Site Based Management Plan

256 Old Esk Road, Taromeo

CLIENT: PRO-PINE PTY LTD

PROJECT NO.	**J001911**
STATUS	**FINAL**
DATE	**26/08/2025**

rangeenviro.com.au

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Document Control

Version	Purpose	Lead Author	Reviewer	Approved by	Date
1.	Final Report	MJW	RJM	LMT	21/05/2025
2.	Final Report (minor updates to include supporting technical reports)	RJM	RJM	LMT	26/08/2025

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1 Overview

1.1 Background

This Site Based Management Plan (SBMP) provides an environmental management framework for Pro Pine Pty Ltd.'s proposed increase in annual throughput of an existing sawmill located at 256 Old Esk Road, Taromeo (hereafter 'the site'). The site is formally comprised of Lots 228 and 229 on SP136942 (Figure 1).

The proposed operations at the site are considered to present a low risk of harm to local environmental values with the implementation of this SBMP. A copy of the SBMP shall be kept on site at all times.

1.2 Scope

The scope and application of this SBMP is provided in Table 1.

Table 1 Scope and application of this SBMP

Question	Answer
Who?	This SBMP applies to all personnel (staff, inspectors, sub-contractors, site visitors and other personnel) at the site under the control of Pro Pine Pty Ltd.
What?	This SBMP applies to all environmental aspects of operational and maintenance activities at the site.
When?	This SBMP applies during the operations phase of the site.
Where?	This SBMP applies to the site located at 256 Old Esk Road, Taromeo (formally comprised of Lots 228 and 229 on SP136942) (Figure 1).
Why?	The purpose of this SBMP is to minimise the risk of environmental harm and to satisfy legal and other obligations for environmental protection and general environmental duty.

1.3 SBMP Objectives

The objectives of this SBMP are to:

- Describe the site and proposed operations.
- Provide site-specific control measures to minimise the risk of adverse environmental impact during operational activities.
- Define roles, responsibilities, and timing for the implementation of environmental control measures.
- Provide mechanisms for incident management and monitoring, review, and continual improvement of environmental performance at the site.

Figure 1
Site Locality

Project: Site Based Management Plan

Client: Pro-Pine Pty Ltd

Project No.: J001911

Compiled by: MJW Date: 3/02/2025
Approved by: RJM Date: 3/02/2025

Metres
0 180 360

Legend

- Cadastre
- Roads
- Site boundary

The content of this document includes third party data. Range Environmental Consultants does not guarantee the accuracy of such data.

Source: Cadastral data sourced from DNRME (2025).

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2 Description of Operations and Maintenance

An overview of the site's proposed operations is provided at Table 2.

Table 2 Site Operations

Aspect of Operations	Description
Facility Operator	• Pro-Pine Pty Ltd
Registered Suitable Operator (RSO)	• RSO550637
Site	• Lots 228 and 229 on SP136942
Nature of Activity	• Timber milling

ERA	• Existing and approved ERA: ERA 47 (b) – Timber milling and woodchipping – milling, in a year, more than 10,000t but not more than 20,000t of timber.
	• Proposed ERAs:
	  • ERA 33 - Crushing, milling, grinding or screening - crushing, grinding, milling or screening more than 5,000t of material in a year.
	  • ERA 47 (c) – Timber milling and woodchipping – milling, in a year, more than 20,000t but not more than 100,000t of timber.

Annual Throughput	• The site proposes to mill a maximum of 60,000t of timber per annum and screen approximately 5000t/year of bark (organic material) through the trommel.
Plant, Equipment, and Hazardous Chemicals	Mobile plant: • Four (4) x front end loaders (12-14t). • One (1) x 15t excavator. • Four (4) x forklifts (2.5-4t). • Two (2) x bobcats. • Three (3) x tip trucks. Fixed sawmill plant at Mill 1: • Various log decks and transfers. • Valonkone VK26M ring debarker. • Automatic log docking machine. • Storti PGS350 log saw. • Storti canter. • WD auto edger. • Lindex chipper canter. • Costa multi rip saw. • Storti R16 multi rip saw. • Ogam multi rip saw. • Auto timber stacking machine. • Gibson docking machine. • Bruks 602 woodchipper. • Sawdust transfer chain system. • Sawdust extraction system (vacuum).

	Fixed equipment at Mill 2: • Mebor HTZ1200 horizontal band sawmill. • Gibson combination edger multirip. • ERJO SN165 woodchipper. Hazardous chemical storages: • One (1) x 17,000L self-bunded diesel AST. • One (1) x 1000L Taratek intermediate bulk container (IBC) stored in a secondary concrete containment area. • One (1) x 1000L IBC of Chain & Bar oil on a bunded pallet within a designated oil storage area. • Two (2) x 205L drums of hydraulic 68 oil on a bunded pallet within a designated oil storage area. • One (1) x 4.5L container of air tool oil located in the maintenance shed. • One (1) x 20L container of brake cleaner stored on a secondary spill tray within the maintenance shed. • One (1) x 20L container of hammer drill oil stored on a secondary spill tray within the maintenance shed. • One (1) x 205L drum of engine oil stored within secondary containment. • One (1) x 205L drum of hydraulic oil stored within secondary containment.
Hours of Operation	The site operates from 6:00am to 4:00pm, Monday to Friday as follows: • Heavy vehicle and light vehicle access from 6:00am to 7:00am. No timber milling, woodchipping or maintenance works are undertaken during this period. • Full operations from 7:00am to 4:00pm. Site maintenance activities are undertaken on Saturdays between 7:00am and 4:00pm, depending on maintenance requirements. No operations at the site shall occur on Sundays or public holidays. Extended operating hours are not required to meet the increased production rate.
Staffing	• The site is proposed to operate with a total of 40 staff members.
Traffic	RMA Engineers' (2025) Traffic Impact Assessment outlined the following anticipated future traffic volumes for the site: • 38 heavy vehicle movements per day (combined in and out). • 80 light vehicle movements per day (combined in and out).
Wastes	• The following waste streams[1] will be generated from the timber milling process and will be used to produce various products: ◦ Trim waste generated from the WD Edger will be discharged to the Bruks 602 woodchipper to produce a sawdust product. ◦ Trim waste and bark that cannot be processed by the Bruks woodchipper will be stockpiled for processing later. Approximately twice per year, a contractor will be engaged

[1] Section 8AA under the *Waste Reduction and Recycling Act 2011*. **Waste** includes any thing that –

(a) Is **left over**, or is an unwanted by-product, from an industrial, commercial, domestic or other activity; or

(b) Is **surplus** to the industrial, commercial, domestic or other activity generating the waste.

(4) A thing can be waste whether or not it is of value.

	to grind timber mill waste into a ground wood product using a large mobile grinder. Ground wood will be stockpiled in the eastern portion of the site and delivered as required to various customers. • Wood waste generated from the Gibson multirip saw will be fed into the conveyor of the ERJO SN165 woodchipper to produce a soft fall woodchip product. • General and recyclable wastes are stored in covered bins and removed from the site weekly for disposal or recycling by JJ Richards. • Regulated wastes generated from onsite servicing of mechanical plant and equipment will be removed offsite by the service technicians at the end of each task/day (whichever occurs first).

2.1 Site Maintenance

To ensure optimum performance of critical equipment in mitigating the environmental impacts of the site's operations, routine inspection and maintenance activities shall be scheduled and implemented.

Maintenance programs and schedules shall be developed for the site in accordance with legislative requirements and manufacturer's specifications. The purpose of site maintenance is to minimise the risk of equipment failure that could result in injury to people, impacts to site operations and service delivery and/or adverse environmental impacts. Maintenance records shall be retained as per Section 11.

