



Palmer Wind Farm

Waste Management Plan

29 April 2026



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Palmer Wind Farm

Waste Management Plan

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Abbreviations

ACM	Asbestos-containing material
CEMP	Construction and Environmental Management Plan
COEMP	Construction and Operational Environmental Management Plan
The Contractor	BMD Constructions
EMS	Environmental Management System
MMC	Mid Murray Council
NCR	Non-Conformance Report
PDI Act	<i>Planning, Development and Infrastructure Act 2016</i>
Project	Palmer Wind Farm Project
RM9	Reserved Matter 9
SA	South Australia
SA EPA	South Australian Environment Protection Authority
SoC	Statement of Commitments
WMP	Waste Management Plan
WMS	Work Method Statement

1 Introduction

1.1 Background

The Palmer Wind Farm Project (the Project) is located approximately 50 km east of Adelaide, near the townships of Palmer and Tungkillo and wholly contained within the Mid Murray Council (MMC) Local Government Area and on the lands of the Peramangk People (refer to Figure 1). The Project will comprise of 40 wind turbine generators, totalling approximately 288 megawatts (MW) of installed generation capacity, with associated wind farm infrastructure. The Project will connect to the national electricity grid via the existing Tungkillo Switchyard, owned and operated by ElectraNet. The Project will help reduce Australia's carbon footprint by generating up to 300MW of clean energy when constructed, which is enough to power up to 150,000 South Australian homes.

Development Authorisation by way of Development Plan Consent under the *Development Act 1993* was granted for the Project by MMC in December 2015 (DA 711/072/14). Subsequent variation to the Development Plan Consent was approved by the State Commission Assessment Panel under the *Planning, Development and Infrastructure Act 2016* (PDI Act) in February 2025 (SA 24005571; Planning Consent).

The Project will be constructed and operated by Palmer Wind Farm Pty Ltd (the Proponent) as trustee for Palmer Wind Farm Trust. The Proponent has engaged both BMD Constructions as the Balance of Plant Contractor and Vestas – Australian Wind Technology Pty Limited as the wind turbine generator supplier and installer for the Project, with various aspects of the scope of works to be subcontracted to relevant parties.

A Construction and Operational Environmental Management Plan (COEMP) has been developed for the Project in response to legislative and approval requirements, to outline the Project's environmental management requirements. A series of aspect specific management plans (including this Waste Management Plan) describe additional details for implementation of mitigation actions for the Project and have been prepared to specifically satisfy approval requirements.

1.2 Purpose and Scope

The purpose and scope of this Waste Management Plan (WMP) is to satisfy the requirements of the Project's Planning Consent, specifically Reserved Matter RM9 stating:

"A Waste Management Plan that details the waste collection and disposal service to dispose of the volume of waste at the rate it is generated, shall be prepared in consultation with the Mid Murray Council and submitted to the satisfaction of the State Planning Commission".

This WMP provides a framework for the management of all waste associated with the construction of the Project. Its primary purpose is to describe the management systems and procedures which will be adhered to in achieving project environmental objectives and goals.

The WMP is the overarching project reference for waste management throughout the construction phase. It describes how all Contractors propose to manage and control waste related environmental aspects and potential impacts of the Project, through both project-wide and element-specific approaches. The WMP prescribes all applicable procedures, processes, and practices to be undertaken by the Contractors and subcontractors in order to manage waste related environmental risks, effectively minimise impacts on the surrounding environment, and ensure compliance with regulatory and other obligations throughout project delivery.

This WMP is one of several environmental management sub-plans for the Project. The WMP and its procedures will be applicable to all project works, staff, and subcontractors during construction of the Project.

1.3 Project Area

The Project Area is located in the eastern Mount Lofty Ranges, South Australia, approximately 70 km east of Adelaide CBD. There are five key localities near the development: Palmer, Tungkillo, Cambrai, Sanderston and Milendella. Tungkillo has a population of approximately 600 people and includes the townships of Tungkillo and Palmer. Palmer is a small township (approximate population 75 people) that consists of a general store, hotel and a small primary school consisting of approximately 25 students.

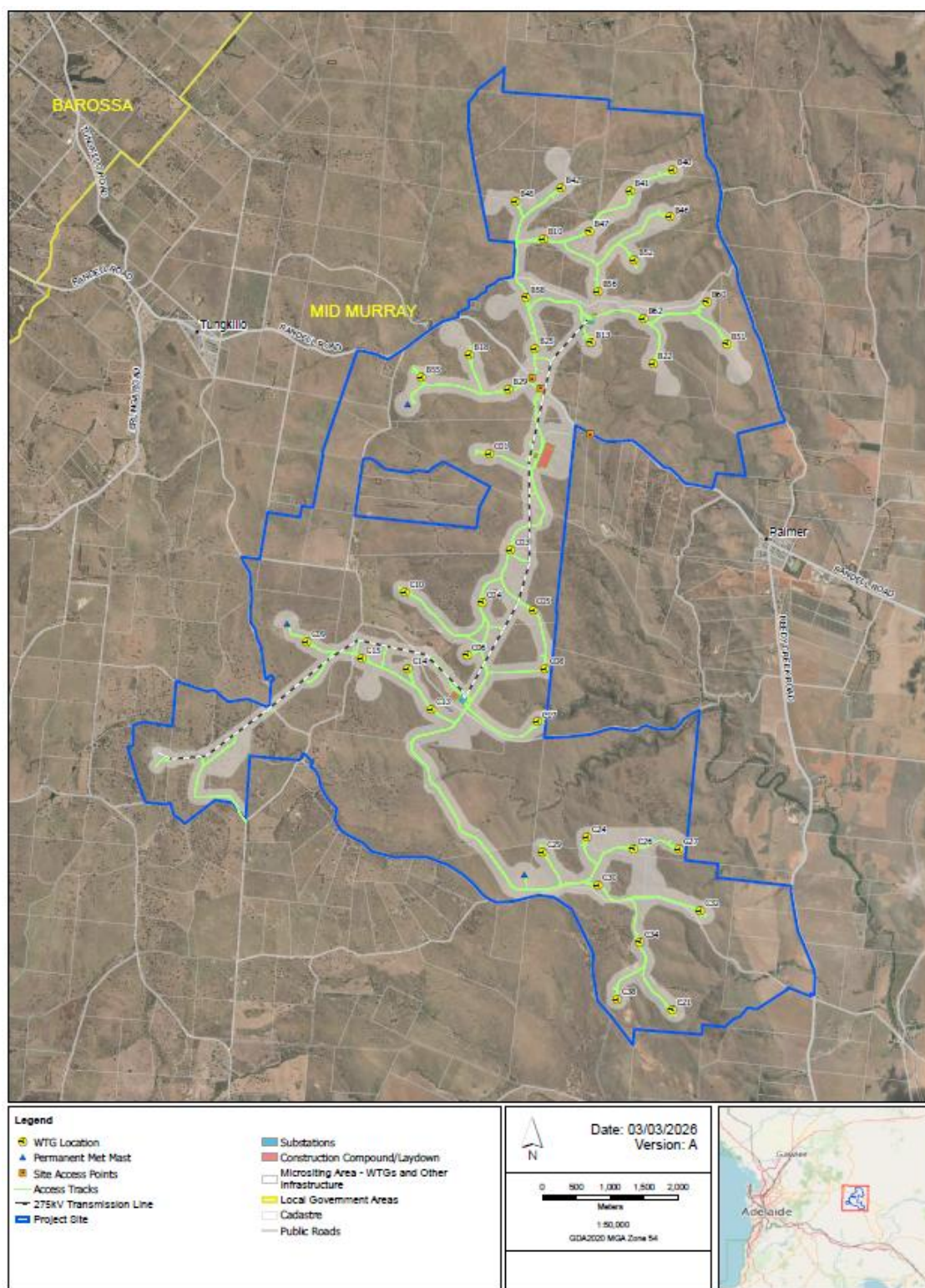
Mount Pleasant is the regional centre of the area with a population of approximately 1,000 people. Mount Pleasant has a number of facilities, including a small primary school. The Project will be located on a number of private properties, primarily used for farming and is predominantly rural in nature with limited residential properties.

