

	Picton WHSE-006 Picton Operational Environment Management Plan (OEMP)		Version No:	V01
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1. Purpose

This document describes the Operation Environmental Management Plan (OEMP) implemented by Allied Pinnacle Pty Ltd and its contractors during the operation of the Allied Pinnacle Flour Mill at Maldon, in the Wollondilly Local Government Area (LGA).

This OEMP responds to the specific requirements of the Consent Conditions for Development Application DA-318-12-2004-I, as modified by Modification 3 approved on 30 November 2017.

1.1 Requirements for this plan

The purpose of this plan is to detail an environmental management framework, practices and procedures to be followed during operation of the development. The controls documented in this management plan seek to address the requirements of the Department of Planning and Environment (DPE), the Australian Rail and Track Corporation (ARTC), Wollondilly Shire Council (Council) and the Environment Protection Authority (EPA).

Consent condition 5.3 requires the OEMP to specifically address the requirements outlined in Table 1. Table 1 also provides a reference to where the requirements have been addressed in this plan.

Table 1 – Requirements of consent conditions 5.3

Requirements	Reference to this plan
a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals, and consultations;	Section 3
b) a description of the roles and responsibilities for all relevant employees involved in the operation of the development;	Section 4
c) overall environmental policies and principles to be applied to the operation of the development;	Section 5
d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved, where appropriate;	Section 5.5 and 6.1
e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this consent; and	Section 6
f) the Management Plans listed under condition 5.4 of this consent.	Section 6 Appendix A-E

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In addition the OEMP also addresses the consent conditions outlined in Table 2.

Table 2 – Other relevant consent conditions

Consent condition		Requirements	Reference to the plan
1.3	Statutory requirements	The Applicant shall ensure that all licences, permits, and approvals are obtained and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals.	Section 3
3.3	Auditing	Twelve months after the commencement of operation of the development, and every three years thereafter, or as otherwise agreed or required by the Secretary, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Secretary prior to the commencement of the Audit. An Environmental Audit Report shall be submitted for the approval of the Secretary within one month of the completion of the Audit. The audit shall:...	Section 5.5.1
4.3	Complaints Register	The Applicant shall record details of all complaints received through the means listed under condition 4.2 of this consent in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the EPA and the Secretary upon request.	Section 5.4.2
6.1	Incident reporting	The Applicant shall notify the EPA and the Secretary of any incident with actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred.	Section 5.7.2
6.2	Incident reporting	The Applicant shall meet the requirements of the Secretary to address the cause or impact of any incident, as it relates to this	Section 5.7.2

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		<p>consent, reported in accordance with condition 6.1, within such period as the Secretary may require.</p> <p>Note: Condition 6.2 of this consent does not limit or preclude the EPA from requiring any action to address the cause or impact of any incident, in the context of the EPA’s statutory role in relation to the development.</p>	
6.3	Annual Performance Reporting	<p>The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Secretary, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to:...</p>	Section 5.8

1.2 Scope of the Picton Operational Environment Management Plan (OEMP)

The OEMP covers operations involved in the milling process at the site and draws particular attention to aspects potentially impacting on the environment.

The OEMP outlines environmental responsibilities and provides practical guidance on the implementation of environmental management procedures relating to site operations. Areas of risk are examined and corresponding mitigation measures such as environmental monitoring are outlined.

As per the consent conditions, particular attention has been paid to the key areas of environmental significance associated with the development. These areas include:

- Noise management
- Water monitoring and management
- Traffic management
- Cultural heritage
- Landscape management

Detailed management requirements for these aspects are addressed in sub-plans to this OEMP.

1.3 Objectives of the Picton Operational Environment Management Plan (OEMP)

The objectives of this OEMP are to:

- Provide an operational framework demonstrating Allied Pinnacle’s commitment to conduct all operational activities in a manner that minimises impacts to the physical, biological, cultural, and social environment
- Ensure that impacts are minimised or avoided during the operation phase
- Ensure that all Allied Pinnacle’ employees and Contractors involved in the operational activities on the site, are aware of their environmental responsibilities and are proactive in their approach to environmental management
- Comply with relevant legislative requirements

Under the contractual arrangements for the operations of the site, all workers, contractors and sub-contractors undertaking work during operations must comply with this OEMP.



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Abbreviation	Details
ARTC	Australian Rail Track Authority
CBNTCAC	Cubbitch Barta Native Title Claimants Aboriginal Corporation CoC
DA	Development Application
DCP	Development Control Plan
DIPNR	Department of Infrastructure, Planning and Natural Resources
DPE	Department of Planning and Environment
EMS	Environmental Management System
EMP	Environmental Management Plan
EPA	Environmental Protection Authority
EP & A	Environmental Planning and Assessment Act 1979
EPL	Environment Protection Licence
EIS	Environment Impact Statement
LEP	Local Environmental Plan
LGA	Local Government Area
OE	Office of Environment and Heritage
OEMP	Operation Environmental Management Plan
POEO	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
TLALC	Tharawal Local Aboriginal Land Council

2. Operations

2.1 Overview

Milling operations cannot proceed on the site without the consideration of a number of factors that may have an impact on the surrounding environment and community if not managed appropriately.

The issue of wastewater management holds some significance when the proximity of the mill to regional catchments is examined.

The operations will generate noise and traffic to a degree and the levels, impacts and mitigation measures should be implemented to adequately protect the local community.

The site is surrounded by rural and industrial zoned land. Landscaping measures should reflect Allied Pinnacle’s objective to minimise impacts on the visual amenity in the area.

The mill is situated within a culturally sensitive area and operations should be undertaken in such a way as to minimise impacts on Aboriginal heritage.

The OEMP is designed to address these areas of key environmental significance within an operational framework, whilst demonstrating the procedures in place to ensure operations will be undertaken in a manner that is consistent with the relevant provisions of the Consent Conditions and Environment Protection Licence (EPL).