3 Environmental Values, Potential Impacts and Mitigation Measures

3.1 Environmental Values

The relevant environmental values of the site and local area with regards to the site's proposed operations are described in Table 3.

Table 3 Environmental values

Environmental value	Description
Surface water	The existing sediment basin located in the western corner of the site is intersected by Jessie Creek. Jessie Creek (1st order stream) flows to the north where it enters Taromeo Creek (East Branch) (2nd order stream). Taromeo Creek (East Branch) flows to the north to Taromeo Creek (3rd order stream).
Groundwater	The bore logs for registered bores within a nominal 1 km buffer of the site were reviewed. The shallowest aquifer recorded in the area was a granite aquifer 24 m below ground level (mbgl) in the Taromeo Igneous Complex.
Soil	Native soils of the region are broadly described by the Bureau of Rural Sciences (2009) as shallow bleached loams.
Amenity (air, odour, greenhouse gas, noise, and light	Ambient air quality, light and noise levels of the local area are expected to reflect the influence of nearby roads and surrounding rural activities. The closest sensitive receptor to the site is an existing residential dwelling (Receptor 1) located approximately 336 m west of the operational footprint (stockpiling adjacent to Mill 1) (Figure 2).

3.2 Potential Impacts and Mitigation Measures

Potential impacts on environmental values and key mitigation measures are outlined in Table 4 below. Reference should be made to the Environmental Control Plans (ECPs) at Section 4.3 for full details of mitigation measures.

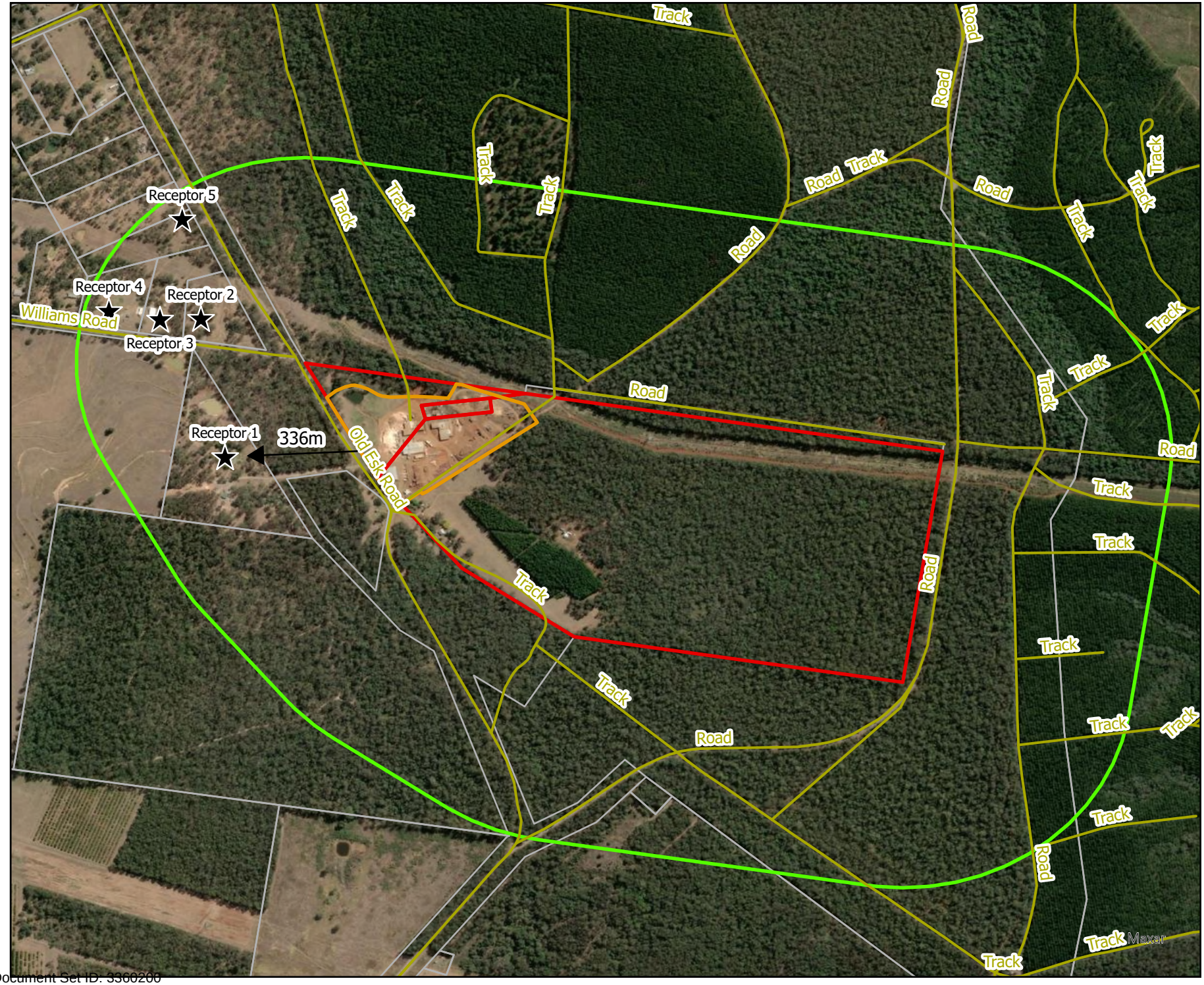

Figure 2 Sensitive Receptors

Project: Noise Impact Assessment

Client: Pro-Pine Pty Ltd

Project No.: J001911

Compiled by: MJW Date: 25/03/2025
Approved by: RJM Date: 25/03/2025

0 150 300 Metres

Legend

- Cadastre
- Site boundary
- Operational footprint
- 500m buffer
- Sensitive Receptors
- Roads

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Table 4 Potential impacts and mitigation measures

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
Land	Spill/leak from chemical storages or during refuelling or handling activities causes a release of contaminants to soil.	Unlikely	Insignificant	Low	• All chemicals stored onsite in containers greater than 15L are provided with secondary containment (including self-bunding, concrete containment area, bunded pallets, spill trays, etc.). • Refuelling of mobile equipment shall be undertaken at the location of the self-bunded AST only. • Any spills/leaks that occur at the site shall be absorbed using the sawdust produced onsite. • Plant and equipment shall be maintained as per the manufacturer's specifications. • Spills and leaks of contaminants at the site are not anticipated to present a significant soil contamination risk.
	Contaminated firewater is released from the site during an emergency and adversely impacts soil quality.	Unlikely	Minor	Low	• During operations at the site, measures shall be undertaken to reduce the possibility of fire, including regular housekeeping to reduce build-up of combustible materials, regular waste removal, and maintenance of plant and equipment. • In the event of a fire at the site, the use of firewater shall be minimised as far as reasonably practicable and measures to contain firewater onsite shall be employed as required. • The SBMP outlines further measures that shall be taken to reduce the risk of fire at the site. • The proposed operations are not anticipated to present a significant soil contamination risk in the event of a fire.

