Independent Environmental Audit

Allied Mills Pty Ltd - Picton Mill
# Quality Information

**Document** Independent Environmental Audit  
**Ref** 60308047  
**Date** 12-Mar-2014  
**Prepared by** Thomas Mitchell (Lead Auditor)  
**Reviewed by** Ian Richardson

## Revision History

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<th>Revision Date</th>
<th>Details</th>
<th>Authorised</th>
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| A        | 12-Feb-2014   | Draft for Client Review | James McIntyre  
EP&M Team Leader  |
| B        | 12-Mar-2014   | Final                 | James McIntyre  
EP&M Team Leader  |
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Executive Summary

AECOM Australia Pty Limited has been commissioned by Allied Mills Pty Limited to conduct the Independent Environmental Audit (IEA) for the Picton food processing site (“the site”) in accordance with the Development Consent DA 318-12-2004-i (as modified).

This audit was undertaken generally in accordance with AS/NZS ISO 19011:2002 – Guidelines for quality and/or environmental management systems auditing.

This is the first IEA of the site and so covers the period from the date of approval of the development (9 August 2005) to the date of the audit (23 October 2013). This IEA includes:

- Comments on Allied Mills’ compliance against the conditions of Development Consent DA 318-12-2004-i (as modified), the Environmental Protection Licence (EPL 12498) and the Environmental Impact Statement prepared for the site (KBR, 2004) (Section 3.0);
- An assessment of Allied Mills’ environmental management and performance of the Picton site (Section 4.0);
- A review of the adequacy of relevant environmental management plans for the site (Section 5.0); and
- A list of recommendations flowing from the findings of this audit (Section 6.0).

The audit was conducted by Thomas Mitchell (Lead Auditor) and Jessica Miller (Assistant Auditor) and consisted of a detailed desktop review of documentation, interviews with key Allied Mills staff and a visit to the Picton food processing site. Additional desktop reviews were conducted following the site inspection. A quality review of this IEA report has been conducted by Ian Richardson.

The Operator’s commitments in the Development Consent DA 318-12-2004-i (as modified), Environmental Protection Licence (EPL) 12498, and the Environmental Impact Statement (EIS) prepared for the site (KBR, 2004) were all audited. Where compliance could not be found against the conditions audited, this has been acknowledged as non-compliant for the purposes of the audit. During this IEA a total of 20 non compliances were identified.

A consolidated list of recommendations stemming from the audit findings can be found in Section 6.0 and individual non-compliances are outlined in more detail in Section 3.0. At the time of the audit, Allied Mills representatives were made aware of identified non-compliances against the conditions of Development Consent DA 318-12-2004-i (as modified).

Various good practices were noted and the Site was found to be well maintained and in a clean and tidy manner. The riparian vegetation areas were observed to be in good condition, and the lawns and grounds are maintained to control weeds. The Site manages preventative maintenance for plant and machinery on site through its SAP operating system. Each machine is included with a schedule prompting preventative maintenance and is also able to produce breakdown maintenance reports.

Several non-compliances identified were administrative in nature, such as reports submitted late, documents not available on the Site website or construction documentation no longer available. Some of the non-compliances stemmed from documents not having been prepared or not having been retained on site. The OEMP for the Site was not readily available during the audit, but was provided to the auditors in March 2014, which suggests that the OEMP is not being adequately implemented on site. Recommendations have been made where appropriate to address these non-compliances. A general recommendation has also been made for the Site to implement a Document Control System and a Compliance Tracking System to improve the Site’s compliance.
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1.0 Introduction

1.1 Background

AECOM Australia Pty Ltd (AECOM) was commissioned by Allied Mills Pty Ltd (Allied Mills) to undertake an Independent Environmental Audit (IEA) for its Picton food processing site (the Site) in accordance with Condition 3.3 of the Development Consent DA 318-12-2004-i (as modified).

The IEA was undertaken consistent with the relevant planning approval conditions for the Site and focused on verification of the Site’s compliance against the Development Consent DA-318-12-2004-i (as modified), Environment Protection Licence (EPL) 12498, and the Environmental Impact Statement (EIS) for the site (KBR, 2004).