As a working document, this OEMP will be under periodic review and monitoring to provide all stakeholders involved with an assurance that the environmental impacts have been recognised and are being managed appropriately.



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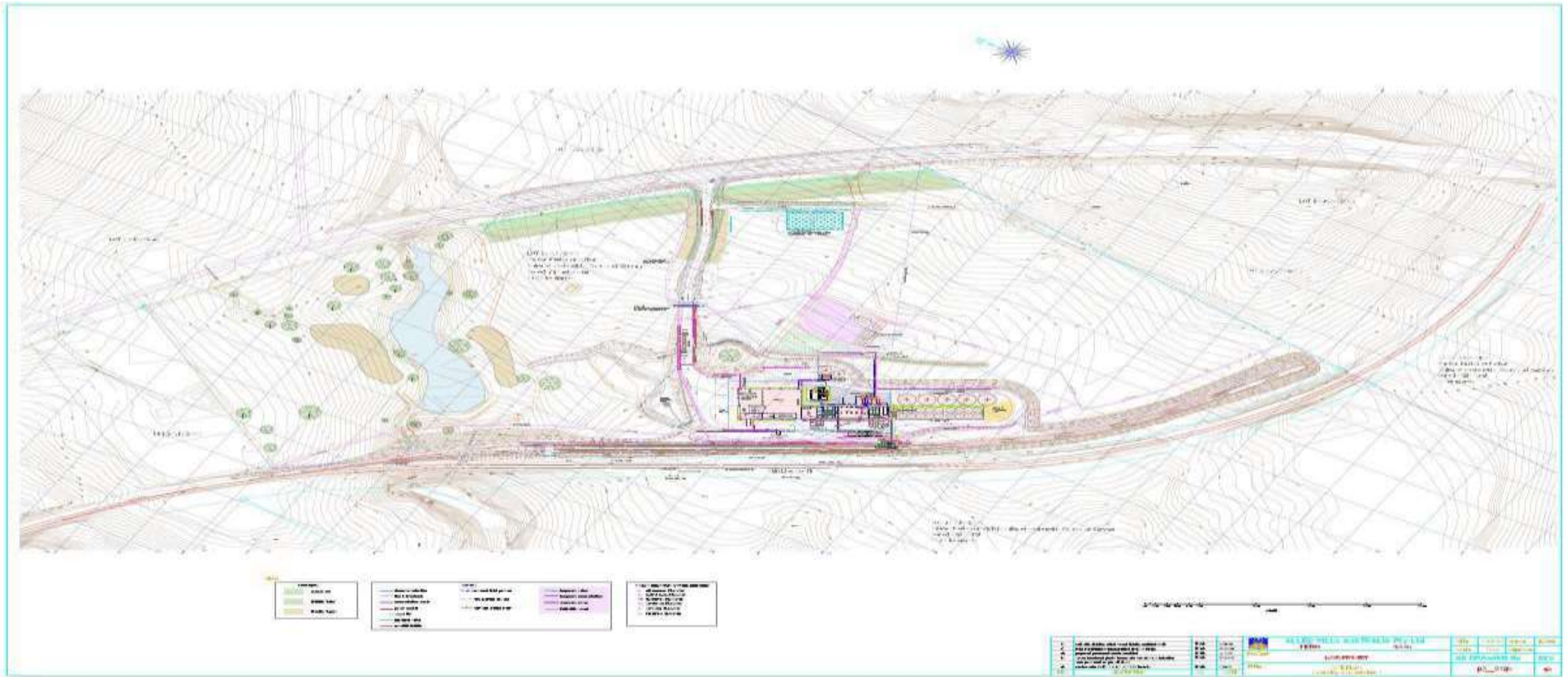
2.2 Operational activities

The mill is capable of processing up to 300,000 tonnes a year of wheat and maize, with a corresponding 300,000 tonnes a year output from the milling process (not including a small amount of moisture that is added to the product during the milling process).

The operations summarised in this section provide an overall view of the processes on site that have the most influence on the surrounding environment. An overview of the site is shown on Figure 1.

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Figure 1 Extent of Operation



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2.2.1 Flour and Maize Mill Operations

Grain Intake

The grain intake plant is one of the key elements of the milling operations, processing up to approximately 300,000 tonnes per year of grain.

All grain is received through a combination of rail and road deliveries.

Grain is received on site using the grain intake facility located under the rail siding, where an intake pit will receive grain from either rail or road transport.

The grain is transported to the bulk storage bins via an underground conduit directly connected to the elevator pit.

Grain Bulk Storage

Wheat is stored on site in the wheat silos.

These are connected to the main plant by chain conveyors. In addition to the main storage facility, the wheat cleaning plants also require separate storage bin capacity.

Grain Cleaning Process

Pre-cleaning of incoming grain involves screening (to remove metal and other impurities) and aspiration (drawing air through the grain to extract light impurities).

As part of the cleaning process, water is sprayed onto the grain and absorbed at a rate of up to 5% of dry grain weight (a process known as tempering).

A second tempering is carried out for the application of additional water at a rate of up to 3% of grain weight. Collected screenings (impurities) are graded and passed to a ground screenings bin in the screenings disposal plant.

Milling Process

Both wheat and maize is processed by wheat and maize milling technology.

Wheat based products such as fine low ash flours, baker's flours, biscuit flours, wheat semolinas, general purpose flours, noodle flours and wholemeal flours are produced on the wheat mill.

The maize milling plant is designed primarily for the production of maize products (flaking grits, semolinas, polenta and residual flour).