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
	Poor management of solid or liquid wastes causes a release to land.	Unlikely	Insignificant	Low	• General and recyclable wastes shall be stored in covered bins and removed from the site weekly for disposal or recycling by JJ Richards. • Regulated wastes generated from onsite servicing of mechanical plant and equipment shall be removed offsite by the service technicians at the end of each task/day (whichever occurs first). • There shall be no onsite waste disposal or burning of wastes. • ViridAU's Air Quality Impact Assessment demonstrated that air emissions from wind erosion of designated stockpiling locations of sawdust, timber waste and exposed areas can be mitigated to minimise a release to land. • Storage of wastes at the site is not anticipated to present a significant soil contamination risk.
Water (stormwater, surface water and groundwater)	Spill/leak from chemical storages or during refuelling or handling activities causes a release of contaminants to stormwater, surface water or groundwater.	Unlikely	Insignificant	Low	• All chemicals stored onsite in containers greater than 15L are provided with secondary containment (including self-bunding, concrete containment area, bunded pallets, spill trays, etc.). • Refuelling of mobile equipment shall be undertaken at the location of the self-bunded AST only. • Any spills/leaks that occur at the site shall be absorbed using the sawdust produced onsite. • Plant and equipment shall be maintained in accordance with the manufacturer's specifications. • Stormwater within the operational footprint shall be managed in accordance with the Stormwater Management Plan prepared by

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
					RMA Engineers, which demonstrated the following: • A sediment basin has been designed for the 24 hour 10% AEP storm event to mitigate sediment loads leaving a portion of the development site in accordance with DETSI's Stormwater Guideline: Environmentally Relevant Activities (ESR/2015/1653) to minimise the risk of contaminated stormwater leaving the site. • Channels have been designed to convey runoff internal to the development to the sediment basins and around the site operations. • The proposed development will reduce the size of the contributing catchments discharging external to the site. The reduced catchments will therefore not increase the median post-developed peak flow discharging from the site. • Groundwater is deep (at least 24 mbgl) and at a low risk of impact. • Spills and leaks of contaminants at the site are not anticipated to present a significant contamination risk to waters.
	Contaminated firewater is released from the site during an emergency and adversely impacts water quality.	Unlikely	Minor	Low	• Groundwater is deep (at least 24 mbgl) and at a low risk of impact. • During operations at the site, measures shall be undertaken to reduce the possibility of fire, including regular housekeeping to reduce build-up of combustible materials, regular waste removal, and maintenance of plant and equipment. • In the event of a fire at the site, the use of firewater shall be minimised as far as reasonably practicable and measures to

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
					contain firewater onsite shall be employed as required. • The SBMP outlines further measures that shall be taken to reduce the risk of fire at the site. • The proposed operations are not anticipated to present a significant contamination risk to waters in the event of a fire.
	Poor management of solid or liquid wastes causes a release of contaminants to stormwater, surface water or groundwater.	Rare	Insignificant	Low	• General and recyclable wastes shall be stored in covered bins and removed from the site weekly for disposal or recycling by JJ Richards. • Regulated wastes generated from onsite servicing of mechanical plant and equipment shall be removed offsite by the service technicians at the end of each task/day (whichever occurs first). • There shall be no onsite waste disposal or burning of wastes. • ViridAU's Air Quality Impact Assessment demonstrated that air emissions from wind erosion of designated stockpiling locations of sawdust, timber waste and exposed areas can be mitigated to minimise a release to waters. • The storage of wastes at the site is not anticipated to present a significant contamination risk to waters.
Noise, Air, GHG emissions, Odour and Light	Noise emissions from the operation of plant/equipment and vehicle movements causes nuisance at sensitive receptors.	Unlikely	Minor	Low	• The closest sensitive receptor to the site is an existing residential dwelling (Receptor 1) located approximately 336 m west of the operational footprint (stockpiling adjacent to Mill 1) (Figure 2). • The dense forest areas surrounding the site provide a foliage volume attenuation with an effective height of 10m.

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment

					• The Noise Impact Assessment prepared by ViridAU (Reference: V25-147.RT1.02) found the following:
					  • The predicted cumulative noise levels at all residential receptors comply with the outdoor Acoustic Quality Objectives in the Environment Protection (Noise) Policy 2019.
					  • Sound insulation testing was conducted at the most exposed receptor to derive specific outdoor to indoor transmission losses with the windows open. Predicted internal noise levels calculated with the measured outdoor to indoor sound transmission losses comply with the indoor Acoustic Quality Objectives in the
					  • Environment Protection (Noise) Policy 2019 for the daytime and night-time period, and with the sleep disturbance criterion.
					• All plant and equipment associated with timber milling, woodchipping and maintenance works shall be restricted to the daytime period (7:00am to 4:00pm). The only noise sources that shall be operational during the night-time period (6:00am to 7:00am) are light and heavy vehicles, the 30t excavator, wheeled loader and mini loader.
					• The SBMP provides further management measures that shall be implemented at the site to minimise noise emissions.
					• Note - Ongoing noise monitoring is not required for the following reasons:
					  • Sleep disturbance at nearby sensitive receptors is a low risk due to the daytime operating hours of the timber milling and woodchipping activities.

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
					• There is no history of noise complaints at the nearest and most sensitive receptor (Receptor 1). • The predicted cumulative noise levels complied with the relevant noise assessment criteria. • Pro-Pine shall proactively manage noise emissions as outlined above. • The proposed operations are not anticipated to present a significant noise nuisance risk due to the separation distances to sensitive receptors, the daytime operations of milling and woodchipping activities and the demonstrated façade attenuation levels for the nearby sensitive receptors.
	Air emissions from the operation of plant and equipment, timber processing, and the stockpiling of woodchip and sawdust causes nuisance at sensitive receptors.	Unlikely	Insignificant	Low	• No complaints of air quality nuisance have been received for the existing sawmill operations. • Dispersion modelling of air emission sources in ViridAU's Air Quality Impact Assessment demonstrated that air emissions from the proposed operations complied with the relevant air quality criteria. • The SBMP includes mitigation measures to minimise dust emissions from the proposed operations. • The proposed operations are not anticipated to cause air quality nuisance at sensitive receptors.
	Odour emissions from the operation of plant and equipment, timber processing, and the stockpiling of woodchip and sawdust causes nuisance at sensitive receptors.	Unlikely	Insignificant	Low	• The closest sensitive receptor to the site is an existing residential dwelling (Receptor 1) located approximately 336 m west of the operational footprint (stockpiling adjacent to Mill 1) (Figure 2).

Environmental Value	Potential Impact	Likelihood	Consequence	Risk	Comment
					• ViridAU's Air Quality Impact Assessment does not present any sources of odour as a matter of concern regarding environmental nuisance. • The proposed operations are not anticipated to cause odour impacts at nearby sensitive receptors.
	GHG emissions are released to the atmosphere as a direct result of the operation of the sawmill (i.e., Scope 1 under the DETSI's GHG Guideline) that significantly contributes to climate change.	Unlikely	Insignificant	Low	The following information was collated to respond to Table 3 of the DETSI's Greenhouse gas emissions guideline (2024) regarding the application requirements for low emitters (i.e., generate <25,000t CO_2-e per year): • ViridAU's Air Quality Impact Assessment included an assessment of total Scope 1 and Scope 2 emissions, which was calculated to be 1078t CO_2-e per year. • Therefore, the proposed operation is categorised as a low emitter and does not require annual reporting of GHG emissions.
	Light emissions from the site causes nuisance at sensitive receptors.	Unlikely	Insignificant	Low	• Outdoor lighting at the site shall comply with Australian Standard *AS4282 Control of the Obtrusive Effects of Outdoor Lighting*. • Light spill emissions from the site will be shielded by existing vegetation between the site and nearby sensitive receptors. • Nuisance impacts in relation to light emissions from the site are unlikely due to separation distances.

4 Environmental Management

4.1 Management Commitment

Pro Pine Pty Ltd is committed to providing a high standard of environmental performance, protection, and conservation of the natural environment at the site. This will be achieved by practicing good environmental management and the ongoing measurement, evaluation, and review of performance to ensure continual improvement.

Pro Pine Pty Ltd are committed to:

- Complying with all legal and other obligations that apply to the site for environmental protection.
- Providing adequate resources to implement this SBMP and the associated environmental protection and monitoring measures.
- Achieving the environmental goals outlined in the Environmental Control Plans (ECPs) provided at Section 4.3.
- Monitoring compliance with this SBMP and seeking to continually improve environmental performance at the site.