This is the first IEA audit of the Site and so covers the period from the date of approval of the development (9 August 2005) to the date of the audit (23 October 2013).

1.2 Site Description

Allied Mills manufactures and distributes a wide range of food ingredients, particularly grain based baking supplies. The Allied Mills Picton site is located at Lot 32 DP 731013, 330 Picton Road, Maldon within the Wollondilly Local Government Area, which is approximately 80 km southwest of Sydney.

The Site is bordered by the Main Southern Railway to the south, and Picton Road to the north. Surrounding land use comprises predominantly agricultural land with some residential properties to the east and west and some residential development on Picton Road to the north. The Blue Circle Southern Cement Works is located approximately 500m west of the Site.

The Site’s business is a flour and maize mill, which processes wheat and maize to produce flour, semolina and wholemeal. The mill was constructed to fill Allied Mills production capacity replacing the Summer Hill mill in Sydney, which has been decommissioned.

Department of Planning and Infrastructure (DP&I) granted Allied Mills Development Consent DA 318-12-2004-i for the Site on 9 August 2005. A modification to the Consent was approved in June 2007 to allow the relocation of the amenities building. A further modification to the Consent was approved in February 2008 to allow for the rail siding on the Site.

The Allied Mills Picton Site is approved to produce up to 250,000 tonnes of product annually and employs around 30 full time staff. Processing equipment and ingredients storage is housed within mill structures which are fully enclosed to reduce the potential for loss of product and external noise impacts. Outside activities are limited to unloading of bulk deliveries and solid waste management and dispatched for recycling or disposal.

1.3 Scope of Work

The audit and this IEA report have been prepared pursuant to Condition 7.3 of the Project Approval 143-06-01 (as modified). Table 1 lists the requirements of this condition and indicates where each has been addressed in this IEA report.

<table>
<thead>
<tr>
<th>Condition</th>
<th>Commitment</th>
<th>Where addressed in this report</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3</td>
<td>Twelve months after the commencement of operation of the development, and every three years thereafter or as otherwise agreed or required by the Director-General, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. An Environmental Audit Report shall be submitted for the approval of the Director-General within one month of the completion of the Audit. The Audit shall:</td>
<td>Appendix A and Appendix B</td>
</tr>
<tr>
<td>3.3(a)</td>
<td>a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing;</td>
<td>Section 1.4</td>
</tr>
<tr>
<td>Condition</td>
<td>Commitment</td>
<td>Where addressed in this report</td>
</tr>
<tr>
<td>-----------</td>
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<td>-------------------------------</td>
</tr>
<tr>
<td>3.3(b)</td>
<td>b) assess compliance with the requirements of this consent, and other licences and approvals that apply to the development;</td>
<td>Section 3.0</td>
</tr>
<tr>
<td>3.3(c)</td>
<td>c) assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this consent; and</td>
<td>Section 4.0</td>
</tr>
<tr>
<td>3.3(d)</td>
<td>d) review the effectiveness of the environmental management of the development, including any environmental impact mitigation works.</td>
<td>Section 5.0</td>
</tr>
<tr>
<td></td>
<td>The Director-General may require the Applicant to undertake works to address the findings or recommendations presented in the Report. Any such works shall be completed within such time as the Director-General may require.</td>
<td>Noted.</td>
</tr>
</tbody>
</table>

### 1.4 Audit Approach

This IEA was undertaken generally in accordance with AS/NZS ISO 19011:2003 – *Guidelines for quality and/or environmental management systems auditing* by the following AECOM staff:

- Thomas Mitchell (Principal Consultant) – Lead Auditor;
- Jessica Miller (Graduate Environmental Planner) – Assistant Auditor;
- Alison O’Neill (Project Environmental Scientist) – Assistant Auditor; and
- Ian Richardson (Associate Director Environment) – Peer Review/Quality Control.

This IEA consisted of a detailed desktop review of documentation, interviews with key Allied Mills Pty Limited staff and a visit of the Site on 23 October 2013. Attendees at interviews included:

- Steve Bower – Site Manager;
- Maria Hooker – National EHS Manager; and
- Jane Tulloch – Administration Manager.

