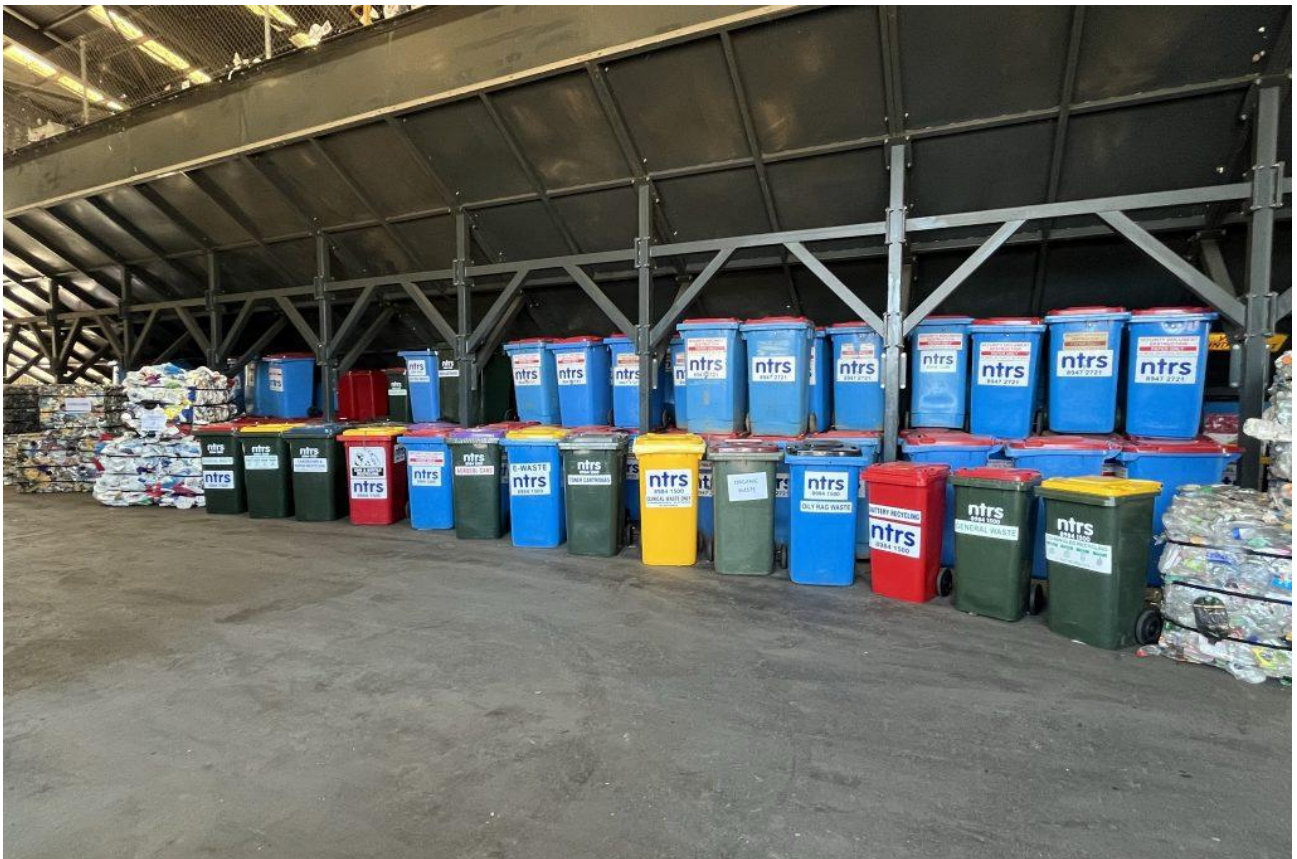




Environmental Management Plan (EMP)



95 Syrimi Road, Tivendale
Northern Territory

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ABN:	48 112 787 685
Line of Business:	Resource Recovery
Facility:	Depot Encompasses: • Transfer Depot • Waste Storage • Recycling Depot • Liquid Treatment Plant
Address:	95 Syrimi Road, Tivendale, Northern Territory
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1 Purpose and Scope

1.1 Why is it Important?

Northern Territory Recycling Solutions Pty Ltd (NTRS) have developed an Environmental Management Plan (EMP) to ensure its operations align with the environmental protection standards set by the Northern Territory Environment Protection Authority (NT EPA). The purpose of this EMP is to systematically identify, manage, and mitigate potential environmental risks associated with the handling and storage of listed waste. By complying with NT EPA requirements, NTRS demonstrates its commitment to environmental stewardship, regulatory compliance, and continuous improvement in waste management practices. The EMP also supports transparency and accountability through regular reporting and performance reviews

1.2 Who does it apply to?

At NTRS, the EMP applies to all personnel involved in activities that may impact the environment, in line with NT EPA regulations. This includes site managers, environmental officers, project managers, and consultants responsible for waste handling, storage, and environmental compliance.

2 Company Profile

NTRS was established in Darwin on August 26, 2016. The business specialises in waste management and recycling of a range of domestic, commercial, and industrial products, operating in strict compliance with current and emerging industry standards.

NTRS is a specialist in waste management and recycling. Key services provided include:

- Waste recycling through its material recycling facility (MRF)
- Treatment of waste oils for reuse purposes through its oil treatment facility (NTOC),
- Secure destruction of classified paper-based material
- Shredding of waste material for recycling purposes

The company employs over 30 people and has invested heavily in new plant and equipment to ensure consistency in service delivery.

Waste management is an ever-changing field that requires continual improvement in waste management technology, reduction of the impact of waste on the workplace and the environment, and the provision of quality services while minimising customer costs. This is not possible without exceptional customer service and a team of valued, dedicated and trusted employees.