The topography of the area comprises undulating hills of the eastern Mount Lofty Ranges, with steep escarpments present along geological fault zones, particularly at the eastern extent of the ranges. Steep sided valleys occur where watercourses cross the escarpments. There are a number of watercourses within the area, with the majority being ephemeral.

Transportation networks in the wider area consist of mainly unsealed gravel roads owned and maintained by the Mid Murray Council, plus regional / collector sealed roads servicing the townships. Access to the Project will be via Randell Road, a designated State Maintained Road.

1.4 Consultation Requirements

Reserved Matter RM9 requires that consultation is undertaken with Mid Murray Council for the preparation of this WMP. Comments from Mid Murray Council on the draft WMP were received on 27 March 2026. The WMP was updated following receipt of comments.



Palmer Wind Farm

Project Map

Figure 1: Project Map

2 Legislative Requirements and Compliance Obligations

2.1 Legislative Requirements

The following legislation and regulatory guidelines apply directly to Project works.

Commonwealth

- *Environmental Protection and Biodiversity Conservation Act 1999*
- *Environmental Protection and Biodiversity Conservation Regulations 2000*
- *National Environmental Protection Council Act 1994*
- *National Greenhouse and Energy Reporting Act 2007*

South Australia (SA)

- *Environmental Protection Act 1993*
- *Environment Protection Regulations 2023*
- *Environment Protection (Waste to Resources) Policy 2010*
- *Environment Protection (Movement of Controlled Waste) Policy 2014*
- *Environment Protection (Wastes containing asbestos – removal, transport and disposal) Policy 2023*
- *Landscape South Australia Act 2019*
- *Work Health and Safety Act 2012*
- *Work Health and Safety Regulations 2012*
- *Local Nuisance and Litter Control Act 2016*
- *River Murray Act 2003.*

2.2 Compliance Obligations

The Project will ensure all environmental compliance obligations are identified prior to the commencement of works onsite. These requirements shall be included in Project documentation and communicated to the Project team. Key project compliance obligations are included in Table 1. Requirements and conditions of these licences, permits and approvals are incorporated within this WMP.

Table 1: Key Compliance Obligations

Item Name	Legislation	Responsibility	Timing	Requirement
Development Authorisation	<i>Planning, Development and Infrastructure Act 2016</i>	Proponent / Contractor	Prior to and during construction	Comply with all conditions of approval including: • Reserved Matter 9 • Condition 1 • Condition 5 • Condition 6 • Condition 34 • Condition 35 • Condition 36.

Item Name	Legislation	Responsibility	Timing	Requirement
Statement of Commitments (SoC)	<i>Planning, Development and Infrastructure Act 2016</i> (Enforced under Condition 1 of the Planning Consent)	Proponent / Contractor	Prior to and during construction	Comply with all commitments relating to waste including: • Commitment 4.9.1 • Commitment 4.9.2 • Commitment 4.9.3.
SA EPA Licences and Approvals (if applicable)	<i>Environmental Protection Act 1993</i>	Contractor Project Manager / Contractor Environmental Representative	Prior to and during construction	Obtain and comply with any licences or approvals required under the <i>Environmental Protection Act 1993</i> for prescribed activities (e.g. concrete batching plant and transporters of waste).
Consignment Authorisation	<i>Environmental Protection Act 1993</i>	Contractor Project Engineer	Prior to movement of waste	Approval given by a receiving facility or the SA EPA to producers or those acting on their behalf to transport a specific type of waste for a prior of up to 1 year.

2.3 Environmental Management System

This WMP incorporates the Environmental Management Framework set out in the Project's COEMP to ensure compliance with the Planning Consent. The WMP forms part of the suite of aspect specific management plans, as illustrated in Figure 2 below. This WMP should be read in conjunction with the Project COEMP and other relevant management plans.

To achieve the intended environmental objectives and goals, Contractors are required to implement their own corporate environmental management systems that align with both regulatory requirements and management frameworks of the Project.