Finished Product Storage

The finished product is stored in the following structures:

- concrete storage bins for flour storage
- flour blending bins
- mill mix storage bins
- specialty product storage bins
- wholemeal storage bins

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Out-loading

Finished product is dispatched from the plant by:

- packing into bags and on to pallets for loading onto flat-bed trucks (approximately 20-40% of finished products)
- bulk loading into tankers for removal by truck (approximately 60-80% of finished products, including all by-products)

Bag Packing

Bag packing may be required 24 hours a day, seven days a week, and is executed by a fully automated flour packing system. Trucks reverse into the packaged product loading area and are loaded by fork lift.

Bulk Loading

Bulk out-loading occurs using a rapid loading system to handle flour that is then deposited into tankers or waiting trucks. Approximately 80% of the production output for flour, semolina and wholemeal is in bulk. The bulk flour out-loading system can accommodate approximately 25 to 30 tanker loads a day.

By-product Handling

The only by-product of the process is grain husks ('mill mix'), which requires storage before being loaded into open top transport.

From the storage bins, this by-product is transported in bulk to a pellet mill, to be turned into animal feed. Two storage and bulk out-loading silos allow rapid loading into open top trucks.

The system meets a standard free of product spillage and dust emission, and the trucks are housed in a completely enclosed loading area.

Administration and General Maintenance Facilities

There are several ancillary areas within the plant, including:

- a small onsite laboratory, used for testing the physical properties of the raw grains and the quality of the finished products
- materials and finished products
- control centre area
- maintenance area
- administrative/office area

2.2.2 Transport operations

Operations involve the delivery of grain by rail unless issues with the rail network result in the use of trucks for incoming grain as a contingency measure.

Trains arrive at different times but will only unload between the hours of 7am to 7pm. It is anticipated that one train will arrive every two days.

Trucks will be used to take the processed product from the site and operate 24 hours a day, 7 days a week depending on production flows. B-doubles and semi-trailers transport the flour, which forms approximately 80% of the processed product.

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Trucks with trailers and bogies transport the mill mix, which is a by-product of the milling process and represents the other 20% of product to be produced by the mill. Truck operations including deliveries, are approximately 30 vehicles per day making up to 60 trips in and out of the site.

Access to the site is via a two-lane, eight-metre-wide road, with direct access onto Picton Road.

The haul road is connected to Picton Road via a 'Type C' style intersection (in accordance with Roads and Maritimes Services (RMS) requirements).

Access to properties to the east of the site is provided by a spur road from the main access road. The internal road system is divided into designated private car and heavy freight vehicle areas, to minimise traffic-related conflicts.

2.2.3 Water management

The milling process at the Picton site consumes potable water to maintain suitable moisture content in the grain and, as the grain absorbs all of the water, there is no liquid waste generated by this process.

Bioswales and drainage lines have been developed around the facility to maintain the surface water and water table quality.

Measures such as grading away from buildings and bunding assist in directing the movement of surface water away from built areas whilst the presence of spill kits provide added protection to surface water and groundwater from contamination in the event of a spill.

Systems have been established to manage water on site and include:

- Sprinkler irrigation area developed to manage liquids separated by the biocycle treatment process
- Drainage lines and bio-swales to control and redirect water flows
- Bunding around storage areas to limit the accumulation of surface water runoff

2.2.4 Waste water management

Domestic wastewater is generated from the onsite staff amenities.

All domestic wastewater is treated on site as there is no municipal sewer connection.

The water is treated by means of a small package sewage treatment plant.

The plant comprises of a septic tank, primary aeration tanks, and secondary aeration tanks that clarify and chlorinate the water.

The treated effluent is disposed of by irrigation to land within the mill site.

Waste waters generated from the onsite laboratory are kept isolated from stormwater drainage and from domestic wastewater systems and are disposed of in a controlled manner.

The milling process is described as a 'zero-waste process'.

The process water added during the milling process is wholly consumed, and no liquid process waste streams are discharged from the mill.

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The sewage treatment plant is designed for a maximum daily flow of 3000L/day and serves as a low maintenance system that treats only domestic wastewater, preventing offensive odours in the process.

3. Regulatory Requirements

3.1 Project Documentation

The OEMP outlines the statutory and other obligations applicable to the project as stipulated in the relevant provisions of the:

- Development Application DA-318-12-2004-i lodged with the Department of Infrastructure, Planning and Natural Resources (DIPNR) on 23rd December 2004
- Consent Conditions MODs 1 to 3 dated 30 November 2017 issue by DPE
- EPL 12498 issued by the NSW Environment Protection Authority (EPA)
- Environmental Impact Statement (EIS) for Grain Milling Facility, Picton Road, Maldon, prepared by Kellogg Brown and Root Pty Ltd, dated 22 December 2004
- Additional information relating to air quality, traffic, waste water, visual amenity impacts and responding to issues raised in submissions prepared by Kellogg Brown and Root Pty Ltd, including the Visual Assessment: Additional Information report prepared by Garry Stanley dated March 2004, all submitted to DPE on 12 April 2005
- Aboriginal Heritage Assessment, Final Report for the Proposed Allied Mills Flour Mill, Picton NSW, prepared by Austral Archaeology Pty Ltd, dated May 2005, and submitted to DPE 2 June 2005
- Additional information relating to operational noise prepared by Heggies Australia dated 10 June 2005
- Review of wastewater treatment and effluent application to land, Allied Mills Pty Ltd – Picton Mill, 2016 prepared by Landfax Laboratory

3.2 Statutory instruments

This section provides a summary of the statutory instruments applicable to the operation of the site. Copies of the Allied Pinnacle statutory instruments are available at the Allied Pinnacle Picton office or on the Allied Pinnacle webpage at:

<https://alliedpinnacle.com/whs/picton/>

3.2.1 Development Consent Conditions

The EIS for the construction and operations of Allied Pinnacle' Picton Flour Mill works was prepared to satisfy the requirements of Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act), and Schedule 3 of the Environmental Planning and Assessment Regulations.

The EIS was assessed by the DPE in consultation with other relevant authorities. Development consent was required under part 4 of the EP&A Act.