3 Roles & Responsibilities

Role	Responsibility
Managing Director	• Ensure that the Environmental Management System (EMS) is effectively implemented; • Approve the Environmental Management Plan; • Appoint/nominate the Environmental Representative and/or Site nominee; • Report to senior management on the performance of the system and environmental breaches; • Allocate project resources to handle environmental issues; • Take action to resolve major non-conformances.
People, Safety and Training Manager	• Ensure that audits of the system are carried out and reported; • Ensure that the Emergency Response Plan (ERP) is effectively established, implemented and maintained at the site level; • Provide advice and support concerning the ERP; • Complete environmental site checklists; • Collaborate to review the EMP to ensure compliance with NTRS standards. • Review and update the EMP and associated documentation; • Provide support to the team to enable them to meet their environmental commitments; • Ensure that site personnel receive appropriate environmental awareness training; • Ensure that environmental records and files are maintained; • Ensure that non-conformances are recorded and actioned; • Complete environmental site checklists; • Undertake annual environmental audits to establish licence compliance gaps, and • Undertake periodic site environmental inspections and monitoring regarding regulatory standards.
Technical Manager	• Provide support from a risk analysis on environmental hazards • Update plans, drawings and supporting documents for the EMP

	• Initial contact for the NT EPA • Take part in compliance checks and audits
All Site Personnel	• Comply with the relevant Acts, Regulations and Standards. • Comply with NTRS's Environmental Policy and procedures. • Promptly report to management on any non-conformances and/or breaches of the system. • Promptly report to management on any spills or environmental incidents; • Undergo induction and training in environmental awareness as directed by management.

4 Statutory and Policy Considerations

This section outlines the environmental planning and regulatory context for the Site's operation, as well as NTRS's management system requirements. NTRS is dedicated to fulfilling all legal obligations and other voluntary commitments made by the company. Compliance with applicable regulations is ensured through:

- Identifying and accessing legal and other requirements that are directly applicable to the Contracts;
- Consulting and involving relevant agencies, where applicable;
- Internally communicating relevant information regarding legal and other requirements;
- Continually auditing, reviewing and upgrading company systems, management plans and supporting documentation; and
- Provide relevant training.

4.1 Legal and Other Requirements

4.1.1 Acts and Regulations

Applicable requirements summarised from the key environmental legislation relevant to the operation of this Site is provided in Table 1 below.

Table 1. Key Environmental Legislation

Legislation	Purpose	Application
Environment Protection Act 2019 (and associated regulations)	• Environment protection and pollution reduction by regulating discharges to air, water and land, as well as preserving community amenities such as impacts from traffic, noise or odour emissions.	• Adherence to regime under new legislative requirements in force from the 28 June 2020

	• Provide the framework for assessing environmental impacts and seeking planning approval of development proposals or activities by public authorities in NT.	
	• Classifying offences and issue of notices, subject to the severity of the offence.	
	• Establish conditions and requirements for environmental audits.	
Environmental Protection (Air) Policy (Qld Gov, 2019)	• Designed to achieve the objectives of the Environmental Protection Act 1994 in relation to the air environment.	• Determine parameters for any potential emissions.
	• The purpose of the EPP (Air) is achieved by identifying environmental values to be enhanced or protected, outlining indicators and air quality objectives for enhancing or protecting these values and providing a framework for making consistent, equitable and informed decisions about the air environment.	
Waste Management and Pollution Control Act 1998	• Environmental protection, and where practicable to restoration and enhancement of the quality of, the Territory environment by: ○ (i) preventing pollution; ○ (ii) reducing the likelihood of pollution occurring; ○ (iii) effectively responding to pollution; ○ (iv) avoiding and reducing the generation of waste; ○ (v) increasing the reuse and recycling of waste;	• Specifies the Regulations or an: ○ Environment protection objective, ○ Environment protection approval, ○ Environment protection license, ○ best practice license, environmental audit program, compliance plan, performance agreement or pollution abatement notice.
		• All works undertaken are required to utilise the waste hierarchy to avoid, recover and reduce waste.

	and ○ (vi) effectively managing waste disposal; (b) to encourage ecologically sustainable development; and (c) to facilitate the implementation of national environment protection measures made under the National Environment Protection Council (Northern Territory) Act 1994.	• The NT EPA may exempt from environment protection approval, by notice in writing, declare that subsection (1) or (2) of the act does not apply in relation to an activity specified in Part 1 of Schedule 2 conducted at specified premises if a development permit has been granted under section 53 of the Planning Act in relation to the activity.
		• An EPL for transport of any trackable waste is held by the proposed tenant however, if required (refer Section 2.1.2).
		• General duty to immediately notify pollution incidents where material harm is caused or threatened is a requirement.
		• Pollution incidents such as water leakages, chemical or fuel leakages, or any other contamination that occurs whilst undertaken works must be reported.
Dangerous Goods Act 1998	An Act to provide for the safe storage, handling and transport of certain dangerous goods	• Safe handling of dangerous goods and containers that are used in connection with dangerous goods, including the precautions to be observed and the methods of handling to be employed; • the classification of dangerous goods and methods for determining classifications; • manufacturing, designing, installing, repairing or carrying out any work on containers, pipelines or any plant or things that are used or are intended for use in connection with dangerous goods, • the design, construction, manufacture, installation, cleanliness, ventilation, venting, marking, placarding, labelling and maintenance of

		places, premises, plant, vehicles, containers, pipelines and other things that are used or intended for use in the handling of dangerous goods; - the siting, design, construction, ventilation, venting, illumination, maintenance, fittings, fixtures and management of premises, plant, buildings and structures that are used, or are intended for use, in connection with dangerous goods and the treatment of premises, plant, buildings and structures no longer required for the handling of dangerous goods; - the provision, maintenance, testing and use of safety and first aid facilities at a place, on premises or in or on a vehicle used for any purpose in connection with dangerous goods; - the making, keeping, production and inspection of records relating to dangerous goods and the providing of returns and other information relating to dangerous goods;
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4.2 Management System

NTRS utilises an integrated management system (IMS), administered through Skytrust, a cloud-based compliance system. The IMS, which is a structured governing document outlining policies, standards, procedures and templates representing the critical functional areas of the organisation.

NTRS is committed to achieving best practices in environmental management across all its activities. This commitment is demonstrated by:

- Ensuring all NTRS personnel, including contractors, adhere to the IMS, this EMP, and applicable environmental laws, regulations, and client standards;
- Assessing potential environmental effects to minimise or prevent them throughout the site's operational phase;
- Ensuring that all NTRS personnel, including contractors, understand their environmental obligations, receive appropriate training and induction, and take an active role in environmental management;

- Confirming that site activities do not impair the quality of the surrounding environment;
- Reducing waste generation and resource usage while promoting recycling initiatives; and
- Implementing correct management and disposal methods for any contaminated waste encountered during operations.

Skytrust also manages issues and incidents, featuring modules for recording audits and inspections. Together, these systems provide NTRS employees with access to NTRS policies and processes. Moreover, NTRS offers systems and tools for contractor management, learning and development, and data management.

NTRS consistently conducts audits, reviews, and updates company systems, management plans, and associated documentation to uphold business practices and best standards while ensuring compliance with applicable legislation.