4.2 Environmental Management Responsibilities

4.2.1 General Environmental Duty

All personnel at the site shall comply with their General Environmental Duty under the *Environmental Protection Act 1994* (EP Act). This means a person must not carry out any activity that causes, or is likely to cause environmental harm, unless all reasonably practicable measures to prevent or minimise the harm have been taken.

4.2.2 Duty to Notify of Environmental Harm

All persons have a duty under the EP Act to notify the Department of the Environment, Tourism, Science and Innovation (DETSI) of incidents or emergencies that cause or threaten material or serious environmental harm. This obligation is detailed further at Section 7.

4.2.3 Duty to Restore the Environment

All persons have a duty under the EP Act to take actions as soon as reasonably practicable to rehabilitate or restore the environment as far as reasonably practicable to its condition before the harm was caused. The duty to restore applies if a person has caused or permitted an incident involving contamination to occur that results in unlawful environmental harm.

When deciding the measures required to restore the environment, regard for the following must be had:

- The nature and extent of the environmental harm caused by the contamination.
- The sensitivity of the receiving environment to remedial measures that might be taken in relation to the environmental harm.
- The current state of technical knowledge for remedial measures that might be taken in relation to the environmental harm.
- The likelihood of successful application of the different measures that might be taken in relation to the environmental harm.
- The financial implications of the different measures that might be taken in relation to the environmental harm.

The Duty to Restore the Environment Information Sheet can be downloaded from the DETSI website.

4.2.4 Roles and Responsibilities

All personnel, including sub-contractors and visitors, are responsible for environmental protection during operations and maintenance works at the site. Responsibilities and reporting lines for environmental matters are described in Table 5.

Table 5 Roles and responsibilities

Role	Responsibilities	Reports to
Site Manager	• Ensure operations comply with all relevant regulatory and project requirements by undertaking routine monitoring of site operations. • Monitor changes to legislation which may affect site operations. • Ensure this SBMP is fully implemented, and environmental protection is not secondary to operational requirements. • Provide adequate resources for the implementation of the SBMP. • Ensure that all personnel understand, accept, and fully carry out their obligations for environmental protection and that they are adequately trained, instructed and resourced to fulfil their obligations. • Undertake the annual environmental management review and SBMP review. • Seek relevant approvals for any required works or changes to the site conditions outside the limits of the applicable approvals/permits/plans. • Conduct environmental incident investigations as required. • Direct that works be stopped immediately where there is an actual or potential risk of environmental harm. • Comply with General Environmental Duty, Duty to Notify of Environmental Harm and Duty to Restore the Environment.	Regulatory authorities
Other personnel (includes staff, inspectors, sub-contractors, site visitors and other personnel).	• Regard environmental protection as a central theme in their actions. • Conduct operations as per the SBMP to reduce the risk of adverse environmental impacts. • Report any defects in plant or equipment and keep the workplace in a tidy state. • Notify the Site Manager of any unexpected changes to site conditions. • Assist with environmental incident investigations as required. • Stop works where there is an actual or potential risk of environmental harm and notify the Site Manager. • Comply with General Environmental Duty, Duty to Notify of Environmental Harm and Duty to Restore the Environment.	Site Manager

4.3 Environmental Control Plans

Environmental Control Plans (ECPs) have been developed to document site-specific environmental management measures to address the key environmental management considerations for the site. Alternative controls to those outlined in the ECPs may be adopted if the objectives of the relevant

ECP can still be met and should be documented in an updated SBMP. The ECPs provide management measures in relation to:

1. Air, noise, and light.
2. Land and water.
3. Dangerous goods and hazardous substances.
4. Liquid and solid waste.
5. Weeds and pests.

Specific controls in relation to environmental emergency preparation and response (fire, heavy rain, and spill response) are provided at Section 8.

ECP 1 – Air, noise, and light management measures		
Guidelines and Legislative Requirements		
EPP Air, EPP Noise, EP Act, Development Approval and Environmental Authority.		
Performance Goal		
No complaints of nuisance regarding air, noise, or light emissions from the site.		
Management Actions	**Responsibility**	**Frequency**
Noise		
All plant and equipment associated with timber milling, woodchipping and maintenance works shall be restricted to the daytime period (7:00am to 4:00pm). The only noise sources that shall be operational during the night-time period (6:00am to 7:00am) are light and heavy vehicles, the 30t excavator, wheeled loader and mini loader.	All persons	At all times
Maintain plant and equipment in accordance with the manufacturer's requirements to minimise noise emissions.	Site Manager	At all times
When purchasing new equipment, models with low noise emissions shall be preferred where practicable.	Site Manager	As required
No unnecessary revving or idling of engines on mobile and stationary machines and shut down any equipment not in use.	All persons	At all times
Minimise the drop height of materials when transferring (e.g., loading and unloading vehicles).	All persons	At all times
Air Quality and Odour		
Plant and equipment shall be inspected and maintained in accordance with the manufacturer's specifications to minimise fugitive air emissions from leaking plant and equipment.	Site Manager	At all times
General waste bins shall be covered and emptied weekly to prevent wind-blown litter and odour emissions.	Site Manager	At all times
Dust suppression measures (e.g., surface watering by a water truck) shall be used on unsealed surfaces to minimise dust emissions.	Site Manager	As required
Light and heavy vehicles shall be limited to a 20 km/hr speed limit onsite for unsealed surfaces.	Site Manager	At all times
The sawdust extraction system shall be used to stockpile sawdust within the designated stockpiling area from operations at Mill 1 and Mill 2.	Site Manager	At all times
No burning of wastes or other materials on site shall be permitted.	All persons	At all times
Lighting		
All external lighting at the site shall comply with Australian Standard *AS4282 Control of the Obtrusive Effects of Outdoor Lighting.*	Site Manager	At all times
Monitoring		
Site inspections shall include monitoring of site conditions and work practices to ensure compliance with the SBMP for air, noise, and light emissions.	Site Manager	Monthly
Air, noise, or light monitoring at sensitive receptors shall be undertaken by a suitably qualified person if a written request is made by the administering authority to investigate a complaint of nuisance.	Site Manager	As required
Corrective Actions		

Complaints and incidents in relation to air, light and noise emissions from the site shall be investigated by the Site Manager to identify necessary corrective actions for implementation.		
Reporting		
Monitoring results shall be provided to the administering authority within 28 business days of a request to conduct nuisance-based monitoring.	Site Manager	As required

ECP 2 – Land and water management measures		
Guidelines and Legislative Requirements		
EP Act, EPP Water and Wetland Biodiversity, Stormwater Management Plan, Development Approval and Environmental Authority.		
Performance Goal		
To minimise the risk of adverse impacts to soil or water (stormwater, surface water and groundwater) resources and on environmentally sensitive areas.		
Management Actions	**Responsibility**	**Frequency**
General Management Requirements		
Chemical handling and storage at the site shall be managed in accordance with ECP 3 – Dangerous goods and hazardous chemical management measures.	All persons	At all times
Wastes generated onsite shall be managed in accordance with ECP 4 – Liquid and solid waste management measures.	All persons	At all times
Stormwater within the operational footprint shall be managed in accordance with the Stormwater Management Plan (2025) prepared by RMA Engineers.	Site Manager	At all times
Spills and Leak Prevention and Response		
Maintain and operate plant and equipment within the manufacturer's recommended performance specifications.	All persons	At all times
Spills shall be cleaned up immediately using sawdust produced onsite as the absorbent agent.	All persons	At all times
Personnel shall be trained in spill prevention and spill response/control procedures.	Site Manager	At all times
Emergency – Fire Water		
During operations, undertake all reasonable and practicable management measures to prevent a fire (refer to Section 8.1).	All persons	At all times
Minimise water use during a fire as far as safe and practicable to limit wastewater generation.	All persons	During a fire
Contained firewater shall be removed by a regulated waste contractor.	Site Manager	During a fire
Monitoring		
If soil or water contamination is encountered at the site or occurs during operations and causes or threatens material or serious environmental harm, it shall be investigated and managed by a Suitably Qualified Person in accordance with the EP Act, National Environmental Protection (Assessment of Site Contamination) Measure 1999 (Amended 2013) and the Monitoring and Sampling Manual 2018.	Site Manager	As required
Corrective Actions		
Incidents in relation to soil and water management at the site shall be investigated by the Site Manager to identify necessary corrective actions for implementation.		
Reporting		
If runoff from the site causes or threatens serious or material environmental harm, the incident shall be notified to the DETSI (refer to Section 7.3).	Site Manager	As required