An agenda for the site meeting and itinerary for the site inspection component of the IEA (inclusive of attendees) is shown in Appendix C.

The site visit included an inspection of the factory, the site grounds and riparian vegetation areas, as well as discussions with Allied Mills staff and observations of processes, procedures and operations. Weather at the time of the site inspection was dry and very windy.

#### 1.4.1 Limitations of the Audit

The AECOM audit team received complete cooperation from all staff during the IEA. However, the following issues arose during the IEA, which limited to some extent, its findings:

- Opinions presented in this report apply to the Site’s conditions and features as they existed at the time of AECOM’s site visit on 23 October 2013 and those reasonably foreseeable. They necessarily cannot apply to conditions and features which AECOM is unaware of and has not had the opportunity to evaluate;
- The conclusions presented in this report are professional opinions based solely on AECOM’s visual observations of the Site and the immediate vicinity, and upon AECOM’s interpretations of the documentation reviewed, interviews and conversations with personnel knowledgeable about the Site and other available information, as referenced in this report. These conclusions are intended exclusively for the purpose stated herein, at the Site listed, and for the project indicated; and
- This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any particular circumstances constitute a breach of relevant legislation.
1.5 Report Structure by Section

This report is structured as follows:

Section 1.0 provides an introduction, background, description and layout of the Site, describes the requirements for the IEA and provides a guide to the structure of the report.

Section 2.0 lists the planning approvals in place at the Site, provides a description of each and confirms those which have been the subject of this IEA.

Section 3.0 provides a discussion of non-compliances against the project approval, environmental assessments and management plans.

Section 4.0 provides a review of effectiveness of environmental performance under the mentioned approvals at the Site.

Section 5.0 provides a review of the adequacy of the environmental management plans reviewed.

Section 6.0 provides recommendations for measures or actions to improve the environmental performance of the Site.
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2.0 Documents Reviewed

Table 2 lists the documents reviewed for this IEA along with where each is addressed in the report.

<table>
<thead>
<tr>
<th>Document</th>
<th>Where addressed in this report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Consent DA-318-12-2004-i (as modified)</td>
<td>Section 3.1</td>
</tr>
<tr>
<td>EPL 12498</td>
<td>Section 3.2</td>
</tr>
<tr>
<td><em>EIS for Grain Milling Facility, Picton Road, Maldon</em> (KBR, 2004)</td>
<td>Section 3.3</td>
</tr>
<tr>
<td><em>Operation Environmental Management Plan (OEMP), Allied Mills Maldon</em></td>
<td>Section 5.1</td>
</tr>
<tr>
<td><em>Grain Milling Facility</em></td>
<td></td>
</tr>
<tr>
<td><em>Vegetation Management Plan (VMP), Grain Milling Facility, Picton Road</em></td>
<td>Section 5.2</td>
</tr>
<tr>
<td><em>Maldon</em> (Total Earth Care, June 2006)</td>
<td></td>
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</tbody>
</table>
3.0 Environmental Compliance

Condition 3.3 of the Development Consent DA-318-12-2004-i (as modified) requires the applicant to “commission an independent, qualified person or team to undertake an Environmental Audit of the development”. Subclause 3.3 (b) of this Condition specifies that the IEA must:

(b) assess compliance with the requirements of this consent, and other licences and approvals that apply to the development.

In the assessment of compliance, the status of each condition is described as:
- Complies;
- Not Compliant; or
- Not Triggered (used where conditions have not yet been activated (e.g. due to activities not being commenced, requests not being made, or for historical conditions to have been superseded by more recently approved management plans).

The commitments given by Allied Mills in the Development Consent DA-318-12-2004-i (as modified), the EPL 12498, and the EIS for the site (KBR, 2004) were audited with a total of 20 non-compliances. A summary of these non-compliances is outlined in Table 3. Where compliance could not be found against the commitments made in these consent documents, this has been acknowledged as not compliant for the purposes of this IEA. A detailed outline of the compliance with each of these commitments is outlined in Appendix D to Appendix F.