4.3 Policies

NTRS has established several company-wide policies to ensure effective management of its operations. These policies have been approved by NTRS's leadership team and are regularly reviewed. All employees at NTRS are required to adhere to these policies. NTRS's environmental policies aim to reduce emissions in land, air, and water and to promote the responsible use of natural resources. This commitment is outlined in NTRS's environmental and sustainability policies (see below).

4.3.1 Environment Policy

NTRS is committed to minimising the environmental impacts of its operations and continually improving its environmental performance within a framework of sustainable development by:

- Effectively managing our significant environmental impacts which involves regularly monitoring progress and assessing our performance against set objectives and targets.
- Ensuring compliance with applicable environmental laws and contractual obligations relating to our operations while supporting our customers and suppliers in using products and services in an environmentally conscious manner.
- Effectively communicate our policies, objectives, and accomplishments to everyone working on behalf of the business, providing education and training to employees to enhance their understanding of environmental issues and the impact of their actions.
- Prevent pollution and protect natural, historical, and constructed environments while minimising the consumption of raw materials, energy, and other supplies.
- Actively consult with relevant stakeholders, considering local environmental contexts, and collaborate with communities to achieve shared and sustainable outcomes.

4.3.2 Sustainability Policy

For NTRS, sustainable development involves implementing business strategies and activities that fulfil the current needs of NTRS and its stakeholders, while safeguarding, supporting, and enhancing the human and natural resources required for the future. This commitment is articulated in NTRS's Sustainability Policy:

- We prioritise ethical responsibility to create value in our activities while employing sound risk management principles in our business operations. As part of its ‘non-negotiables,’ NTRS will adhere to all relevant legislation regarding pollution prevention and strive to enhance our integrated business management system, ensuring a consistent and disciplined approach to our processes. We will leverage appropriate resources, both internally and externally, to help achieve our objectives.
- We believe in partnering for innovation and aim to understand and support our customers in reaching their business goals.
- Our commitment to attracting and retaining a diverse and talented workforce will include providing development opportunities for continuous learning, effective communication, workplace consultation, and fostering an ‘Always Safe’ environment, with the goal of achieving a zero-incident policy regarding workplace injury or illness for our employees, visitors, and contractors.
- We are dedicated to designing and implementing sustainable solutions that ensure access to resources while also protecting and replenishing them. NTRS is committed to demonstrating environmental leadership in its operations, managing our environmental impacts, and enhancing outcomes related to waste, water, energy, and carbon while safeguarding biodiversity and natural capital.
- We actively collaborate with local communities to achieve meaningful and long-lasting results. Furthermore, NTRS will engage with government bodies, policymakers, advocacy groups, industry associations, and other stakeholders in our operational areas to generate better value and outcomes in sustainable practices.

5 Site Details

5.1 Location & Area of Site

The subject site is located at 95 Syrimi Road, Tiverdale, 0822 (herein referred to as “the site”). The site has an area of approximately 8.1 hectares. Erected on the site are a 4,198 square metre main industrial shed, a 557 square metre second shed and ground improvements that include a loading dock from the creek, a truck loading ramp, a quarantine yard and fencing.

5.2 Description of Infrastructure

Services

The site is presently serviced by the following:

- Water – connection in the footpath from Syrimi Road
- Sewer – septic tank
- Electricity – connection at the front of site
- Telecom - connection in the footpath of Pruen Road

Infrastructure

The site has the following buildings and associated infrastructure:

- Site entrance/exit from Syrimi Road;
- Single storey 4,198 m² main shed;
- 557 m² secondary shed;

- On-site parking and dedicated landscaped areas;

5.3 Site Topography

The site at 95 Syrimi Road, Tivendale, is situated within a modern industrial precinct characterised by flat, low-relief terrain typical of the Darwin region. The landform is generally level, with no notable natural slopes or undulations, supporting heavy-vehicle access and large-format industrial development. The surrounding area consists of engineered industrial allotments, indicating that the site has been previously cleared and graded to create a stable surface suitable for hardstand construction and operational activities. The location does not intersect any mapped waterways, drainage lines, or flood-sensitive topographic features, and the broader Tivendale estate is designed with controlled stormwater pathways that direct runoff away from operational areas. Overall, the topography presents low environmental sensitivity, minimal erosion risk, and a predictable surface profile conducive to industrial use and straightforward environmental management.



Figure 1. 95 Syrimi Road, Tivendale

5.4 Site geology, Hydrology and Hydrogeology

The geology of the Tivendale industrial precinct is typical of the Darwin coastal plain, consisting of highly weathered lateritic profiles, sandy clays, and underlying sedimentary materials. These formations have undergone prolonged tropical weathering, producing stable, iron-rich soils with low shrink–swell potential. The area has no known geological constraints such as rock outcrops, steep relief, or subsurface instability. The geological setting provides a predictable and robust foundation for industrial development, supporting hardstand construction, heavy-vehicle movements, and engineered stormwater systems without requiring specialised geotechnical treatment.

Hydrology across the site is shaped by its flat topography and fully developed industrial layout. Natural surface water features are absent, with no creeks, gullies, wetlands, or mapped drainage lines intersecting the allotment. Stormwater behaviour is dominated by constructed drainage infrastructure within the Tivendale estate, directing runoff toward roadside swales and council-managed systems designed for high-intensity wet-season rainfall. The site is not located within a flood-prone zone and exhibits low hydrological sensitivity, provided standard stormwater controls are maintained to prevent ponding, erosion, or uncontrolled discharge.

Soils in the Tivendale area are primarily lateritic sandy clays and compacted fill, reflecting both natural weathering processes and past industrial earthworks. These soils are generally well-drained, moderately permeable, and resistant to erosion when stabilised. The lateritic component provides a firm base suitable for heavy-duty surfaces, while the clay fraction can become waterlogged during peak wet-season rainfall if not properly graded. Soil profiles show low contamination risk in their natural state, and the engineered fill present on industrial allotments supports predictable load-bearing performance for waste and recycling operations.

The site is located within the tropical monsoonal climate of the Northern Territory, characterised by distinct wet and dry seasons. The wet season (November–April) brings high-intensity rainfall, elevated humidity, and short-duration storm events that generate rapid runoff across hardstand areas. The dry season (May–October) is marked by low rainfall, stable conditions, and minimal surface water movement. Temperatures remain consistently high year-round, influencing evaporation rates, dust generation, and the need for robust stormwater and erosion controls during seasonal transitions. Climate conditions are predictable and well understood, allowing for straightforward environmental planning.