ECP 3 – Dangerous goods and hazardous chemical management measures		
Guidelines and Legislative Requirements		
EP Act, Development Approval, Environmental Authority, *AS1940-2017: The Storage and Handling of Flammable and Combustible Liquids* and Workplace Health and Safety Queensland's Managing Risks of Hazardous Chemicals in the Workplace 2021.		
Performance Goals		
No environmental harm caused by the storage, use or handling of dangerous goods or hazardous substances at the site.		
Management Actions	**Responsibility**	**Frequency**
General Management Requirements		
Spills shall be cleaned up immediately using sawdust produced onsite as the absorbent agent.	All persons	At all times
Personnel shall be trained in spill prevention and spill response/control procedures.	Site Manager	At all times
Appropriate fire extinguishers shall be provided on site for flammable and combustible chemicals and materials.	Site Manager	At all times
All chemicals stored onsite in containers greater than 15L shall be provided with secondary containment (e.g., self-bunding, concrete containment area, bunded pallets, spill trays, etc.). Bunds should be large enough to contain the volume of the largest container + 10%.	Site Manager	At all times
No onsite disposal of chemical wastes shall be permitted. Any chemical wastes shall be removed as regulated waste by a regulated waste contractor.	All persons	At all times
All dangerous goods and/or hazardous substances shall be classified, stored, labelled, and used in accordance with the Code of Practice, Safety Data Sheets (SDS), manufacturer's requirements and the relevant Australian Standard.	All persons	At all times
Plant and Equipment Maintenance		
Spill kits, drip trays, and any other necessary controls shall be used during maintenance or repair works to plant and equipment.	Service Contractors	As required
Wastes generated from plant and equipment maintenance or repair works (e.g., waste oil, oil filters, oily rags, etc.) shall be removed offsite at the end of each task/day (whichever occurs first).	Service Contractors	As required
Pre-start checks shall be completed on all plant and equipment.	Operators and Site Manager	Daily
Plant and equipment shall be operated and maintained in accordance with the manufacturer's specifications.	All persons	At all times
Funnels, extended nozzles, or quick release nozzles shall be used to minimise fuel spillage when refuelling mobile equipment at the site.	All persons	At all times
Monitoring		
Inspect dangerous goods and hazardous chemical storages.	Site Manager	Monthly
Monitor equipment operating hours/mileage to ensure plant and equipment are serviced at the required intervals.	Site Manager	Ongoing
Corrective Actions		
Incidents in relation to dangerous goods and hazardous chemical storage and handling at the site shall be investigated by the Site Manager to identify necessary corrective actions for implementation.		
Reporting		

Large spills that cause or threaten serious or material environmental harm shall be notified to the DETSI (refer to Section 7.3).	Site Manager	As required
An SDS register shall be kept on site for all chemicals stored and shall be updated at least every five (5) years.	Site Manager	At all times
Daily pre-start forms shall be kept with the plant and equipment.	Operators and Site Manager	At all times
Service records shall be retained and made available upon request.	Site Manager	At all times

ECP 4 – Liquid and solid waste management measures		
Guidelines and Legislative Requirements		
EP Act, Environmental Protection Regulation 2019, *Waste Reduction and Recycling Act 2011*, Development Approval and Environmental Authority.		
Performance Goals		
• Wastes correctly segregated and stored. • No onsite waste disposal or burning of wastes. • All wastes transported by appropriately licensed waste transporters to waste facilities that are licensed to receive the wastes. • No unauthorised release of wastes to the environment that causes environmental harm.		
Waste Management Hierarchy		
The waste and resource management hierarchy below is an extract from the *Waste Reduction and Recycling Act 2011*. It lists the preferred order in which waste and resource management options should be considered: a. AVOID unnecessary resource consumption. b. REDUCE waste generation and disposal. c. RE-USE waste resources without further manufacturing. d. RECYCLE waste resources to make the same or different products. e. RECOVER waste resources, including the recovery of energy. f. TREAT waste before disposal, including reducing the hazardous nature of waste. g. DISPOSE of waste only if there is no viable alternative. Waste management for the site shall adhere to the waste management hierarchy.		
Management Actions	**Responsibility**	**Frequency**
The site shall be kept in a clean and tidy state.	All persons	At all times
Wastes of any kind shall not be burnt or disposed of on site.	All persons	At all times
General wastes shall be segregated and stored in covered bins to prevent windblown litter, access by birds/vermin and rainfall ingress and shall be removed offsite weekly for disposal at a licensed waste facility.	All persons	At all times
Regulated wastes generated from onsite maintenance activities shall be removed offsite at the end of each task/day (whichever occurs first) by the service contractor.	Site Manager and Service Contractors	As required
Any sawdust used as a chemical spill absorbent shall be removed offsite by a regulated waste contractor.	Site Manager	As required
Monitoring		
Site inspections shall include review of waste management practices.	Site Manager	Monthly
Review waste streams and quantities to identify opportunities to improve waste management in line with the waste management hierarchy.	Site Manager	Annually
Corrective Actions		
Incidents in relation to waste management at the site shall be investigated by the Site Manager to identify necessary corrective actions for implementation.		
Reporting		
Retain records/receipts of waste removal from the site.	Site Manager	As required

ECP 5 – Weed and pest management measures		
Guidelines and Legislative Requirements		
Biosecurity Act 2014, Development Approval and Environmental Authority.		
Performance Goal		
To prevent the introduction and/or spread of invasive weeds and animals at the site.		
Management Actions	**Responsibility**	**Timing**
Putrescible wastes (e.g., food wastes) shall be kept in covered bins to prevent access by vermin and be removed from the site weekly.	Site Manager	At all times
Feeding of wild animals at the site is prohibited.	All persons	At all times
Weed management activities shall be undertaken as required to control weeds that are listed under the *Biosecurity Act 2014* using registered herbicides only.	Site Manager	As required
Pest animal control shall only be undertaken by contractors with appropriate permits and licences.	Site Manager	As required
Ensure all staff and sub-contractors are aware of fire ant carrier materials (e.g., soil, baled hay or straw, animal products/by-products, plant material (mulch, sawdust, green waste, compost)).	Site Manager	At all times
Ensure all materials (e.g., sawdust product) are transported offsite in accordance with relevant regulatory controls for Fire Ants. Fire Ant Biosecurity Zone maps and material movement advice tools can be accessed from the National Fire Ant Eradication Program website. This should be checked prior to moving materials offsite to determine if there are any applicable movement restrictions or permits required (e.g., Biosecurity Instrument Permit).	Site Manager	At all times
If fire ants are encountered at the site, they shall be reported to Biosecurity Queensland within 24 hours. Reporting details are provided on the National Fire Ant Eradication Program website. The Site Manager shall consult with Biosecurity Queensland on relevant controls/exclusion areas to implement if Fire Ants are encountered.	All persons	As required
Monitoring		
Site inspections shall include monitoring for invasive weeds and/or pests.	Site Manager	Monthly
Corrective Actions		
Incidents in relation to weed and pest management at the site shall be investigated by the Site Manager to identify necessary corrective actions for implementation.		
Professional pest control shall be undertaken in response to an identified outbreak at the site.		
Reporting		
If invasive plants and/or animals listed as Category 1 or 2 restricted matter at Schedule 2 of the *Biosecurity Act 2014* are identified at the site, these shall be reported to Biosecurity Queensland by calling 13 25 23.	Site Manager	Within 24 hours of becoming aware

