

Vermin and Pest Control Plan - CTT

PURPOSE	The purpose of this VPCP is to provide pest and vermin management procedures to form part of the Clyde Transfer Terminal (CTT) Operational Environmental Management Plan (OEMP), in accordance with the Conditions of Consent (COCs), EPL, relevant legislation and as part of Veolia's Business Management System (BMS).
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Scope	This VPCP has been prepared to provide the control measures implemented to minimise potential vermin and pest related impacts during the operation stage of the CTT.
Review Frequency	Yearly

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	<p>Vermin and Pest Monitoring and Reporting</p> <p>Monitoring Program</p> <p>Performance Reporting and Review</p> <p>Exceedances and Corrective Actions</p> <p>Publishing of Monitoring Data</p>
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Quality Information

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Line of Business:	Waste
Facility:	Clyde Transfer Terminal
Address :	322 Parramatta Road, Auburn NSW

Rev	Revision Details	Issued to	Date
0.1	First draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	06 November 2020
0.2	Second draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	29 July 2021
0.3	Final draft	Department of Planning, Industry and Environment	30 July 2021

Definitions/Abbreviations

See definitions in the [BMS Dictionary](#) - Only definitions directly pertaining to this document are included.

Subject	Definition
AEMR	Annual Environmental Management Report
BMS	Business Management System
CCC	Community Consultative Committee
CTT	Clyde Transfer Terminal
COC	Conditions of Development Consent
DA	Development Application
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
TPA	Tonnes per annum
Veolia	Veolia Australia and New Zealand
VPCP	Vermin and Pest Control Plan
WHS	Work Health and Safety (Act and Regulation)

1. Introduction

1.1. Overview

Veolia Australia and New Zealand (Veolia) operates the Clyde Transfer Terminal (CTT), which is located within a portion of the Clyde Rail Yard, at 322 Parramatta Road, and forms part of Lot 201 of DP10076683 in the Cumberland Local Government Area. Refer to Site Layout Plan in **Appendix A** of the Operational Environmental Management Plan (OEMP).

The CTT facility has been approved to receive up to 600,000 tonnes per annum (TPA) of waste from within the Sydney Region. Waste is containerised and loaded onto rail wagons for transportation by rail to the Woodlawn Eco Precinct (owned and operated by Veolia) in the Southern Tablelands (approximately 250 kilometres southwest of Sydney) for treatment, recycling and energy recovery.

The CTT includes the following infrastructure:

- An access road for waste trucks entering and exiting the facility from Parramatta Road.
- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.
- A hardstand area for temporary storage and maneuvering of full and empty sealed shipping containers prior to loading on to trains.
- Rail sidings for the loading of containers onto trains for rail transport to Woodlawn.

The Minister of Planning approved the Development Application (DA) 205-08-01 on 29 August 2002, in accordance with section 89 (e) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). A number of Conditions (COC) of Development Consent (Consent) were issued to stipulate regulatory requirements for the operation of the CTT.

There have been a number of modifications since to COC which have been approved by the Department of Planning, Industry and Environment (DPIE) in accordance with section 75W of the *Environmental Planning and Assessment Act 1979*. The consent modification application (DA No. 205-08-01 MOD 5) to extend operations and increase waste acceptance to 600,000 TPA were outside the scope of this Vermin and Pest Control Plan (VPCP).

In addition, Environment Protection Licence (EPL) 11763 has been issued under the *Protection of the Environment Operations Act 1997* (POEO Act) by the NSW Environment Protection Authority (EPA).

This Vermin and Pest Control Plan (VPCP) has been prepared in accordance with conditions 51, 115, 116 and 117 of the Conditions of Development Consent (COCs) for the CTT.

1.2. Scope and Objectives

The purpose of this VPCP is to provide pest and vermin management procedures to form part of the CTT OEMP, in accordance with the COCs, EPL, relevant legislation and as part of Veolia's Business Management System (BMS).

The OEMP is the working environmental management tool for the operation of the CTT, concentrating on key environmental issues, including supporting detailed plans for the management of water quality, waste, traffic, air quality, noise, contamination, pest and vermin and emergency response.

The primary objectives of the VPCP are to establish monitoring programs and control strategies to minimise the attraction of vermin and pests to the site, and to prevent the degradation of local amenity.