5.5 Location of Sensitive Receptors

The surrounding land use at 95 Syrimi Road is entirely industrial, with neighbouring lots occupied by transport depots, warehousing, logistics operations, and light-to-medium industrial activities. The precinct is purpose-designed for heavy-vehicle access, bulk material handling, and commercial operations, with no sensitive receptors such as residential areas, schools, or conservation zones in close proximity. The broader Tivendale estate forms part of a designated industrial corridor supporting Darwin's logistics and waste-management sectors. This land-use context provides low environmental sensitivity and aligns well with recycling, waste processing, and other industrial activities.

5.6 Nearby Waterways

The site at 95 Syrimi Road is not intersected by any natural waterways, creeks, or drainage lines. The nearest significant surface water features are associated with the Hudson Creek, located to the south-west of the Tivendale industrial precinct. These waterways do not directly influence the site due to the flat topography, distance, and the presence of engineered stormwater systems throughout the estate. All stormwater generated on-site flows into constructed roadside swales and council-managed drainage infrastructure, which ultimately direct runoff toward the broader municipal network rather than natural watercourses. As a result, the site presents a low risk of direct impact to natural waterways, provided standard sediment, hydrocarbon, and stormwater controls are maintained.

6 Description of Activities

6.1 Existing Operations

NTRS Pty Ltd is licensed by the Northern Territory Environment Protection Authority (NT EPA) under Environment Protection Licence EPL168 to operate as a listed waste handler and manage facilities located at 5 Dennis Court and 19 Pruen Road. The licence permits NTRS to collect, transport, store, recycle, treat, and dispose of a wide range of listed waste for commercial and residential customers. This EMP applies specifically to the addition of the new site and its operations at 95 Syrimi Road, Tivendale.

6.2 Proposed Operations

The site is intended for recycling various types of waste, including construction and demolition debris, commercial and industrial waste, green waste, tyres, and soils. Although NTRS is already licensed to perform these activities at 19 Pruen Road, the new site will allow NTRS to expand its operations. This will help Northern Territory businesses achieve recycling and circular economy goals while maintaining waste management within the Territory.

6.2.1 Materials Accepted for Resource Recovery

NTRS accepts the following materials for onsite processing and reuse:

- Construction and demolition (C&D) waste
- Commercial and industrial (C&I) dry waste
- Tyres
- Concrete
- Bricks
- Ceramics
- Natural rock
- Asphalt
- Green waste
- Soils and Aggregates

6.2.2 Processing of Waste

NTRS will undertake a range of controlled waste-processing activities designed to safely recover recyclable materials and stabilise suitable waste streams in accordance with NT EPA requirements. All processes are conducted using engineered equipment and established operating procedures that minimise environmental risk and ensure compliance with licence conditions. Activities on the site will include:

- **Mechanical size-reduction (shredding and crushing)** Used to break down various solid waste streams into manageable and recyclable fractions. These processes operate within enclosed or controlled areas to prevent dust, noise, and material escape.

- **Screening and material separation** Screening equipment will be used to classify and size recyclable materials, improving recovery efficiency. This is a dry, mechanical process with low environmental risk and standard dust-control measures.
- **Green waste thermal processing (air-blanketed burner)** An already Australian-approved controlled combustion unit designed specifically for green waste, reducing waste to landfill. The system operates under managed airflow conditions to ensure efficient burning, reduced emissions, and compliance with relevant air-quality standards. The byproduct is an agent that is added to composting processes or can be reused for encapsulation of soils.
- **Composting of organic materials** The site will operate a controlled composting process that blends green waste with suitable organic inputs, including **food-derived grease-trap liquids**, to enhance microbial activity and produce a high-quality compost product. All composting activities will be undertaken within managed areas with controls for odour, leachate, and stormwater to ensure compliance with environmental standards.
- **Soil encapsulation and fixation** Stabilisation processes will be used to treat soils that require immobilisation of contaminants. These methods produce a solid, non-leachable material suitable for compliant disposal or reuse, preventing environmental release of contaminants.
- **Evaporation of high TDS waters:** We will incorporate an evaporation tower system as a controlled, low-impact method for managing high-TDS waters within our Environmental Management Plan. The enclosed HDPE-panel design delivers rapid, passive evaporation without drift, misting, or aerosol generation, ensuring no off-site impacts and maintaining compliance with EPL conditions.

All activities are supported by routine environmental monitoring, engineered stormwater controls, and documented operating procedures to ensure safe, compliant, and environmentally responsible waste processing.

6.2.3 Tracking and Record-Keeping

All incoming material and outgoing materials are weighed and recorded in the NTRS tracking register, documenting:

- Date
- Vehicle registration
- Customer/company
- Material source
- Destination
- Tonnage
- Weighbridge docket number

6.2.4 Facility Operating Hours

The standard hours are currently 6:00 am to 6:00 pm, with Saturday and Sunday work occurring as required. The facility will continue to operate in this manner.

6.3 Site Operation Controls

6.3.1 Waste Acceptance Criteria

- Verify all licences, approvals, and customer details before accepting tyres, C&I dry waste, or kerbside commingled recyclables.
- Confirm all loads are accompanied by correct documentation.
- Ensure tyres and other materials are free from contaminants such as oils, chemicals, or hazardous residues.

6.3.2 Waste Handling

- Use vehicles suitable for transporting tyres, C&I waste, and kerbside recyclables, ensuring loads are secured to prevent movement.
- Ensure personnel are trained in safe loading and unloading procedures for all waste streams.

6.4 Processing

- Conduct tyre shredding and resource recovery activities following all safety and environmental protocols, including dust suppression over hopper.
- Process C&I dry waste and kerbside commingled recyclables in accordance with NTRS procedures and NT EPA requirements.
- Ensure all processing activities comply with relevant regulatory standards.

6.5 Storage

- Store shredded tyres, C&I waste, and kerbside recyclables in secure, ventilated, and clearly designated areas.
- Store unprocessed tyres with the below limitations
 - Maximum height of 3 metres
 - Maximum width of 5 metres
 - Maximum length of 45 metres
 - Average side slope of 1:1
 - Separation distance between stockpiles 10 metres
 - Separation distance from end of stockpiles of 10 metres
 - Separation from site boundaries of 6 metres

- Water vessels surrounding stockpiles to mitigate spread in the event of a fire
- Maintain good housekeeping to minimise fire risk and operational hazards.
- Conduct inspections as required to ensure storage does not exceed limits

6.5.1 General Storage Controls

- Segregate C&I waste and kerbside recyclables from hazardous or incompatible materials.
- Ensure all containers, bays, and stockpiles are clearly labelled.
- Maintain accurate manifests and storage records for all waste streams.
- Fire hydrants located within the sites in the event of a fire hazard.

