respond to complaints. • Environmental performance meets expectations.

3.2 Waste Volumes, Storage and Flow

Table 2 shows a typical composition of FCM based on data from Visy's Taren Point MRF. Hazardous waste was estimated to be <0.04% of FCM composition based on up to 50kg of hazardous waste per day (ie 1-2 large items) removed at Taren Point. For example one 32kg gas bottle and one car battery.

Using this FCM composition data and the maximum waste capacity for the facility (ie. 110,000tpa FCM and 45,000tpa P&C), the daily waste flows into and out of the facility and the waste storage capacities developed for the facility from these are shown in *Table 3*. The waste storage areas for each material type and form are shown in Figure 1.

Table 2. Typical composition of FCM based on data from Visy's Taren Point MRF.

Material	FCM Contribution*
Paper/Cardboard	51%
Glass	34%
Mixed plastics	7%
Steel	3%
Aluminium	<1%
Non-recyclables	5%
Hazardous#	<0.04%

* The composition of FCM can vary seasonally and between municipalities.

Hazardous materials make up a very small portion of this total, estimated as up to 2 items per day.

Table 3. AxTRF waste material flows (based on 2019 data from Visy Taren Point) and storage capacity for material types.

Material	Material form	Storage capacity (tonnes)	Incoming maximum volume (tonnes)		Outgoing volume (tonnes)	Removal frequency
			Daily	Weekly		
Paper and Cardboard product	Loose	75	144	865	NA	
	Baled	384			144	Daily
FCM product	Loose	500	423	2115	NA	
	Consolidated	NA			423	Daily
Non-Recyclable Materials*	Loose	50			17	As required
Hazardous waste		4			<0.2	As required

*Gross non-recyclable materials will only be removed at AxTRF if necessary.

Tables 1 and 2 drawn from *Visy Dry Recyclables Facility 112-120 Euston Road, Alexandria Environmental Impact Statement*, November 2019, Urban Perspectives.

3.3 Design Controls

As a modern dry recyclables facility, AxTRF design is in accordance with current requirements and expectations for a resource recovery and waste storage facility. This includes a number of design waste management controls which provide high level mitigation that is implemented into the facility operation on an ongoing basis as controls are incorporated into the layout and infrastructure. Key design controls for waste include:

- Operations fully contained within the operations building with dedicated vehicle entry and exit doors fitted with rapid doors that open to permit truck passage and close immediately afterwards.
- One way traffic flow through the facility with separate inbound and outbound weighbridges, each fitted with an electronic scancode system to allow efficient waste tracking through the Visy waste tracking system.
- Two side-by-side FCM receival bays and one P&C receival bay separated to allow use of both areas at once promoting efficiency and minimising time on site for recyclable trucks.
- Building ventilation system comprising:
 - 2 fans above the inbound weighbridge and 1 above the outbound weighbridge with suction ductwork above work zones and traffic zones, discharging to 3 roof exhaust vents via acoustically shielded ductwork; and
 - Fresh air inflow via 3 disused doorways, 2 on Euston Road and 1 on Burrows Road, all fitted with acoustic louvres to allow the required air inflow while minimising noise emission.
- No stormwater connection to inside operations building (drainage pits sealed).
- Fire management system based on *Fire Safety in Waste Facilities guideline* developed through consultation with FRNSW
- Operations building perimeter bunding to retain fire water and any inflow flood water and prevent escape of litter.
- Designated storage areas for P&C bales and an elevated hazardous waste storage area on raised pallet racking above the 1% AEP flood level.

3.3.1 Facility Layout

The operations area layout within the building is shown in *Figure 1* and a general description of the waste handling and storage activities within the identified areas is given below.

