

8. DRAFT STATEMENT OF COMMITMENTS

This section provides a Draft Statement of Commitments in relation to the construction activities, operations, environmental management and monitoring of the proposed RIRP.

8.1 INTRODUCTION

Section 75 F (6) of the *EP&A Act* states that the Director-General may require the Proponent to include in an EA a Statement of Commitments for environmental management and mitigation measures. The DGRs issued by DoPI require inclusion of a Statement of Commitments in the EA. REMONDIS will undertake the construction and operation of the RIRP so as to control and minimise environmental impacts. This section of the EA presents REMONDIS's draft Statement of Commitments.

8.2 CONSTRUCTION

Table 8.1 summarises the commitments made in relation to construction of the proposed RIRP. These commitments will be incorporated in the Construction EMP.

Billbergia will undertake all works associated with disturbance to the subsurface for the installation of services and stormwater connections.

REMONDIS will construct the platform and the facility.

8.3 OPERATIONS

Table 8.2 summarises the commitments in relation to operations of the proposed RIRP. These commitments will be incorporated in the Operational EMP.

Table 8.1
Construction Commitments

Objective	Commitment
ENVIRONMENTAL MANAGEMENT – CONSTRUCTION	
<i>Suitably qualified and experienced personnel will develop and implement project specific environmental management plans and procedures in consultation with relevant government agencies.</i>	
Consultation to minimise impacts on the local community	<ul style="list-style-type: none"> • The Study Group established during preparation of the EA will form the basis of a community liaison group to encourage open dialogue with potentially affected local stakeholders, providing a channel through which concerns can be voiced directly; • The Construction Management Plan will identify the potential risks and will include a consultation plan so that local concerns are addressed; and • Stakeholders including users of Camellia railway station and adjoining businesses will be advised of activities being undertaken during construction to ensure they are aware of the nature and extent of activities during construction. The Construction Manager will be identified as the primary point of contact.
Management of area of contaminated materials	<ul style="list-style-type: none"> • The geophysical survey of the site to be completed prior to final design and construction of the platform; • Treatment of identified voids to be completed prior to construction of the platform in accordance with the requirements of a SWP and Work Method Statement prepared in accordance with the SMP; • All subsurface works for the installation of services will be undertaken by Billbergia in accordance with the SMP (EPA 2004) and SWP (refer Appendix D); • All excavated material will be classified using the OEH Waste Classification Guidelines and transported off-site for disposal; and • Monitoring will be undertaken to ensure all activities meet the requirements of the SMP, SWPs and Work Method Statements.
Minimise water quality impacts	<p>Erosion and sediment controls will be designed, installed, maintained and managed in accordance with the principles in the Site Management Plan (EPA 2004) and Managing Urban Stormwater – Soils and Construction (Landcom 2006) and would include:</p> <ul style="list-style-type: none"> • Conduct of all site works which involve breaching of the cap in accordance with the SMP and SWPs; • Installation and maintenance of silt fences around the site boundary for the duration of construction activities; • Containment of spills and treatment of affected areas; • Daily monitoring of site activities; and • Water quality monitoring as required.
Protection of flora and fauna	<ul style="list-style-type: none"> • All vegetative waste and materials potentially containing noxious weed propagules would be removed and disposed of at an appropriate waste disposal facility;

Objective	Commitment
	<ul style="list-style-type: none"> • Noxious and environmental weeds occurring within the proposed RIRP site will be controlled and suppressed during and post construction; • The REMONDIS CEMP will include measures for protection of the Environment Protection Zone and environs on the Parramatta River; and • The Environment Protection Zone will be clearly identified and marked on site.
Minimise air quality impacts off the site	<p>Dust suppression and avoidance measures will be implemented to minimise impact on air quality including, where appropriate:</p> <ul style="list-style-type: none"> • Disturbance of the minimum area necessary; • Use of watering during the trenching activity; • Watering of any exposed materials and heavily trafficked areas; • Covering stockpiles of clean fill during platform construction; • Limit vehicle speeds; and • Rehabilitation of completed sections of the site.
Protection of heritage values	<ul style="list-style-type: none"> • Known heritage sites including the grave located on the north western corner of the Billbergia site will be identified on construction maps with protection measures identified; • Prior to the commencement of future works on the site if approved, all planners and contractors involved would be made aware of the possibility (albeit limited) that as yet undiscovered Aboriginal archaeological materials may exist within (beneath) the footprint of the proposed RIRP activity areas. This would be undertaken through a site induction, which would notify all involved of their obligations under the <i>National Parks and Wildlife Act 1974</i>; • Prior to the commencement of future works on the site, all planners and contractors involved would be made aware of their obligations and responsibilities under the <i>NSW Heritage Act 1977</i> (as amended); and • In the (largely) unexpected circumstance that any Aboriginal or European objects are unearthed as a result of future works, activities would temporarily cease within the immediate vicinity of the find locality, be relocated to other areas of the site, and OEH would be contacted to advise on the appropriate course of action to allow the identified item(s) in a timely fashion to be recorded/conserved to ensure works schedules are maintained and balanced with statutory heritage requirements.
Monitoring of environmental impacts	<ul style="list-style-type: none"> • Monitoring will be undertaken during construction to assess the effectiveness of the mitigation and management measures. Where required, additional feasible and reasonable mitigation and management measures will be used.
Minimise noise impacts off the site	<ul style="list-style-type: none"> • Only equipment with appropriate noise shielding will be employed during construction; and • Construction hours will be restricted to 7am to 6pm Monday to Friday, 8am to 1pm Saturdays with no construction work on Sundays or public holidays.
Minimise traffic disruption during construction	<ul style="list-style-type: none"> • Conduct of Road Safety Audit prior to the commencement of construction; • Completion of works associated with upgrade of parking area and level crossing within 3 months of project approval;