6.5.2 Monitoring

- Check loads before, during, and after transport to ensure stability.
- Record and report any incidents such as load shifts, contamination issues, or vehicle defects.
- Inspect transport vehicles regularly for wear, damage, or mechanical issues.

6.5.3 Corrective Actions

- Stop transport immediately if a load becomes unstable and secure the load before continuing.
- Report incidents to relevant authorities as required.
- Provide additional training or review loading procedures if recurring issues are identified.

6.5.4 Reporting

- Maintain detailed records of tyre, C&I, and kerbside recyclable collections, transport, processing, storage, stockpile volumes, sources, and destinations.
- Submit required reports to the NT EPA, including incident notifications.
- Ensure all activities comply with NT regulatory requirements and NTRS internal procedures.

6.6 Mobile Shredding

Mobile tyre shredding operations will be managed to minimise fire risk, prevent environmental harm, and maintain safe handling practices. Controls will include maintaining small, separated stockpiles and ensuring clear access for fire response, consistent with national tyre-storage fire-prevention guidance. Operations will also ensure tyres are protected from water ingress to reduce leachate risks and are stored away from ignition sources in line with EPA waste-tyre handling principles. Prior to mobilisation, a site-specific Environmental Management Plan, Emergency Management Plan, and risk assessment will be developed to address local conditions and ensure safe, compliant shredding activities.

6.7 Biodiversity

The NTRS Site Risk Assessment assessed the potential effects on biodiversity throughout the site's operation. Findings indicate that the recognised biodiversity effects from operational activities are unlikely to negatively

impact off-site sensitive receptors or local amenities, assuming that the proposed mitigation measures are effectively enacted.

6.7.1 Threatened flora or fauna species, endangered flora populations or endangered ecological communities

- No threatened flora or fauna species, endangered flora populations or endangered ecological communities were recorded in the area.
- Site long established and in an industrial zoned area.

6.7.2 Discovery of Aboriginal and Macassan archaeological places at the site

Aboriginal and Macassan archaeological sites are unlikely to be found in areas that have been reclaimed, previously cleared or disturbed, or built over. In these cases, no action is typically required. If a site of Aboriginal or Macassan significance, or one that may be significant, is discovered during work, all operations in the vicinity will stop immediately. The Environmental Representative for NTRS will be contacted promptly to determine the next steps. If suspected human skeletal remains are found, all work will halt, and the NT Police and NT Coroner's office will be notified. Should the burial be confirmed as Aboriginal, a heritage professional and the NT Office of Environment and Heritage will be consulted to establish the appropriate course of action.

6.8 Weather Controls

The NTRS Site Risk Assessment evaluated the expected weather effects during site operations. It concluded that the recognised weather impacts from operational processes are unlikely to negatively affect any off-site sensitive areas or local amenities, assuming that the suggested mitigation measures are properly applied.

6.8.1 Wind

The NTRS Site Risk Assessment has recognised one potential environmental impact risk to the site. It has been classified as Low after implementing control measures. The entire site is fenced ensuring that no litter can leave the premises as well as regular housekeeping measures are in place.

6.8.2 Cyclone, Potential for emissions off site

- Enclosed works
- Weather monitoring
- Business continuity plan to include severe weather conditions

6.8.3 Storms

The NTRS Site Risk Assessment has identified one potential risk of environmental impact on the site. It was deemed Low after control actions applied.

6.8.4 Bushfires

The NTRS Site Risk Assessment has identified one potential risk of environmental impact to the site. It was deemed Low after control actions applied. The facility is fitted with onsite fire hydrants as well as access from the front and rear of the site for fire emergency services. The existing shed is fitted with fire alarms which remotely notify NTRS management when the site is not attended.

6.8.4.1. Potential for emissions off site, Potential for facilities damages

- Not located in a bushfire zone.
- No activity is expected to cause significant emissions.

6.9 Environmental Incidents

The NTRS Site Risk Assessment conducted an evaluation of the anticipated Environmental Incident impacts during site operations. The assessment revealed that the identified environmental incident effects from the operational processes are unlikely to adversely affect any sensitive receptors off-site or local amenities, provided that the proposed mitigation measures are effectively implemented.

6.9.1 Spills

The NTRS Site Risk Assessment has identified spills as low risk due to the material being processed or recycled is dry in nature.

6.10 Regulatory noncompliance

The NTRS Site Risk Assessment has identified one potential environmental impact risk at the site, rated as Medium following the application of control measures.

6.10.1 Licence breach / Regulatory action (notices/warnings/penalties)

- Legal and other requirements addressed
- Risk register
- EMP
- Work documentation
- Report to regulators as required
- Monitoring and sampling as required

6.10.2 Reputation, community relationships

The NTRS Site Risk Assessment has identified one potential environmental impact risk to the site, which was rated as low following the implementation of control measures.

6.10.3 Negative social media/media attention

- Site location (industrial zoning) - less impact on sensitive receptors
- Existing site (not greenfield site)
- Existing operations have 24/7 permissions (transport etc)
- Signage installed at front of site (public notice/exhibition)

6.11 Other

The NTRS Site Risk Assessment evaluated additional factors that might influence site operations. It found that the other recognised impacts from operational processes are unlikely to adversely affect off-site sensitive receptors or local amenities, provided that the identified mitigation measures are effectively implemented.

6.11.1 Visual Amenity

The NTRS Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed Low after control actions applied.

6.11.1.1 Windblown litter, material tracking offsite and stockpile waste

- Housekeeping inspections to ensure litter controlled and visual amenity not impacted
- Supply a bin for litter control
- Induction, training
- Most enclosed activities

6.11.2 Socio-economic

The NTRS Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed Low after control actions applied.