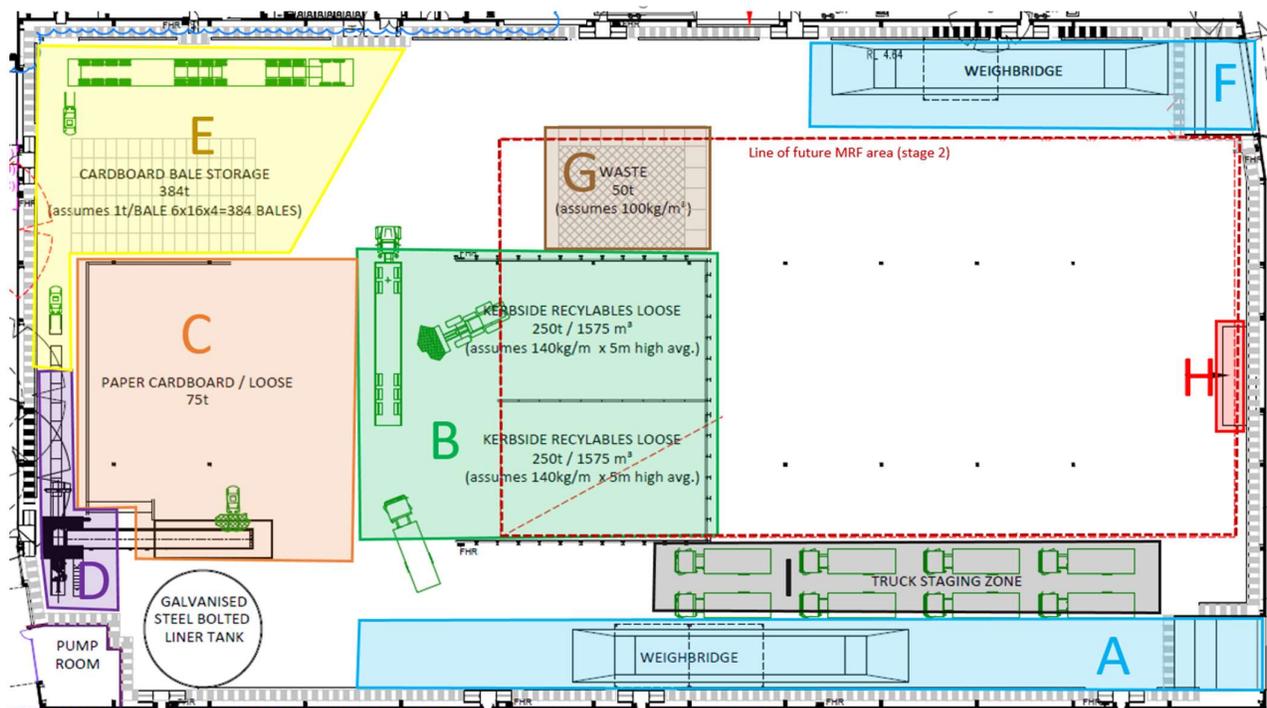


Figure 1. Operation building layout showing operation zones.

Zone A - Truck entry and inbound weighbridge (blue)

Kerbside recyclable collection trucks and small commercial paper/cardboard collection trucks enter from Burrows Road via rapid door and travel onto the inbound weighbridge. After being weighed, trucks continue to zone B or C.

Zone B - FCM receival bay and handling (green)

Kerbside recycling collection trucks unload into the FCM kerbside recyclables receival bay and then continue to zone F. The front-end loader moves FCM within the receival bay or loads FCM into bulk haul trucks. This is a AAA (authorised access area).

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

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

Zone D - Baler (purple)

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

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

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

Zone F - Truck outbound weighbridge and exit (blue)

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

Zone G - Non-recyclable waste storage (brown)

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

Zone H - Hazardous waste storage (red)

Hazardous items removed from FCM as waste are sent to the dedicated hazardous waste storage area and stored within banded pallets, IBCs or palletcons depending on the type of material. These are elevated on raised pallet racking above the 1% AEP flood level plus 0.5m freeboard.

3.4 Operations Controls

The information below is summarised from the OEMP activity protocols and includes specific conditions for waste management from SSD-10364 and EPL 21359.

3.4.1 Waste Tracking

The facility implements waste tracking in accordance with the POEO (Waste) Regs and follows the same protocol as Visy's other resource recovery facilities in NSW.