Objective	Commitment
	<ul style="list-style-type: none"> • Employees of the site be required to park on-site; • All trucks departing the site will be required to turn left onto Grand Avenue; and • Drivers of heavy vehicles and others accessing the site will be trained or receive specific briefings to avoid conflicts with pedestrians, other drivers and rail carriages.
Minimise impacts from accidents	<ul style="list-style-type: none"> • Spills will be contained immediately; and • Bunded areas will be used for storage of oils, chemicals, toxic substances, flammable and combustible liquids and contained spills.
Protection of Local Amenity	<ul style="list-style-type: none"> • Any local construction impacts including traffic, air and noise impacts would be minimised through implementation of control measures; • During construction the extent of clearing would be kept to a minimum to maximise the screening effect of existing vegetation; • Measures to reduce visual impacts during the construction period will relate to maintenance of the construction areas in a neat and orderly state and adhering to approved vehicle movement guidelines; and • Consultation will be maintained with the local community during this phase to ensure issues are managed effectively.

Table 8.2
Operational Commitments

Objective	Commitment
ENVIRONMENTAL MANAGEMENT – PROJECT APPROVAL / DETAILED DESIGN PHASE	
<p><i>The operation of the RIRP will be undertaken in such a manner that external impacts are minimised and internal impacts are managed appropriately.</i></p> <p><i>Suitably qualified and experienced personnel will develop and implement project specific environmental management plans and procedures in consultation with relevant government agencies.</i></p>	
Site Operations	
Operational Activities to comply with Conditions of Approval and the EPL	<ul style="list-style-type: none"> • All activities on site will be undertaken in accordance with the requirements of the Conditions of Approval and the EPL; • Any changes to site operations will be reviewed to ensure they are consistent with the site approvals; • Any incidents will be managed and reported in accordance with the requirements of the Conditions of Approval and EPL. Site procedures will be reviewed and revised in response to any incidents; and • Emergency procedures will be developed as part of the OEMP.
Social	
Consultation to minimise impacts on the local community	<ul style="list-style-type: none"> • The community liaison group would encourage open dialogue with potentially affected local stakeholders, provide a channel through which concerns can be voiced directly and facilitate the integration and acceptance of this development into the local area; • Procedures would be developed to monitor and report on odour and other impacts, in the event of emissions occurring; and • The OEMP will address the potential risks to the local community and include a consultation plan.
Flooding	
Minimise impacts of flooding	<ul style="list-style-type: none"> • Emergency measures will be in place to ensure that site activities are managed during major flood events to ensure no offsite impacts from the operations.
Surface Water and Drainage	
Minimise water quality impacts	<ul style="list-style-type: none"> • The stormwater system is designed to collect all surface runoff (excluding roof water) and direct it to the collection and retention system which incorporates a First-flush system with an oil interceptor and a gross pollutant trap; • No leachate will be allowed to discharge from the site; and • Post construction inspections of the stormwater infrastructure would be undertaken to ensure their integrity.
Contaminated Soil Management	
Management of area of contaminated materials	<ul style="list-style-type: none"> • Implementation of a Subsidence Management Plan;