6.11.2.1 Noise and traffic impact to local residents / Action on Council

- No local residents, only commercial/industrial
- <95dBa (daytime activities) daytime operations only (hours to be confirmed)
- 24-hour operations permitted in zoning and within background levels of surrounds Action (worker PPE - noise protection >84dBa for 8 hours)

7 Implementation of this EMP

All personnel associated with the operation of the Site must comply with the legal, contractual and environmental requirements presented by NTRS and addressed in this EMP. The EMP is implemented based on the standard Plan, Do, Check, Act model as follows:

- Planning and environmental issues identification;
- Development of corporate and operational documents including corporate policies, project planning strategies, environmental performance indicators, management plans, procedures and guidelines and project specific documentation;
- Implementation of environmental management programs, with adequate resourcing and training;
- Setting of environmental objectives and targets;
- Measurement and evaluation against key performance indicators; and
- Conducting management review for continual improvement.

All relevant conditions of licences, permits, consents and approvals are to be adhered to during the operation of the Site. Copies of all licences, consents, permits and approvals will be held on Site.

This section describes the implementation requirement of this EMP.

7.1 Environmental Training

Upon commencement, all contractors shall be made aware of their environmental responsibilities and shall familiarise themselves with the requirements of this EMP.

All contractors will receive induction/training in the following areas:

- Environmental Policy;
- EMP and related documents;
- Significant site aspects, impacts and controls;
- Emergency procedure and response;
- Understanding the site legal obligations;
- Personnel performing tasks that can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience, and;
- All inductions and on-going training, if required, shall be recorded.

7.1.1 Specific Training

In addition to the above, specific training related to environmental requirements, may include awareness of the following:

- Legal obligations and facility or activity specific environmental approvals (EPA licences etc)
- Individual authorities and responsibilities;
- Contract specific significant aspects, impacts and controls;
- Contract specific environmental objectives and targets,;
- Consequences of departure from procedures and contract requirements;
- Contract specific emergency procedure and response procedures; and
- Contract specific reporting and notification processes.

7.1.2 Contractor Training

Contractors engaged in activities pertaining to the Contracts will undergo training prior to starting work. Competency expectations for Contractors are communicated during the prequalification and selection process to align with contract requirements. This includes a request of necessary experience, qualifications, competencies and training records. NTRS's Contractor Prequalification outlines its expectations. Environmental awareness training is delivered as part of the Contracts expectations.

7.1.3 Visitor Inductions

All visitors to Sites where work under the Contracts is occurring must be accompanied by a NTRS authorised worker who has been fully inducted as per requirements. In addition, visitors must undergo the following training:

- General Site induction;
- Familiarisation with any Site-specific emergency requirements; and
- Familiarisation with Site features and hazard awareness, including issue reporting requirements.

7.2 Communication and Consultation

NTRS is committed to meaningful stakeholder engagement and works in collaboration with relevant government agencies and the local community in the areas where the Site operates to receive feedback and/or resolve issues that result from the operational activities.

7.2.1 External Stakeholders

External stakeholders relevant to the Site operation include, but are not limited to:

- Local Council in which the Site operates;
- Regulatory authorities (such as NT-EPA, local councils etc.);
- Emergency services;
- Other asset owners/operators;
- Nearby residents and businesses; and
- Any sensitive receivers, including businesses, schools etc. if identified where the works are being undertaken.

NTRS liaises with appropriate regulatory authorities via meetings and/or correspondence.

7.2.2 Community Engagement

NTRS will endeavour to keep neighbouring businesses informed in a proactive and responsive manner. NTRS's communications may include signage, written notification, or personal calls.

Early engagement helps NTRS to make neighbours aware of the works being undertaken, as well as to provide an opportunity to address concerns, where feedback is received by the Site manager.

When feedback is received, the Site manager will notify the relevant stakeholders to properly address the feedback received.

7.2.3 Complaints Handling

A sign will be displayed at the Site to inform neighbouring businesses or the public who to contact for complaints. The contact person is the Site manager through the phone number: (08) 7909 8888. The Site manager will be available to receive public feedback, including complaints. The following process is to be followed on receipt of complaints:

- All complaints received (either written or verbal) will be documented to record and the following information is required:
 - Date and time of the complaint;
 - Date and time of the occurrence of matters causing the complaint;
 - Nature and extent of the complaint;
 - Details of all related factors including location, dates, frequency, duration, Site conditions and effects of the complaint
 - Method by which the complaint was made;
 - Name and position of the person receiving the complaint;
 - Name and address of complainant (if known);
 - Action taken in response to the complaint;
 - Action taken to prevent a re-occurrence of the circumstances leading to the complaint; and
 - Action(s) taken to address the complaint including follow up contact with the complainant.
- Complaints pertaining to environmental issues are to be reported to NTRS People, Safety & Training Manager immediately, and escalated as appropriate.
- The complaints are to be logged in Skytrust. Any substantial complaint will be addressed as a non-conformance with the Contracts.
- Records of all complaints will be kept for at least 3 (three) years after the complaint was made.
- All complaints will be acknowledged as soon as practicable following receipt.
- The NTRS Project Manager, or their nominee, shall investigate and determine appropriate corrective/preventive actions to be taken to address complaints and avoid any recurrence or minimise the reported (and verified) adverse effects.
- Where no action is taken the reasons why are to be recorded.

7.3 Incident and Emergency Response

A key objective of this EMP is to identify potential risks, and to develop, and maintain measures to manage them. Notwithstanding this, NTRS recognises that unforeseen incidents can arise.

NTRS operates under an Emergency Response Plan (ERP) whenever a major incident, emergency or crisis could lead to public health, safety or environmental issues.

NTRS's approach to incident and emergency response management includes:

- Risk Analysis - The identification of hazards and risks that could impact the community, environmental and operational implications.
- Prevention – The planning and documentation of prevention and mitigation activities for all major hazards, and allocation of responsibility for their implementation.
- Preparedness – The development, implementation and review of specific incident management plans and processes to manage identified risks, the training of staff, and establishment of facilities to ensure the company can respond effectively to an incident.
- Response – The issue of warnings and establishment of processes for effective notification of incidents, and mobilisation of resources to combat the incident or threat.
- Recovery – The return to normal operations, management of debriefs, and implementation of lessons learnt from the response process.

The following priorities are adopted when combating an incident / crisis:

- Protection of human life and welfare;
- Protection of the environment; and
- Protection of NTRS's assets.