The EIS went on public exhibition and received approval from the Minister for Planning on 9th August 2005 and as modified by MOD1 (approved 11 June 2007), MOD2 (approved 11 February 2008) and MOD3 (approved 30 November 2017).

The Consent Conditions outline various reporting conditions which Allied Pinnacle need to meet in order to comply with the Consent Conditions. These include:

- Independent Audit every three years
- Annual Environmental Management Report
- Environmental monitoring

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3.2.2 Environment Protection Licence (EPL)

EPL12498 issued by the EPA under the provisions of the POEO Act regulates the operation of agricultural crop processing at the Allied Pinnacle Flour Mill.

The license permits the Scheduled Activity - Agricultural Processing of between 100,000 - 250,000 tonnes annual processing capacity. The EPL must be reviewed at least every five years after being issued.

According to license requirements, an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the license (including the recording of complaints), must be submitted to the EPA. This OEMP provides the framework for managing environmental risk including compliance with the EPL.

3.3 Legislation

Legislation and guidelines related to site operations and the broad implication of these are listed in Table 3.

Allied Pinnacle will seek to ensure that the relevant provisions of legislation and guidelines are complied with during site operations by a review as required, or at least every three years.

Table 3 Legislation Summary

Legislation/Guidelines	Summary/Function	Applicability
Commonwealth Legislation		
Environment Protection and Biodiversity Conservation Act 1999	To provide for the protection of Matters of National Environmental Significance.	Site operations do not have any impacts upon Matters of National Environmental Significance.
NSW Legislation		
Contaminated Land Management Act, 1997	To establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation.	The EPA must be notified where an activity has resulted in contamination or contaminated land is discovered at the site where the contaminants exceed the relevant criteria. This OEMP details the regulatory notification requirements to be implemented in the event of activities causing contaminated land or the discovery of contaminated land.
Environmental Planning and Assessment Act 1979	To provide a framework for the formal assessment of proposed development in NSW to confirm its compliance with planning controls.	Picton Mill operates under DA-318-12-2007-i as modified. Any proposed changes to the site and its operations may be subject to assessment and approval under the Act.
Heritage Act 1977	To protect natural, cultural and built heritage in NSW by allowing heritage items or places to be	No natural, cultural or built heritage is located on the site.



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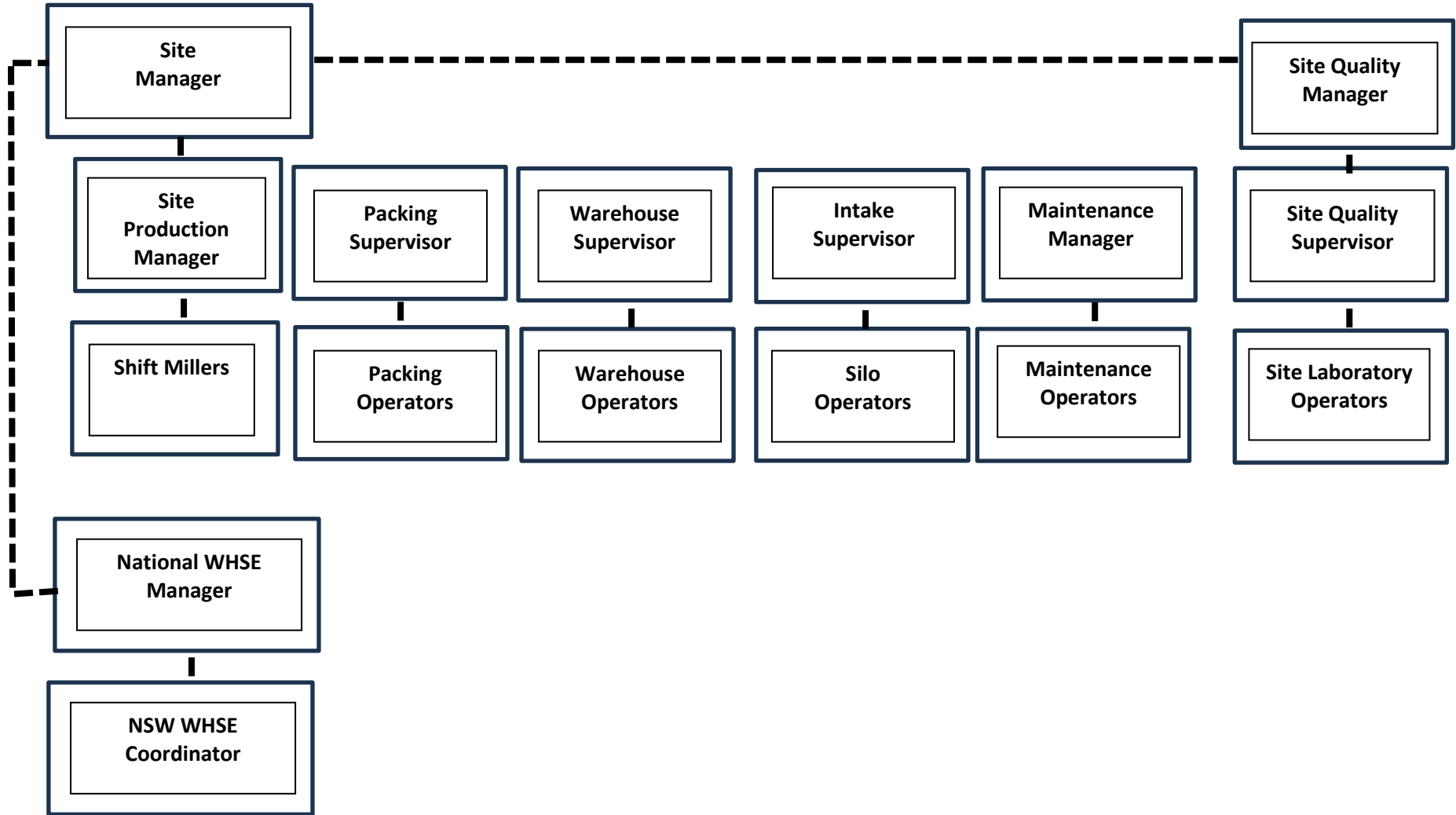
	<p>listed on the State Heritage Register, and for interim heritage orders to be made to protect heritage items or places.</p> <p><i>Note: this Act does not apply to Aboriginal Heritage, which is managed under the provisions of the National Parks & Wildlife Act 1974.</i></p>	
National Parks & Wildlife Act 1974	To administer national parks and reserves in NSW, and to protect and conserve flora and fauna, Aboriginal places, and Aboriginal objects.	<p>Aboriginal objects are located on the site.</p> <p>It is an offence under the Act to harm or desecrate an Aboriginal object or place. Any aboriginal heritage items to be salvaged or destroyed will require consent under Section 90 of the Act, in the form of an Aboriginal Heritage Impact Permit (AHIP).</p> <p>The scarred tree (AMP ST 1) has specific protection requirements detailed in the CoA.</p>
Native Vegetation Act 2003	To protect native vegetation of high conservation value and prevent broadscale clearing of native vegetation in NSW.	<p>No rare or threatened flora species are known to occur on the site.</p> <p>Site operations do not require the disturbance of vegetated areas.</p>
Noxious Weeds Act 1993	To reduce the negative impact of weeds on the economy, community, and environment of NSW.	The management of weeds on site must be compliant with the requirements of this Act.
Protection of the Environment Operations Act, 1997	To regulate pollution in NSW through providing a system for licensing polluting activities, issuing environment protection notices and penalty notices.	<p>Picton Mill undertakes the Scheduled Activity Agricultural Processing under EPL12498.</p> <p>Site operations must be compliant with the requirements of the licence.</p>
Roads Act 1993	To regulate the carrying out of various activities on public road.	Access to Picton Road is compliant with the requirements of this Act.
Wollondilly Local Environmental Plan 2011	To make local environmental planning provisions for land in Wollondilly.	Any proposed changes to the site and its operations may be subject to the requirements of the LEP.