Objective	Commitment
	<ul style="list-style-type: none"> In the event that additional subsurface works are required they would be undertaken in accordance with the SMP (EPA 2004) and a SWP.
Flora and Fauna	
Protection of flora and fauna	<ul style="list-style-type: none"> All vegetative waste and materials potentially containing noxious weed propagules would be removed and disposed of at an appropriate waste disposal facility; Noxious and environmental weeds occurring within the site would be controlled and suppressed; The REMONDIS OEMP will include measures for protection of the Environment Protection Zone and environs on the Parramatta River; and The Environment Protection Zone will be clearly identified and marked on site.
Air Quality	
Management of dust and odour emissions to prevent off site impacts	<ul style="list-style-type: none"> No outdoor handling of materials; Traffic management procedure will include co-ordination of the delivery schedule to avoid a queue of the incoming or outgoing trucks outside the building for an extended period of time; Spill management procedures will include immediate cleanup of any spill/leakage from the incoming and outgoing trucks, identify the cause and take appropriate action to prevent any future spill/leakage incidents; Use of the rapid roller doors to minimise the escape of odour; All operations including waste delivery and processing are undertaken in an enclosed areas; Real-time processing of odourous feedstock material and raw materials will not be stockpiled for more than a day under normal operating conditions; Air management system will include ventilation hoods over emission sources; Odorous air will be recycled as far as possible through the tunnel composting system to minimise air volume into the deodorisation; Stockpiles will be managed to facilitate natural ventilation to prevent anaerobic zones; Air management system will ensure building is under slight negative pressure; Additional air curtains mounted above each fast speed roller door entrance will be installed (if required); Maintenance and on-line performance monitoring of biofilters; Maintenance of biofilters; Procedures will be implemented for waste removal, disposal and diversion in the event of disruption to Facility operations; and Maintain an odour complaint logbook. Once any complaint is made, the site manager will immediately investigate any unusual odour sources (including spill or leakage in the traffic areas) within the site boundary and take appropriate action to eliminate any unusual odour sources.
Noise	
Management of noise emissions to prevent off site impacts	<p>To minimise the noise emissions from the proposed RIRP and not exceed noise limits, the on-site management measures shall comprise a combination of:</p> <ul style="list-style-type: none"> Fitting and maintenance of appropriate mufflers on mobile equipment;

Objective	Commitment
	<ul style="list-style-type: none"> • Installation of noise hoods on engines and enclosure of noisy equipment; • No operation of shredders after 10 PM on weekdays or on the weekend; and • If necessary, noise generating activities will be restricted when wind and weather conditions are unfavourable.
Heritage	
Minimise impact on Aboriginal and Non-Aboriginal heritage sites	<ul style="list-style-type: none"> • In the (largely) unexpected circumstance that any Aboriginal or European objects are unearthed as a result of future works, activities would temporarily cease within the vicinity of the find locality, be relocated to other areas of the site, and OEH be contacted to advise on the appropriate course of action to allow the identified item(s) in a timely fashion to be recorded/conserved to ensure works schedules are maintained and balanced with statutory heritage requirements.
Visual and Landscaping	
Maintenance of existing visual and landscape values Integrate urban design scheme for the project	<ul style="list-style-type: none"> • The lighting design for the site will aim to avoid highlighting prominent built form such as the main buildings, minimise the spill of light into surrounding sites and ensure that all lighting associated with the development complies with <i>Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting</i>; • Implementation of the site Landscape Master Plan which includes mitigation measures in relation to visual impact; • Tree planting would be undertaken at strategic locations around the site and along boundaries adjacent to potentially affected properties where possible; • Colours for built elements would be recessive or neutral where possible and overall be sympathetic with the tone of the surrounding landscape character. • Site revegetation and landscaping will predominantly incorporate native endemic species; and • Maintenance of landscaped areas.
Monitoring	
Ensure compliance with legal requirements Ensure activities are not impacting on the local environment or the local community	<ul style="list-style-type: none"> • Regular monitoring will be undertaken in accordance with the requirements of the EPL and Conditions of Approval; and • Monitoring results will be reported to the Community Liaison Group and other interested Stakeholders.
Waste	
Management in accordance with government policies	<ul style="list-style-type: none"> • The objective of the RIRP is to meet the objectives of national and NSW government policies particularly in relation to minimising waste to landfill and monitoring resource recovery; • Any residual waste materials will be disposed at the appropriate waste facility; • Compliance with The Raw Mulch Exemption 2008; • Compliance with The Food Waste Compost Exemption 2008; and • Compliance with General Resource Recovery Exemption for derived outputs from mixed wastes.

Objective	Commitment
Traffic	
Management of RIRP traffic flows on and off the site	<ul style="list-style-type: none"> • The access road will be one way to facilitate traffic flows; • Traffic controls (give-way, keep clear signage etc) will be installed as appropriate; • Traffic management procedure will include co-ordination of the delivery schedule to avoid a queue of the incoming or outgoing trucks outside the shed for an extended period of time; • Trucks leaving the site will be instructed to turn left onto Grand Avenue; • Employees of the site be required to park on-site; and • Drivers of heavy vehicles and others accessing the site be trained or receive specific briefings to avoid conflicts with pedestrians, other drivers and rail carriages.
Hazards	
Management of operations to minimise hazards	<ul style="list-style-type: none"> • Spill management procedure will include immediate cleanup of any spill/leakage from the incoming and outgoing trucks, identify the cause and take appropriate action to prevent any future spill/leakage incidents; and • Ongoing consultation with RailCorp, Billbergia, the RTA and Parramatta Council in relation to proposed works in the area adjacent to the site entry.
Consultation	
Consultation will be maintained with stakeholders to ensure issues are being managed and legal requirements are being met	<p>Consultation will be maintained with:</p> <ul style="list-style-type: none"> • Parramatta Council; • DoPI; • OEH; • RTA; • RailCorp; • Adjoining property holders; and • Billbergia.