Recommendations made by the auditors in relation to compliance with the conditions and requirements of the Development Consent, EPL and EIS are summarised in Section 6.0 (refer Table 7).

Table 3 Summary of Non-compliances

<table>
<thead>
<tr>
<th>Document</th>
<th>Reference</th>
<th>Non-compliance</th>
<th>Recommendations Made</th>
</tr>
</thead>
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<tr>
<td>Development Consent DA-318-12-2004-i (as modified)</td>
<td>Section 3.1</td>
<td>13</td>
<td>9 - Table 7</td>
</tr>
<tr>
<td>EPL 12498</td>
<td>Section 3.2</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>EIS for Grain Milling Facility, Picton Road, Maldon (KBR, 2004)</td>
<td>Section 3.3</td>
<td>3</td>
<td>1 - Table 7</td>
</tr>
</tbody>
</table>

3.1 Development Consent DA 318-12-2004-i (as modified)

Table 4 shows the conditions that were found to be non-compliant with the Development Consent DA-318-12-2004-i (as modified). A detailed assessment of compliance for each condition is outlined in Appendix D.

Table 4 Non-compliance against Development Consent

<table>
<thead>
<tr>
<th>Condition</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
</table>
| 2.3       | The Applicant shall design, construct, operate and maintain the development to ensure that the noise contributions from the development do not exceed the maximum allowable noise contribution limits specified in Table 1, at those locations and during those periods indicated. The maximum allowable noise contributions apply under meteorological conditions of: a) wind speed up to 3 m/s at 10 metres above ground level; or b) temperature inversion conditions of up to 3°C/100 m and wind speed up to 2 m/s at 10 metres above ground level. | Noise monitoring undertaken (reports dated 19 August 2009 and 25 March 2010) indicated exceedances at Location 1 during the evening and at all locations during the night time. Further monitoring was undertaken (report dated 31 October 2013) and also indicated exceedances at Location 1 during the evening, and at Locations 1 - 5 during the night time. The exceedances were attributed to the cumulative contribution of many other noise sources around the site. The report concluded that additional noise
<table>
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<tr>
<th>Condition</th>
<th>Commitment</th>
<th>Audit Finding</th>
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<tbody>
<tr>
<td></td>
<td>control measures at the site were not necessary as no significant benefit would be gained (given the current ambient noise levels from other noise sources largely exceeding the Allied Mills contribution).</td>
<td></td>
</tr>
<tr>
<td>2.8</td>
<td>Unless otherwise approved with the Director-General, the Applicant shall extend Landscape Treatment L2 along the entire length of the shared property boundaries between the site and the adjacent properties to the east and west of the site.</td>
<td>During the site visit it was noted that landscaping was not provided along the entire length of shared property boundaries. Correspondence from DP&amp;I (24 February 2009) approving the OEMP noted that Allied Mills had requested changes to the landscaping required under conditions 2.7 and 2.8, due to the Maldon industrial rezoning application. DP&amp;I approved a delay in implementing this screening while a decision on the rezoning was made. The DP&amp;I requested that the status of screening landscaping be updated in the AEMR. Allied Mills has not prepared an AEMR for the site as yet; however this is currently being prepared. It is recommended that the AEMR include an update on the status of this screening landscaping.</td>
</tr>
<tr>
<td>2.25</td>
<td>Immediately after completion of initial planting/seeding and every six months thereafter for the duration of the maintenance period the Applicant shall submit to DWE a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.</td>
<td>No evidence was provided to show that these monitoring reports were prepared or submitted to OEH. It is recommended that Allied Mills writes to OEH a summary letter to address and close out the VMP requirements of condition 2.25. Then, it is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operations phase.</td>
</tr>
<tr>
<td>2.29(b)</td>