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4. Environmental Responsibilities





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Table 4. Roles and Responsibilities

Role	Reports to	Responsibilities
Site Manager	Central Management Team	<ul style="list-style-type: none"> • Monitor activities against the Consent Conditions, the EPL, the OEMP and associated sub plans to maintain compliance. • Oversee the implementation of the OEMP and associated sub-plans • Update and review the OEMP and associated sub plans, as required • Review the environmental risk assessment following a change in operations or following an incident or complaint • Ensure all personnel on site including contractors have completed the environmental awareness induction and attend toolbox discussions as required • Maintain communications with Government Authorities and other stakeholders • Ensure that all complaints and incidents are recorded in Incident reporting Database • Investigate all non-compliances, complaints, and incidents, identify corrective and preventative actions and ensure actions are implemented and monitored • Ensure all environmental audits, monitoring, inspections, and reporting is undertaken in accordance with this OEMP. • Ensure all reporting to Government Authorities is submitted in a timely manner • Ensure all environmental incidents are recorded in accordance with procedures and mitigation measures are implemented to minimise the possibility of the same incident happening again • Has the authority and independence to recommend the implementation of reasonable mitigation measures to avoid or minimise unintended or adverse environmental impacts
Area Managers	Site Manager	<ul style="list-style-type: none"> • Monitor that all personnel (including subcontractors) are aware of responsibilities with respect to the environment and the requirements of the OEMP • Provide support to site staff on environmental issues and OEMP implementation • Advise Site Manager on all emerging environmental issues, including suggestions for mitigation • Ensure that all environmental incidents are immediately reported to the Site Manager • Ensure that corrective actions arising out of reviews, inspections and environmental incidents are implemented in a timely and satisfactory manner • Receive, develop, and implement actions to address community complaints and incidents in consultation with the Site Manager, and others in the team • Input of complaints, records of community contact and other relevant information into Incident Reporting Database

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Operators	Relevant Area Managers/Supervisors	<ul style="list-style-type: none"> Follow instructions and procedures stipulated in the environmental awareness/induction training program Install environmental controls as directed by Site Managers Maintain environmental controls to ensure they remain effective Report environmental incidents to Area Managers or the Site Manager as soon as practicable Carry out corrective and preventative actions as directed by Area Managers or the Site Manager
Contractors	Relevant Area Managers/Supervisors	<ul style="list-style-type: none"> Follow instructions and procedures stipulated in the environmental awareness/induction training program Report environmental incidents to Area Managers or the Site Manager as soon as practicable

5. Environmental management

5.1 Environmental management framework

Allied Pinnacle’s approach integrates environmental management systems into the production framework as a corporate responsibility and in order to maintain a high standard of quality control as a business centred on the food industry.

The management system supports the company’s compliance with legislated and voluntary environmental obligations as well as continuously improving their overall environmental performance.

Allied Pinnacle is committed to an ethical business approach through:

- Compliance with the law
- Honouring business obligations
- Ensuring absolute integrity

Allied Pinnacle recognise the importance of adhering to stringent product quality, safety, and environmental standards and take such standards very seriously in their constant quest to maintain the highest standards of consistency, reliability, and environmentally responsible practices that customers expect in Allied Pinnacle products.

Allied Pinnacle documents their commitment to environmental performance through their Work, Health Safety Environment and Rehabilitation Policy

Refer to WHSE-Form-02 Allied Pinnacle and Champion Flour WHSE & Rehab Policy

5.2 Environmental risk assessment

The Environmental Risk Register in **Section 5.2.3** and the relevant sub-plans in **Section 6** of this OEMP both provide a framework for the environmental risks associated with the operation of the site.