1.3. Legal and Other Requirements

The following regulatory framework applies to this VPCP:

- Development Consent (DA 205-08-01) issued under the *Environmental Planning and Assessment Act 1979*
- Environment Protection Licence (EPL 11763) issued under the *Protection of the Environment Operations Act 1997* (POEO Act)

1.3.1. Conditions of Development Consent

The COCs related to the VPCP are detailed in **Table 1.1** below.

Table 1.1 Conditions of Consent Requirements

Relevant Conditions	Requirement	VPCP Reference
51	The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues: (a) Removing all waste from the tipping areas at the end of each day (b) Cleaning up all waste tipping and handling areas at the end of each day (c) Regular cleaning of catch drains and drainage sumps (d) Minimising onsite waste storage and handling (e) Maintaining any bird deterrent measures such as hanging wires (f) Routine inspection and action for potential vector habitats (g) Using commercial vector control specialists (h) Conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads.	Noted and addressed in the following sections of the Vermin and Pest Control Plan (VPCP): (a) Section 4.1.2 (Schedule and Method of Control) and Section 4.1.3 (Housekeeping) and refer to Section 4.3 (Waste Storage and Processing) of WMP (b) Section 4.1.3 (Housekeeping) and refer to Section 4.3 (Waste Storage

		<p>and Processing) of WMP</p> <p>(c) Section 4.1.3 (Housekeeping)</p> <p>(d) Section 4.1.2 (Schedule and Method of Control) and Section 4.1.3 (Housekeeping)</p> <p>(e) Section 4.1.2 (Schedule and Method of Control) and Section 4.1.3 (Housekeeping)</p> <p>(f) Section 5.1 Monitoring Program</p> <p>(g) Section 5 Monitoring and Reporting</p> <p>(h) Section 4.1.3 (Housekeeping)</p>
115	<p>The design of the terminal building and associated waste handling facilities shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures:</p> <p>(a) Sealing surfaces to prevent moisture and odour absorption</p> <p>(b) Elimination of crevices where waste, moisture and vermin can accumulate</p> <p>(c) Providing screening of the ventilation openings in the building</p> <p>(d) Eliminating horizontal surfaces where birds can congregate</p> <p>(e) Minimising horizontal ledges where dust and litter can accumulate</p> <p>(f) Using fencing and netting to prevent wind-blown litter from escaping.</p>	<p>Noted in Section 4.1 (Vermin and Pest control measures) VPCP</p>
116	<p>The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Planning Secretary.</p>	<p>Noted</p>
117	<p>The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.</p>	<p>Noted and addressed in Section 4.1 (Vermin and Pest Control Measures)</p>

1.4. Stakeholder Consultation

As part of an ongoing commitment to stakeholder engagement, Veolia has implemented a program of communication and consultation during the preparation of this VPCP. Veolia has consulted with government bodies and other key stakeholders.

Further details regarding the site community consultation program and other stakeholder consultation are detailed in **Section 4.3** of the Operational Environmental Management Plan (OEMP).

1.4.1. Government Bodies

The following government agencies will be consulted with in relation the requirements of this VPCP:

- NSW Department of Planning, Industry and Environment;
- NSW Environment Protection Authority;
- Cumberland City Council

1.4.2. Community

Veolia aims to ensure that the local community is kept informed of the progress of the project in a proactive and responsive manner. Veolia’s communication may include the following where applicable:

- public notices and announcements;
- meetings and correspondence with appropriate regulatory authorities; and
- discussions with adjoining landowners / neighbours who may be affected by the CTT.

The key objectives of the community focused communication and consultation program include:

- Educating stakeholders regarding key aspects of the CTT; and
- Informing community groups and neighbours to help Veolia understand concerns.

The following avenues provide availability of information about the CTT:

- Dedicated Veolia webpage:
<https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station>
- Community telephone line and email address:

Location	Contact
CTT 24 hour feedback line	(02) 9841 2600
Dedicated email address	clyde.weighbridge@veolia.com

- Published Monitoring Reports:
<https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station>
- Published Monitoring Data:
<https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports>

2. Goals of VPCP

2.1. Roles and Responsibilities

The following table details the roles and responsibilities associated with the VPCP.