<td>b) fully establish and secure Heritage Conservation Zone 2 incorporating the area surrounding a scarred tree (AMP ST 1) with at least a diameter of 30 metres. The Zone shall be enclosed by a permanent fence that restricts access into the Zone for the duration of the development (including construction activities); and</td>
<td>Section 2.0 of the Pre-Construction Compliance Report (KBR, October 2006) provides an aerial delineation of these Heritage Conservation Zones. However this area has never been fenced. Interviews with Allied Mills staff confirmed that a quote is currently being obtained for this fencing. Allied Mills confirmed that its personnel recognise this scarred tree as having a designated perimeter (e.g. a no-mow area).</td>
</tr>
<tr>
<td>3.1</td>
<td>A report providing the results of the program shall be submitted to the Director-General within 28 days of completion of the testing required under a). If the noise monitoring indicated that the operation of the development, under design loads and normal</td>
<td>Sampling was undertaken from 30 June to 10 July 2009 and so the report was due by 7 August 2009. The report submitted to DP&amp;I is dated 19 August 2009, so was</td>
</tr>
</tbody>
</table>
Condition | Commitment | Audit Finding
---|---|---
operating conditions will lead to greater noise impacts than permitted under condition 2.3 of this consent, then the Applicant shall investigate details of remedial measures to be implemented to reduce noise impacts to levels required by that condition. If necessary, the Report shall include details of the proposed remedial measures, with a timetable for implementation, to be approved by the Director-General and the DECC. | twelve days late. The letter from DP&I (dated 22 October 2009) requested additional information related to exceedances of noise criteria. In response, additional monitoring was undertaken (Verification of Mill Noise Emissions (Heggies, 23 March 2010)). This report stated that a Noise Management Plan had been prepared in a letter dated 8 December 2009. The additional monitoring was the first stage of the Plan. The additional monitoring identified exceedances of night time criteria at all locations and the report recommended sound power levels of all fixed mechanical plant and mobile equipment be carried out and that noise mitigation and control be investigated. The auditors did not view any further correspondence with DP&I on this issue. Further noise monitoring was undertaken (AECOM, October 2013) and exceedances were indicated, however the report concluded that additional noise controls would not provide significant benefit. |
3.2 Within 28 days of the sampling and analysis undertaken in this condition the Applicant shall submit to the Director-General and the DECC, a report detailing the outcomes of that sampling and analysis. Where necessary, the report shall include details of the proposed remedial measures, with a timetable for implementation, to be approved by the Director-General and the DECC. | Sampling was undertaken on 30 June - 1 July 2009, and so the report was due by 29 July 2009. The report submitted to DP&I is dated 19 August 2009, so was 3 weeks late. Also, no evidence was provided to show that this report was submitted to DECC. |
3.3 Twelve months after the commencement of operation of the development, and every three years thereafter, or as otherwise agreed or required by the Director-General, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Director-General prior to the commencement of the audit. An Environmental Audit Report shall be submitted for the approval of the Director-General within one month of completion of the audit. | There is no evidence that an environmental audit was undertaken twelve months after commencement of operation, or at any later date, until this current IEA. This is the first independent environmental audit for the site since commencement of operation. |
4.1 Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request. This shall include provision of all documents at the site for inspection by visitors, and in an appropriate electronic format on the Applicant’s internet site, should one exist. | A website does exist for the site however no documents are made available on the website. It is recommended that the Consent, EPL, OEMP and VMP be provided on the website, as well as the AEMR and Audit reports, once they are finalised. |
4.3 The Applicant shall record details of all complaints | Interviews with Allied Mills confirmed that
### Table: Audit Findings vs Commitments