In order to calculate and assess the likelihood, consequences and risk rating of these environmental risks and others that may emerge as the milling operations progress, a process has been established by Allied Pinnacle that can be utilised by workers and management alike.

This process is consistent with the Allied Pinnacle risk management process and adapted for determining environmental risks for this OEMP.



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5.2.1 Risk Assessment

The following tables outline the risk assessment process.

This will determine the type and level of environmental protection measures that will be required.

Where a significant risk to the environment has been identified, environmental protection measures must be introduced to reduce the risk to an acceptable level within a suitable time frame.

Aspects with a medium or low risk should also have practicable management measures implemented if these can further reduce risk.

Table 5 Risk Matrix

Potential Severity Matrix					
Most likely consequence	Likelihood				
	Almost certain will occur	Good chance could occur	Likely to occur	Unlikely to occur	Extremely unlikely to occur
Disastrous	25	24	22	19	15
Critical	23	21	18	14	10
Serious	20	17	13	9	6
Significant	16	12	8	5	3
Minor	11	7	4	2	1

Table 6 Consequences

Consequences	Injury	WHS & E Loss of Containment
Disastrous	Fatality.	<ul style="list-style-type: none"> Extensive damage to property or equipment. Extensive public alarm, media coverage. Extensive disruption to the public. Extensive environmental impact.
Critical	Disabling injury, i.e. amputation and/or permanent loss of bodily function.	<ul style="list-style-type: none"> Major damage to equipment. Major public alarm, attracting media attention. Major disruption to public activities. Major environmental impact.
Serious	An injury resulting in more than 1 week off normal duties.	<ul style="list-style-type: none"> Serious damage to equipment. Serious public alarm. Serious disruption to public activities. Serious environmental impact.
Significant	An injury resulting in less than 1 week off normal duties.	<ul style="list-style-type: none"> Negligible damage to equipment. Negligible public alarm. Negligible disruption to public activities.

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Minor	Minor first aid injury.	<ul style="list-style-type: none"> • Negligible environmental impact. • No damage to equipment. • No public alarm. • No disruption to public activities. • No environmental impact.
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Table 7 Recommendation time frames

Risk Score	Level of risk	Recommended Action
20-25	Category 1 High risk	<ul style="list-style-type: none"> • Immediately implement effective interim controls before task commences. • Long term control strategies shall be implemented as soon possible
14-19	Category 2 Moderate risk	<ul style="list-style-type: none"> • Communicate hazard details to affected personnel. • Action required to control hazard within 1 week
8-13	Category 3 Low risk	<ul style="list-style-type: none"> • Communicate hazard details to affected personnel. • Action required to control hazard within 1 month.
1-7	Category 4 very low risk	<ul style="list-style-type: none"> • Raise team awareness. • Action required within 3 months.

5.2.2 Control of risk

The Site Manager shall determine how the risks can be successfully mitigated to ensure sound environmental management.

Refer to WHSE-008 Hazard ID, risk assessment and control measures

This includes updating the OEMP and associated sub-plans to cover any further identified management measures and mitigation strategies.

It is the responsibility of the Site Manager and relevant Area Managers to ensure that all personnel are aware of the nature and implications of any changes to the operational activities associated with the milling process.

5.2.3 Environmental aspects and impacts register

Environmental aspects and potential adverse environmental impacts relevant to the operation of the Allied Pinnacle Flour Mill were identified during the EIS and approval phases of this development.

These aspects and impacts are summarised in Table 8.

Environmental Aspect	Potential Impacts	Reference
Waste Water Management	Effluent contamination of groundwater or surface water catchment area.	Appendix B – Soil & Water Management Sub-Plan
Chemical Storage	Leakages from chlorine nook into groundwater and surface water. Emission of chlorine to the atmosphere as a vapour.	Picton WHSE-001 Picton PIRMP Section 4.12 Hazard Identification, Risk Analysis and Management measures
Spill Management	Spills of fuels or oils impacting on groundwater and surface water quality.	Picton WHSE-001 Picton PIRMP Section 4.12 Hazard Identification, Risk Analysis and Management measures
Operational Noise Impacts	Significant noise impacts on surrounding community through milling and transport operations.	Appendix A – Operational Noise and Vibration Management Sub Plan

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Air Quality	Dust plume over mill and neighbouring properties through grain receipt and handling.	Picton WHSE-001 Picton PIRMP Section 4.12 Hazard Identification, Risk Analysis and Management measures
Fire Management	Dust explosion at grain / product storage involving grain or flour dust. Fire involving timber pallets and packing paper impacting on surrounding flora, fauna, and heritage items.	Picton WHSE-005 Picton Emergency Response Plan
Visual Amenity	Visual impacts on nearby properties and the surrounding roads.	Appendix E – Landscape Management Sub Plan
Heritage Items	Direct or indirect impacts on items of indigenous or non-indigenous heritage value.	Appendix D – Cultural Heritage Management Sub Plan

The environmental risk register and risks identified in each of the sub-plans attached to this OEMP should be reviewed by the Site Manager following a change in operations or following an incident or complaint.

A closer assessment of environmental risks associated with site operations is undertaken within each sub-plan attached to this OEMP, as required by Condition 5.4.

5.3 Environment awareness training and internal communications

All personnel involved in operations at the site receives a base level of environmental awareness and induction training prior to commencing work on the site.

The environmental component to the site general induction broadly addresses the environmental aspects, risks and mitigation measures outlined in this OEMP.

The site induction training is delivered by completing an electronic induction.

Additional environmental communications or training may be required

- when site environmental measures are found to be inadequate to manage potential or actual environmental impacts, and/or a change in the scope of operations occurs
- when refresher training is required on the Allied Pinnacle’s obligations under the Consent Conditions, EPL or this OEMP
- in response to specific environmental issues or concerns, requests by Authorities or any changes on site that affect the environmental aspects of the operations

Additional communications would typically be delivered through management reviews or meetings.