5 Rehabilitation Plan

Where disturbed land at the site will not be subject to any further disturbance and is not required for any current or future operational use, it shall be rehabilitated. Rehabilitation shall be planned and executed to ensure that:

- Any infrastructure that is not required by the landholder is removed and any infrastructure that is required by the landholder is left in a safe and stable condition.
- All liquid and solid wastes are removed from the site.
- Suitable vegetation for the location and any proposed future land use is established and sustained for exposed earthen surfaces to minimise erosion.
- The quality of soil and water, including seepage, released from the site does not cause environmental harm.
- The potential for environmental nuisance caused by dust is minimised.
- The final landform is stable and protects the safety of humans, stock, and wildlife.

6 Complaint Management

All complaints shall be recorded by the Site Manager in the complaint log (Appendix A). The following details must be recorded for all complaints received:

- Time, date, name, and contact details of the complainant.
- Reason for the complaint.
- Any investigations undertaken.
- Conclusions formed.
- Any actions taken.
- Feedback to the complainant.
- Assessment of the complainant's attitude to the company response.
- Further follow-up action as required.

All complaints shall be investigated and managed in accordance with Figure 3 below.

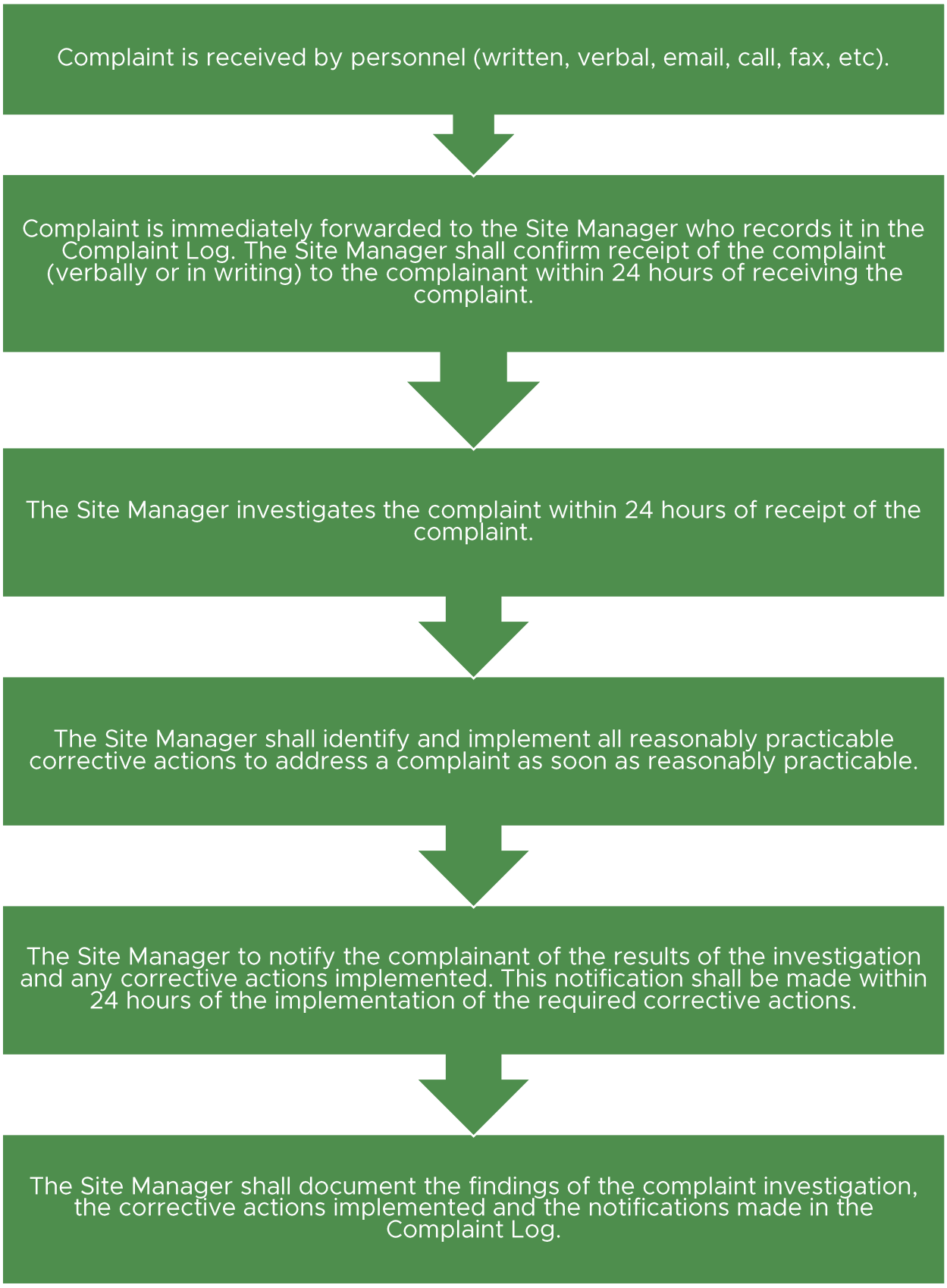

Figure 3 Complaint management flow chart

7 Environmental Hazards, Incidents & Emergencies

7.1 Categories of Environmental Harm

There are three (3) categories of environmental harm for environmental incidents and emergencies under the EP Act (Table 6).

Table 6 Categories of environmental harm

Category	Definition	Internal reporting required?	External reporting required?
Nuisance	An unreasonable interference or likely interference with an environmental value caused by: • Aerosols, fumes, light, noise, odour, particles, or smoke; or • An unhealthy, offensive, or unsightly condition because of contamination; or • Another way prescribed by regulation.	Yes	Yes, but only if a breach of an EA condition (refer to Section 12.1)
Material	Environmental harm that: • Is not trivial or negligible in nature, extent or context; • Causes actual or potential loss or damage to property of an amount of, or amounts totalling, $10K-$100K; or • Results in costs of $10K-$100K for actions to prevent or minimise the harm and rehabilitate or restore the environment to its condition before the harm. • Note – Matters which are characterised as environmental nuisance (e.g., odour, noise, etc.) may constitute environmental harm that is material.	Yes	Yes
Serious	Environmental harm that: • Is irreversible, or a high impact or widespread; • Causes harm to an area of high conservation value or special significance; • Causes actual or potential loss or damage to property of an amount of, or amounts totalling more than $100K; or • Results in costs of more than $100K for actions to prevent or minimise the harm and rehabilitate or restore the environment to its condition before the harm. • Note – Matters which are characterised as environmental nuisance (e.g., odour, noise, etc.) may constitute environmental harm that is serious.	Yes	Yes

7.2 Environmental Hazards, Incidents and Emergencies

7.2.1 Hazard and Incident Reporting

All environmental hazards, incidents and emergencies must be reported to the Site Manager as soon as possible, but no longer than 24 hours, after becoming aware of the matter.