<table>
<thead>
<tr>
<th>Condition</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
</table>
| 4.2       | received through the means listed under condition 4.2 of this consent in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:  
  a) the date and time, where relevant, of the complaint;  
  b) the means by which the complaint was made (telephone, mail or email);  
  c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;  
  d) the nature of the complaint;  
  e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and  
  f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the DECC and the Director-general upon request. | no complaints have been received since the site was constructed. Some isolated complaints were received during the initial construction of the site, but these were dealt with by John Holland (the construction contractor). The process of recording complaints is discussed in the OEMP for the site. However, there was no evidence to indicate that a Complaints Register is kept on site, or that the required information would be recorded if a complaint were received. It is recommended that a Complaints Register be prepared and maintained on site. |
<p>| 5.2(a)(iii) | details of proposed measures to ensure the continued integrity of the culverts under the Great Southern Railway line, including scour protection works on the watercourses flowing towards the culverts; | The Environmental Control Plan Greenfield Mill - Picton Aboriginal &amp; European Cultural Heritage (John Holland, July 2006) includes some detail on the control measures to be used to protect the culverts during construction. However, the auditors sighted a letter from DP&amp;I approving the CEMP (dated 1 May 2007) but the letter noted that these detailed measures were yet to be submitted. No evidence was provided that these details were subsequently submitted. |
| 5.3 | The Applicant shall prepare and implement an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the development. | During the audit, the OEMP was not readily available, however it was provided to the auditors in March 2014. A review of the OEMP was undertaken by the auditors, and it was found to comply with these requirements. However, given that the OEMP was not readily available, it appears that the OEMP is not being adequately implemented at the site. It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the OEMP be kept on site. A copy of the updated OEMP should be submitted to DP&amp;I. |
| 5.5 | Every three years after the commencement of operation of the development the Applicant shall undertake a formal review of the OEMP required under condition 5.3 of this consent. The review shall ensure that the OEMP is up-to-date and all changes to procedures and practices prior to the review are fully incorporated into the OEMP. The Applicant shall | The OEMP was prepared in February 2009. There is no evidence to indicate that the OEMP has been reviewed since 2009. It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the OEMP be kept on site. A copy of the updated OEMP should be |</p>
<table>
<thead>
<tr>
<th>Condition</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.3</td>
<td>The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development.</td>
<td>No AEMRs have been submitted to date. The first AEMR for the site is currently being prepared. It is recommended that preparation of AEMRs be included as part of Allied Mills' existing quality system.</td>
</tr>
</tbody>
</table>

### 3.2 EPL 12498

Table 5 shows the conditions that were found to be non-compliant with Allied Mills’ EPL 12498. A detailed assessment of compliant for each condition is outlined in Appendix E.

#### Table 5 Non-compliances against EPL

<table>
<thead>
<tr>
<th>Reference</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>R1.1</td>
<td>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. 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.</td>
<td>Copies of the Annual Returns were not provided to the auditors and so this requirement could not be verified.</td>
</tr>
<tr>
<td>R1.5</td>
<td>The Annual Return for the reporting period must be supplied to the EPA 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’).</td>
<td>The due date for Allied Mills' Annual Returns is 4 August each year. The EPA website records that the Annual Returns were received on 13-Aug-2013, 30-Jul-2012, 19-Aug-2011, 8-Sep-2010, 16-Jul-2009, 27-Aug-2008 and 29-Aug-2007.</td>
</tr>
<tr>
<td>R1.6</td>
<td>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.</td>
<td>Copies of the Annual Returns were not provided to the auditors.</td>
</tr>
<tr>
<td>R1.7</td>
<td>Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</td>
<td>Copies of the Annual Returns were not provided to the auditors and so this requirement could not be verified.</td>
</tr>
</tbody>
</table>
3.3 **EIS for Grain Milling Facility, Picton Road, Maldon (KBR, 2004)**

Table 6 shows the conditions that were found to be non-compliant with **EIS for Grain Milling Facility, Picton Road, Maldon (KBR, 2004)**. A detailed assessment of compliance for each condition is outlined in Appendix F.