Additional training would typically be delivered through additional inductions or toolbox discussions.



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5.4 External communications

5.4.1 Regulatory, community and stakeholder communications

The operation of the site involves communication with members of the community, regulators, and stakeholders at various levels.

Allied Pinnacle ensures that operations are supported by open communication throughout the life of the works, not just in response to incidents or complaints.

The following stakeholders have been identified as relevant to the operations at this site:

- Department of Planning and Environment (DPE)
- Environment Protection Authority (EPA)
- Roads and Maritime Services (RMS)
- Office of Environment & Heritage (OEH)
- Wollondilly City Council (Council)
- Sydney Water Corporation (Sydney Water)
- NSW Department of Primary Industries (DPI)
- Tharawal Local Aboriginal Land Council (Tharawal LALC)
- Cubbitch Barta Native Title Claimants
- Aboriginal Corporation (Cubbitch Barta NTCAC)
- Australian Rail Track Corporation (ARTC)
- Community including neighbouring residents and businesses.

Allied Pinnacle will proactively liaise with all external stakeholders (as applicable) to inform them of any changes to site operations or activities that may cause change in off-site environmental or community impacts.

5.4.2 Complaints management process

Allied Pinnacle record the details of all complaints received in the Incident Reporting Database.

Refer to WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work

The database includes:

- the date and time of the complaint
- the means by which the complaint was made (e.g. telephone, email, mail, in person)
- any personal details of the complainant that were provided, or if no details were provided a note to that effect
- the nature of the complaint
- the time taken to respond to the complaint
- any investigations and actions taken by Allied Pinnacle in relation to the complaint
- any follow-up contact with, and feedback from, the complainant
- if no action was taken by Allied Pinnacle in relation to the complaint, the reason(s) why no action was taken

5.5 Environmental surveillance

Environmental surveillance is undertaken to periodically review the performance of the operations and monitor compliance with regulatory requirements as outlined in the Consent Conditions, the EPL and this OEMP.

Environmental surveillance comprises environmental audits, monitoring, and inspections.

A summary of environmental audits, monitoring and inspections required by the OEMP is provided in the **Picton WHSE-012 Picton Combined Implementation Checklist (Appendix F)**

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The environmental audits, monitoring and inspections are programmed and scheduled alongside operational inspections using the “MEX Plant Maintenance Program” as well as the annual review the Site PIRMP.

Refer to Picton WHSE-001 Picton PIRMP

5.5.1 Environmental Audits

An environmental audit shall be undertaken every three years in accordance with the requirements of consent condition 3.3. The audit shall be undertaken by a person or team independent of the operations and approved by the Secretary of DPE.

Internal compliance reviews shall be undertaken by a person or team nominated by the Site Manager. Internal compliance reviews are undertaken in preparation for the Annual Environmental Management Report required by consent condition 6.3 and the Annual Return for the EPL.

5.5.2 Monitoring

Environmental monitoring is specified within each sub-plan attached to this OEMP (Appendix A to Appendix E).

5.5.3 Inspections

Environmental site inspections shall be undertaken by staff nominated by the Site Manager on a periodic basis, typically quarterly or six months, as specified within each sub-plan attached to this OEMP.

5.6 Non-compliances

Non-compliances or potential non-compliances are situations or events that do not comply with the safeguards and procedures stipulated in this OEMP.

Non-compliances or potential non-compliances may be identified in any of the following situations:

- As part of site inspections, supervision or monitoring of normal activities
- Incident investigation reviews
- During internal or external audits
- Review of legal compliance for licences and dangerous goods
- Complaint investigations

Where non-compliance cannot be resolved by site staff and relevant Area Managers in the first instance, the non-compliance shall be recorded in the Incident Reporting Database.

5.7 Environmental incident management

5.7.1 Environmental incident response procedure

The site has a statutory obligation to respond to incidents in accordance with the site’s Pollution Incident Response Management Plan (PIRMP).

Refer to Picton WHSE-001 Picton PIRMP

A PIRMP is required under the *Protection of the Environment Operations Act 1997* (POEO Act) for all EPL holders.

A copy of the PIRMP is available on site and on the Allied Pinnacle – Picton webpage as well

<https://alliedpinnacle.com/whs/picton/>

5.7.2 Notifying the Secretary of an Incident

In addition to the statutory obligations of the PIRMP, the Site Manager shall, in accordance with consent conditions 6.1 and 6.2:

- notify the EPA and the Secretary of any incident with actual or potential significant off-site impacts on

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- people or the biophysical environment within 12¹ hours of becoming aware of the incident provide full written details of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred

¹Note: The PIRMP requires “immediate” notification to relevant agencies. This OEMP does not override that requirement.

5.7.3 Incident investigation

The Site Manager must be involved in the investigative process as the point of contact for all environmental issues related to the site.

All site workers and contractors must be made aware of the requirement to report any environmental incidents and participate in incident investigations.

A collaborative effort must be made to ensure that the cause of the incident is identified in order to establish the most suitable methods for preventing recurrence.

Details of the incident investigation are recorded in the Incident Reporting Database.

5.8 Reporting to authorities

Allied Pinnacle obligations to report to relevant authorities are summarised in Table 9.