The two weighbridges (inbound and outbound) are linked by common software which saves data for each transaction to the Visy database, which is used nationally across Visy's resource recovery and recycling facilities. The transaction records are also used for daily stock and inventory control and financial management for the facility. At each month's end, all total material inputs and outputs are entered into the Waste Monthly Contribution Report on the NSW Waste and Resource Reporting Portal.

Boom gates at each end of the weighbridges control truck entry and exit to permit only one vehicle on the weighbridge at a time. Weighbridges are maintained and serviced bi-annually and independently verified annually.

Incoming and outgoing trucks to the facility are identified by their unique scancard as described in the OEMP. Drivers are provided with a weighbridge receipt confirming vehicle details and weight.

If there is an error with the scancard reader, the weighbridge phone must be used. This provides a direct line to Visy's weighbridge team and the driver must provide scancard number and truck registration which allows the weighbridge team to manually enter information into the database and issue a receipt.

The following information is automatically logged into the database for each transaction from information gathered at both weighbridges:

- Site designation and name
- Date and time
- Carrier and vehicle registration details
- Purpose of entry (transaction type – inbound delivery or outbound removal)
- Vehicle tare and gross weight
- Amount and type of waste material.

3.4.2 Product Storage & Dispatch

Fully Commingled Recyclables (FCM)

AxTRF can accept up to 110,000 tpa of FCM, which is typically specified to Councils to include:

- Paper (such as newspapers, magazines, stationery, office paper)
- Cardboard (except waxed cardboard)
- Glass bottles and jars (such as beverage bottles, glass condiment jars)
- Aluminium (such as cans and foil balls)
- Steel and aerosol cans (such as food tins, aerosol cans)
- Rigid plastic packaging including numbered 1 to 7 (not Polystyrene foam).

FCM must only be unloaded into one of the two FCM receival bays at a height not exceeding 5 meters. Each FCM bay has capacity for 250 tonnes, so the total FCM storage capacity is 500 tonnes. The facility EPL 21359 specifies the maximum FCM storage height as 5m (which is the height identified in the EIS) and total waste volume (unprocessed and processed) as 2000 tonnes at any time.

FCM must be removed from site on a daily basis through consolidation into bulk haul trucks and should be managed to ensure no FCM is retained onsite for longer than 48 hrs (to avoid odour generation).

FCM stockpile must not exceed 5m in height and 250 tonnes in each receival bay.

Paper & Cardboard (P&C)

AxTRF can accept up to 45,000 tpa P&C which is typically specified to collection customers to include:

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

P&C must only be unloaded into the P&C receival bay. The P&C bay capacity is 75 tonnes.

Baled P&C must be stored only in the P&C bale storage area, which has a capacity of 384 tonnes, in accordance with the AxTRF P&C bale stacking procedure. This procedure is in line with the *Fire Safety in Waste Facilities guideline* and contributes to the fire safety of the facility. The P&C bale storage area is inspected daily against the bale stacking guidelines, including a maximum bale stack height of 5m.

P&C bales must be loaded onto haul trucks for dispatch only in the bale loading zone.

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

3.4.3 Daily Product Stocktake

A stocktake of product will be undertaken daily to reconcile the waste tracking records from the Visy database.

3.4.4 Unacceptable Materials Removal & Storage

Non-recyclables

Contamination in FCM (ie. *contamination*) includes but is not limited to:

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

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

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

Minor contamination (ie. individual items) can be removed by hand only when the AAA procedure has been followed and it is safe to do so. Otherwise it can be left in place and will be removed at the MRF.

Gross contamination (ie. typically greater than 15% of the load) may trigger contractual ramifications and the Site Manager must be informed if a load is suspected to have gross contamination. The FEL operator must then isolate the load until it can be inspected. Following inspection, the contamination is to be removed only when the required risk assessment for the waste and its removal has been completed and AAA procedure has been followed.

All unacceptable contamination waste removed from FCM or P&C must be taken to the waste area and managed as appropriate for the material and in accordance with any risk controls identified for the waste. Putrescible waste must be disposed off-site as soon as practicable.