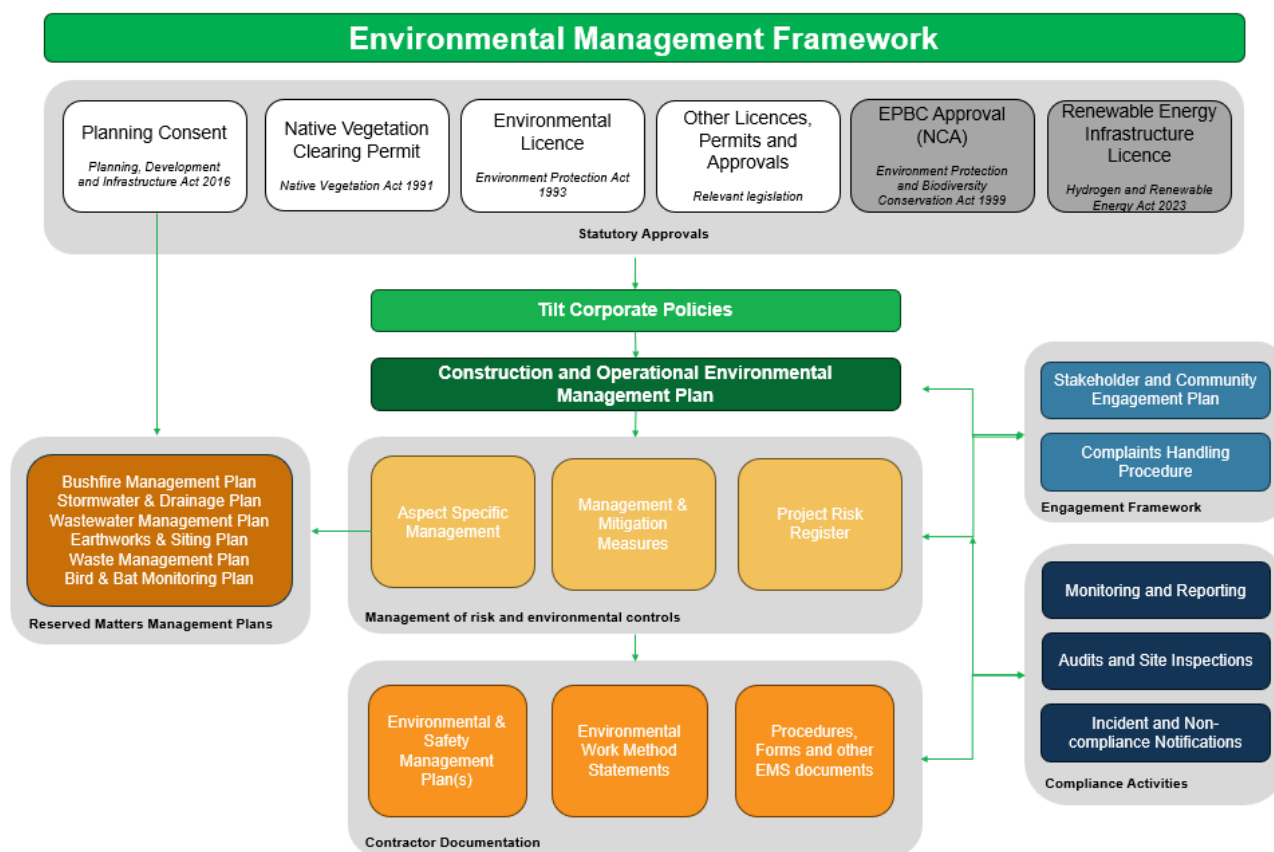


Figure 2: Environmental Management System

2.4 Other Requirements

Additional to the requirements identified above, the following standards, specifications, publications and codes of practice relating to waste management will be implemented or referenced by the Project during delivery.

Australian Standards

- AS/NZS ISO 14001: Environmental Management Systems – Specifications with Guidance for Use
- AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids.

Government Publications and Guidelines

- South Australia's Waste Strategy 2020–2025
- South Australia Environment Protection Authority (SA EPA) Standard for the Production and Use of Waste Derived Fill 2010
- SA EPA Waste Transport and Tracking Guidance
- SA EPA Guidelines for Stockpile Management – Waste and Waste Derived Fill
- SA EPA Guidelines for Bunding and Spill Management 2016
- SafeWork SA Code of Practice: Demolition Work
- SafeWork SA Code of Practice: How to safely remove asbestos
- SafeWork SA Code of Practice: How to manage and control asbestos in the workplace
- National Environment Protection (Assessment of Site Contamination) Measure 1999
- National Environment Protection (Movement of Controlled Waste between States and Territories) 1998.

3 Objectives and Targets

The key objective of this WMP is to minimise risks to human health and the environment arising from the generation, storage and handling of construction-related wastes, while minimising the quantity of waste requiring disposal and maximising opportunities for the beneficial reuse and recycling of materials.

As a means of assessing environmental performance, environmental objectives, targets and performance indicators have been established for the Project and are provided in Table 2. These objectives and targets have been developed in consideration of requirements in the Planning Consent (RM9), contractual requirements, legislative requirements, and significant environmental aspects and impacts.

Exceedances of the proposed targets will be investigated and reported based on the issue. Any exceedances which result in a non-compliance with the Planning Consent will be reported in accordance with Section 8.4 of this WMP.

Table 2: Objectives and Targets

Objectives	Targets	Performance Indicators
Ensure waste is minimised throughout the Project life cycle.	- Implementation of waste minimisation initiatives where practical. 100% re-use or recycling of reusable clean/inert excavation spoil throughout the Project lifecycle.	Waste Tracking Register Monthly reporting
Waste management strategies will be undertaken in accordance with the Waste Management Hierarchy as follows: Avoidance of unnecessary resource consumption Resource recovery (including reuse, reprocessing, recycling and energy recovery) Disposal.	- Implementation of waste minimisation initiatives where practical. - Waste products are recovered and reused on site where practical.	Waste Tracking Register Monthly reporting Audits
Ensure all waste is assessed, classified, managed, transported, and disposed of in accordance with SA EPA requirements	100% of waste classified and documented in waste management reports during construction. 100% of waste disposal records retained during construction. - Confirmation waste transport complies with Section 38 of the Environment Protection Act 1993 and Consignment Authorisations issued.	Waste Tracking Register Waste contractor onboarding processes Monthly reporting Audits
Ensure Waste streams are segregated to avoid cross-contamination of materials and	All waste generated during construction is classified in accordance with SA EPA guidelines, with appropriate records and disposal dockets retained for audit purposes.	Regular monitoring Audits Monthly reporting

Objectives	Targets	Performance Indicators
maximise reuse and recycling opportunities		
Ensure project personnel are aware and competent in their responsibilities in relation to the management of waste.	100% of project personnel aware of responsibilities under this WMP.	Project induction and training register Monthly reporting
Compliance with Planning Consent requirements and relevant legislation as it applies to the Project.	Full compliance.	Monthly reporting
Compliance – permits/licences.	Full compliance.	Monthly reporting
Implementation of performance outcomes, commitments and mitigation measures specified in Planning Consent.	Full compliance.	Monthly reporting

4 Roles and Responsibilities

Responsibilities specific to waste management are detailed in Table 3 below. The implementation of the WMP primarily is the responsibility of the relevant Contractor, however the Proponent maintains oversight of the relevant activities through the assurance processes outlined in the COEMP.

Table 3: Roles and Responsibilities – Waste

Role	Responsibility
Contractor Project Manager	- Familiarising themselves with their responsibilities within this WMP and the Project Environmental Management System. - Ensuring the project is compliant with the requirements detailed in this WMP and relevant legislation. - Ensuring waste management requirements are fully implemented and not secondary to construction activities. - Providing adequate resources (personnel, financial and equipment) to support effective waste management. - Reviewing and authorising waste management procedures, controls and revisions to this WMP. - Monitoring compliance with site waste management requirements, schedules and targets. - Ensuring waste-related risks are identified, assessed and managed in accordance with the Project risk management framework. - Ensuring subcontractors submit appropriate Work Method Statements (WMS) and environmental documentation addressing waste management prior to commencement. - Ensuring subcontractor compliance with the requirements of this WMP and other relevant documentation. - Reviewing waste-related incidents, hazards and near misses and ensuring corrective actions are implemented within agreed timeframes. - Reporting waste management performance and statistics as required. - Upholding an active interest in workplace environmental and waste management issues.
Contractor Field Supervisor	- Implementing waste management requirements and control measures in accordance with this WMP. - Ensuring waste segregation, storage and containment measures are in place and maintained. - Conducting routine inspections of waste storage areas, bins and skips and coordinating corrective actions as required. - Ensuring all site personnel and subcontractors are aware of waste management requirements and controls. - Ensuring required approvals are in place prior to commencing waste-generating activities. - Ensuring subcontractors comply with waste management requirements and taking immediate action where non-compliance is identified. - Reporting waste-related incidents, spills, contamination or non-conformances to the Environmental Representative or Project Manager. - Participating in toolbox talks and pre-start meetings to communicate waste management requirements. - Upholding an active interest in workplace waste and environmental management.