Table 9 – Summary of reporting obligations

Obigation	Report	Frequency
CoA 5.8	AWTS Maintenance and Monitoring Requirements	Quarterly
EPL Clause R1	Annual Return	Annually
CoA 6.3	Annual Environmental Management report	Annually
CoA 3.3	Independent Environmental Audit	Once every 3 years
NVMP	Periodic compliance noise monitoring	Once every 3 years
CoA 5.5	Update the OEMP	Once every 3 years
CoA 6.1 and 6.2 Picton WHSE-001 Picton PIRMP	Incident Reporting	Event Based
CoA 6.1	Compliance update as may be required by the Secretary	As required
NVMP	Within 28 days of completing noise monitoring any non-compliance with the noise criterion shall be reported to the EPA and the Director-General	As required

5.9 Document controls

Environmental records will be maintained to provide evidence of the effective operation of this OEMP. Such records include:

- Correspondence to/from stakeholders and interested parties.
- Permits, licences and approvals
- Induction and training records
- Environmental complaints and Incident reports
- MEX Plant Maintenance System including non-compliance reports
- Implementation checklist
- Independent audit reports



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6. Implementation

6.1 Environmental targets and key indicators

The following environmental performance indicators in Table 10 are used to assess the performance of the milling operations.

If adverse trends are noted a review of the relevant procedures and mitigation measures will be initiated by the Site Manager in consultation with the relevant site supervisory staff, to address the issue in question and achieve acceptable performance.

Table 10 – Environmental performance targets and indicators

Environmental Aspect	Performance Targets	Performance Indicators
Operational Noise	<p>Achievement of zero non-compliance with the noise limit criteria as outlined in the Noise Management Sub-plan.</p> <p>Adopt best management practices and best available technology economically achievable principles to reduce noise emissions.</p> <p>Adherence to noise mitigation measures including the adaptation where necessary of engineering measures on trucks, the implementation of operating techniques such as limited compression braking and speed limit restrictions.</p> <p>Maintain accurate truck movement data to establish patterns and time frames that can assist in controlling noise impacts.</p>	<p>Noise monitoring data obtained from the sensitive receiver locations outlined in Appendix A.</p> <p>Compliance indicators as assessed by the specialist noise consultant as required.</p> <p>Site inspections to demonstrate compliance with engineering and operational requirements respectively.</p> <p>Accurate and up to date logs and movement records indicating compliance with timeframes and adherence to operational boundaries as defined in this OEMP.</p> <p>Zero noise complaints received for the operations</p>
Water Quality	<p>Ensure that process water added during the milling process is wholly consumed and no liquid process waste streams are discharged from the mill during operations.</p> <p>Retain the maximum daily flow of 3000L/day to ensure the effective operation of the treatment plant.</p> <p>Respond to pollution incidents (such as the release of waste water into undesignated areas) and implement control measures within 24 hours of identification of breach.</p>	<p>Visual evidence of liquid process waste during operations.</p> <p>Monitoring level in-flow to treatment plant.</p> <p>Records for regular maintenance and monitoring of the treatment plant and irrigation area.</p> <p>Zero external/internal environmental complaints and incidents relating to apparent odours, visual pollution or pollution of land/water.</p>
Traffic	<p>Allied Pinnacle and sub-contractor compliance with Traffic Management Sub-plan and regulatory requirements.</p>	<p>Site traffic movements operating as per Traffic Management Sub-plan.</p> <p>Accurate and up to date logs and movement records indicating compliance with timeframes and adherence to operational boundaries as defined in this OEMP.</p>

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Cultural Heritage	Allied Pinnacle and sub-contractor compliance with Cultural Heritage Management Sub-Plan and regulatory requirements. Comply with heritage requirements of relevant stakeholders.	Landscaping and site management to ensure 100% compliance with stakeholder requirements
Landscape	Allied Pinnacle and sub-contractor compliance with Landscape Management Sub-plan and regulatory requirements. Minimal impact to visual amenity.	Evidence of landscaping and revegetation as screening mechanisms.

6.2 Environmental management sub-plans

Detailed management sub-plans have been developed to mitigate potential environmental impacts associated with the operation of the site.

The following sub-plans are included as appendices to this OEMP:

- Noise & Vibration Management Sub-Plan (Appendix A)
Refer to Picton WHSE-007 Picton Noise & Vibration Management Sub-Plan (Appendix A)
- Soil and Water Management Sub-Plan (Appendix B)
Refer to Picton WHSE-008 Picton Soil and Water Management Sub-Plan (Appendix B)
- Traffic Management Sub-Plan (Appendix C)
Refer to Picton WHSE-009 Picton Traffic Management Sub-Plan (Appendix C)
- Cultural Heritage Management Sub-Plan (Appendix D)
Refer to Picton WHSE-010 Picton Cultural Heritage Management Sub-Plan (Appendix D)
- Landscape Management Sub-Plan (Appendix E)
Refer to Picton WHSE-011 Picton Landscape Management Sub-Plan (Appendix E)

6.3 Management/mitigation measures

An implementation checklist which comprises all the management/mitigation measures specified in the sub-plans is appended in the Combined Implementation Checklist (Appendix F)

Refer to Picton WHSE-012 Picton Combined Implementation Checklist (Appendix F)

Related Documents

- WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work
- WHS-019 Emergency Management
- WHSE-024 Environmental Management Plan including PIRMP
- WHSE-008 Hazard ID, risk assessment and control measures
- WHSE-Form-02 Allied Pinnacle and Champion Flour WHSE & Rehab Policy
- Picton WHSE-001 Picton PIRMP
- Picton WHSE-005 Picton Emergency Response Plan
- Picton WHSE-007 Picton Noise & Vibration Management Sub-Plan (Appendix A)
- Picton WHSE-008 Picton Soil and Water Management Sub-Plan (Appendix B)
- Picton WHSE-009 Picton Traffic Management Sub-Plan (Appendix C)
- Picton WHSE-010 Picton Cultural Heritage Management Sub-Plan (Appendix D)
- Picton WHSE-011 Picton Landscape Management Sub-Plan (Appendix E)
- Picton WHSE-012 Picton Combined Implementation Checklist (Appendix F)



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DOCUMENT APPROVAL and CHANGE HISTORY

APPROVAL

Action	Position Title	Name (s)	Date
New Document Approval Version V01 to update to new format and Control under WHSE System	National WHSE Manager	Maria Hooker	20/7/2023



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