Table 2.1 VPCP Roles and Responsibilities

Action	Responsibility	Timing
Overall implementation of the VPCP	Facility Manager	Ongoing
Implement of the methodologies for minimising vermin and pests	Facility Manager	Ongoing
Placement of bait stations and monitoring	Contractor	Quarterly
Site inspections	Site personnel	Ongoing
Coordinate monitoring and mitigation strategies	Facility Manager/ Monitoring Personnel	As Required
Maintaining internal records	Facility Manager	Ongoing
Reporting on monitoring results	Monitoring Personnel	Annually (<i>Annual Environmental Management Report</i>)

3. Existing Environmental and Operational Impacts

3.1. Existing Environment

The CTT accepts General Solid Waste (putrescible) and is operational 24 hours a day, 7 days a week, with peaks in vehicle movement in the morning and afternoon. There is a likelihood of attracting pests, vermin and birds given the nature of the waste materials.

3.2. Predicted Vermin, Pest and Bird Impacts

The CTT is in close proximity to the Duck River corridor. Historical site assessments have been undertaken in order to understand the potential impacts of the operation of the CTT on surrounding natural habitats and attracting vermin, pests and birds to have a better understanding of management strategies. For the purpose of formulating an effective vermin and pest control plan, the site assessment considers:

- The site layout;
- Nature of waste materials to be delivered;
- The minimal time uncontainerised waste material remains on site;
- Proximity to the Duck River and surrounding vegetation; and,
- The nature of surrounding industrial activities.

A total of 14 vertebrate fauna species have previously been identified in the Duck River corridor, including 11 birds, one mammal and two reptiles. The fauna species recorded within the Duck River corridor are typical of similar habitat types throughout the Parramatta area.

The native and introduced fauna recorded on the subject site included the Superb Fairy-wren, White-plumed Honeyeater, Red-browed Finch and Common Myna. No evidence for any threatened fauna species is known to occur within 10km of the Duck River corridor. Suitable habitat resources for threatened fauna have not been determined and it is considered unlikely for these species to occur given the disturbed nature of the corridor and surrounding industrial area.

No habitat or resources of special significance for any of those threatened species are known to occur within 10km of the Duck River corridor. It is theoretically possible that some of the more mobile and wide-ranging threatened species (ie. some birds and microchiropteran bats) could occur in the Duck River corridor on an occasional or transitory basis. Given that the remnant vegetation is unaffected by the operations at the CTT, there would be no impact on this community and the habitats it currently provides.

The potential variety of pests, vermin and birds likely to be encountered on site include:

- Mice;
- Rats;
- Cockroaches;
- Spiders;
- Ants;
- Silverfish and
- Ibis.

4. Vermin and Pest Management Measures

4.1. Vermin and Pest Control Measures

The Facility Manager is responsible for ensuring the pest control program is carried out as per this plan.

All buildings and equipment are maintained in such a manner that will not encourage the presence of pests. Efforts shall be taken to prevent access to insects, birds and rodents, as well as steps to remove them when their presence has been detected.

All pest control activities have been developed to comply with legal and safety and standard requirements.

4.1.1. Pest Control Contractor

The Facility Manager is responsible for engaging a licensed pest control contractor to assist in carrying out the functions detailed in this plan. In addition to carrying out the pest control activities the contractor will have regard for neighbouring industries that may be sensitive to potential for pests.

4.1.2. Schedule and Method of Control

Management of pest, vermin and birds at the site is controlled through both preventative and responsive mitigation measures.

Preventative control measures include, but are not limited to:

- Bird nets and spikes;
- Minimising the time waste is spent on the floor of the building;
- Quarterly inspection of the site by a registered pest controller;
- Good housekeeping practices as detailed in **Section 4.1.3**;
- Placement of rodent bait stations at various locations around the site as follows:
 - Transfer Terminal;
 - Compactor Pit;
 - Site Administration Office;
 - Weighbridge Office.
- Training of all staff for recognising potential vector habitats;
- Border spraying, for the prevention of cockroaches, silverfish, spiders and ants; and,
- Cockroach gel in office areas.

Responsive measures include, but are not limited to:

- Recording and action of staff complaints and reports, as required;
- Discussion of any pest or vermin issues at monthly toolbox meetings; and
- Increase in the preventative measures listed above if considered necessary, and as advised by the Pest Controller, such as netting or hanging wires for birds.