### Table 6 Non-compliances against the EIS

<table>
<thead>
<tr>
<th>Reference</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
</table>
| 11.2.2    | On completion of the construction period, monitoring and maintenance of the development in relation to soil and groundwater conditions should be undertaken at regular intervals. A monitoring system including the following activities should be implemented:  
  - Regular inspection of all drainage facilities constructed for the proposed development at initial weekly inspection intervals to assist with early identification of saline seepage, bank instability, salt scalds etc.;  
  - A system of groundwater monitoring will be installed and monitored initially at three monthly intervals. The wells will be located within the irrigation area at a general spacing of approximately 50m and downstream of any other water retention structures;  
  - Regular inspection of the sediment load in drainage channels, basins and the creek will be undertaken; and  
  - During periods of drought special monitoring and maintenance may be required to assess the condition and maintenance requirements of the artificial liners and other facilities. | No evidence was provided that a soil and groundwater monitoring program has been implemented during the operational phase. |
| 11.2.3    | A detailed drawing of the proposed erosion and sediment control would be prepared before construction, based on the following principles:  
  - Sediment would be controlled by silt mesh and hay bales to the perimeter of the wash area;  
  - Water would be controlled so that sediment can be directed to a series of ponds and captured, so that only clean water can pass from the final pond;  
  - Erosion would be controlled by seeding the newly formed banks and limiting the excavation plant to the main work area in the site;  
  - Any areas that require quick control would be protected by fine mesh/mattign staked to the bank;  
  - Runoff protection would be installed at the base of banks until ground cover (grass) had sufficiently established to control erosion; and  
  - Overland flow from areas above the site would be directed to pipes under the road. No additional overland flow would be created beyond existing conditions. | A detailed drawing of erosion and sediment control measures was not contained within the CEMP for the site. No evidence was provided that this drawing was prepared prior to construction. |
<p>| 11.2.3    | An operational Environmental Management Plan (EMP) would be prepared for water quality management, to include: | During the audit, the OEMP was not readily available, however it was provided to the auditors in March 2014. A |</p>
<table>
<thead>
<tr>
<th>Reference</th>
<th>Commitment</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>· a schedule for maintenance of the drainage system, in particular keeping grass short in the vicinity of the mill buildings so that drainage is efficient and standing water is eliminated;</td>
<td>review of the OEMP was undertaken by the auditors, and it was found to comply with these requirements. However, given that the OEMP was not readily available, it appears that the OEMP is not being adequately implemented at the site.</td>
</tr>
<tr>
<td></td>
<td>· a schedule for maintaining the shut-off gate, cleaning culverts and trash racks; and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>· a program of quarterly sampling from the reservoir to monitor reservoir water quality. This should start before construction, so that any impacts of construction can be identified.</td>
<td>It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the OEMP be kept on site.</td>
</tr>
</tbody>
</table>
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4.0 Assessment of Environmental Performance

This section provides an assessment of the environmental performance of the Site, as required by Condition 3.3 (c) of Development Consent DA-318-12-2004-i (as modified). Specifically this Condition requires the IEA to:

(c) assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this consent.”

As indicated in Section 3.0, several non-compliances were found during this IEA. Many of these non-compliances relate to administrative matters, such as documentation not being available to show compliance, particularly those relating to the earlier construction period. However many of the non-compliances have resulted from an action not having been undertaken (for example, no AEMRs, Environmental Audits or Complaints Register have been prepared). The OEMP for the Site was not readily available during the audit, which suggests it is not being adequately implemented at the Site.

Several non-compliances were identified in the Development Consent DA-318-12-2004-i (as modified) in relation to noise. It is understood that Allied Mills conduct noise monitoring if required following a noise complaint and that no complaints have been received. Previous noise monitoring (19 August 2009) identified exceedances of noise criteria and recommended further investigations to be undertaken. Correspondence from DP&I (22 October 2009) requested additional information related to these exceedances and further monitoring was undertaken in March 2010 which noted exceedances of the night time noise criteria. The report recommended that noise mitigation and control be investigated. The auditors did not view any further correspondence with DP&I about this issue. However noise monitoring was undertaken in October 2013 and the report identified exceedances of the noise criteria which were attributed to the cumulative contribution from many noise sources distributed around the Site. The report concluded that due to the cumulative impact of the other noise sources and the current ambient noise levels from other sources largely exceeding the Allied Mills contribution, it would be unreasonable to implement noise control measures at the Site as no significant benefit would be gained.

Several recommendations have therefore been made by the auditors to improve the administration of environmental matters at the Site. Several recommendations relate to the review and implementation of the OEMP for the Site. A general recommendation has been made to implement a Document Control System for the Site to store, manage and track documentation required for compliance purposes. This will improve the Site’s compliance with regard to availability and reliability of documentation. A general recommendation has also been made to implement a Compliance Tracking system. This would assist the Site to identify and schedule statutory compliance requirements, as well as to compile documentary evidence for future audits.