Role	Responsibility
Contractor Project Engineer	- Familiarising themselves with their responsibilities under this WMP and the Project's Environmental Management System. - Ensuring waste management requirements are considered in construction planning and sequencing of works. - Developing, reviewing and approving WMS that address waste generation, segregation, storage and disposal. - Reviewing subcontractor WMS to ensure waste management risks and controls are adequately addressed. - Undertaking risk assessments where changes to activities may affect waste generation or management. - Liaising with the Environmental Representative on waste-related matters, including spoil classification and controlled waste management. - Conducting inspections to identify waste-related environmental risks or non-conformances. - Raising waste management issues or concerns with the Environmental Representative or Project Manager.
Contractor Environmental Representative (or delegate)	- Establishing, maintaining and reviewing this WMP and associated waste management documentation. - Implementing waste-related monitoring, inspection and reporting requirements. - Providing waste management training and awareness to personnel, subcontractors and visitors. - Coordinating approvals, licences and permits relevant to waste management. - Liaising with the SA EPA, regulators and environmental consultants on waste-related matters. - Maintaining records of waste-related incidents, complaints and corrective actions. - Monitoring compliance with waste legislation, policies and standards and updating this WMP as required. - Assisting subcontractors with understanding and applying waste management requirements. - Participating in audits, inspections and reviews related to waste management. - Advising the Project Manager of any waste management issues that may pose a risk to the environment, personnel or compliance obligations.
All Site Personnel (including the Principal and sub-contractors)	- Familiarising themselves with the requirements of this WMP and site waste management procedures. - Attending site inductions, pre-start meetings and toolbox talks addressing waste management. - Complying with site waste segregation, storage and disposal requirements. - Using waste controls identified in WMS, procedures and work instructions. - Preventing waste spills, loss or cross-contamination and maintaining tidy work areas. - Stopping work and notifying supervision if waste-related activities pose a risk to the environment. - Reporting waste-related hazards, incidents and near misses immediately. - Actively participating in waste management reviews and continuous improvement initiatives. - Upholding an active interest in workplace waste and environmental management.

5 Risk Identification and Assessment

5.1 Environmental Risk Assessment

Potential environmental risks associated with Project works have been identified during the environmental assessment process. Additional risks will be considered and updated as part of the Contractor's risk management standard and maintained in the Project's Risk Register.

Significant environmental risks for waste include:

Table 4: Significant Environmental Risks – Waste

Aspect	Potential Impact	Management Document
Air Quality	Dust from temporary spoil stockpiles and loading trucks may reduce air quality.	Waste Management Plan Construction and Operational Environmental Management Plan Air Quality and Dust Environmental Management Sub-Plan
Community	Reduction of air quality as a result of dust generation from spoil handling.	Waste Management Plan Construction and Operational Environmental Management Plan Construction Stakeholder and Community Engagement Plan
Contamination	Cross contamination of spoil from the inappropriate segregation, storage, transport and disposal of spoil.	Environmental Control Plan Construction and Operational Environmental Management Plan Earthworks and Siting Management Plan Site Contamination, Hazardous Material and Spill Response Environmental Management Sub-Plan
Resources	Excessive volumes of waste directed to landfill from inadequate collection, segregation, classification and disposal of spoil.	Waste Management Plan
Sedimentation	Potential for sediment-laden site runoff from spoil stockpiles.	Environmental Control Plan Waste Management Plan Construction and Operational Environmental Management Plan Earthworks and Siting Management Plan Water Quality Environmental Management Sub-Plan
Soil and Water	Pollution from the incorrect storage, handling and disposal of waste.	Emergency Response Plan Construction and Operational Environmental Management Plan Waste Management Plan
Biosecurity	Introduction or spread of declared weeds and pest plant species from the incorrect handling, stockpiling, disposal or off-site removal of weedy vegetative material.	Waste Management Plan Biosecurity Management Plan

5.2 Ongoing Risk Assessment

Environmental risk assessment will be ongoing throughout Project delivery. Emphasis will be placed on any changes to construction methodology and changes in materials or quantities used. All Project staff are responsible for identifying risks and managing assessments in consultation with the Project team. Forums for facilitation of risk identification include:

- Project meetings;
- Toolbox meetings; and
- Informal site discussions.

5.3 Impact Identification

Potential impacts are identified through the risk identification processes addressed within this WMP. Potential impacts to the environmental values and wider rural community may result from:

- Excessive waste generation;
- Excessive use of natural resources;
- Inefficient use of resources;
- Improper management of wastes generated during construction;
- Release of waste (controlled or uncontrolled) causing contamination of air, land, surface or groundwater; or
- Increase in vermin and pests.

Poor or ineffective waste management practices may result in the following impacts:

- Introduction or spread of weeds through the movement or disposal of vegetation and soil material during clearing and earthworks;
- Increased volumes of waste directed to landfill due to excessive material consumption, inadequate reuse and recycling, or incorrect waste classification;
- Contamination of soil, surface water or groundwater resulting from inappropriate storage, handling, transport or disposal of liquid and solid wastes;
- Waste materials being unnecessarily disposed of to landfill due to inadequate segregation or identification of resource recovery opportunities;
- Attraction of vermin or pests due to improper storage, handling or disposal of putrescible wastes;
- Generation of excess unused materials due to over-ordering or poor materials management;
- Failure to identify or implement feasible options for reuse or recycling of materials; and
- Potential cumulative impacts associated with temporary increases in resource demand, waste generation and spoil management during peak construction activities.

The potential impacts outlined above are typical of large-scale infrastructure construction projects and are considered manageable through the implementation of the waste management controls and mitigation measures detailed in this WMP.

Upon identification of additional potential impacts, this WMP will be updated accordingly.

6 Waste Management

6.1 Waste Management Hierarchy

The Project will apply the waste management hierarchy in accordance with the *Environment Protection Act 1993* and the *Environment Protection (Waste to Resources) Policy 2010*, with priority given to waste streams with the most significant potential lifecycle impacts (refer to Figure 3).

Where practicable, waste avoidance and minimisation strategies will be incorporated into construction planning and site practices to reduce the volume of waste requiring off-site disposal.

Prior to reuse on site or transport off site for treatment or disposal, materials will be classified in alignment with SA EPA requirements, including the *Environment Protection Act 1993* (SA), the *Environment Protection (Waste to Resources) Policy 2010* and guided by the *National Environment Protection (Assessment of Site Contamination) Measure 1999*.

No waste will be received on site unless permitted under relevant approvals and licensing requirements.

Waste-related risks and opportunities will be identified and managed in accordance with the Project risk management framework, as described in Section 5 of this WMP. Sustainability opportunities relating to waste minimisation and resource recovery will be identified, documented and managed through relevant project registers, where applicable.

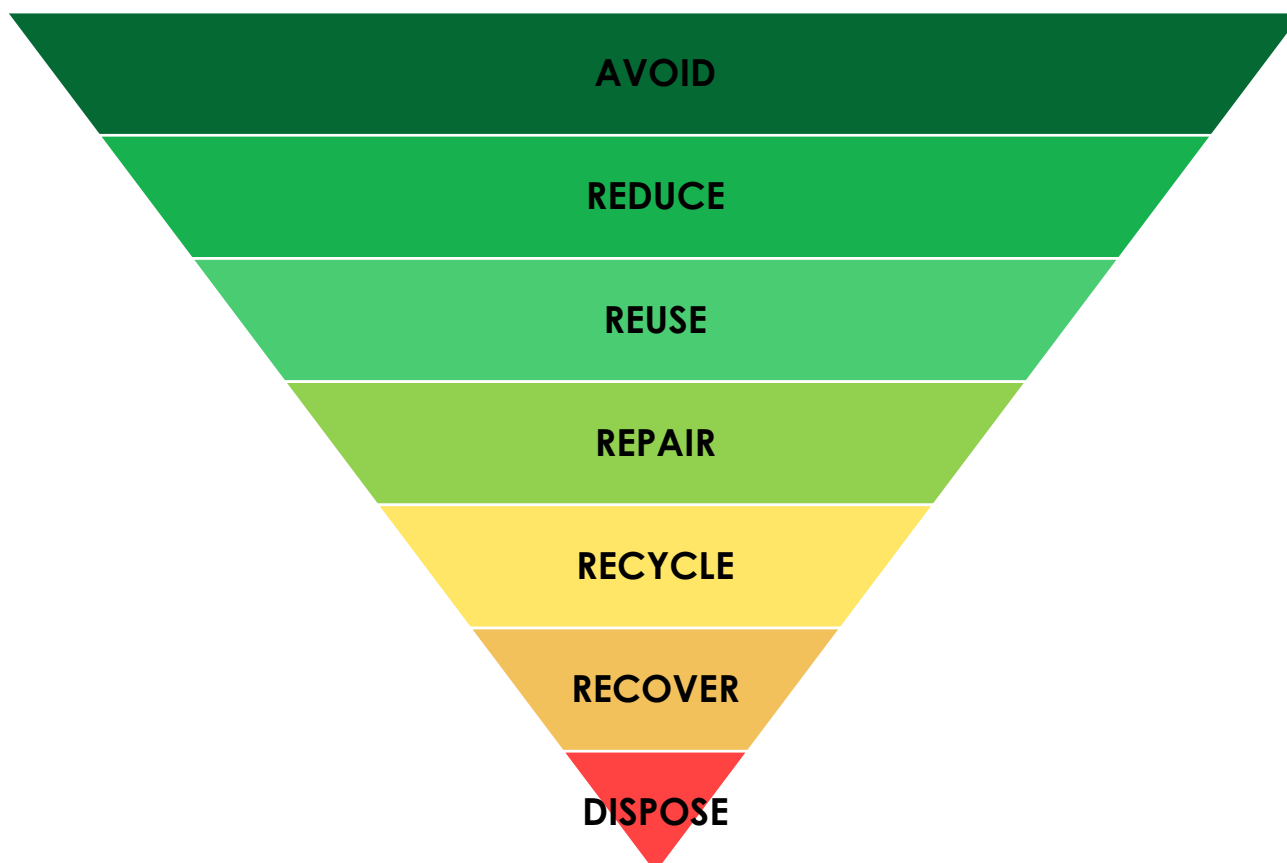


Figure 3: Waste Management Hierarchy (Source: *Environment Protection (Waste to Resources) Policy 2010*)

6.2 Classification of Waste

Where waste cannot be avoided, reused or recycled, it will be classified and appropriate disposal will then occur. Waste generated by the Project will be broadly classified as:

- General waste;
- Controlled waste; or
- Resource recovery waste.

Waste classification will determine storage, handling, transport, tracking and disposal requirements. Controlled wastes will be managed by appropriately licensed waste transporters and disposed of at suitably licensed facilities in accordance with SA EPA requirements.

6.2.1 General Waste

General waste includes waste materials that are not classified as controlled waste and are not suitable for reuse or recycling. General waste typically comprises non-hazardous, non-recyclable materials generated from day-to-day construction activities and site operations.

General waste may include, but is not limited to:

- Putrescible waste (e.g. food waste);
- Mixed general refuse from site offices and amenities;
- Non-recyclable packaging and composite materials; and
- Windblown litter collected during site housekeeping activities.

General waste will be managed to prevent littering, pest attraction and environmental harm. Management measures will include:

- Segregation of general waste from recyclable and controlled waste streams;
- Storage in covered, clearly designated and vermin-proof bins or skips;
- Regular collection to prevent accumulation and odour;
- Transport by suitably engaged waste contractors; and
- Disposal at facilities licensed by the SA EPA to receive general waste.

General waste will not be mixed with controlled or recyclable waste streams.

6.2.2 Controlled Waste

Controlled waste includes waste that poses a higher risk to human health or the environment and is subject to additional regulatory controls. Controlled waste may include, but is not limited to:

- Contaminated soil or spoil;
- Asbestos-containing materials;
- Waste oils, fuels and hydrocarbons;
- Oily rags, absorbents and spill clean-up materials;
- Paints, solvents and chemical wastes (including washdown discharge);
- Batteries (including lead-acid and lithium);
- Weedy vegetative material;
- Electronic waste (e-waste); and
- Other regulated or hazardous waste streams.

The management of controlled waste will include:

- Identification and segregation of controlled waste from other waste streams;
- Conservative classification where contamination is suspected, pending confirmation;
- Storage in appropriate, clearly labelled, secure and bunded containers or areas to prevent loss, spillage or environmental contamination;
- Engagement of appropriately licensed controlled waste transporters;
- Application of permits for transport, as required (e.g. permit to transport declared weeds);
- Disposal, treatment or recycling at facilities licensed by the SA EPA to receive the relevant controlled waste type; and
- Tracking and documentation of controlled waste movements where required under SA EPA policy.

Where uncertainty exists regarding the classification of waste, materials will be managed as controlled waste until classification is confirmed through appropriate assessment or advice.

6.2.3 Resource Recovery Waste

Resource recovery waste includes materials that can be reused on site or recycled off site, consistent with the Waste Management Hierarchy and the objectives of the *Environment Protection (Waste to Resources) Policy 2010*.

Resource recovery waste may include, but is not limited to:

- Paper and cardboard;
- Plastics, glass and aluminium;
- Scrap metals (including steel, copper and aluminium);
- Untreated timber, pallets and formwork;
- Clean concrete, brick, asphalt and masonry;
- Cleared vegetation suitable for mulching or reuse; and
- Clean excavated spoil suitable for beneficial reuse.

Resource recovery waste will be managed to maximise reuse and recycling opportunities and minimise disposal to landfill. Management measures will include:

- Segregation of recyclable and reusable materials at source;
- Storage in designated areas to prevent contamination;
- Reuse of suitable materials on site where practicable (e.g. clean spoil, concrete, mulch);
- Collection and transport by appropriately engaged contractors; and
- Delivery to facilities or processors licensed or authorised to receive and recycle the relevant materials.

Materials intended for reuse or recycling will be managed to ensure they remain suitable for their intended end use.

6.3 On-site Handling, Transportation and Disposal

6.3.1 On-site Handling

Material segregation facilities will be provided on site. This will include:

- Recyclable waste stored separately from general waste, with recycling bins located adjacent to general waste bins where practicable;

- Sufficient secured storage areas, with waste collected on a regular basis;
- Maintenance of good housekeeping practices and litter-free work areas;
- Use of vermin-proof bins for putrescible waste;
- Provision of specialist bins for specialist waste streams where needed; and
- Storage of waste oil, liquid wastes and spill clean-up materials in appropriately bunded areas.

Spoil stockpiles will be located within approved disturbance areas and sited away from drainage lines, native vegetation and flood-prone areas. Stockpiling locations will be shown on Environmental Control Plan and the Erosion and Sediment Control Plan appended within the Project's Earthworks and Siting Management Plan.

6.3.2 Transportation

Where waste cannot be reused on site, it will be transported off site by appropriately licensed waste management contractors. All transport vehicles will be suitable for the type and classification of waste being transported and will be covered, with tailgates secured, prior to leaving the site to prevent loss of material. This requirement will be reinforced via the following measures:

- Clear communication to subcontractors during procurement of transportation of this requirement;
- Visual inspections by Contractor representatives prior to departure from site; and
- Reporting of non-compliances, in accordance with the requirements detailed in Section 8.4.

Waste transporters engaged for the Project will hold the required SA EPA licences or approvals applicable to the transport of the relevant waste type. Controlled wastes, as defined under the *Environment Protection (Movement of Controlled Waste) Policy 2014*, will only be transported by licensed controlled waste transporters and licences confirmed prior a part of the commercial onboarding process.

Where required, the movement of controlled waste will be tracked and documented in accordance with SA EPA requirements. Records of waste transport and disposal will be maintained by the Project.

6.3.3 Waste Disposal

Waste (including spoil) disposal will be undertaken in accordance with the *Environment Protection Act 1993*, the *Environment Protection (Waste to Resources) Policy 2010*, and the *Environment Protection (Movement of Controlled Waste) Policy 2014*, where applicable. Waste materials that cannot be avoided, reused or recycled will be classified and disposed of offsite at facilities appropriately licensed by SA EPA to receive the relevant waste type.

6.3.4 Receiving Facilities

Facilities used for the receiving of waste will be appropriately licensed by the SA EPA to accept the classified waste type. The Contractor's Environmental Representative will review the licence of each receiving facility prior to waste being transported from the Project Area.

Details of approved receiving facilities and locations anticipated to be used by the Project are provided in Appendix 3.

6.4 Material Tracking

Waste and material tracking will be undertaken to record the movement and management of wastes generated by the Project in accordance with SA EPA requirements. Waste tracking will capture information across the waste lifecycle, including:

- Types and quantities of waste sent to landfill;
- Types and quantities of waste reused or recycled;
- Types and quantities of waste treated;
- Types and quantities of controlled waste generated, including the method of treatment and disposal;
- Receiving facility locations and waste destinations;
- Quantities of spoil generated and managed;
- Measures implemented to reduce disposal to landfill; and
- Records demonstrating lawful transport, treatment and disposal, including transporter and receiving facility licence details where required.

Quantities of solid waste streams will be recorded by weight, and liquid waste streams by volume, based on documentation provided by waste transporters (e.g. waste dockets, disposal receipts or controlled waste tracking documentation, where applicable).

A Waste Tracking Register will be kept detailing the information listed above as detailed in Appendix 2. The information will be collated, and register maintained by the site Contractor's Environment Representative (or delegate).

6.5 Construction Waste Streams and Resource Use

Details regarding the estimated waste streams to be produced during the construction of the Project are presented in Table 5.

Table 5: Project Waste Volume Estimates

Waste Classification	Waste Stream	Containment	Management / Disposal Approach
General Waste	General site waste (food waste, mixed packaging, non-recyclables)	240 L bins	Dedicated general waste bin Disposed to landfill via a private waste contractor
Resource Recovery	Paper and cardboard	240 L bins	Source separated and dedicated Recycling bins Collected for recycling by a private waste contractor
	Plastics, glass, aluminium	10 m ³ bins	Source-separated and recycled
	Scrap metal (steel, aluminium)	10 m ³ bins	Dedicated metal waste skip bin Collected by metal recycling contractors
	Electrical cabling offcuts	10 m ³ bins	Recycled by licensed recycler
	Untreated timber and pallets	10 m ³ bins	Reused on site or recycled
	Clean concrete and masonry	Stockpiled in segregated areas on site	Reuse on site or off-site recycling
	Cleared vegetation	Stockpiled in segregated areas on site	Mulched and reused on site
	Clean spoil	Stockpiled in segregated areas on site	Beneficial reuse on site

Waste Classification	Waste Stream	Containment	Management / Disposal Approach
Controlled Waste	Waste oils and lubricants	240 L bins within bunded areas	Licensed controlled waste contractor
	Fuels and hydrocarbons	Stored in bunded areas	Managed as controlled waste
	Oily rags and absorbents	240 L bins within bunded areas	Segregated and disposed of as controlled waste
	Contaminated soil or spoil / Asbestos-containing material	None identified in background documents. If encountered, managed in line with contamination consultant advice	Disposed at licensed facility
	Batteries and e-waste	Segregated and bunded areas	Licensed recycler.

7 Mitigation and Management Measures

Specific measures and requirements to meet the objectives of this WMP and to manage impacts on construction waste are outlined in Table 6. These measures have been developed in line with the requirements in the Project Approvals (refer to Appendix 1).

Table 6: Management and Mitigation Measures – Waste

Measure / Requirement	Responsibility	Timing	Evidence
Waste generation will be minimised where practicable through planning, procurement controls and efficient material management.	Contractor Project Manager / Contractor Project Engineer	Pre-construction and construction	Meeting minutes Procurement records Work Method Statement reviews
A high standard of housekeeping will be maintained across all work areas, compounds and laydown areas, including: • Regular removal of waste • Secured lids or covers on bins and skips to prevent windblown litter • Vermin-proof storage of putrescible waste • Prompt clean-up of loose materials.	Contractor Field Supervisor	Construction	Site inspections
Waste will be segregated at source into general, resource recovery (recyclable/reusable) and controlled waste streams to maximise reuse and recycling and prevent cross-contamination.	Contractor Field Supervisor	Construction	Site inspections
Appropriately licensed waste management contractors will be engaged for collection, transport, recycling and disposal of wastes. Controlled wastes will only be transported by licensed controlled waste transporters and delivered to SA EPA-licensed receiving facilities.	Contractor Project Manager / Contractor Environmental Representative	Pre-construction and construction	Contractor licenses Waste dockets Waste Tracking Register
Waste storage areas will be clearly designated, signposted and managed to prevent loss, spillage, unauthorised access or release to land or water.	Contractor Field Supervision	Construction	Site inspections Environmental Control Plans
Liquid wastes, fuels, oils and chemicals will be stored in appropriately banded areas/containers at least 50 m from	Contractor Field Supervision	Construction	Site inspections

Measure / Requirement	Responsibility	Timing	Evidence
drainage lines (or closer if specific risk assessment has been completed) to prevent leaks and spills from reaching soil, drainage lines or watercourses.			
A waste collection schedule will be established and maintained to ensure waste is removed at a rate consistent with generation, and storage capacity is not exceeded.	Contractor Field Supervision	Construction	Waste Tracking Register Site inspections
Waste tracking records will be maintained for all waste streams (dockets/receipts), and controlled waste movements will be tracked and documented in accordance with SA EPA requirements.	Contractor Environmental Representative	Construction	Waste Tracking Register Disposal dockets SA EPA Waste Tracking System records
No waste materials (including excavation or fill material) will be allowed to enter drainage lines, watercourses or the River Murray system. Waste and spoil will be contained to prevent erosion and pollution.	Contractor Field Supervision / Contractor Project Engineer	Construction	Site inspections Monitoring reports Environmental Control Plans
Where relevant, the stockpiling of soil and materials will follow requirements of the SA EPA <i>Guideline for Stockpile Management</i> (dated October 2020), including: - Any materials with a potential to produce leachate and contaminated runoff will be stored in a sealed and bunded area - Limiting stockpile height, with stockpiles being no greater than 3 metres in height - Materials must be stored away from drains and watercourses to prevent environmental harm to water - Locating designated fill stockpiles away from vegetation and drainage lines, with a minimum of 10 metres separation from stormwater drains - No stockpiling within the drip lines of trees to minimise compaction of root zones	Contractor Field Supervision / Contractor Environmental Representative	Construction	Site inspections Photographs Environmental Control Plans

Measure / Requirement	Responsibility	Timing	Evidence
Maintaining separate stockpiles for different materials.			
During construction activities the subject land must be managed in a manner as to prevent erosion and pollution of the subject site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to ensure no pollutants (including excavation or fill material) enter the River Murray system.	Contractor Field Supervision / Contractor Environmental Representative	Construction	Site inspections Photographs Environmental Control Plans
Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not: - Be located within the floodplain of any watercourses; - Impede the natural flow of any surface waters; - Allow sediment to enter any water body; - Adversely impact native vegetation; - Facilitate the spread of pest plant and pathogenic material.	Contractor Project Engineer / Contractor Environmental Representative	Construction	Site inspections Photographs Environmental Control Plans
Vehicle/equipment washdown areas (or equivalent) will be managed to capture and remove material. Any Declared Weed material collected during hygiene procedures will be collected and disposed of in accordance with the PIRSA Declared Plant Policy (or equivalent current guidance) for the relevant species.	Contractor Environmental Representative / Contractor Field Supervisor	Construction	Site inspections Photographs Environmental Control Plans Waste Tracking Register
An authorised waste transporter will remove contaminated waste materials from the Project. Contaminated fill/soil (if encountered) will be managed conservatively and disposed of at an SA EPA-licensed facility in accordance with waste classification requirements.	Contractor Environmental Representative / Contractor Project Manager	As required	Transporter licenses Waste tracking records Disposal dockets SA EPA licensing confirmation
Unexpected finds (e.g. suspected contamination/asbestos) will trigger cessation of work in the affected area, isolation/quarantine of material and	Contractor Field Supervisor / Contractor Environmental Representative	As required	Unexpected Finds reports Incident logs

Measure / Requirement	Responsibility	Timing	Evidence
implementation of the Project Unexpected Finds Procedure.			
Sources of dust and particulate generation associated with waste handling/storage (e.g. bins, stockpiles, wastewater storage tanks) will be covered or otherwise managed where appropriate.	Contractor Field Supervisor	Construction	Site inspections Photographs
Spills will be reported immediately, controlled, contained and cleaned up. Absorbent materials used for spill response will be collected, contained and disposed of appropriately in accordance with this WMP.	Contractor Field Supervisor / Contractor Environmental Representative	Construction and as required	Incident reports Disposal dockets Corrective action records Waste Tracking Register
Waste management practices and performance (reuse/recycling/landfill quantities, controlled waste movements) will be reviewed periodically and updated where required following incidents, non-conformances or changes in activities.	Contractor Environmental Representative / Contractor Project Manager	Construction	Audit / NCR reports Corrective action records Meeting minutes
Temporary ablutions must have scheduled servicing to prevent overflow, a high-level alarm fitted to storage tanks, a water tank that is smaller than the storage tank and be protected from potential damage.	Contractor Field Supervisor / Contractor Project Engineer	Construction	Service logs Product datasheet
At completion of construction, all waste will be removed from site and work areas reinstated to a clean and tidy condition.	Contractor Field Supervisor / Contractor Project Manager	Construction completion	Handover inspection checklist Photographs

8 Compliance Management

8.1 Training and Awareness

All personnel will receive training appropriate to their role in waste management on the Project. Ongoing toolbox talks covering the requirements for management of waste will be used to raise awareness to the wider Project team. Timing and content of such meetings will be aligned with Project works programme and the significant risks at that time.

The site induction will be utilised to train all personnel in the general requirements of waste management. Specific environmental training courses may also be facilitated as required for appropriate personnel.

Further details regarding staff induction and training are outlined in Section 5 of the COEMP.

8.2 Monitoring, Inspections and Auditing

8.2.1 Monitoring and Inspection

Regular site inspections and visual monitoring of construction activities and waste storage areas will be undertaken to ensure the environmental controls detailed within this WMP are being implemented. Environmental monitoring requirements will be carried out as per project requirements and specifications.

8.2.2 Auditing

Audits will be undertaken to assess the effectiveness of environmental controls, compliance with this WMP, Planning Consent and other relevant licenses, and guidelines. These audits will be undertaken at planned intervals to provide information on:

- Whether the Project is meeting its compliance obligations;
- Conformance to this WMP; and
- If this WMP is being effectively implemented and maintained.

The approach to audits is outlined further in Section 8.1.3 of the COEMP.

8.2.3 Reporting

The Project will communicate relevant waste performance information both internally and externally, as identified in its communication processes and as required by its compliance obligations. Project waste information will be captured and provided to the Principal on a monthly basis including, but not limited to:

- Environmental incident data
- Volumes of waste sent to landfill
- Volumes of waste recycled
- Waste segregation data.

This information will be made available to Mid Murray Council within a reasonable timeframe following any written request.

8.3 Environmental Incidents

The procedure for the management of environmental incidents will be undertaken in accordance with Section 8.3 of the COEMP. All environmental incidents are to be investigated, reported, documented, actioned and closed out as per the details provided in the COEMP.

Examples of incidents and non-compliances as they relate to waste management may typically include:

- Bins overflowing;
- Waste taken to incorrect waste facility; or
- Failure to use a licensed transporter for prescribed waste.

Following an incident, corrective and preventative actions will be identified, assigned to the appropriate person/s and closed out in accordance with the appropriate time frames set in response to the circumstances.

8.4 Non-Conformance Reports (NCRs)

Non-conformance with any environmental Project requirement will be managed and reported on in accordance with the COEMP. In the event of any non-conformance with any regulatory or other compliance obligation, as set out the WMP, corrective action/s shall be raised. All corrective actions shall be entered into the Corrective or Improvement Actions Database.

8.5 Environmental Complaints

All complaints made by the community and stakeholders will be managed in accordance with the Complaints Management Plan and Section 9.2 of the COEMP.

9 Review and Improvement

This WMP, its operation and implementation will be periodically reviewed during Project delivery. Formal review of the WMP will be implemented at least once every 12 months. Other triggers for review may include:

- A reportable environmental incident;
- Corrective or Preventative Actions resulting from a non-conformance;
- On receipt of new or additional information, such as when a new sub-contractor is engaged;
- Changes to relevant legislative, regulatory or compliance obligations;
- Modifications to site operations, processes, or infrastructure;
- Results from internal or external audits indicating deficiencies or areas for improvement;
- Stakeholder feedback related to environmental performance; or
- Updates to Proponent environmental policies or objectives.

Where this review leads to a revision of the WMP, the revised WMP will be submitted to the SPC and/or MMC for approval if required.

9.1 Minor Amendments to the WMP

The Contractor's Environmental Representative (or Contractor's Project Manager nominee) may consider any minor amendments to be made to the WMP, which will be approved by the Proponent.

'Minor amendments' are defined as those that involve updating a document or are of an administrative nature and do not increase impacts to the environment or nearby dwellings, and may typically include those that:

- Are editorial in nature e.g. staff and agency/authority name changes;
- Do not increase the magnitude of impacts on the environment when considered individually or cumulatively;
- Do not compromise the ability of the Project to meet approval conditions or legislative requirements;
- Are required as a result of monitoring, inspection and audit results;
- Result from consideration of recent and relevant incidents and any lessons learnt;
- Are required because of any new regulatory obligations;
- Are identified as needed based on a review of the effectiveness of environmental controls;
- Are required because of changes in operational needs such as resourcing; and/or
- Are required because of feedback from regulators and other relevant stakeholders.

The updated WMP will be provided to Mid Murray Council should any revision to the WMP as a result of a minor amendment occur, noting any relevant changes.

Appendix A

Compliance Matrix

Planning Consent Requirements – DA#24005571

Condition Number	Condition	Document Reference	How Addressed
Reserved Matters			
RM9	A Waste Management Plan that details the waste collection and disposal service to dispose of the volume of waste at the rate it is generated, shall be prepared in consultation with the Mid Murray Council and submitted to the satisfaction of the State Planning Commission.	This WMP	Waste generation, segregation, storage, collection, transport, reuse and disposal are addressed within this WMP, including establishment of waste collection schedules. Summary of consultation with Mid Murray Council is included in Section 1.4 of this WMP.
Conditions			
C1	The development authorisation granted herein shall be undertaken in accordance with the stamped approved plans, drawings, specifications and other documents submitted to the State Planning Commission, except where varied by conditions below (if any).	This WMP	This WMP has been prepared to align with the approved project documentation, including the Statement of Commitments and Project Approval conditions. Compliance is addressed through implementation of this WMP.
C5	Stockpiled materials, including cleared vegetation and excavated soil is not to be placed under native trees or on top of native understorey outside the approved area.	Section 5 Section 7 ECPs	Management of waste is detailed in Section 5, 6 and 7 of this WMP.
C6	Construction vehicles, equipment or materials are not to be stored or placed on top of native vegetation outside the approved clearance area.	Section 5 Section 7 ECPs	Management of waste is detailed in Section 5, 6 and 7 of this WMP.
C34	During works or construction activities associated with the development, the subject land must be managed in a manner as to prevent erosion and pollution of the site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to	Section 3 Section 5 Section 7 ECPs	Waste shall be managed in accordance with relevant legislative framework detailed in Section 2 of this WMP. Management of waste is detailed in Section 5, 6 and 7 of this WMP.

Condition Number	Condition	Document Reference	How Addressed
	ensure no pollutants (including excavation or fill material) enter the River Murray system.		
C35	Any fill material brought to the site must be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material.	Section 5 Section 7	Any potentially contaminated material will be assessed in accordance with Section 5.2 of this WMP and managed accordingly.
C36	Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not: • Be located within the River Murray 1956 flood extent; • Impede the natural flow of any surface waters; • Allow sediment to enter any water body; • Adversely impact native vegetation; • Facilitate the spread of pest plant and pathogenic material.	Section 3 Section 5 Section 7 ECPs	Waste shall be managed in accordance with relevant legislative framework detailed in Section 2 of this WMP. Management of waste is detailed in Section 5, 6 and 7 of this WMP.

Statement of Commitments

SoC Number	Commitment	Document Reference	How Addressed
4.9.1	During construction activities the subject land must be managed in a manner as to prevent erosion and pollution of the subject site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to ensure no pollutants (including excavation or fill material) enter the River Murray system.	Section 3 Section 5 Section 7 ECPs	Waste shall be managed in accordance with relevant legislative framework detailed in Section 2 of this WMP. Management of waste is detailed in Section 5, 6 and 7 of this WMP.
4.9.2	Any fill material brought to development sites must be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material.	Section 5 Section 7	Any potentially contaminated material will be assessed in accordance with Section 5.2 of this WMP and managed accordingly.

SoC Number	Commitment	Document Reference	How Addressed
4.9.3	Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not: a) Be located within the floodplain of any watercourses; b) Adversely impact native vegetation; c) Impede the natural flow of any surface waters; d) Allow sediment to re-enter any water body; e) Facilitate the spread of pest plant and pathogenic material.	Section 7 ECPs	Waste shall be managed in accordance with relevant legislative framework detailed in Section 2 of this WMP. Management of waste is detailed in Section 5, 6 and 7 of this WMP.

Appendix B Waste Tracking Register Template



Date	Material Type	Description	Quantity of Material (t)	Waste Classification	Source Location	Haulage Company	Destination Facility	EPA Licence Number	Reused / Recycled (Y/N)	Landfill (Y/N)	EPA Controlled Waste Tracking No.	Haulage Invoice No.	Disposal Invoice No.	Comments

Appendix C Receival Sites

Potential Waste



The table below provides a guide as to the potential receival sites the Contractor will utilise. All the listed sites may not be used with the list updated throughout the course of works as new opportunities become available.

Facility Name	Location	Type of Licensed Activity	SA EPA Licence #
Adelaide Resource Recovery	412 Hanson Rd, Dry Creek SA 5013	Waste Recovery Facility Treatment of listed waste	18944
Signal Waste & Recycling	11 Newfield Rd, Para Hills West SA 5096	Waste Recovery Facility	1003
Veolia Adelaide ResourceCo Recovery Facility	Lot 246 Wilkins Rd, Wingfield SA 5013	Waste Recovery Facility Any other waste reprocessing facility	19583
ResourceCo – Wingfield	144-150 Wingfield Road North, Wingfield SA 5013	Waste Recovery Facility Any other waste reprocessing facility	13997

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