All hazards, incidents and emergencies shall be recorded by the Site Manager and investigated to identify root causes and the appropriate course of action taken to prevent a recurrence. Corrective actions are to be evaluated on the basis of the hierarchy of controls with the aim of elimination of the impacts identified. This SBMP may require review and amendment following identification of a hazard, incident, or emergency.

If a hazard, incident, or emergency causes or threatens material or serious environmental harm, refer to Section 7.3 for external reporting requirements.

7.2.2 Incident Management & Investigation

All incidents shall be investigated by the Site Manager to determine:

- Nature, type, location and extent of the incident and the affected area.
- Actual and/or potential environmental impacts of the incident.
- Suspected cause/s of the incident.
- Measures required to stop any further environmental harm.
- Remedial measures required to correct any environmental harm.
- Management measures to be implemented to prevent a recurrence of the incident.
- Incident reporting requirements for regulatory authorities (refer to Section 7.3 below).

The requirements for the environmental assessment of impacts of an incident shall be determined by the Site Manager who may seek advice from an environmental consultant. If an incident involves serious or material environmental harm or a breach of an Environmental Authority condition, the regulatory authority may also advise/direct the environmental assessment.

The assessment may include environmental monitoring of a contaminant release. Based on the nature and type of the incident, the Site Manager, in consultation with their environmental consultant, shall determine:

- Sampling and analytical requirements.
- Applicable guidelines or thresholds to apply to data for assessing compliance and level of impact.

7.3 External Reporting of Material or Serious Environmental Harm

All persons who become aware, or ought reasonably to have become aware, have a duty to notify the DETSI of incidents or emergencies that cause or threaten material or serious environmental harm. Environmental incidents or emergencies that cause or threaten material or serious environmental harm shall be reported to the DETSI in accordance with Table 7.

Table 7 External reporting of material or serious environmental harm

By	To	Within	Method
Visitors, staff, or contractors	Site Manager	24 hours of becoming aware of the matter.	Verbal or written.
	If the Site Manager cannot be contacted, notification must be made directly to the DETSI.		Verbal initially followed by written.
Site Manager	DETSI	24 hours of becoming aware of the matter. This 24-hour period starts as soon as the Site Manager is first notified.	Verbal initially followed by written.

The Duty to Notify of Environmental Harm Guideline and standard written notification form to the DETSI for material or serious environmental harm can be downloaded from the DETSI website. Contact details for the DETSI are provided in Table 8 below.

Table 8 DETSI contact details

Method of contact	Details
Pollution Hotline	1300 130 372
Fax	(07) 3330 5875
Email	pollutionhotline@detsi.qld.gov.au
Web	https://www.detsi.qld.gov.au/
Registered Post	Permit and Licence Management Department of the Environment, Tourism, Science and Innovation GPO Box 2454 Brisbane 4001

8 Emergency Preparation and Response

This section provides an overview of preparation and response requirements for environmental emergencies that could reasonably be expected to occur at the site during operations. Incident reports and investigations are to be completed for any emergency at the site.

8.1 Fire

A fire has the potential to threaten the safety or health of people, cause environmental harm and/or damage infrastructure and equipment. The risk of fire at the site shall be reduced by:

- Provision and maintenance of firefighting equipment, such as fire extinguishers, at strategic locations on site.
- Monitor weather and bushfire warnings in the media.
- Maintain the existing firebreaks and access tracks at the site.
- Regular monitoring and maintenance of plant and equipment in accordance with manufacturer's specifications.
- Training site personnel in emergency response to fire and the use of fire safety equipment.
- Compliance with *AS1940-2017: The storage and handling of flammable and combustible liquids.*
- Identification of a designated smoking area which is away from combustible materials and has a cigarette bin.
- Regular housekeeping at the site to prevent the accumulation of combustible materials.
- No burning of wastes or other materials at the site shall be permitted.

If a fire cannot be safely controlled with onsite resources, the matter shall be referred immediately to emergency services by calling triple zero (000).

8.2 Heavy Rain

The site is not mapped in a Flood Hazard Area under the Flood Hazard Overlay of the South Burnett Planning Scheme or under State Planning Policy (SPP) mapping but may be subject to heavy rainfall and localised flooding. To prevent the potential contamination of stormwater and impacts on the downstream receiving environment, the following strategies shall be employed:

- Keep the site in a clean and tidy state at all times.
- Ensure all stormwater infrastructure and controls outlined in the Stormwater Management Plan prepared for the site are fully operational and maintained.
- If heavy rainfall is forecast, prepare the site by ensuring that plant, equipment, and materials are securely stored to minimise their contact with rainfall and stormwater where practicable.
- Ensure all leaks and spills have been cleaned up and the source of the leak/spill rectified.

8.3 Spill Response

A chemical spill has the potential to threaten the safety or health of people, create a fire hazard or cause environmental harm (on- and off-site). Where a chemical spill occurs, it shall be cleaned up immediately using the sawdust produced onsite as the absorbing agent.

A spill response flow chart is provided at Figure 4 below. If a spill cannot be safely contained and controlled with onsite resources, the matter shall be referred immediately to emergency services by calling triple zero (000).