Potential threats to the environment or public health that may arise as a result of the construction works at the Site include:

- Fire;
- Spills;
- Structural damage;
- Power or other utility failure;
- Natural disaster;
- Air/water quality contamination;
- Traffic incidents;
- Medical emergencies

The ERP aims to minimise the risk to all personnel in an emergency and control any incident or emergency to minimise damage to the environment, plant, equipment, and property. The ERP outlines:

- Facility/contact description, site plans and maps;

- Information on potential pollutants;
- Information on hazardous materials, including safety data sheets and spill containment materials, type and location (ie. on Site or on a vehicle);
- Incident identification and notification process;
- Emergency contact details;
- Emergency response personnel roles, responsibilities and procedures;
- Procedures to follow to minimise/control environmental incidents; and
- Testing and training requirements.

A copy of the ERP is to be kept where construction works are being performed and made available at all times.

7.3.1 Emergency Response Management

The Emergency Response Plan (ERP) identifies and responds to potential incidents and emergencies at the Site. It describes the general policy and approach that should be followed when dealing with an emergency or incident. It aims to:

- Address various types of emergencies, including fire, spills, medical emergency etc;
- Minimise the risk to all personnel in an emergency;
- Control any incident to minimise damage to plant, equipment, property and the environment.

Incidents and emergencies will be managed in accordance with the ERP. This includes external and internal notification, recording, reporting and response processes.

7.3.2 Emergency Contacts

A list of personnel to be contacted during any Site or environmental emergencies has been compiled and presented in the table below:

Table 2 Site Contacts

Name	Role	Mobile	Email
James Prakash	Managing Director	0447 969 847	James.prakash@vtgwaste.com.au
Dion Meta	Technical Manager	0456 224 117	dion.meta@vtgwaste.com.au
Aubrey Champs	Site Supervisor	0477 266 015	aubrey.champs@ntrs.com.au

Jayden Day	People, Safety & Training Manager	0418 847 403	jayden.day@vtgwaste.com.au
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7.3.3 Incident Notification

The Site will have a set of procedures to ensure that all incidents are effectively reported, recorded, investigated and acted upon wherever possible. Notifications will be in accordance with the ERP.

The ERP provides guidance on the identification, reporting and escalation of incidents and emergencies that have affected or have the potential to affect the environment and/or health and safety of a worker or a visitor at the Site.

Incidents will be logged in Skytrust, NTRS's issues management system, and managed in the following sequence:

- Log incident;
- Investigate incident;
- Close incident;

If further action is required, this is also logged in Skytrust, assigned for action to specific NTRS personnel. Corrective action can then be implemented to minimise the risk of recurrence of the incident.

Notifiable Environmental Incident

A notifiable environmental incident is an incident arising from a regulated activity that has caused or has the potential to cause material or serious environmental harm. Any notifiable environmental incidents are to be reported immediately to Senior Management and the People, Safety & Training team.

Environmental Incidents

An environmental incident includes a leak, spill or escape of a substance or circumstances where this is likely to occur. Material harm includes onsite and offsite actual or potential harm to:

- The health or safety of humans;
- The environment; or
- Property damage resulting in significant costs to remediate

If the circumstances giving rise to environmental harm or potential environmental harm occurs, communication with the appropriate regulatory authority (NT-EPA) is to be via the Environmental Compliance Advisor and/or nominee, and provide the following information:

- the identity of the person giving notice;
- the time and date of the circumstance;
- the circumstance causing or threatening to cause environmental harm;

- the place where the circumstance occurred or is likely to occur;
- how the environmental harm occurred, is occurring or may occur; and
- action taken to prevent, reduce control, rectify, or clean up the pollution or resultant environmental harm caused or threatening to be caused by the circumstances

If instructed by the People, Safety & Training Manager and/or nominee, the following authorities must be notified immediately, as relevant in the below table.

- NT Fire and Rescue Service
- NT EPA;
- NT WorkSafe;
- Local Council (where the incident has occurred).

Table 3 Notification Authorities

Contacts	Function	Contact Number
Police	Emergency Attendance	000 131 444
Fire	Emergency Bushfire Hotline	000 1300 362 361
Ambulance	Emergency	000
NT EPA	Pollution Hotline	1800 064 567
NT WorkSafe	Notifiable Incidents	1800 019 115
City of Darwin	24 Hour service	08 8930 0300
State Emergency Services	Emergency	132 500
Power Emergencies and Faults	Emergency/Faults - 24 Hours	1800 245 090

The most likely form of potential or actual environmental incidents at the Site during operation are considered to be fire and/pollution of waterways. Internal and external emergency contacts details are listed in the ERP, with guidance on what to report. The reporting required, in accordance with relevant regulations may include but is not limited to as described in the section below.

7.3.4 Incident Reporting

NTRS Management must notify the Northern Territory Rates Act Area EPA, and any other relevant agencies or stakeholders of incidents causing or threatening material harm to the environment or human health as soon as practical after they become aware of the incident. Notification will initially be made via telephone.

A written report will be provided within 7 days of the incident occurring to the EPA.

NTRS will provide a written report, at the request of any authorised EPA officer, in relation to an event that has caused, is causing or is likely to cause material harm to the environment.

7.3.5 Licence Non-Compliance Reporting

NTRS must notify the NT EPA of any non-compliance by completing the Non-Compliance Notification via NT EPA Online (or by emailing waste@nt.gov.au), as soon as practicable after (and in any case within 24 hours after) first becoming aware of the non-compliance.

The following information must be included in the notification of non-compliance to the NT-EPA:

1. when the non-compliance was detected and by whom;
2. the date and time of the non-compliance;
3. the actual and potential causes and contributing factors to the non-compliance;
4. the risk of environmental harm arising from the non-compliance;
5. the action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance;
6. corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur;
7. if no action was taken, why no action was taken; and
8. a date when an incident investigation report will be submitted to the NT EPA.

8 Environmental Management

8.1 Performance Measures

The table below outlines the environmental objectives and targets that will be adopted for the Site. These targets will be reviewed and amended based on any environmental impact and risk assessments undertaken, as well as any specific approval conditions and/or any other requirements imposed from external sources. The assessment and reporting of the data related to incidents, regulatory breaches, fines or penalties will be regularly reviewed by NTRS and, where reportable, notified to relevant authorities.