Hazardous Materials

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

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

In the event that any hazardous materials, or suspected hazardous materials, are identified during inspection of FCM by the FEL operator, the process should follow that for other

unacceptable materials. Where individual hazardous items are identified, these are removed and taken to the hazardous waste area and managed as appropriate for the material.

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

3.4.5 Litter Management

VMS requires that all sites implement appropriate litter management to prevent the escape of litter beyond the site boundary. The AxTRF Environmental Impacts and Aspects Register (A&I Register) includes litter as a risk for the site and identifies management plan controls which include both design engineering and operational procedures to prevent the escape of litter from the facility. Key litter management plan controls are:

- All waste materials are received, stored and handled only within the enclosed operations building
- The rapid doors at the building entry and exit open only to permit truck passage and close immediately after truck passage
- Operations building perimeter bunding to contain loose items in the event of water inside the building due to fire water or flooding inundation
- Incoming product waste must only be received and stored in its relevant designated 3 sided receival bay
- Unacceptable waste removed from product waste must be taken directly to designated waste area and stored appropriately for the material type
- Product waste handling must aim to achieve onsite residence time less than 24 hours and up to 48 hours at a maximum
- Routine housekeeping must ensure loose items of any waste are collected and contained within designated storage areas
- Ongoing vigilance and communication for compliance with housekeeping standards.

3.4.6 Vermin and Pest Management

The AxTRF A&I Register also includes pests/vermin as a risk for the site and identifies management plan controls which include the following key controls:

- All waste received, stored and handled within operations building to exclude large pests (ie. birds, foxes)
- Product waste handling must aim to achieve onsite residence time less than 24 hours and up to 48 hours at a maximum to reduce opportunities for vermin (ie. rats, mice)
- Routine housekeeping and daily site inspection to include that there are not 'stagnant' areas of FCM in the receival bay where vermin could reside
- Rat and mice bait stations to be placed throughout the facility and maintained by a vermin management service provider.

3.4.7 Weed Management

The site hosts a large landscaped area in the north-east corner which includes 4 large fig trees and a number of casuarina trees¹. The shaded ground area contains a variety of garden ground cover plants comprising native understorey plantings and some common ivy, which is a vigorous, shade loving plant that can be invasive if not suitably managed. A garden maintenance contractor should be engaged at least annually to undertake garden maintenance at the site, and this should include pruning the common ivy and removing weeds as required to ensure they do not interfere with the health of then native understorey plantings, or established figs and casuarina trees.

3.5 Contingency Waste Management Plan

The EIS outlines a contingency waste management plan for the facility which is primarily intended for stage 2 operation in the event of MRF downtime when FCM processing is reduced or halted for short term or longer term periods. It also includes contingency in the event of baler downtime.

P&C contingency plan

In the event that baler downtime is anticipated to cause the P&C receival bay to exceed its capacity limit of 75t, the following contingency measures must be initiated:

1. P&C to be consolidated into transport truck/s and transferred offsite to other Visy baling operations, such as Smithfield.
2. If required, some inbound commercial collection trucks to be diverted directly to other Visy baling operations.

FCM contingency plan

In the event that any disruption at the facility is anticipated to cause the FCM receival area to exceed its capacity limit of 500t, the following contingency measures must be initiated:

1. Additional bulk haul trucks to be used for transfer of consolidated FCM offsite to Visy MRFs, such as Taren Point or Smithfield.
2. The residence time of FCM at the facility must remain at less than 48 hours.
3. If required, some inbound kerbside collection trucks to be diverted directly to other Visy MRFs.

4 MONITORING

The OEMP provides an overview of the monitoring and review of the AxTRF management plans. In summary, the facility is monitored against its environmental objectives and performance through environmental monitoring inspections which incorporate relevant statutory management and mitigation controls and other additional measures contained in AxTRF management plans. Where a performance indicator is not satisfactory, a review of the controls will be undertaken to determine their effectiveness and, if required, a contingency plan with corrective actions will be developed.

¹ 112 Euston Road Alexandria – Arboricultural Assessment, October 2019, Ecological.