The Weekly Site Inspection Checklist is accessible on Veolia's issue management system, Rivo and is used to check and record the site conditions such as drain blockages, litter, evidence of vermin and pests and checks

that any actions undertaken to ensure the mitigation measures mentioned above are being implemented effectively.

4.1.3. Housekeeping

Good housekeeping practices detailed below are primarily implemented and checked through the Weekly Site Inspection Checklist which is accessible on site.

4.1.3.1. Grounds

The grounds are kept in good condition to limit harbourage for pests by ensuring grounds and gardens are kept free from excessive weeds and undergrowth.

The drainage sumps and catch drains are inspected daily and cleaned regularly to prevent providing a potential habitat for pests.

Daily litter patrols are conducted to remove any wind blown litter. Incorporated in the litter patrol is an inspection for the emergence of potential vector habitats.

4.1.3.2. Building

To prevent the proliferation of pests, all areas are maintained in a manner that will not encourage the presence of pests and birds, including keeping the holding time of waste on the floor to a minimum.

The waste floors, dado walls and all loading areas are cleaned regularly, including mechanical sweeping of the building floor following periods of high traffic volumes.

All overhead structures and internal roofs are also inspected daily to ensure they are kept clean.

The CTT also includes other enhanced pest management controls, including nets and an Electric Bird Deterrent System (Avishock) installed early in 2019. Observations made during the 2019 IEA found that these controls were effective in reducing the presence of birds (particularly ibis) in the CTT.

4.1.4. Control of Chemicals Used

The pest controller is required to use approved chemicals only. A list of chemicals proposed and Safety Data Sheet (SDS) for each are submitted and approved prior to use by the contractor.

All pesticides, poisons and other chemicals used in the control and prevention of pest infestation are used in accordance with the manufacturers' instructions and the provisions of the Work Health and Safety Act 2011, SafeWork NSW and any other relevant legislation.

5. Vermin and Pest Monitoring and Reporting

5.1. Monitoring Program

Pest and vermin inspections are undertaken on a quarterly basis by an external contractor and treated with baits or spray as required. Inspections are also undertaken on a routine basis by the CTT's operators, as part of general housekeeping and recorded on relevant housekeeping and inspection checklists. **Table 5.1** below identifies the housekeeping undertaken at the Terminal to manage pest and vermin.

Table 5.1 - Pest and Vermin Management

Parameter	Performance Measure	Standard	Statutory Requirement
Litter and Odour Control	Visual Inspection and housekeeping	Veolia Business Management System	Vermin and Pest Control Plan-Consent Conditions 51, 115-117
Vermin Habitat			

5.2. Performance Reporting and Review

Following each quarterly site inspection, the pest controller reports the following details to the Facility Manager:

- The level of pest activity noted during inspection;
- Actions as part of routine schedule; and
- Actions in response to problems noted.

As a minimum requirement, all reports include the company name and address, the pest control license number, the date and the areas inspected and areas where action was taken. From time to time, the pest controller may be requested to carry out further investigations. The results of these investigations will be provided in report form.

The Pest and Vermin Reports are documented and reported in the Annual Environmental Management Report (AEMR).

5.3. Exceedances and Corrective Actions

Handling of any operational pest and vermin related complaints will be managed in accordance with the process outlined in **Section 4.3.4** of the OEMP. The Facility Manager, or their site nominee, will record and manage all complaints in accordance with Veolia's complaints handling, notification and reporting procedures.

If a pest complaint is received or any changes to the operations occur then the following actions will be taken:

- A review of additional attended pest inspections required to determine if the modified activity may attract excessive pest and vermin will be conducted. If necessary, amelioration strategies will be employed to eliminate or reduce the presence of pests.

- Consultation with any other relevant parties (e.g. community, businesses, government agencies) to address any pest and vermin issues.

A summary of corrective actions taken will be reported in the CTT's Annual Environmental Management Report (AEMR), which may include recommendations for any further mitigation measures for compliance with pest control requirements.

5.4. Publishing of Monitoring Data

Where required, Veolia publishes the results of any environmental monitoring required under the EPL on the following website:

<https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports>