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**2021 Independent Environmental Audit  
Veolia Environmental Services (Australia)  
Camellia Materials Recycling Facility  
37 Grand Avenue, Camellia NSW**

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**We declare that:**

The report contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the audit is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft	R. Loemker, Dr M. Jackson, A. Parsons	17/08/21	A. Parsons	Dr. M. Jackson	18/08/21
Client review	R. Loemker, Dr M. Jackson, A. Parsons	29/10/21	A. Parsons	Dr. M. Jackson	01/11/21
Final	R. Loemker, Dr M. Jackson, A. Parsons	04/11/21	A. Parsons	Dr. M. Jackson	05/11/21

## Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of Veolia Environmental Services (Australia) Pty Ltd, Camellia Materials Recycling Facility located at 37 Grand Avenue, Camellia NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in July 2021, as required under Condition C9 of the Development Consent (SSD 4964). The scope of the Audit was limited to the period between 7 July 2018 and 6 July 2021 which is consistent with Condition C9, with the audit being commissioned within three years after the first audit in year one. The initial Independent Environmental Audit was carried out in August 2018 and covered the period between August 2017 and July 2018.

Development consent was issued on 6 July 2016. However, for the period between 6 July 2016 and 5 July 2017, no construction or operational activities were carried out at the Site. On 23 May 2017, the then NSW Department of Planning and Environment approved Veolia's request to stage the construction activities of the Site. The staging was requested so that pre-loading earthworks could be completed to appease the recommendations of initial Geotechnical Investigations and to meet the City of Parramatta Flooding Policy prior to the construction of the Materials Recycling Facility (MRF). Consequently, the construction of the Site was carried out in two stages: stage 1 involved preloading of the site; and stage 2 involved construction of the MRF. Stage 1 works commenced in July 2017, therefore triggering Condition C9.

The audit was conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2020).

The audit also included the environmental performance requirements under Environmental Protection Licence (4806) for the same period, which is not specifically required under Condition C9.

NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment and City of Parramatta Council have also been consulted on the environmental performance of the development.

Overall, Veolia Environmental Services (Australia) Pty Ltd operates the development in accordance with the Conditions of Consent for SSD 4964 and the conditions of EPL 4806. Veolia Environmental Services (Australia) Pty Ltd has implemented all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period. One complaint was received during for the Audit Period and has been satisfactorily resolved.

The Audit Team found that the Site is managed by Veolia Environmental Services (Australia) Pty Ltd to a high standard. All procedures relating to the management of the construction phase of the development is being effectively implemented.

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# 1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in July 2021. Veolia Environmental Services (Australia) Pty Ltd (Veolia) commissioned JEP to conduct the Audit and assess the environmental performance of the Camellia Materials Recycling Facility, located at 37 Grand Avenue, Camellia NSW, for the period between 7 July 2018 and 6 July 2021.

On 11 June 2021, the Department of Planning, Industry and Environment approved the audit team to undertake the audit (refer to Appendix B).

## 1.1. Background

Operating under State Significant Development Consent SSD 4964 for the audit period and Environment Protection Licence (EPL) No. 4806, the Site is approved to receive up to 200,000 tonnes of general waste per calendar year from the commercial and industrial sector.

Development consent was issued on 6 July 2016. However, for the period between 6 July 2016 and 5 July 2017, no construction or operational activities were carried out at the Site. On 23 May 2017, the then NSW Department of Planning and Environment approved Veolia's request to stage the construction activities of the Site. The staging was requested so that pre-loading earthworks could be completed to appease the recommendations of initial Geotechnical Investigations and to meet the City of Parramatta Flooding Policy prior to the construction of the Materials Recycling Facility (MRF). Consequently, the construction of the Site was carried out in two stages: stage 1 involved preloading of the site; and stage 2 involved construction of the MRF.

This audit covers stage 1 of the development. Stage 2 involving the construction of the MRF is yet to commence.

### 1.1.1. Site changes and upgrades

The following provides a timeline of approvals and constructions works on the site:

- **Jul 2016:** State Significant Development Consent SSD 4964 approval;
- **May 2017:** Construction of a new stormwater outfall;
- **Apr 2017 – Sep 2018:** Stage 1 (preloading) works;
- **Jan 2020 – Jun 2020:** Stage 1A bulk earthworks, installation of new stormwater system and placement of 2 coat seal capping;
- **Jul 2020 – current:** completion of Remediation Action Plan Validation Monitoring.

## 1.2. Audit team

The Audit Team from Jackson Environment and Planning Pty Ltd included: Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

## 1.3. Audit objectives

As required under Condition C9 of the Development Consent (SSD 4964), an Independent Environmental Audit report is to be submitted to the Department of Planning, Industry and Environment. Specifically, Condition C9 states:

*Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs or agrees otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:*

- (a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary;*



- (b) be led by a suitably qualified auditor, and include experts in fields specified by the Secretary;*
- (c) include consultation with the relevant agencies;*
- (d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);*
- (e) review the adequacy of any approved strategy, plan or program required under the above-mentioned consents; and*
- (f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.*

Condition C10 states:

*Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.*

The objective of this Audit is to obtain an independent and objective assessment of the environmental performance and compliance status of the project and comply with Condition C9 of the Development Consent (SSD 4964).

## 1.4. Audit scope

Three considerations relevant to the scope of this Independent Environmental Audit include that of:

- Audit period;
- Project implementation phase; and
- Spatial scope.

### 1.4.1. Project implementation phase

In relation to project implementation phase, the operational phase has not commenced.

Construction of the Camellia MRF will be carried out in two stages that include:

- Preloading the Site;
- Construction of the MRF.

The approved Stage 1 works have now been completed. The completed Stage 1 works involved ground compaction, followed by preloading and levelling the Site with imported fill materials (as Virgin Excavated Natural Material (VENM)). Along with raising site levels above the existing pavement, the filling placed over the Site was left until consolidation settlement within the subsurface layers was achieved.

Additional works (Stage 1A), not originally anticipated to be undertaken under the previously approved Stage 1 were carried out between January and June 2020. The proposed Stage 1A works involved levelling, grading, installation of a new stormwater system and placement of a two-coat seal over the fill material to stabilise the preload and improve water management on the site.

Therefore, the scope of this audit includes the final part of the Stage 1 (preloading) works and any additional works completed up to 6 July 2021.

### 1.4.2. Spatial scope

The Camellia Materials Recycling Facility as located at 37 Grand Avenue, Camellia NSW, entirely within Lot 1, DP539890 (refer to Figure 1.1) which defines the spatial scope of the Audit.

It is noted that the water tanks on the site which are remaining are not in service and will be placed into service once the site is operational. For the purposes of the audit, this infrastructure was included into the scope of the audit.

### 1.5. Temporal period covered by the audit

This Audit assesses the environmental performance of the Camellia Materials Recycling Facility (MRF) for the period between 7 July 2018 and 6 July 2021.



Figure 1.1. Spatial scope of the 2021 Independent Environmental Audit – Veolia’s Camellia Materials Recycling Facility (site boundaries are shown in green).



<b>Date</b>	<b>Revision</b>	<b>Drawn By</b>	<b>Site description</b>	<b>Jackson Environment and Planning Pty Ltd</b>	 <b>JACKSON</b> <b>ENVIRONMENT AND PLANNING</b> <small>STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT</small>	<b>Client</b>	<b>Veolia Environmental Services (Australia) P/L</b>
27/07/2021	Revision A	R. Loemker	37 Grand Avenue, Camellia NSW, entirely within (Lot 1, DP539890)	<b>Strategy   Infrastructure   Compliance   Procurement</b>		<b>Project</b>	Camellia Materials Recycling Facility
				A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>		<b>Title</b>	Spatial Scope of audit
						<b>Scale</b>	As shown
						<b>Source</b>	Nearmap

## 2. Audit methodology

### 2.1. Selection and endorsement of audit team

The Audit Team from Jackson Environment and Planning Pty Ltd included: Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

In accordance with Condition C9 of SSD 4964 and Section 3 of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2020) (the Independent Audit Requirements), Veolia presented the Audit Team to the Department of Planning, Industry and Environment and sought approval for the team put forward.

Approval for the independent audit team was provided to Veolia on 11 June 2021. The letter of approval is provided in Appendix B.

### 2.2. Independent audit scope development

The Independent Environmental Audit was developed in accordance with the Independent Audit Requirements and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The Audit involved the following stages:

- **Audit initiation** – Documents relating to the Audit period between between 7 July 2018 and 6 July 2021 were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Remote audit** – The audit was carried out remotely using Google Meet (due to Covid19 restrictions). The remote audit began with an opening meeting to make introductions, update the auditors on the status of the site and confirm the scope and extent of the Audit and discuss the schedule. The remaining gaps in the audit tool developed by JEP was completed by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting.
- **Site inspection** – A separate site inspection was conducted on 21 October 2021 to confirm the plans developed for the site have been effectively implemented and compliant with the conditions of consent.
- **Audit Report (this report)** – The final findings have been formally written and distributed in this audit report.

The audit plan is shown in Appendix C.

### 2.3. Compliance evaluation

Compliance checklists were developed based on the Conditions of Consent for SSD 4964, the conditions of EPL 4806 and in accordance with the *Independent Audit Guideline* and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The detailed list of compliance conditions is provided in Appendix D (SSD 4964 CoCs) and Appendix E (EPL 4806 licence conditions). The compliance assessment summary is provided in the Section 3.

### 2.4. Site interviews

Compliance was determined via interviews with key staff during a remote meeting Google Meet carried out on 27 July 2021. Interviewees included Sara Maddison, Anae Ressos, Mary Wong, Ramona Bachu and Promit Biswas from Veolia Environmental Services (Australia) Pty Ltd.

## 2.5. Site inspection

The auditors attended a site inspection on 21 October 2021. Photographs taken during the site inspection are provided in Appendix F.

## 2.6. Consultation

As part of the audit process, Jackson Environment and Planning consulted the NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment, and City of Parramatta Council on key environmental issues which need to be considered in the Independent Environmental Audit. Letters were sent to each agency providing opportunity to provide feedback. The letters are contained within Appendix G.

## 2.7. Compliance status descriptors

Compliance has been assessed using the Independent Audit Requirements (Table 2.1).

**Table 2.1. Compliance assessment criteria - DPE [2018] *Independent Audit Post Approval Requirements.***

Assessment	Criteria
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.



## 3. Audit findings

### 3.1. Approval and document list

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance with the conditions of Development Consent SSD 4964 for the period between 7 July 2018 and 6 July 2021.

Documentation included:

- Construction Environmental Management Plan (dated 19 December 2019);
- Temporary Water Management Plan (dated 19 December 2019);
- Flood Emergency Response Plan (dated 7 September 2015);
- Annual Environmental Management Report 2019-2020 (dated 3 September 2020);
- Annual Environmental Management Report 2018-2019 (dated 30 August 2019);
- Annual Environmental Management Report 2017-2018 (dated September 2018);
- Environment Protection Licence 4806;
- Emergency Response Plan;
- Incident register;
- Complaints register;
- 2018 Annual Return;
- 2019 Annual Return;
- 2020 Annual Return;
- Preliminary Validation Report (dated 2 December 2020); and
- Draft Final Validation Report (dated November 2021).

#### 3.1.1. Construction Environmental Management Plan

Veolia managed construction at the Site under a Construction Environmental Management Plan – Stage 1 Works (CEMP-1) and Construction Environmental Management Plan – Stage 1A Works (CEMP-1A) which has been prepared in conjunction with the Environmental Protection Licence to fulfil the requirements of the SSD Conditions of Consent (CoCs).

The CEMP-1 and CEMP-1A provide sufficient detail for the effective management of environmental measures for the following environmental aspects as examples of content:

- Air quality;
- Traffic;
- Noise;
- Soils;
- Water quality;
- Waste;
- Visual amenity; and
- Heritage.

The objectives of this CEMP-1 and CEMP-1A are to:

- Provide a working environmental management tool to follow during the preloading of the site / Stage 1A works;
- Comply with relevant environmental legislation, including the Conditions of Consent relating to the Site;

- Provide a means of implementing the recommended mitigation measures for the key environmental issues, associated with preloading / Stage 1A works, identified in the Environment Impact Statement (EIS);
- Define roles and responsibilities of the project management team and contractors during the preloading of the site / Stage 1A works;
- Provide a guide for the interaction with relevant government authorities and other relevant stakeholders, including the community during the preloading of the site / Stage 1A works.

## 3.2. Compliance performance

Overall, Veolia had carried out the Stage 1 and Stage 1A phases on the development in accordance with the Conditions of Consent for SSD 4964 and the conditions of EPL 4806. Veolia implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period.

The Audit Team found that the Site is operated by Veolia in accordance with the Construction Environmental Management Plans. All procedures relating to the development are effectively implemented.

## 3.3. Summary of agency notices, orders, penalty notices or prosecutions

There have been no agency notices, orders, penalty notices or prosecutions issued to the facility.

## 3.4. Non-compliances

No non-compliances were identified against the Conditions of Consent for SSD 4964 for the Audit Period.

## 3.5. Previous audit recommendations

Four (4) non-compliances were documented in the Independent Environmental Audit conducted by Ramboll Australia Pty Ltd (dated 31 January 2019). Details of the non-compliances, corrective actions and status included in Table 3.1.

**Table 3.1. Previous audit findings – non-compliance.**

SSD/EPL Condition	Non-Compliance	Corrective Actions	Status
SSD4964 – B7	Revisions of the Stage 1 Water Management Plan had not been submitted to the NSW Department of Planning & Environment for approval. The previous Auditors noted that this revision (May 2018) has provided additional information and is generally consistent with the previous revision (December 2016). Revision 2 has subsequently been submitted to the DPE. The latest revision should be made publicly available following approval.	The Revision 2 was later submitted to DPIE	Completed
SSD4964 – C9	The IEA was not commissioned within 1 year of the commencement of Stage 1 preloading works. The previous Auditors noted that this non-compliance has been rectified by commissioning of this Audit and that	No further action required.  The 2021 IEA was commissioned in May 2021 as per this condition.	Completed

SSD/EPL Condition	Non-Compliance	Corrective Actions	Status
	the DPE has been kept informed of the timing. No recommendation on further corrective action is made.		
EPL4806 – G1.1	Veolia has a state-wide Pollution Incident Response Management Manual (PIRMM) and site incident response procedures as part of the Construction Environmental Management Plan (CEMP). The previous Auditors consider that the CEMP incident response plan is adequate for the current level of activity at the site; however, it does not technically comply with all legislative requirements for a Pollution Incident Response Management Plan (PIRMP).	Update plans to meet all PIRMP requirements under the legislation (refer to Section 3.5.1).  A copy of the updated plan to be kept at the site to satisfy the requirement of the legislation.	Completed
EPL4806 – G1.1	A copy of EPL 4806 was not kept at the site. Although there are currently no buildings at the site and site is unattended, it is recommended that a copy of the EPL be placed in the storage container to satisfy the requirements of the licence.	Keep a copy of the EPL 4806 in the storage container onsite	Completed

### 3.5.1. PIRMP Requirements

As identified in the non-compliance listed in Table 3.1 (Refer to EPL4806 – G1.1), Veolia has a state-wide Pollution Incident Response Management Manual (PIRMM) and site incident response procedures as part of the Construction Environmental Management Plan (CEMP). The previous Auditors considered that the CEMP incident response plan is adequate for the current level of activity at the site; however, it does not technically comply with all legislative requirements for a Pollution Incident Response Management Plan (PIRMP).

The following responses were provided by Veolia in relation to section 153D of the POEO Act (cl. 98D(1) and (2)) of General Regulation (Table 3.2).

**Table 3.2. POEO Act PIRMP Requirements.**

POEO Act PIRMP Requirements	Veolia response
Full PIRMP maintained at premises	A hard copy is kept onsite in storage container as there are no other infrastructure/amenities
PIRMP in a prominent position on a publicly accessible website of the licensee	A Pollution Incident Response Management Manual (PIRMM) which overarches licence specific PIRMPs is available on Veolia's website, as per address below and provided in EPA annual returns
The following information must be made publicly available:	
<ul style="list-style-type: none"> <li>Procedures for contacting the relevant authorities including the EPA, the local council, NSW Health, SafeWork NSW, Fire and Rescue NSW and their contact details</li> </ul>	Refer to PIRMM, <i>Notification Protocol</i>
<ul style="list-style-type: none"> <li>procedures for contacting the owners or occupiers of premises in the vicinity</li> </ul>	Refer to PIRMM, <i>Notification Protocol</i>

POEO Act PRIMP Requirements	Veolia response
<ul style="list-style-type: none"> <li>procedures for communicating with the community</li> </ul>	Refer to PIRMM, <i>Notification Protocol</i>
<ul style="list-style-type: none"> <li>mechanisms for providing early warnings and regular updates to premises in the vicinity</li> </ul>	Refer to PIRMM, <i>Compliance Provisions, Table 3</i>
<ul style="list-style-type: none"> <li>may form part of another document prepared in accordance with other legislation</li> </ul>	incorporated within Veolia Emergency Response Plan
<ul style="list-style-type: none"> <li>may be an index document detailing the other plans that meet the requirements of the PIRMP</li> </ul>	refer PIRMM, <i>Purpose &amp; Scope</i>

## 3.6. Compliance with Construction Environmental Management Plan

The Audit Team found that the Site is operated in accordance with the CEMP-1 and CEMP-1A and subplans for the Audit Period and no non-compliances were identified.

## 3.7. Compliance with Environment Protection Licence 4806

The Audit Team found that the Site is operated in accordance with the conditions of EPL 4806 for the Audit Period and no non-compliances were identified (refer to Appendix E and Section 3.8.1).

## 3.8. Overview of environmental performance

### 3.8.1. Consultation outcomes

As part of the audit process, Jackson Environment and Planning consulted the NSW Environment Protection Authority, NSW Department of Planning, Industry and City of Parramatta Council on key environmental issues which need to be considered in the Independent Environmental Audit.

The Department of Planning, Industry and Environment responded on 7 July 2021 to advise they have no comments.

The City of Parramatta Council responded on 9 July 2021 to advise that in the past five years, Council has only received one complaint that was to do with dust management at the site, that was investigated and resolved. Council had no further comments.

The NSW EPA responded on 20 July 2021 and identified three key environmental issues for the site that relate to contaminated land:

1. Potential contaminated seep and ponding identified during an EPA inspection on 12 May 2021.
2. A deteriorating unsealed spoon drain located on the western side of the site identified during an EPA inspection on 12 May 2021. The permeability of this structure and potential contaminant flux is not currently known.
3. Public access to the foreshore and lack of signage in and around the foreshore.

The above points were further investigated during the audit and the following responses were provided as written response from Geosyntec Consultants Pty Ltd (letter dated 3 August 2021 provided in Appendix H):

1. Zoic Environmental Pty Ltd (now trading as Geosyntec Consultants Pty Limited) completed the first of the seep validation inspections specified in Section 4.5 of the Operational Site Management Plan (OSMP) (Zoic report dated February 2021) but has three more to complete. Further seep validation inspections are on hold until COVID-19 Public Health Order restrictions are lifted for Parramatta LGA. Veolia has also completed some



mapping of chromium impacted seeps / ponding along the foreshore in response to NSW EPA queries and has conducted laboratory analysis to confirm that the concentrations of chromium VI at these locations are consistent with those assessed using visual colour observations. A detailed review and assessment of this data is ongoing, but the preliminary findings indicate that the laboratory results correlate with those assessed using visual colour techniques described in the Preliminary Validation Report and OSMP. The collated data will be presented in a Final Validation Report.

2. Following the inspection completed by NSW EPA on 12 May 2021, Geosyntec Senior Hydrogeologist (Joshua Lloyd) completed a detailed inspection and found that the 2 Coat Seal was intact beneath a surface covering of sediment across the majority of the Conveyance Channel (referred to in NSW EPA correspondence above as spoon drain), which in turn was underlain by the original concrete slab for the site and could not be removed during demolition due to ground level stipulations for the Conveyance Channel made by Parramatta City Council. Ongoing available monitoring data to date does not suggest that mounding of groundwater along the western boundary is occurring. This also suggests that surface water infiltration along the western boundary is not noticeably contributing to groundwater flow. Consequently, an increase in chromium VI flux at the foreshore is considered unlikely and has not been observed (i.e. reduced seepage). However, Geosyntec is currently assessing the situation and will provide multiple lines of evidence approach within the Final Validation Report that the localised absence of 2 Coat Seal is unlikely to increase the current nor future potential for chromium VI flux at the foreshore if the site is maintained as per conditions outlined in the OSMP.
3. Maria Bowen of NSW EPA has provided Veolia with signage templates for use on the foreshore. This signage is now in place.

The response letter prepared sufficiently addresses points 2 and 3 above, however, the auditors sought further clarification from Veolia regarding Point 1. Veolia provided a draft version of the Final Validation Report (prepared by Geosyntec Consultants Pty Ltd dated November 2021) and the following response was provided:

*To address this concern Zoic has since conducted a detailed inspection and assessment of the Conveyance Channel and concluded that it meets the intent of the Veolia (2015) RAP for the following reasons:*

- *No damage to the two coat seal was noted in base of the channel (including areas overlain by sediment);*
- *Whilst spalling of the batter was observed, the state of compaction of the underlying preload and the angle of repose would limit the potential for infiltration as water would be shed into the base of the channel; and*
- *Groundwater monitoring does not indicate mounding along the western site boundary that would substantiate infiltration is occurring within the footprint of this feature.*

The auditors are satisfied that Point 1 has also been adequately addressed.

### 3.8.2. Complaints

One complaint was received during for the Audit Period. On 30 November 2018, the adjoining business Transdev, raised concerns regarding the condition of the sandbags on the site. Veolia staff conducted an initial site visit to assess the extent of the issue. Veolia carried out a further site visit with Transdev representatives on 4 December 2018. The outcome of the site visit, involved Veolia installing strips of geofabric over the surface of the site to cover the sandbags. The complaint is considered resolved.

### 3.8.3. Incidents

The above complaint was considered a minor environmental incident as it was recorded in the Incident Register for the site. In addition, on 29 January 2020, a contractor was required to remove two 200L steel drums containing contaminated material and liquid for off-site disposal. One of the drums was punctured causing approximately 0.5L

of liquid to leak out. The liquid was contained using containment berms and spill sheets. The leaking drum was placed in an intermediate bulk container and all contaminated material was shovelled and placed into the intermediate bulk container. No further action was taken.

### 3.8.4. Actual verses predicted environmental impacts

The predicted impacts are being managed effectively through the implementation of the Construction Environmental Management Plans for the site. Therefore, the site is operated in accordance with the Conditions of Consent for SSD 4964 and the conditions of EPL 4806. No additional impacts have been identified that have not been identified in the consent documentation.

### 3.8.5. Site inspection

During the site inspection the auditors did not identify any significant environmental issues at the site.

Minor issues identified during the site inspection include:

- Litter along the front boundary fence of the site (refer to Figure F12 in Appendix F); and
- Blocked stormwater drain pits along the inside front boundary of the site (refer to Figure F7 in Appendix F).

### 3.8.6. Remote interviews

The remote interviews identified that employees and managers have a good understanding of the site conditions of consent and Environment Protection Licence conditions.

## 4. Recommendations

### 4.1. Opportunities for improvement

Areas of improvement that have been recommended following the site audit and inspection include:

- Regular site inspections to check for, and management, the following
  - Litter along boundary fences and front of site;
  - Integrity of capping layer particularly the capping along the batter on the western boundary of the site should be monitored on a monthly basis and repaired immediately where deterioration is observed.

## 5. Conclusions

An Independent Environmental Audit was conducted to assess the environmental performance of Veolia Environmental Services (Australia) Pty Ltd, Camellia Materials Recycling Facility located at 37 Grand Avenue, Camellia NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in July 2021, as required under Condition C9 of the Development Consent (SSD 4964). The scope of the Audit was limited to the period between 7 July 2018 and 6 July 2021 which is consistent with Condition C9, with the audit being commissioned within three years after the first audit in year one. The initial Independent Environmental Audit was carried out in August 2018 and covered the period between August 2017 and July 2018.

The audit was conducted in accordance with the NSW Department of Planning and Environment's Independent Audit Post Approval Requirements (2020).

The audit also included the environmental performance requirements under Environmental Protection Licence (4806) for the same period, which is not specifically required under Condition C9.


NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment and City of Parramatta Council have also been consulted on the environmental performance of the development.

Overall, Veolia Environmental Services (Australia) Pty Ltd operates the development in accordance with the Conditions of Consent for SSD 4964 and the conditions of EPL 4806. Veolia Environmental Services (Australia) Pty Ltd implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period. One complaint was received during for the Audit Period and has been satisfactorily resolved.

The Audit Team found that the Site is managed by Veolia Environmental Services (Australia) Pty Ltd to a high standard. All procedures relating to the management of the construction phase of the development is being effectively implemented.

## Appendix A – Independent Audit Declaration Form

Project Name	Camellia Materials Recycling Facility
Consent Number	State Significant Development Consent 4964
Description of Project	Camellia Materials Recycling Facility
Project Address	37 Grand Avenue, Camellia NSW
Proponent	Veolia Environmental Services (Australia) Pty Ltd
Title of Audit	2021 Independent Environmental Audit – Camellia Materials Recycling Facility
Date	04/11/2021
<p>I declare that:</p> <ul style="list-style-type: none"> <li>i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;</li> <li>ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;</li> <li>iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;</li> <li>iv. I am not an Environmental Representative for the project; and</li> <li>v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.</li> </ul> <p>Note.</p> <ul style="list-style-type: none"> <li>a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</li> <li>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)</li> </ul>	
Name of Auditor	Alan Parsons
Signature	
Qualification	Lead Auditor HSEQ
Company	ARP Risk Management Solutions Pty Ltd
Company Address	1 Power Place, Jindabyne NSW 2627

## Appendix B – Audit Team Approval



Sara Maddison  
Veolia Environmental Services (Aus) Pty Ltd  
L4, 65 PIRRAMA ROAD  
PYRMONT NSW 2009

11/06/2021

**Attention:** Sara Maddison, Operations Project Manager

**Veolia Camellia Resource Recovery Facility - SSD-4964  
Independent Audit Team**

I refer to your request (SSD-4964-PA-2) for the Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit for the Veolia Camellia Resource Recovery Facility (SSD-4964).

The Department has reviewed the nominations and information you have provided and is satisfied that the experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the referenced experts to prepare the Independent Audit.

In accordance with Condition C9 of SSD-4964 (the '**Consent**') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team from ARP Risk Management Solutions Pty Ltd and Jackson Environment and Planning Pty Ltd:

- Alan Parsons as lead auditor;
- Mark Jackson as auditor; and
- Rylan Loemker as auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156.



Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope', written in a cursive style.

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

## Appendix C – Audit Plan



**SSD Independent Environmental Audit: Audit Plan and Agenda**  
**Veolia Environmental Services (Australia) Pty Ltd**  
**Camellia Materials Recycling Facility**  
**Via Zoom Videoconference (<https://us06web.zoom.us/j/81916367033>)**  
**Date: Tuesday 27<sup>th</sup> July 2021**  
**Time: 10am to 12pm**

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**Introduction to the audit:**

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd (Veolia) to undertake an Independent Environmental Audit (Audit) of the Camellia Materials Recycling Facility (the Site), located at 37 Grand Avenue, Camellia. This audit is required under Condition C9 of the Development Consent (SSD 4964), which states:

*“Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development...”*

Development consent was issued on 6<sup>th</sup> July 2016. However, for the period between 6<sup>th</sup> July 2016 and 5<sup>th</sup> July 2017, no construction or operational activities were carried out at the Site. On 23<sup>rd</sup> May 2017, the then NSW Department of Planning and Environment approved Veolia’s request to stage the construction activities of the Site. The staging was requested so that pre-loading earthworks could be completed to appease the recommendations of initial Geotechnical Investigations and to meet the City of Parramatta Flooding Policy prior to the construction of the Materials Recycling Facility (MRF). Consequently, the construction of the Site was carried out in two stages: stage 1 involved preloading of the site; and stage 2 involved construction of the MRF.

Stage 1 works commenced in July 2017, therefore triggering Condition C9. The initial Independent Environmental Audit was carried out in August 2018 and covered the period between August 2017 and July 2018.

Based on this, Jackson Environment and Planning Pty Ltd have been commissioned to conduct the Audit and cover the period after the original audit between 7<sup>th</sup> July 2018 and 6<sup>th</sup> July 2021, being three years since the last audit.

The Audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C9.

The Audit will be performed in accordance with the NSW Department of Planning and Environment’s *Independent Audit – Post Approval Requirements June 2018* and *AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems (2018)*.

The Department of Planning, Industry and Environment approved the audit team on 11<sup>th</sup> June 2021.

## Audit team

Members of the audit team are outlined below, including site representatives from Veolia. It is noted that Mr Alan Parsons from ARP Risk Management Solutions Pty Ltd will be supporting the audit team as the lead auditor.

Ms Sara Madison	Operations Project Manager	Veolia Veolia Veolia
Dr Mark Jackson	Director	Jackson Environment and Planning Pty Ltd
Mr Rylan Loemker	Senior Consultant	Jackson Environment and Planning Pty Ltd
Mr Alan Parsons	Director	ARP Risk Management Solutions Pty Ltd

## Audit plan

The audit process outlined in ISO 19011 *Guidelines for Auditing Management Systems* (2018) has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1. Audit activities to be performed remotely on 27<sup>th</sup> July 2021 are noted.

## Audit Scope and Objectives

Three considerations relevant to the scope of this Independent Environmental Audit include that of

- Project implementation phase;
- Documentation; and
- Spatial Scope.

## Project phase

In relation to project phase, the audit will cover the construction phase of the development.

## Documentation

The scope of the Audit will be limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 4964 for the period 7<sup>th</sup> July 2018 and 6<sup>th</sup> July 2021.

The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*.

The Audit also included environmental performance requirements under Environmental Protection Licence (4806) for the same period, however this is not specifically required under Condition C9 of SSD 4964.

It is noted that due to COVID restrictions in Sydney, the site inspection will be postponed until COVID restrictions are relaxed.

### Spatial Scope

The Camellia Materials Recycling Facility is located at 37 Grand Avenue, Camellia entirely within Lot 1, DP 539890.

**Table 1. Summary of the audit methodology and the audit plan.**

Status	Audit plan task
Completed	<b>Letter seeking audit team approval</b> – In accordance with the NSW Department of Planning and <i>Environment's Independent Audit Post Approval Requirements</i> June 2018, a letter was prepared seeking DPIE approval for the audit team.
Completed	<b>Develop the Audit Plan</b> – An audit plan be developed outlining what will be audited, who will do the auditing, when it will happen and who will be audited, and how much time will be dedicated to each process in the audit. Work will also be assigned to auditors. The audit working papers will also be prepared to identify what the auditors wants to verify, what questions to ask, and what they expect as evidence. The Audit Plan will also include the audit sequence. We will also allow time for consultation with relevant agencies, including NSW EPA, Department of Planning, Industry and Environment and City of Parramatta Council in accordance with your consent and the <i>Independent Audit Post Approval Requirements</i> .
Remote audit Completed – 27 <sup>th</sup> July 2021	<b>Conduct the opening meeting</b> – The onsite audit begins with an opening meeting. This is to introduce the auditors, confirm the scope and extent of the audit and discuss the schedule.
Site visit completed – 21 <sup>st</sup> October 2021	<b>Review documents</b> – After the meeting, any documents immediately presented by Veolia will be reviewed to gather relevant information that might not have been available before.
	<b>Carry out the audit</b> – The auditors will commence the audit by interviews and collecting the records and observations that will demonstrate if the processes meet the Development Consent conditions and EPL requirements. We will also write to NSW EPA, Department of Planning, Industry and Environment and City of Parramatta Council and seek any feedback on the environmental performance of the development.  The site inspection is on hold until COVID restrictions are relaxed.
	<b>Generate findings and conclusions</b> – JEP will generate the audit findings and prepare any audit conclusions to be presented at the closing meeting.
	<b>Conduct the closing meeting</b> – The onsite audit finishes with a closing meeting. This is to present the audit findings and provide Veolia with the opportunity to discuss and ask questions about the audit and findings.
Completed – 1 November 2021	<b>Formalise audit findings in a report</b> – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the remote audit on 27<sup>th</sup> July 2021 is given in Table 2.

**Table 2. Agenda for the on-site audit scheduled for 27<sup>th</sup> July 2021.**

Agenda item	Item description
1.	1000 - 1015: Introductions (all) – via Videoconference (Zoom). Link to meeting is: <a href="https://us06web.zoom.us/j/81916367033">https://us06web.zoom.us/j/81916367033</a>
2.	1015- 1030: Confirm scope of the audit (Mark)
3.	1030 - 1045: Overview of the Audit Plan (Mark / Rylan) <ul style="list-style-type: none"><li>• Documents reviewed as part of the desktop audit</li><li>• Review of gaps in audit data / evidence needed</li><li>• Complaints data</li><li>• Timeline for providing audit data</li><li>• Timeline for preparation of draft and final report for submission to DPIE</li></ul>
4.	1045 - 1130: Desktop audit of operations: <ul style="list-style-type: none"><li>• Actions to close non-compliances from the last IEA report</li><li>• Environmental monitoring and reporting</li><li>• Community liaison and complaints handling</li><li>• Training, induction, communications and roles / responsibilities under the OEMP</li><li>• Waste management</li><li>• Air quality</li><li>• Noise and vibration</li><li>• Soil and water</li><li>• Traffic and access</li><li>• Fire management</li><li>• Visual amenity</li><li>• Heritage</li></ul>
5.	1130 - 1145: Review of audit findings and additional evidence required to complete audit. Scheduling of the site inspection.
6.	1145 - 1200: Questions and close

# Appendix D – Development Consent Compliance Table



Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>PART A – ADMINISTRATIVE CONDITIONS</b>				
<b>OBLIGATIONS TO MINIMISE HARM TO THE ENVIRONMENT</b>				
A1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Development.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021		Compliant
<b>TERMS OF CONSENT</b>				
A2	The Applicant shall carry out the Development in accordance with the: <ul style="list-style-type: none"> <li>a) EIS;</li> <li>b) RTS;</li> <li>c) Site layout plans and drawings (see Appendix A); and</li> <li>d) Management and Mitigation Measures (see Appendix B).</li> </ul>	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021		Compliant
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Noted		Not triggered
A4	The Applicant shall comply with any reasonable requirements of the Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> <li>a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and</li> <li>b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.</li> </ul>	Noted	It is noted that DPE has not specified additional requirements	Not triggered
<b>LIMITS OF CONSENT</b>				
A5	This consent lapses 5 years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	Noted		Not triggered
<b>STATUTORY REQUIREMENTS</b>				
A6	The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021		Compliant
<b>BUILDING CODE OF AUSTRALIA</b>				
A7	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i> (BCA).	Noted		Not triggered

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>LIMITS OF CONSENT</b>			
	<b>Waste Limits</b>			
A8	The Applicant shall not receive or process on the site more than 200,000 tonnes of waste per calendar year.	None		Not triggered
	<b>Waste type</b>			
A9	The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	None		Not triggered
	<b>OPERATION OF PLANT AND EQUIPMENT</b>			
A10	The Applicant shall ensure that all plant and equipment used for the Development is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Audit interview on 27 July 2021	No plant or equipment currently installed on site.	Not triggered
	<b>DEMOLITION</b>			
A11	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	Audit interview on 27 July 2021	No demolition was carried out during the audit period. Demolition was carried out in 2016 and was covered under previous IEA.	Not triggered
	<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>			

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A12	With the approval of the Secretary, the Applicant may: <ol style="list-style-type: none"> <li>a) submit any strategy, plan or program required by this consent on a progressive basis; and/or</li> <li>b) combine any strategy, plan or program required by this consent.</li> </ol>	The Auditors sighted following Stage 1 documents were sighted: <ul style="list-style-type: none"> <li>• Temporary Water Management Plan (dated 19/12/19)</li> <li>• Flood Emergency Response Plan (dated 7/09/2015)</li> <li>• Construction Environmental Management Plan – Preloading Stage (dated 7/11/16)</li> <li>• Construction Environmental Management Plan – Stage 1a works (dated 19/12/19)</li> <li>• Emergency Response Plan – Camellia (incorporating the Pollution Incident Response Management Plan (dated 28/06/2021)</li> </ul>	On 23 May 2017, the then NSW Department of Planning and Environment approved Veolia’s request to stage the construction activities of the Site. The staging was requested so that pre-loading earthworks could be completed to appease the recommendations of initial Geotechnical Investigations and to meet the City of Parramatta Flooding Policy prior to the construction of the Materials Recycling Facility (MRF). Consequently, the construction of the Site was carried out in two stages: stage 1 involved preloading of the site; and stage 2 involved construction of the MRF.	Compliant
<b>SURRENDER OF CONSENTS</b>				

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																	
A13	<p>In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant shall and in the manner prescribed by clause 97 of the Regulation, surrender the development consents described in Table 1 prior to the issue of an Occupation Certificate for the Development.</p> <p><b>Table 1 – Consents to be surrendered</b></p> <table border="1"> <thead> <tr> <th>Determination date</th> <th>DA number</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>3 December 1969</td> <td>1054/J</td> <td></td> </tr> <tr> <td>26 May 1970</td> <td>G114/70</td> <td></td> </tr> <tr> <td>23 July 1992</td> <td>DA 39288/L91</td> <td>Food waste recycling depot (grease trap plant)</td> </tr> <tr> <td>15 March 1996</td> <td>DA 96/00019/DJ</td> <td>Upgrade of existing waste water treatment plant and the construction of two (2) vertical tanks</td> </tr> <tr> <td>12 July 1996</td> <td>DA 95/00886/DJ A</td> <td>Relocate the already approved metal clad workshop towards the street frontage</td> </tr> <tr> <td>28 October 1997</td> <td>DA 97/00532/DJ</td> <td>To erect an awning to an existing wash bay and to extend an existing storage bay</td> </tr> <tr> <td>9 July 2001</td> <td>DA IT/01476/99</td> <td>To extend and upgrade an existing liquid waste treatment facility</td> </tr> <tr> <td>5 April 2005</td> <td>DA/532/1997/A</td> <td>Section 96 application to modify Council original approval and in increase the height of the storage bays</td> </tr> <tr> <td>22 October 2007</td> <td>DA/658/2007</td> <td>Conversion of a vehicle workshop to a packaged waste store</td> </tr> <tr> <td>4 December 2007</td> <td>DA/848/2007</td> <td>Alterations and additions including replacement of 3 liquid storage tanks, increase in the size of the bunded area, extension of soil bay awning and additional soil bays</td> </tr> </tbody> </table>	Determination date	DA number	Details	3 December 1969	1054/J		26 May 1970	G114/70		23 July 1992	DA 39288/L91	Food waste recycling depot (grease trap plant)	15 March 1996	DA 96/00019/DJ	Upgrade of existing waste water treatment plant and the construction of two (2) vertical tanks	12 July 1996	DA 95/00886/DJ A	Relocate the already approved metal clad workshop towards the street frontage	28 October 1997	DA 97/00532/DJ	To erect an awning to an existing wash bay and to extend an existing storage bay	9 July 2001	DA IT/01476/99	To extend and upgrade an existing liquid waste treatment facility	5 April 2005	DA/532/1997/A	Section 96 application to modify Council original approval and in increase the height of the storage bays	22 October 2007	DA/658/2007	Conversion of a vehicle workshop to a packaged waste store	4 December 2007	DA/848/2007	Alterations and additions including replacement of 3 liquid storage tanks, increase in the size of the bunded area, extension of soil bay awning and additional soil bays	None		Not triggered
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	<b>METEOROLOGICAL MONITORING</b>																																				
A14	<p>Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales. The Applicant shall operate the meteorological station for the life of the Development.</p>	None		Not triggered																																	
	<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>																																				

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A15	The Applicant shall: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.	None		Not triggered
	<b>SITE AUDIT STATEMENT</b>			
A16	Prior to the issue of a Final Occupation Certificate for the Development, the Applicant shall obtain from a Site Auditor, a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).	None		Not triggered
	<b>DISPUTE RESOLUTION</b>			
A17	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the Development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	None		Not triggered
	<b>DEVELOPER CONTRIBUTIONS</b>			
A18	Prior to the issue of a Construction Certificate for the development, unless otherwise agreed with Council, the Applicant shall pay development contributions to Parramatta Council calculated in accordance with Section 94A <i>Development Contributions Plan (Amendment No. 4) Parramatta City Council 20 May 2015</i> .	None		Not triggered
<b>PART B – ENVIRONMENTAL PERFORMANCE</b>				
	<b>WASTE MANAGEMENT</b>			
	<b>Waste Monitoring Program</b>			

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B1	From the commencement of operation, the Applicant shall implement a Waste Monitoring Program for the Development. The Program must: <ol style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</li> <li>b) include suitable provision to monitor the:               <ol style="list-style-type: none"> <li>i. quantity, type and source of waste received on site; and</li> <li>ii. quantity, type and quality of the outputs produced on site.</li> </ol> </li> <li>c) ensure that:               <ol style="list-style-type: none"> <li>i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</li> <li>ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste.</li> </ol> </li> </ol>	None		Not triggered
	<b>Waste storage and processing</b>			
B2	The Applicant shall ensure the transportation of waste is: <ol style="list-style-type: none"> <li>a) undertaken by a transporter authorised to transport such wastes; and</li> <li>b) to a place that can lawfully accept that waste.</li> </ol>	None		Not triggered
	<b>Pests, vermin and noxious weed management</b>			
B3	The Applicant shall: <ol style="list-style-type: none"> <li>a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</li> <li>b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding area.</li> </ol> <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	<p>The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.</p> <p>The auditors sighted</p> <ul style="list-style-type: none"> <li>• Environmental Site Inspection Report for April (dated 22/04/21)</li> <li>• Environmental Site Inspection Report for April (dated 24/05/21)</li> </ul>	<p>Overgrown vegetation was identified around the site and documented in the April Environmental Site Inspection Report.</p> <p>Overgrown vegetation was removed on 12th-13th of May and documented in the May Environmental Site Inspection Report.</p>	Compliant
	<b>SOIL AND WATER</b>			
	<b>Compliance Certificate</b>			

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B4	A Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> must be obtained from Sydney Water prior to the commencement of construction.	Audit interview on 27 July 2021	On 25 May 2017, the then NSW Department of Planning and Environment advised that the Section 73 Compliance Certificate is to be obtained prior to the commencement of Stage 2 constructions works, being the construction of the MRF	Not triggered
	<i>Pollution of Waters</i>			

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B5	The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	<p>The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.</p> <p>The auditors sighted</p> <ul style="list-style-type: none"> <li>• Environmental Site Inspection Report for April (dated 22/04/21)</li> <li>• Environmental Site Inspection Report for April (dated 24/05/21)</li> <li>• Final Validation Report (prepared by Geosyntec Consultants Pty Ltd dated November 2021)</li> </ul> <p>Temporary Water Management Plan (dated 07/05/18) states representative samples of basin outlet water shall be collected (during different consecutive events) when the basin is overflowing. However, no overflow events from stormwater basin occurred and therefore the monitoring requirement was not triggered.</p> <p>Response letter prepared by Geosyntec Consultants Pty Ltd (dated 3 August 2021)</p>	<p>Consultation with the NSW EPA (letter dated 20 July 2021) identified a number of environmental issues in relation to contaminated land, specifically:</p> <ol style="list-style-type: none"> <li>1. Potential contaminated seep and ponding identified during an EPA inspection on 12 May 2021.</li> <li>2. A deteriorating unsealed spoon drain located on the western side of the site identified during an EPA inspection on 12 May 2021. The permeability of this structure and potential contaminant flux is not currently known.</li> </ol> <p>The response letter provided sufficient evidence to suggest point 2 above has been adequately addressed.</p> <p>The Final Validation Report (prepared by Geosyntec Consultants Pty Ltd dated November 2021) provided sufficient evidence to suggest point 1 above has been adequately addressed.</p>	Compliant
	<i>Water Management Plan</i>			



Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B6	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The plan must:</p> <ol style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s) in consultation with Council;</li> <li>b) include the details of:               <ol style="list-style-type: none"> <li>i. the Water Management System (see Condition B8);</li> <li>ii. erosion and sediment control measures (see Condition B9); and</li> <li>iii. bunding (see Condition B11).</li> </ol> </li> </ol>	<p>The Auditors sighted the Temporary Water Management Plan (dated 19/12/19).</p>		Compliant
B7	<p>The Applicant shall carry out the Development in accordance with the Water Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.</p> <p>The Auditors sighted the Partial Completion Certificate issued by Philip Chun Code Consulting (dated 12/10/20).</p>		Compliant
<b>Water Management System</b>				
B8	<p>The Applicant shall operate a Water Management System for the site. The system must:</p> <ol style="list-style-type: none"> <li>a) be designed by a suitably qualified and experienced person(s) in consultation with Council;</li> <li>b) include:               <ol style="list-style-type: none"> <li>i. a berm at the front of the site, which is designed to prevent catchment flows up to the 1 in 20-year Average Recurrence Interval event from entering the site;</li> <li>ii. drainage for surface water toward the Parramatta River where possible;</li> <li>iii. one-way devices to prevent the ingress of river water to the water management system; and</li> <li>iv. clean surface water diversion around operational areas of the site</li> </ol> </li> </ol>	<p>The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.</p> <ul style="list-style-type: none"> <li>• The Auditors sighted the Temporary Water Management Plan (dated 19/12/19) and Partial Completion Certificate issued by Philip Chun Code Consulting (dated 12/10/20).</li> <li>• VENM Classification Report - Northcote Street Tunnel Site and Associated Tunnelling (dated 19/09/16).</li> </ul>	<p>Site was modified, in consultation with Council to modify the berm on site. The site was reshaped to prevent catchment flows up to the 1 in 20-year Average Recurrence Interval event from entering the site. The Partial Completion Certificate issued by Philip Chun Code Consulting (dated 12/10/20) certifies remediation of the vacant land and associated stormwater works.</p>	Compliant
<b>Erosion and Sediment Control</b>				

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B9	The Applicant shall implement erosion and sediment control measures on-site in accordance with <i>Managing Urban Stormwater: Soils and Construction Vol. 1</i> (Landcom, 2004).	Site inspection on 21 October 2021.		Compliant
	<b>Acid Sulfate Soils</b>			
B10	The Applicant shall implement acid sulfate soils management measures in accordance with the guidance in the NSW Acid Sulfate Soil Management Advisory Committee's <i>Acid Sulfate Soil Manual</i> .	Site inspection on 21 October 2021.	No demolition was carried out during the audit period. Demolition was carried out in 2016 and was covered under previous IEA.	Not triggered
	<b>Bunding</b>			
B11	The Applicant shall store all liquid wastes and materials including chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection - Participant's Manual 2007</i>	Audit interview on 27 July 2021	No liquid wastes and materials including chemicals, fuels and oils are stored on site. Small quantities of decon90 and handwash stored in shipping container on site	Compliant
	<b>Flood management</b>			
B12	The Applicant shall ensure that: <ul style="list-style-type: none"> <li>a) the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level; and</li> <li>b) any part of a new structure is designed and constructed to be structurally sound during a flood event equivalent to the Probable Maximum Flood.</li> </ul>	None		Not triggered
	<b>Flood emergency response plan</b>			

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B13	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a flood emergency response plan to the satisfaction of the Secretary. The plan must:</p> <ol style="list-style-type: none"> <li>be prepared by a suitably qualified and experienced person(s) in consultation with Council;</li> <li>address the provisions of the <i>Floodplain Risk Management Guideline</i> (25 October 2007, Office of Environment and Heritage);</li> <li>include the details of the flood emergency responses for both construction and operation phases of the development;</li> <li>include details of:               <ol style="list-style-type: none"> <li>site planning and design features;</li> <li>predicted flood levels;</li> <li>flood warning time and flood notification;</li> <li>evacuation and refuge protocols; and</li> <li>awareness training for employees and contractors.</li> </ol> </li> </ol>	The Auditors sighted the Flood Emergency Response Plan (dated 7/09/15)	The Flood Emergency Response Management Plan (FERMP) for Stage 1 pre-loading was approved by the DPE in a letter dated 23 May 2017.	Compliant
B14	The Applicant shall carry out the Development in accordance with the flood emergency response plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Site inspection on 21 October 2021		Compliant
	<b>Imported soil</b>			
B15	<p>The Applicant shall:</p> <ol style="list-style-type: none"> <li>ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;</li> <li>keep accurate records of the volume and type of fill to be used; and</li> <li>make these records available to the Department upon request.</li> </ol>	<p>The Auditors sighted the following documents:</p> <ul style="list-style-type: none"> <li>"Approved notice" issued under Section 143 of the POEA Ac. The notice states that the site can lawfully be used as a waste facility for the waste specified in the notice, being 45,000 tonnes of Excavated Natural Material.</li> </ul>	Excavated Natural Material was imported on to the site was used as pre-load material, the majority of which will remain onsite. It was sourced from a single site being the West Connex Stage 1B Tunnel Spoil.	Compliant
	<b>AIR QUALITY</b>			
	<b>Odour</b>			

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B16	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Site inspection on 21 October 2021		Compliant
	<b><i>Air emissions mitigation</i></b>			
B17	The Applicant shall: <ul style="list-style-type: none"> <li>a) carry out the Development so that air and odour emissions are minimised during all meteorological conditions; and</li> <li>b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development.</li> </ul>	Site inspection on 21 October 2021		Compliant
	<b><i>Construction emissions mitigation</i></b>			
B18	During construction, the Applicant shall ensure that: <ul style="list-style-type: none"> <li>a) all vehicles on site do not exceed a speed of 30 kilometres per hour;</li> <li>b) all loaded construction vehicles entering or leaving the site have their loads covered; and</li> <li>c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads</li> </ul>	Site inspection on 21 October 2021		Compliant
	<b><i>Odour Audit</i></b>			
B19	The Applicant shall carry out an Odour Audit of the Development no later than 6 months after operation of the Development. The audit must: <ul style="list-style-type: none"> <li>a) be carried out by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary;</li> <li>b) audit the Development in full operation;</li> <li>c) include a summary of odour complaints and any actions that were carried out to address the complaints;</li> <li>d) validate the Development against the odour predictions in the EIS;</li> <li>e) review design and management practices of the Development against industry best practice for odour management; and</li> <li>f) include an action plan that identifies and prioritises any odour emission mitigation measures that may be necessary to reduce odour emissions.</li> </ul> <p>Note: The odour audit must be prepared so it addresses the requirements of this consent and the EPL for the Development.</p>	None		Not triggered
B20	Within six months of commissioning the Odour Audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	None		Not triggered

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status															
B21	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of the Odour Audit report.	None		Not triggered															
	<b>NOISE AND VIBRATION</b>																		
	<b>Construction and Operation Hours</b>																		
B22	<p>The Applicant shall comply with the construction and operation hours in Table 2 unless otherwise specified in the EPL and agreed in writing by the Secretary.</p> <table border="1"> <caption>Table 2: Construction Hours</caption> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday - Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</td> </tr> <tr> <td>Sunday &amp; Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="2">Operation</td> <td>Waste processing</td> <td>Any day</td> </tr> <tr> <td>Delivery and dispatch</td> <td>Any day</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Waste processing	Any day	Delivery and dispatch	Any day	<p>The Auditors sighted following Stage 1 documents were sighted the Construction Environmental Management Plan – Preloading Stage (dated 7/11/16) and Construction Environmental Management Plan – Stage 1a works (dated 19/12/19)</p>	<p>The construction hours listed in the Construction Environmental Management Plans are consistent with Consent Condition B22</p>	Compliant
Activity	Day	Hours																	
Construction	Monday - Friday	7 am to 6 pm																	
	Saturday	8 am to 1 pm																	
	Sunday & Public Holidays	Nil																	
Operation	Waste processing	Any day																	
	Delivery and dispatch	Any day																	
B23	Despite Condition B22, any activity may occur at any time if that activity is required to be performed by police or other authorities for safety reasons; and/or if there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification shall be provided to the EPA and any affected residents as soon as possible, or within a reasonable period in the case of emergency.	None		Not triggered															
	<b>Noise Mitigation</b>																		
B24	<p>The Applicant shall:</p> <ol style="list-style-type: none"> <li>implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development;</li> <li>minimise the noise impacts of the Development during adverse meteorological conditions;</li> <li>install a steel fence on the northern and north-eastern side of the truck path;</li> <li>maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and</li> <li>regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</li> </ol>	None		Not triggered															

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status				
	<b>Noise Criteria</b>							
B25	<p>The Applicant shall ensure noise from the operation does not exceed the limits in Table 3 below.</p> <p><b>Table 3: Sleep Disturbance Criteria</b></p> <table border="1"> <thead> <tr> <th>Receiver/Location</th> <th>Sleep Disturbance Criteria (LA1, 1min)</th> </tr> </thead> <tbody> <tr> <td>M1 John Street and M2 Milton Street</td> <td>56</td> </tr> </tbody> </table>	Receiver/Location	Sleep Disturbance Criteria (LA1, 1min)	M1 John Street and M2 Milton Street	56	None		Not triggered
Receiver/Location	Sleep Disturbance Criteria (LA1, 1min)							
M1 John Street and M2 Milton Street	56							
	<b>Vibration criteria</b>							
B26	The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's <i>Assessing Vibration: A Technical Guideline</i> (February 2006) at residential receivers.	None		Not triggered				
	<b>TRAFFIC AND ACCESS</b>							
B27	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> <li>a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of Australian Standard AS 2890.1 and AS 2890.2;</li> <li>b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTRROADS Guide to Road Design;</li> <li>c) the Development does not result in any vehicles queuing on the public road network;</li> <li>d) all vehicles are wholly contained on site before being required to stop;</li> <li>e) all loading and unloading of materials is carried out on site;</li> <li>f) turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;</li> <li>g) all trucks entering or leaving the site with loads have their loads covered;</li> <li>h) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and</li> <li>i) all vehicles enter and leave the site in a forward direction.</li> </ul>	None		Not triggered				
	<b>HAZARD AND RISK</b>							
	<b>Fire Management</b>							

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B28	The Applicant shall: a) implement suitable measures to minimise the risk of fire on-site; b) extinguish any fires on-site promptly; and c) maintain adequate fire-fighting capacity on-site.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.	Fire services connection on site. Direct mains supply.	Compliant
	<b>VISUAL AMENITY</b>			
	<b>Lighting</b>			
B29	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS 4282 1997.	None		Not triggered
	<b>Landscaping</b>			
B30	Prior to the commencement of operation, the Applicant shall implement the Landscape Concept Plan to the satisfaction of the Secretary. The plan shall: a) detail the landscaping measures including vegetation that is to be planted to minimise the visual impact of the Development, particularly from adjoining premises and public vantage points; and b) include measures for monitoring and maintenance of revegetated areas.	None		Not triggered
B31	The Applicant shall carry out the Development in accordance with the Landscape Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	None		Not triggered
	<b>HERITAGE</b>			
B32	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the <i>National Parks and Wildlife Act 1974</i> .	None		Not triggered
	<b>SECURITY</b>			



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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B33	The Applicant shall: <ul style="list-style-type: none"> <li>a) install and maintain a perimeter fence and security gates on the site; and</li> <li>b) ensure that the security gates on site are locked whenever the site is unattended.</li> </ul>	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.  Response letter prepared by Geosyntec Consultants Pty Ltd (dated 3 August 2021)	Consultation with the NSW EPA (letter dated 20 July 2021) identified that there was public access to the foreshore and lack of signage in and around the foreshore. The response letter has provided sufficient information to determine that progress is being made with resolving this issue	Compliant
<b>PARTC – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>				
	<b>ENVIRONMENTAL MANAGEMENT</b>			
	<b><i>Construction Environmental Management Plan</i></b>			
C1	Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must: <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;</li> <li>c) identify the statutory approvals that apply to the Development;</li> <li>d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;</li> <li>e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;</li> <li>f) describe the roles and responsibilities for all relevant employees involved in construction;</li> <li>g) include arrangements for community consultation and complaints handling procedures during construction; and</li> <li>h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent</li> </ul>	The Auditors sighted the Construction Environmental Management Plan (dated 19/12/19)		Compliant

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C2	The Applicant shall carry out the Development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.</p> <p>The Auditors also sighted following Stage 1 documents were sighted the Construction Environmental Management Plan – Preloading Stage (dated 7/11/16) and Construction Environmental Management Plan – Stage 1a works (dated 19/12/19)</p>	The development appears to be construction in general accordance with the Construction Environmental Management Plan	Compliant
	<b><i>Operational Environmental Management Plan</i></b>			
C3	<p>The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> <li>be prepared by a suitably qualified and experienced person(s);</li> <li>provide a strategic framework for environmental management of the Development;</li> <li>identify the statutory approvals that apply to the Development;</li> <li>describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</li> <li>describe in general how the environmental performance of the Development would be monitored and managed including the management of out of hours heavy vehicle parking; and</li> <li>describe the procedures that would be implemented to:               <ol style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</li> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise;</li> <li>respond to any non-compliance; and</li> <li>respond to emergencies</li> </ol> </li> </ol>	None		Not triggered
C4	The Applicant shall carry out the Development in accordance with the Operational Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary	None		Not triggered

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Management Plan Requirements</b>			
C5	<p>The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:</p> <ul style="list-style-type: none"> <li>a) detailed baseline data;</li> <li>b) a description of:               <ul style="list-style-type: none"> <li>i. the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>ii. any relevant limits or performance measures/criteria;</li> <li>iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; and</li> <li>iv. the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</li> </ul> </li> <li>c) a program to monitor and report on the:               <ul style="list-style-type: none"> <li>i. impacts and environmental performance of the Development;</li> <li>ii. effectiveness of any management measures;</li> <li>iii. a contingency plan to manage any unpredicted impacts and their consequences; and</li> <li>iv. a program to investigate and implement ways to improve the environmental performance of the Development over time;</li> </ul> </li> <li>d) a protocol for managing and reporting any:               <ul style="list-style-type: none"> <li>i. incidents;</li> <li>ii. complaints;</li> <li>iii. non-compliances with statutory requirements;</li> <li>iv. exceedances of the impact assessment criteria and/or performance criteria; and</li> <li>v. a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<p>The Auditors sighted following Stage 1 documents were sighted:</p> <ul style="list-style-type: none"> <li>• Temporary Water Management Plan (dated 19/12/19)</li> <li>• Flood Emergency Response Plan (dated 7/09/15)</li> <li>• Construction Environmental Management Plan (dated 19/12/19)</li> <li>• Emergency Response Plan – Camellia (incorporating the Pollution Incident Response Management Plan (dated 28/06/2021))</li> </ul>		Compliant
C6	<p>The Secretary may waive some of the requirements in Condition C5 if they are unnecessary or unwarranted for particular management plans/strategies</p>	Noted		Not triggered
	<b>REPORTING</b>			
	<b>Incident Reporting</b>			

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C7	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	The auditors sighted the Incident Register for the site	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Compliant
	<b>Regular Reporting</b>			
C8	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	The auditors sighted the Annual Environmental Management Reports from the Veolia website covering the years 2019-2020; 2018-2019; and 2017-2018		Compliant
	<b>Independent Environmental Audit</b>			

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Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C9	<p>Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:</p> <ul style="list-style-type: none"> <li>a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</li> <li>b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;</li> <li>c) include consultation with the relevant agencies;</li> <li>d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);</li> <li>e) review the adequacy of any approved strategy, plan or program required under the above, mentioned consents; and</li> <li>f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.</li> </ul>	<p>The Auditors carried out the Independent Environmental Audit was carried out in July 2021.</p>	<p>Development consent was issued on 6 July 2016. However, for the period between 6 July 2016 and 5 July 2017, no construction or operational activities were carried out at the Site. On 23 May 2017, the then NSW Department of Planning and Environment approved Veolia’s request to stage the construction activities of the Site. The staging was requested so that pre-loading earthworks could be completed to appease the recommendations of initial Geotechnical Investigations and to meet the City of Parramatta Flooding Policy prior to the construction of the MRF. Consequently, the construction of the Site was carried out in two stages: stage 1 involved preloading of the site; and stage 2 involved construction of the MRF.</p> <p>Stage 1 works commenced in July 2017, therefore triggering Condition C9. The initial Independent Environmental Audit was carried out in August 2018 and covered the period between August 2017 and July 2018.</p> <p>Based on this, Jackson Environment and Planning Pty Ltd were commissioned to conduct the Audit and cover the period after the original audit between July 2018 and July 2021, being three years since the last audit.</p>	Compliant

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C10	Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	None	It is anticipated that this Audit report will be submitted to the DPE within three months of commissioning. It is noted that due to COVID19 restrictions in place at the time of the audit, the site inspection could not take place. Veolia has sought approval from the NSW Department of Planning, Industry and Environment to submit a copy of the audit report within 2 weeks of COVID19 restrictions ending.	Compliant
<b>Annual Review</b>				
C11	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <ul style="list-style-type: none"> <li>a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;</li> <li>b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the:               <ul style="list-style-type: none"> <li>i. the relevant statutory requirements, limits or performance measures/criteria;</li> <li>ii. requirements of any plan or program required under this consent;</li> <li>iii. the monitoring results of previous years; and</li> <li>iv. the relevant predictions in the EIS;</li> </ul> </li> <li>c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</li> <li>d) identify any trends in the monitoring data over the life of the Development;</li> <li>e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</li> <li>f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</li> </ul>	The auditors sighted the Annual Environmental Management Reports from the Veolia website covering the years 2019-2020; 2018-2019; and 2017-2018.		Compliant

Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Revision of Strategies, Plans and Programs</b>			
C12	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> <li>a) annual review under Condition C11 above;</li> <li>b) incident report under Condition C7 above;</li> <li>c) audit under Condition C9 above; or</li> <li>d) any modification to this consent,</li> </ul> <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</p>	The auditors sighted the Annual Environmental Management Reports from the Veolia website covering the years 2019-2020; 2018-2019; and 2017-2018	<p>In 2018-2019:</p> <ul style="list-style-type: none"> <li>• Minor changes to the Water Management Plan were made including phases of preloading, procedures, and drawings to reflect settlement results.</li> <li>• The CEMP and Flooding Emergency Response Plan (ERP) was reviewed to ensure consistent referencing with the Pollution Incident Response Management Manual and PIRMP are addressed.</li> </ul> <p>In 2019-2020:</p> <ul style="list-style-type: none"> <li>• The Site Emergency Response Plan (ERP) was updated to incorporate the amended PIRMP requirements and Contractor’s ERP during the Stage 1A works and the approved Flooding ERP</li> </ul>	Compliant
C13	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	None		Not triggered
	<b>ACCESS TO INFORMATION</b>			



Conditions of Development Consent – SSD 4964

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C14	<p>The Applicant shall:</p> <ul style="list-style-type: none"> <li>a) ensure a 24-hour contact telephone number for the site is posted on the front fence of the site, and on its website;</li> <li>b) make copies of the following publicly available on its website:               <ul style="list-style-type: none"> <li>i. the documents referred to in Condition A2;</li> <li>ii. all current statutory approvals for the Development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>iv. a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>v. a complaints register, updated on a monthly basis;</li> <li>vi. the annual reviews of the Development;</li> <li>vii. any independent environmental audit of the Development, and the Applicant’s response to the recommendations in any audit; and</li> <li>viii. any other matter required by the Secretary; and</li> </ul> </li> <li>c) keep this information up to date.</li> </ul>	<p>Site inspection on 21 October 2021.</p> <p>The auditors sighted the Complaints Register.</p> <p>The required documentation is available on the Veolia website.</p> <p>A 24-hour contact telephone number for the site is posted on the front fence of the site, and on its website.</p>		Compliant

## Appendix E – Environment Protection Licence 20986

5													
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status									
<b>1</b>	<b>ADMINISTRATIVE CONDITIONS</b>												
<b>A1</b>	<b><i>What the licence authorises and regulates</i></b>												
<b>A1.1</b>	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this license, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1" data-bbox="264 638 810 715"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Resource recovery</td> <td>Recovery of general waste</td> <td>Any general waste recovered</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Resource recovery	Recovery of general waste	Any general waste recovered	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Noted		Not triggered
Scheduled Activity	Fee Based Activity	Scale											
Resource recovery	Recovery of general waste	Any general waste recovered											
Waste storage	Waste storage - other types of waste	Any other types of waste stored											
<b>A1.2</b>	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2.</p> <p>There are 3 stages to the scheduled development works of which the following stages are authorised by this licence:            Stage 1 - Preloading of Site and Stage 2 - Construction of Materials Recycling Facility.</p> <p>This licence does not permit Stage 3 - Operation of the Materials Recycling Facility. A licence variation will be required prior to the commencement of Stage 3.</p>	Noted		Not triggered									
<b>A2</b>	<b><i>Premises or plant to which this licence applies</i></b>												
<b>A2.1</b>	<p>The licence applies to the following premises:            CAMELLIA RECYCLING CENTRE            37 GRAND AVE            CAMELLIA            NSW 2142            LOT 1 DP 539890</p>	Noted		Not triggered									
<b>A3</b>	<b><i>Information supplied to the EPA</i></b>												

5																			
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status															
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> <li>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the <i>Protection of the Environment Operations (Savings and Transitional) Regulation 1998</i>; and</li> <li>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</li> </ul>	Noted		Not triggered															
2	<b>DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND</b>																		
P1	<b>Location of monitoring/discharge points and areas</b>																		
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Noted		Not triggered															
P1.2	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table border="1" data-bbox="257 842 810 973"> <thead> <tr> <th colspan="3">Noise/Weather</th> </tr> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Meteorological Station</td> <td></td> </tr> <tr> <td>2</td> <td>Noise monitoring</td> <td>23 John Street Rydalmere</td> </tr> <tr> <td>3</td> <td>Noise monitoring</td> <td>18 Milton Street Rydalmere</td> </tr> </tbody> </table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location description	1	Meteorological Station		2	Noise monitoring	23 John Street Rydalmere	3	Noise monitoring	18 Milton Street Rydalmere	Noted		Not triggered
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EPA identification no.	Type of monitoring point	Location description																	
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2	Noise monitoring	23 John Street Rydalmere																	
3	Noise monitoring	18 Milton Street Rydalmere																	
3	<b>LIMIT CONDITIONS</b>																		
L1	<b>Pollution of waters</b>																		
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant															
L2	<b>Waste</b>																		

5														
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status										
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td> <td>Resource recovery</td> <td></td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Resource recovery		None		Not triggered
Code	Waste	Description	Activity	Other Limits										
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Resource recovery											
L2.2	No more than 200,000 tonnes of waste is to be received at the Premises per calendar year	None		Not triggered										
L2.3	No more than 200,000 tonnes of waste is to be processed at the Premises per calendar year.	None		Not triggered										
L2.4	All processed and unprocessed waste must be stored wholly within the building at the Premises	None		Not triggered										
L2.5	The authorised amount of waste permitted on the Premises must be applied to this Licence prior to the commencement of Stage 3 - 'Operation of the Materials Recycling Facility' of the development	None		Not triggered										
L2.6	No waste is permitted to be received at the Premises for the purposes of resource recovery as outlined in Condition L2.1 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility	None		Not triggered										
L2.7	No waste is permitted to be processed at the Premises for the purposes of resource recovery as outlined in Condition L2.1 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility.	None		Not triggered										
L3	<b>Noise Limits</b>													
L3.1	Noise emissions from the premises must be in compliance with the requirements of the EPA’s NSW industrial noise policy.	None		Not triggered										

5																																												
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																								
L3.2	<p>Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2.</p> <p><b>Point 2</b></p> <table border="1"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Day</td> <td>Day-LAeq (15 minute) (7am-6pm Mon.-Sat. &amp; 8am-6pm Sun &amp; Public Holidays)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq (15 minute) (6pm-10pm Mon.-Sun.)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Night</td> <td>Night-LAeq (15 minute) (10pm-7am Mon.-Sat. &amp; 10pm-8am Sun.)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Night</td> <td>Night-LA1 (1 minute)</td> <td>-</td> <td>56</td> </tr> </tbody> </table> <p><b>Point 3</b></p> <table border="1"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Night</td> <td>Night-LA1 (1 minute)</td> <td>-</td> <td>56</td> </tr> <tr> <td>Day</td> <td>Day-LAeq (15 minute) (7am-6pm Mon.-Sat. &amp; 8am-6pm Sun &amp; Public Holidays)</td> <td>-</td> <td>35</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq (15 minute) (6pm-10pm Mon.-Sun.)</td> <td>-</td> <td>35</td> </tr> <tr> <td>Night</td> <td>Night-LAeq (15 minute) (10pm-7am Mon.-Sat. &amp; 10pm-8am Sun.)</td> <td>-</td> <td>35</td> </tr> </tbody> </table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	40	Evening	Evening-LAeq (15 minute) (6pm-10pm Mon.-Sun.)	-	40	Night	Night-LAeq (15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	40	Night	Night-LA1 (1 minute)	-	56	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Night	Night-LA1 (1 minute)	-	56	Day	Day-LAeq (15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	35	Evening	Evening-LAeq (15 minute) (6pm-10pm Mon.-Sun.)	-	35	Night	Night-LAeq (15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	35	None		Not triggered
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L3.3	<p>For the purpose of condition L3.2;</p> <ul style="list-style-type: none"> <li>Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays.</li> <li>Evening is defined as the period 6pm to 10pm.</li> <li>Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.</li> </ul>	Noted		Not triggered																																								
L3.4	<p>The noise limits set out in condition L3.2 apply under all meteorological conditions except for the following:</p> <ol style="list-style-type: none"> <li>Wind speeds greater than 3 metres/second at 10 metres above ground level.</li> <li>Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</li> <li>Stability category G temperature inversion conditions.</li> </ol>	Noted		Not triggered																																								

5														
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status										
L3.5	For the purposes of condition L3.4: a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.	Noted		Not triggered										
L3.6	To determine compliance: a) with the Leq(15 minute) noise limits in condition L3.2, the noise measurement equipment must be located: o approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or o within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises. b) with the LA1(1 minute) noise limits in condition L3.2, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in condition L3.2, the noise measurement equipment must be located: o at the most affected point at a location where there is no dwelling at the location; or o at the most affected point within an area at a location prescribed by conditions L3.6(a) or L3.6(b).	Noted		Not triggered										
L3.7	A non-compliance of condition L3.2 will still occur where noise generated from the premises in excess of the appropriate limit is measured: • at a location other than an area prescribed by conditions L3.6(a) and L3.6(b); and/or • at a point other than the most affected point at a location.	Noted		Not triggered										
L3.8	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Noted		Not triggered										
L4	<b>Hours of operation</b>													
L4.1	The hours of construction must be within the following hours: <table border="1" data-bbox="257 1332 810 1414"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday - Friday</td> <td>7am to 6pm</td> </tr> <tr> <td>Saturday</td> <td>8am to 1pm</td> </tr> <tr> <td>Sunday</td> <td>Nil</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7am to 6pm	Saturday	8am to 1pm	Sunday	Nil	Noted		Not triggered
Activity	Day	Hours												
Construction	Monday - Friday	7am to 6pm												
	Saturday	8am to 1pm												
	Sunday	Nil												

5													
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status									
L4.2	<p>The hours of operation must be within the following hours:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>Waste processing</td> <td>Any day</td> <td>6am to 10pm</td> </tr> <tr> <td>Delivery and dispatch</td> <td>Any day</td> <td>Any time</td> </tr> </tbody> </table> <p>Note: Condition L4.2 does not apply to the delivery of material outside the hours of operation permitted by condition L4.2, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.</p>	Activity	Day	Hours	Waste processing	Any day	6am to 10pm	Delivery and dispatch	Any day	Any time	None		Not triggered
Activity	Day	Hours											
Waste processing	Any day	6am to 10pm											
Delivery and dispatch	Any day	Any time											
L4.3	No waste is permitted to be received or processed at the Premises for the purposes of resource recovery as outlined in Condition L4.2 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility.	None		Not triggered									
L5	<b>Potentially offensive odour</b>												
L5.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	Noted		Not triggered									
4	<b>OPERATING CONDITIONS</b>												
O1	<b>Activities must be carried out in a competent manner</b>												
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <ul style="list-style-type: none"> <li>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</li> <li>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</li> </ul>	None		Not triggered									
O2	<b>Maintenance of plant and equipment</b>												
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ul style="list-style-type: none"> <li>a) must be maintained in a proper and efficient condition; and</li> <li>b) must be operated in a proper and efficient manner.</li> </ul>	None		Not triggered									



5				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>03</b>	<b>Dust</b>			
<b>03.1</b>	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind blown or traffic generated dust.	None		Not triggered
<b>03.2</b>	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	None		Not triggered
<b>03.3</b>	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant
<b>03.4</b>	The licensee must ensure that no material, including sediment or oil, is tracked from the premises.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant
<b>04</b>	<b>Emergency response</b>			
<b>04.1</b>	The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.  NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.	The Auditors sighted following Stage 1 documents were sighted the Emergency Response Plan – Camellia (incorporating the Pollution Incident Response Management Plan (dated 28/06/2021)	Section 3.5.1 of this report summarises the responses that were provided by Veolia in relation to section 153D of the POEO Act (cl. 98D (1) and (2)) of General Regulation.	Compliant
<b>05</b>	<b>Processes and management</b>			
<b>05.1</b>	The licensee must ensure that any waste received and/or stored at the premises is assessed and classified in accordance with EPA Waste Classification Guidelines as in force from time to time	None		Not triggered
<b>05.2</b>	Each type of waste stored on site for recovery/recycling must be stockpiled separately.	None		Not triggered
<b>05.3</b>	All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant
<b>06</b>	<b>Other operating conditions</b>			
<b>06.1</b>	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant

5				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O6.2	A Soil and Water Management Plan must be prepared for the Construction Phase of the development and implemented. The plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP should be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).	None		Not triggered
O6.3	A Stormwater Management Scheme must be prepared for the Operational Phase of the development and must be implemented. Implementation of the Scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The Scheme should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme should be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA).	None		Not triggered
5	<b>MONITORING AND RECORDING CONDITIONS</b>			
M1	<b>Monitoring records</b>			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted		Not triggered
M1.2	All records required to be kept by this licence must be: <ul style="list-style-type: none"> <li>a) in a legible form, or in a form that can readily be reduced to a legible form;</li> <li>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</li> <li>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</li> </ul>	Noted		Not triggered
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ul style="list-style-type: none"> <li>a) the date(s) on which the sample was taken;</li> <li>b) the time(s) at which the sample was collected;</li> <li>c) the point at which the sample was taken; and</li> <li>d) the name of the person who collected the sample.</li> </ul>	Noted		Not triggered
M2	<b>Recording of pollution complaints</b>			

5				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	The auditors sighted the Complaints Register	One compliant was received on 30 November 2018 from Transdev regarding the condition of the sandbags on the site. Veolia carried out a site visit with Transdev on 4 Dec 2018. Veolia installed strips of geofabric over the surface of the site to cover the sandbags. The complaint is considered closed out.	Compliant
M2.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	The auditors sighted the Complaints Register		Compliant
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made	Noted		Not triggered
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted		Not triggered
M3	<b>Telephone complaints line</b>			
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	None		Not triggered
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	The findings from this audit, audit interview on 27 July 2021 and site inspection on 21 October 2021.		Compliant
M3.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Noted		Not triggered
6	<b>REPORTING CONDITIONS</b>			
R1	<b>Annual return documents</b>			

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Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> <li>1. a Statement of Compliance,</li> <li>2. a Monitoring and Complaints Summary,</li> <li>3. a Statement of Compliance - Licence Conditions,</li> <li>4. a Statement of Compliance - Load based Fee,</li> <li>5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>7. a Statement of Compliance - Environmental Management Systems and Practices.</li> </ol> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<p>The auditors sighted the Annual Returns for the following periods:</p> <ul style="list-style-type: none"> <li>• 24-1-2020 to 23-1-2021</li> <li>• 24-1-2019 to 23-1-2020</li> <li>• 24-1-2018 to 23-1-2019</li> </ul>		Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period except as provided below.	Noted		Not triggered
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> <li>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</li> <li>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</li> </ol>	Noted		Not triggered
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <ol style="list-style-type: none"> <li>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</li> <li>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</li> </ol>	Noted		Not triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	The auditors sighted the submission dates for all Annual Returns submitted within the audit period.		Compliant

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Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Noted		Not triggered
R1.7	<p>Within the Annual Return, the Statement of Compliance must be certified, and the Monitoring and Complaints Summary must be signed by:</p> <ul style="list-style-type: none"> <li>a) the licence holder; or</li> <li>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</li> </ul> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	<p>The auditors sighted the Annual Returns for the following periods:</p> <ul style="list-style-type: none"> <li>• 24-1-2020 to 23-1-2021</li> <li>• 24-1-2019 to 23-1-2020</li> <li>• 24-1-2018 to 23-1-2019</li> </ul>		Compliant
R2	<b>Notification of environmental harm</b>			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	None	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered
R2.2	<p>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	None	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered
R3	<b>Written report</b>			
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <ul style="list-style-type: none"> <li>a) where this licence applies to premises, an event has occurred at the premises; or</li> <li>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</li> </ul>	The findings from this audit and audit interview on 27 July 2021	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered

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Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	The findings from this audit and audit interview on 27 July 2021	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered
R3.3	The request may require a report which includes any or all of the following information: <ul style="list-style-type: none"> <li>a) the cause, time and duration of the event;</li> <li>b) the type, volume and concentration of every pollutant discharged as a result of the event;</li> <li>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</li> <li>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</li> <li>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</li> <li>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</li> <li>g) any other relevant matters.</li> </ul>	The findings from this audit and audit interview on 27 July 2021	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	The findings from this audit and audit interview on 27 July 2021	No incidents have occurred on site that has caused, or threatens to cause, material harm to the environment.	Not triggered
7	<b>GENERAL CONDITIONS</b>			
G1	<b><i>Copy of licence kept at the premises or plant</i></b>			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site inspection on 21 October 2021	EPL is currently stored in shipping container.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	None		Not triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site inspection on 21 October 2021	EPL is currently stored in shipping container.	Compliant
8	<b>SPECIAL CONDITIONS</b>			
E1	<b><i>Financial assurance</i></b>			

5				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as “Authorised Deposit-taking Institutions” under the banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential regulatory Authority (APRA) must be provided to the EPA.	None		Not triggered
E1.2	The financial assurance must be in favour of the Environment Protection Authority to an amount to be determined prior to the commencement of Stage 3 'Operation of Materials Recycling Facility' of the Scheduled Development Work. The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	None		Not triggered
E1.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	None		Not triggered
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	None		Not triggered
E1.5	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None		Not triggered
E1.6	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None		Not triggered
E2	<b><i>Environmental Obligations of the Licensee</i></b>			

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Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.1	While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must: <ul style="list-style-type: none"> <li>a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents.</li> <li>b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.</li> <li>c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</li> </ul>	Site inspection on 21 October 2021		Compliant
E2.2	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must: <ul style="list-style-type: none"> <li>a) make all efforts to contain all firewater on the licensee’s premises,</li> <li>b) make all efforts to control air pollution from the licensee’s premises,</li> <li>c) make all efforts to contain any discharge, spill or run-off from the licensee’s premises,</li> <li>d) make all efforts to prevent flood water entering the licensee’s premises,</li> <li>e) remediate and rehabilitate any exposed areas of soil and/or waste,</li> <li>f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of,</li> <li>g) at the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises,</li> <li>h) at the request of the EPA monitor surface water leaving the licensee’s premises; and</li> <li>i) ensure the licensee’s premises is secure.</li> </ul>	None		Not triggered
E2.3	After the licensee’s premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: <ul style="list-style-type: none"> <li>a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; and</li> <li>b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.</li> </ul>	None		Not triggered
E3	<b>Post Commissioning Noise Validation Report</b>			



5				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E3.1	<p>After the Final Occupation Certificate is issued for the development approved by development consent No. SSD 4964, the licensee must engage a suitably qualified and experienced expert to prepare a post commissioning noise validation report in accordance with Condition L4.5. The report must include an attended noise monitoring assessment carried out for three consecutive operating days, at monitoring points 2 and 3 listed in Condition P1.2. The assessment must be carried out during each day, evening and night period as defined in Condition L3.3 for a minimum of:</p> <ul style="list-style-type: none"> <li>• 1.5 hours during the day;</li> <li>• 30 minutes during the evening; and</li> <li>• 1 hour during the night.</li> </ul>	None		Not triggered
E3.2	<p>The post commissioning noise validation report must be prepared by a suitably qualified and experienced acoustical consultant and include:</p> <ol style="list-style-type: none"> <li>a) an assessment of compliance with noise limits presented in Condition L3.2 and</li> <li>b) an outline of any management actions taken within the monitoring period to address any exceedences of the limits contained in Condition L3.2</li> </ol>	None		Not triggered
E3.3	The post commissioning noise validation report must be submitted to the EPA within 3 months of the Final Occupation Certificate being issued for the development approved by development consent No. SSD 4964.	None		Not triggered
E4	<b>Post Commissioning Odour Audit</b>			
E4.1	<p>By 6 months from the commencement of operations the licensee must submit an odour audit report to the EPA’s Director Waste Compliance. The odour audit report must address the following:</p> <ol style="list-style-type: none"> <li>a) A summary of any odour complaints received and actions taken to reduce odour emissions where complaints are verified;</li> <li>b) Benchmark the design and management practices at the Camellia Recycling Centre against industry best practice for minimising odour emissions. This should include, but not be limited to, fast close roller doors;</li> <li>c) Using the results of (a) and (b), if it is identified that the facility requires additional odour mitigation measures the report must include:             <ul style="list-style-type: none"> <li>○ Proposed mitigation works and/or management practices to ensure that odour is minimised as far as is practicable; and</li> <li>○ A timetable for the implementation of these works.</li> </ul> </li> </ol>	None		Not triggered

## Appendix F – Site inspection photographs (taken on 21 October 2021)



**Figure F1. View of site facing south showing capping layer.**



**Figure F2. View of site facing northeast.**





Figure F3. Grass drainage swale along the front boundary of the site.



Figure F4. Stormwater drain pit along the front boundary of the site.





Figure F5. View of eastern boundary facing north.



Figure F6. View of northern boundary facing west.





**Figure F7. Stormwater drain pits require cleaning.**

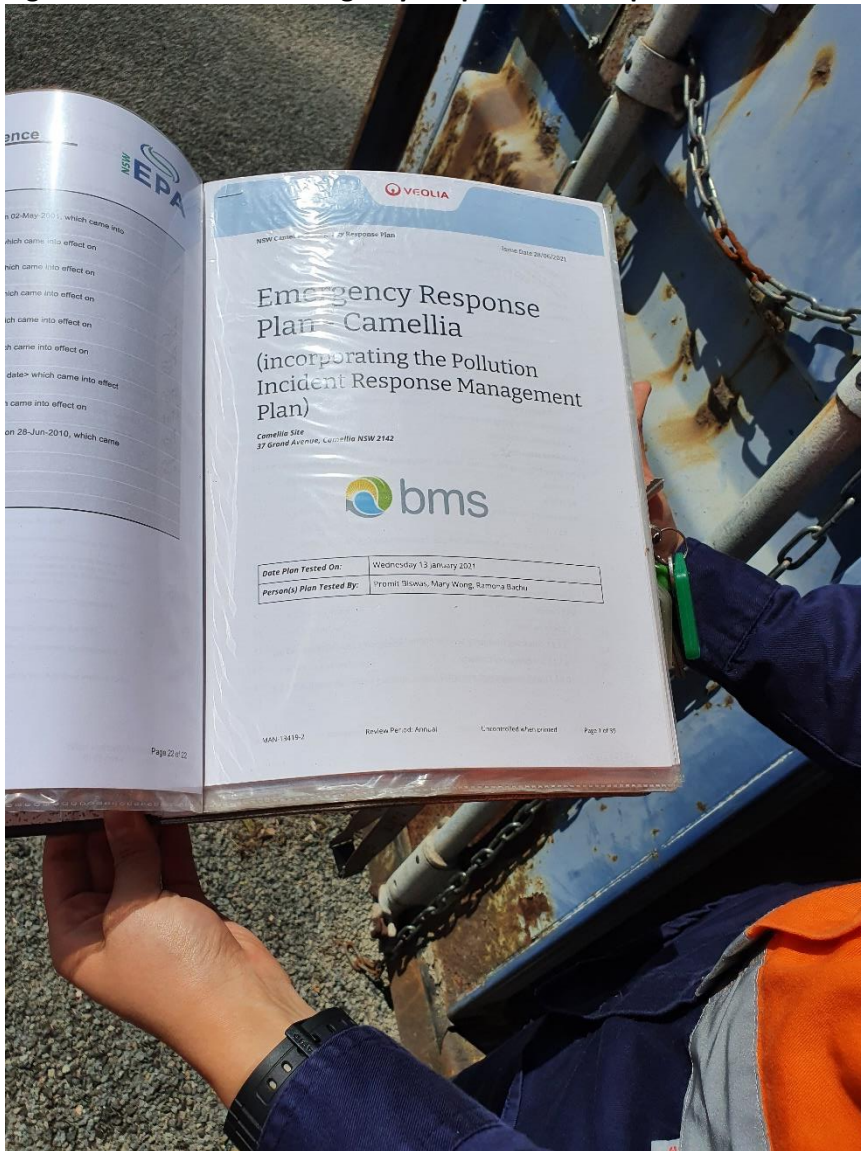


**Figure F8. Capping seal along western batter.**





**Figure F9. Evidence of Emergency Response Plan kept on site.**



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**Figure F10. Evidence of Environment Protection Licence kept on site.**

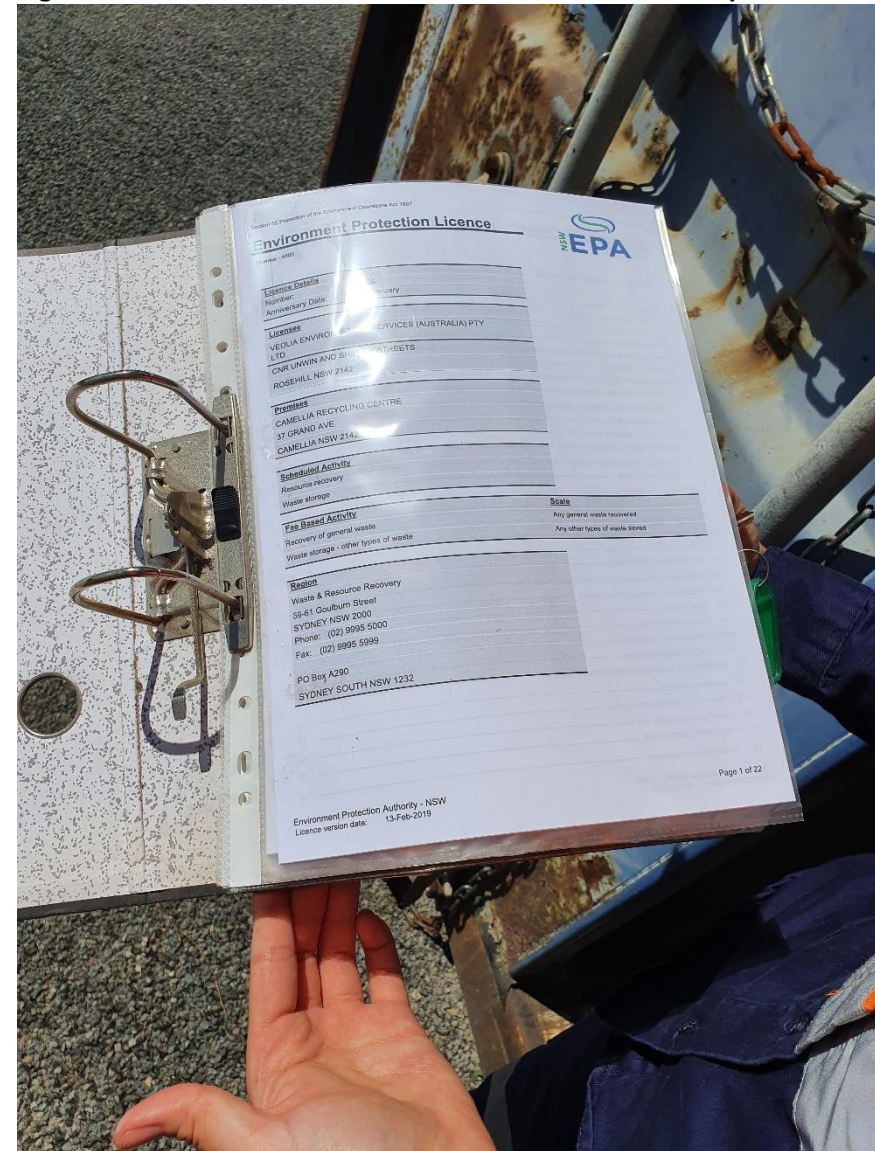




Figure F11. Evidence of 24-hour contact telephone on the front fence.



Figure F12. Evidence of Litter along front boundary of site.





## Appendix G – Agency consultation letters



5<sup>th</sup> July 2021

Brett Newman  
Chief Executive Officer  
City of Parramatta  
PO Box 32  
Parramatta NSW 2124

By email to: [council@cityofparramatta.nsw.gov.au](mailto:council@cityofparramatta.nsw.gov.au)

Dear Mr Newman,

***Re: Agency Consultation – Independent Environmental Audit – Veolia Environmental Services (Australia) Pty Ltd – Camellia Materials Recycling Facility***

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd to undertake an Independent Environmental Audit of the Camellia Materials Recycling Facility located at 37 Grand Avenue, Camellia. This audit is required under Condition C9 of the Development Consent SSD 4964. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Whilst the construction of the buildings and operation of the facility is yet to commence, an Independent Environmental Audit of works conducted on site to date is required as a condition of consent.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11<sup>th</sup> June 2021 and the audit is due to be conducted on Monday 19<sup>th</sup> July.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the site between 7<sup>th</sup> July 2018 and 6<sup>th</sup> July 2021. The independent audit will be performed in accordance with requirements of the NSW Department of Planning, Industry and Environment's *Independent Audit - Post Approval Requirements* (2020) and *ISO 19011 Guidelines for Auditing Management Systems* (2018).

Under Condition C9 of SSD Consent 4964, Veolia are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the NSW EPA, City of Parramatta Council and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present City of Parramatta Council with the opportunity to comment on the environmental performance of the Camellia Materials Recycling Facility, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au) should you need any further information.

Yours sincerely,



**Dr Mark Jackson** B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060

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E: [mark@jacksonenvironment.com.au](mailto:mark@jacksonenvironment.com.au)

W: [www.jacksonenvironment.com.au](http://www.jacksonenvironment.com.au)

Skype: mjjackson\_88



5<sup>th</sup> July 2021

Ms Julia Pope  
Team Leader Compliance  
Metro Projects  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

By email to: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Dear Ms Pope,

***Re: Agency Consultation – Independent Environmental Audit – Veolia Environmental Services (Australia) Pty Ltd – Camellia Materials Recycling Facility***

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd to undertake an Independent Environmental Audit of the Camellia Materials Recycling Facility located at 37 Grand Avenue, Camellia. This audit is required under Condition C9 of the Development Consent SSD 4964. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

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Under Condition C9 of SSD Consent 4964, Veolia are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the NSW EPA, City of Parramatta Council and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present NSW Department of Planning, Industry and Environment with the opportunity to comment on the environmental performance of the Camellia Materials Recycling Facility, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au) should you need any further information.

Yours sincerely,



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Director

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5<sup>th</sup> July 2021

The Unit Head  
Regulatory Operations Metropolitan  
NSW Environment Protection Authority  
PO Box A290  
Sydney South NSW 1232

By email to: [RegOps.MetroRegulation@epa.nsw.gov.au](mailto:RegOps.MetroRegulation@epa.nsw.gov.au)

To The Unit Head,

***Re: Agency Consultation – Independent Environmental Audit – Veolia Environmental Services (Australia) Pty Ltd – Camellia Materials Recycling Facility***

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Jackson Environment and Planning Pty Ltd would like to present NSW EPA with the opportunity to comment on the environmental performance of the Camellia Materials Recycling Facility, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au) should you need any further information.

Yours sincerely,



**Dr Mark Jackson** B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

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## Appendix H – Consultant letter in response to NSW EPA comments