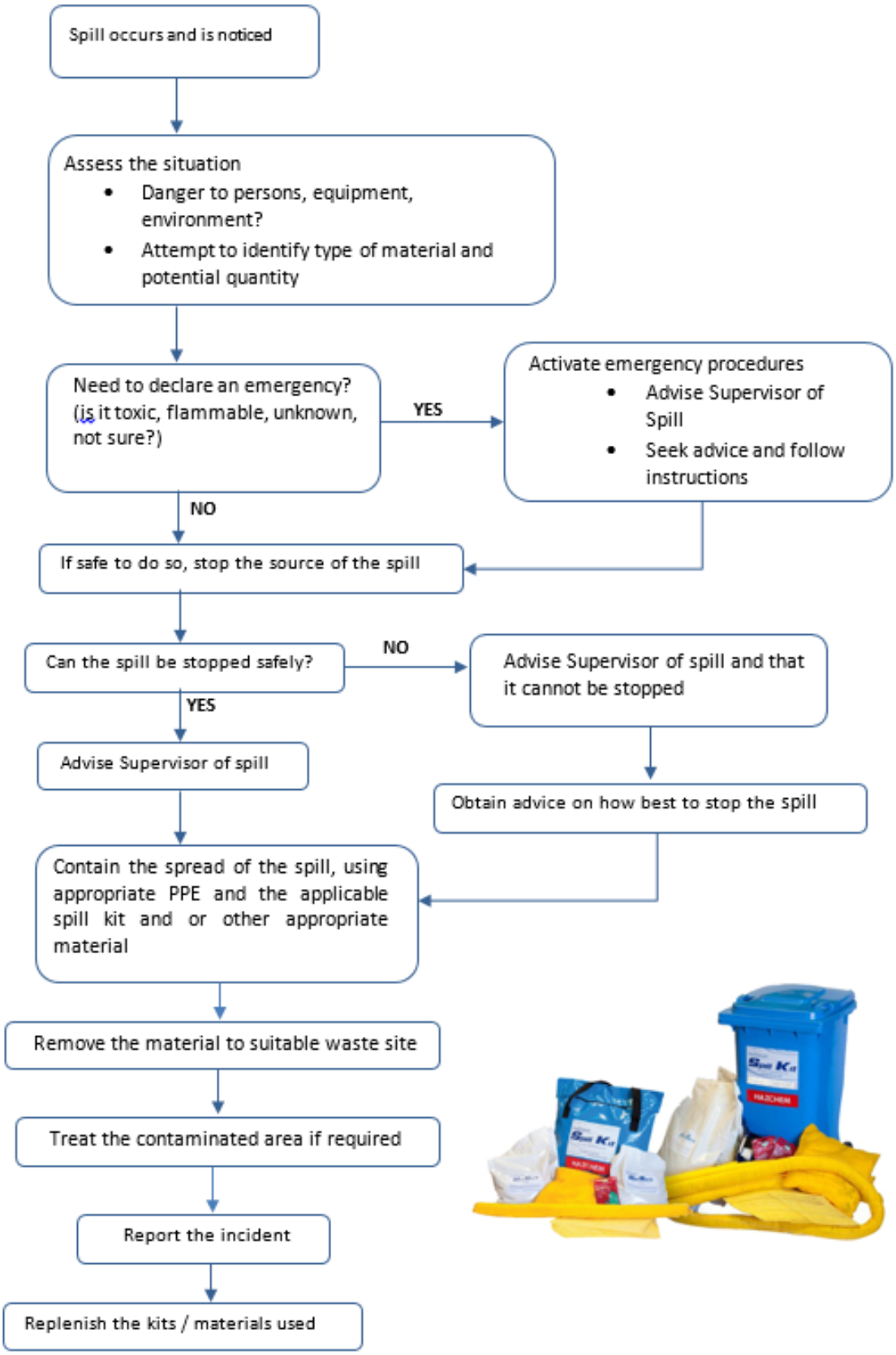

Figure 4 Spill response flow chart

9 Inspections and Monitoring

9.1 Site Inspections

The Site Manager shall undertake monthly environmental site inspections of operations and work practices to:

- Ensure activities are being undertaken in accordance with approved procedures.
- Confirm that appropriate controls have been identified and are in place to minimise the risk of environmental harm.
- Identify any maintenance or workplace practice issues that need to be addressed.
- Identify potential environmental hazards that need to be addressed.

9.2 Environmental Monitoring

Environmental impacts of routine and non-routine operations, incidents and emergencies shall be assessed. Where environmental monitoring is required, it shall be completed by suitably qualified and experienced persons in accordance with legislated standards and guidelines.

All equipment used for environmental monitoring shall be fit for purpose and maintained, operated, and calibrated in accordance with the manufacturer's specifications. Where analysis of samples is required, samples shall be submitted to a National Association of Testing Authorities (NATA) accredited laboratory.

Environmental monitoring records shall be retained and managed in accordance with Section 11.

10 Training & Communication

10.1 Environmental Awareness Training

10.1.1 Inductions

A site induction shall be given upon first entry to the site and annually thereafter to all personnel (staff, contractors, and visitors) to ensure they are aware of their responsibilities and are competent to carry out works at the site. This shall include environmental awareness training which addresses the following:

- General Environmental Duty.
- Duty to Notify of Environmental Harm.
- Duty to Restore the Environment.
- Requirements of the SBMP.
- Environmental complaint, hazard and incident management and reporting.
- Emergency response.

Training records shall be maintained and kept on site in accordance with Section 11.

10.1.2 Ongoing Training

Ongoing staff training shall be undertaken as new activities are ready to start, new environmental risks are identified, or new processes are developed. This will usually be incorporated into a regular toolbox meeting and/or risk assessments prior to undertaking the job. Records of the special training sessions will be in a similar format to toolbox meeting minutes.

10.2 Internal Communication of Environmental Information

The Site Manager shall communicate information regarding environmental matters to site personnel on an as-required basis. The method of communication shall be determined by the Site Manager.

Protocols for internal reporting of environmental hazards, incidents and emergencies are outlined at Section 7.

10.3 Communication with Regulatory Authorities

There is no requirement for routine communication with regulatory authorities regarding environmental matters. Instances where communication with regulatory authorities would be required include, but may not be limited to, the following:

- Environmental hazards, incidents and emergencies that cause or threaten material or serious environmental harm shall be reported to regulatory authorities in accordance with Section 7.
- Any breach of the conditions of the Environmental Authority must be reported by the Site Manager to the administering authority within 24 hours of becoming aware of the breach (refer to Section 12.1).
- Any Notifiable Activities undertaken at the site (refer to Schedule 3 of the EP Act) shall be notified to the DETSI within 20 business days of becoming aware of the activity.
- Biosecurity matters shall be reported in accordance with ECP 5 – Weed and pest management (Section 4.3).

11 Records Management

The Site Manager shall be responsible for managing environmental records for the site. All environmental and site maintenance records shall be made available upon request by regulatory authorities. All environmental and site maintenance records shall be retained for no less than five (5) years and monitoring results shall be retained for no less than 15 years.

Examples of records may include, but not be limited to, the following:

- Site observations and site diary entries.
- Complaints.
- Incidents, incident investigations and associated restoration works.
- Results of any environmental monitoring.
- Correspondence with regulatory authorities or any other party.
- Environmental management performance reviews.
- SBMP updates.
- Site emergencies.
- Training.

12 Review and Improvement

12.1 Non-conformance & Corrective Actions

A non-conformance is defined as failure to comply with the requirements of this SBMP, regulatory requirements and conditions of approvals and permits. Non-conformances may be identified through monitoring, inspections, and incident investigations.

Non-conforming activities shall be stopped by any person at the site in consultation with the Site Manager. The activity shall not recommence until an appropriate corrective action has been implemented. For each identified non-conformance, a corrective action must be identified and implemented.

Any breach of the conditions of the Environmental Authority must be reported by the Site Manager to the administering authority within 24 hours of becoming aware of the breach. Records of the breach must be kept (Section 11) and include details of the breach, notifications made to the administering authority, and the corrective actions taken.

12.2 Environmental Management Performance Reviews

Environmental management performance reviews shall be undertaken annually as part of the continual improvement process. Reviews may also occur in addition to the annual reviews in response to matters that affect environmental management (e.g., incidents, emergencies, changes in site conditions and operations, permit conditions or legislation changes, etc.).

The annual environmental management review shall be undertaken by the Site Manager and any other key staff. The review shall consider:

- Monitoring and inspection results for the past year.
- Recent and relevant incidents and any lessons learnt.
- Management of complaints.
- Feedback from regulatory authorities.
- Tabling of any new legal or other obligations.
- The effectiveness of environmental controls.
- Adequacy of resources for environmental management.

Findings, actions, timeframes, and the responsible parties shall be recorded in accordance with Section 11.

12.3 SBMP Review and Update

The SBMP shall be reviewed at least annually by the Site Manager to determine if the environmental management measures are appropriate for operations and site conditions. If the SBMP is not appropriate for the operations and site conditions at the time of the review it shall be updated accordingly.

Other triggers for review and update of the SBMP outside of the annual review cycle may include, but not be limited to:

- Following the issue of project approvals and permits.
- After an incident that causes environmental harm.
- Changes to the risk profile of the operation.
- Changes to relevant legislation or project approvals.
- Changes to operational methods or site conditions that require additional or alternative environmental controls to manage risk to environmental values.

Appendices

Appendix A Complaint Log

Date & Time Received	Date, Time & Method of Acknowledgment	Complaint Name & Contact Details	Nature of Complaint	Investigation Findings	Corrective Actions Identified	Date Corrective Actions Implemented	Date of Complaint Close-out Notice

Appendix B Monthly Inspection Checklist

Items Inspected	Management Actions Required? (Yes/No)
Amenity	
Site inspections shall include monitoring of site conditions and work practices to ensure compliance with the SBMP management measures relating to air, noise, and light emissions.	
Land and Water	
Inspect processing and storage areas to identify any maintenance requirements.	
Inspect spill kits and replenish as required.	
Inspect dangerous goods and hazardous chemical storages.	
Inspect waste management practices (storage and disposal methods).	
Inspect (and treat as required) property boundary and edge of trafficable areas for invasive weeds and/or pests to meet general biosecurity obligation (GBO) under the *Biosecurity Act 2014*.	

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