Table 4 Objectives and Targets

Environmental Parameter	Objectives	Target / Performance Measure
Soil and Water Quality	• Effective management of Site surface water and unsealed areas to minimise soil erosion and sediment • Effective handling and management of onsite chemicals storage • Effective identification and protection of stormwater drain/discharge points	• Zero externally reportable incidents relating to sediment or sewage release and water quality impacts • Zero externally reportable incidents relating to chemical, fuels and oil spills • Resolution of soil and water quality issues identified through visual inspections, as part of general site housekeeping
Noise	• Limit < 95dBa for day time activities from Tailor Made. • Day time operations only (hours to be confirmed) except 5 am start for concreting. • 24 hour operations permitted in zoning and within background levels of surrounds (limit < 84dBa for 8 hours). • Implement a complaint line to respond to noise complaints	• No works outside standard hours unless for concreting. • All noise related complaints to be responded to by prescribed timeframe.
Air Quality	• No ongoing dust issues created as a result of project activities • Implement a complaint line to respond to dust or odour complaints.	• Areas of dust or odour issues observed during environmental monitoring during construction and post-construction • Number of complaints relating to dust or odour closed out within the prescribed time frame
Traffic and Access	• Avoid traffic disruptions • Avoid impacts on private property access	• No traffic complaints associated with the project

Waste Generation, Resource Use and Energy Use	• Maximum recycling of project wastes • Minimise waste generation	• Evidence of recycling of materials where possible • Reuse of existing plants and equipment
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8.2 Inspection, Testing, Maintenance and Monitoring

8.2.1 Monitoring

An annual monitoring programme is in place at NTRS's facility at Pruen Road including inspections, assessments and reporting. These requirements will be reviewed and adopted as per risk register and in consultation with NT EPA for the operational phase of the Site, subject to its EPL conditions.

8.2.2 Inspections

Regular inspections will be undertaken at the Site, as per the table below, to ensure that nominated environmental controls identified in the ERA have been implemented, meet specifications, and are being maintained following the Site's inspection and testing schedule:

Table 5 Inspections

Item	Type of Inspection/ Testing	Frequency of Inspection	Responsibility
Prestarts/Take 5's	Hazard Identification	Daily	Workers
Always Safe Interactions	Visible leadership and task observation	Weekly Monthly	Supervisors Managers
Environmental Site Checklist	Inspection	Monthly or With changed environmental conditions (such as after significant rainfall events)	Supervisor/ Project Manager
Environmental & Safety Inspection and Audits	Verification	Annual, or as required	Contractors or NTRS People and Safety team
NTRS Asset Management System	Preventative maintenance inspections and checks	As required	Engineering

8.2.3 Records

The following records will be kept in accordance with appropriate regulatory, contractual and business retention periods to demonstrate environmental due diligence and compliance with the Site's Environmental Management Plan (EMP):

- Environmental permits such as licences as relevant;
- Completed inductions and training;
- Completed environmental checklists, categorisations and assessments;
- Environmental audit reports and audit findings;
- Non-conformances identified;
- Completed corrective actions;
- Complaints received;
- Environmental incidents and rectification actions taken;
- Waste tipping dockets;
- Plant and equipment registers and daily checks;
- Safety Data Sheets and chemical registers;

8.2.4 Reporting

At completion of each inspection, records are to be maintained and any findings logged in NTRS's compliance management system, Skytrust. This system enables non-conformances and opportunities for improvement, identified through internal and external audit processes or inspections to be recorded, reported and responded, with corrective actions assigned to the responsible person(s).

Performance and compliance reporting will be undertaken as required, to produce systematic, comprehensive and informative reports on the environmental performance of the Site.

8.2.5 Auditing

Environmental audits will be undertaken as per NTRS's governance program to verify that the Site meets its compliance objectives during the normal operation, as well as to support continuous improvement. The audits will assess the environmental performance of the Site based on:

- compliance with NTRS policies, relevant legislative requirements and industry standards;
- whether the measures and/corrective actions carried out conform to the objectives of the EMP and as identified in the site risk assessment.
- the adequacy of implemented controls to minimise high risk environmental issues; and

- areas for continuous improvement.
- Audit findings will be reported to NTRS management and logged in Skytrust.

8.2.6 Non-Conformances, Corrective and Preventative Actions

Environmental non-conformances shall be recorded in Skytrust, by the People, Safety & Training team.

Allocated corrective actions and preventive actions shall be generated and completed in accordance with NTRS requirements, including required reporting timeframes as summarised in the below table.

Table 6 Non Conformances, Corrective and Preventative Actions

Priority	Action	Time Frame
Low	May not require immediate action. Monitor the situation and schedule control action.	Action typically required within 15 to 29 days.
Medium	Control action as soon as possible	Action typically required within 7 to 14 days.
High	Significant and immediate control	Action typically required within 1 to 7 days.

Environmental incidents and/or source of non-compliances will be investigated as per NTRS's Incident Management Procedure or on a case-by-case basis, depending on the severity of the incident as per NTRS's Risk Management Procedure. The table below summarises the investigation level.

Table 7 Investigation Levels

Incident Classification	Investigator
1. Insignificant 2. Minor 3. Moderate	A suitable competent person from the organisational unit or functional area where the incident occurred.
4. Major 5. Catastrophic (Crisis)	Appropriately independent qualified person appointed as Lead Investigator.

8.3 Management Review

Management review of this EMP will be undertaken to assess the continuing suitability, adequacy and effectiveness of the implemented environmental management measures.

The inputs to the management review process will include (but not be limited to):

- incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received;
- changes in Site conditions or scope of works; and
- implementation of all compliance and legislative changes as identified at a corporate level;

Reviews may also be carried out by consulting documents such as the contractor documentation (as required), work instructions, variation to scope of works, completed inspection check sheets, and inspection and test plans as appropriate.

The output of management review will include any decisions and actions related to:

- possible changes to the EMP, associated work instructions, practices, objectives and targets associated with the environmental management of the works under the Contracts;
- improvement of the effectiveness of the NTRS management system and its processes; and
- resource needs.

In addition to the management review, periodic meetings will be conducted to review all Site-specific key performance indicators pertaining to the environment and relevant business systems. This will include reviews, and if necessary, revision of the EMP following any major incident or series of complaints, or any modifications to the consent.

Changes to the EMP will be recorded and issued as per the document control at the start of this EMP. The review will adequately address all sections of the EMP and action them appropriately.

The following forums will form part of the management review process under the Contracts, conducted periodically by the Project Managers and supervisors, in conjunction with operators and/or the People and Safety team as required:

- Meetings;
- Toolbox talks;
- Hazard review groups;
- Serious incident reviews; and
- Miscellaneous environmental workshops

The following processes will be used for continual improvement:

- root cause identification and correction of incidents, complaints and issues of non-conformance
- root cause identification and prevention of potential incidents and nonconformances
- process/performance review, and
- enhancement of processes and generation of new initiatives.



9 APPENDICES - Site Layout