Various good practices were noted at the Site and the auditors found the Site to be well maintained and in a clean and tidy condition. The riparian vegetation areas were observed to be in good condition, and the lawns and grounds are maintained to control weeds. The Site manages preventative maintenance for plant and machinery on site through its SAP operating system. Each machine is included and has a schedule prompting preventative maintenance and is also able to provide break down maintenance reports.
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5.0 Review the adequacy of Environmental Management Plans

This section addresses Condition 3.3 (d) of Development Consent DA-318-12-2004-i (as modified), which requires this IEA to:

(d) “review the effectiveness of the environmental management of the development, including any environmental impact mitigation works.”

The method to assess the environmental management is to review the site’s management plans. For the Picton Site these include the OEMP and the VMP. It is noted that a Construction Environmental Management Plan (CEMP) was prepared for the site’s construction phase; however it is no longer applicable. A review of this document has not been undertaken for the purposes of this audit.

5.1 Operation Environmental Management Plan

The overarching document to guide environmental activities on site is the OEMP; which is required under Condition 5.3 of the Development Consent DA-318-12-2004-i (as modified). The auditors viewed correspondence from DP&I approving the OEMP (dated 24 February 2009).

During the audit the OEMP was reviewed against the requirements of the Consent and was found to contain the information required. Specifically the OEMP:

- Provides an overview of the site and operational activities;
- Describes the environmental management framework at the site, including the environmental policies, organisational structure and environmental responsibilities for relevant employees;
- Specifies the environmental controls for the operation, including statutory requirements, consultation with key stakeholders and environmental risk assessment;
- Summarises the key performance targets and indicators for the site to assess the performance of operations; and
- Appends the five management plans required under Condition 5.4 of the Development Consent (Noise Management Sub-plan, Water Monitoring and Management Sub-plan, Traffic Management Sub-plan, Cultural Heritage Management Sub-plan, and Landscape Management Sub-plan).

As previously noted, the OEMP was not readily available during the audit and was not provided to the auditors until March 2014. This suggests that the OEMP is not being adequately implemented at the site and therefore Condition 5.3 was found to be non-compliant. Also, there is no evidence that the OEMP has been reviewed on a three yearly basis, as required under Condition 5.5, and so non-compliance was found against Condition 5.5.

The Sub-plans appended to the OEMP were also reviewed against the requirements of Condition 5.4 and compliance was found against each of the requirements. The Sub-plans contained the information required under the Consent. However, one of the commitments made within the EIS 2004 relating to soil and groundwater monitoring program was found to be non-compliant as no evidence was provided to show that this monitoring program has been implemented during the operational phase. This also indicates that the OEMP (and respective Sub-plans) are not being adequately implemented at the Site.

A recommendation was made to review and update the OEMP and to ensure it is implemented at the site. A copy of the updated OEMP should be submitted to DP&I and a copy kept on site.

5.2 Vegetation Management Plan

The other management plan for the Site required by the Development Consent DA-318-12-2004-i (as modified) is the VMP. Condition 2.23 of the Development Consent requires that a VMP be prepared and submitted for approval prior to the commencement of construction activities. This was confirmed in the Pre-Construction Compliance Report (November 2006) for the Site which was submitted to the DP&I on 22 November 2006, and included a copy of the VMP at Appendix D.

During the audit the VMP was reviewed against the requirements of the Consent and was found to contain the information required. Specifically the VMP:

- Delineates the riparian zones to be maintained;
- Describes the pre-construction condition of the vegetation to be retained;
- Provides management measures for restoration and revegetation, including establishment methods, planting densities;
- Provides a program of monitoring and inspection;
- Specifies the roles, responsibilities and training as well as performance criteria and timing of tasks; and
- Includes a list of plant species to be used in each of the riparian zones.

The VMP states that the full period of the restoration and revegetation project will be approximately four and a half years, including 6 months site preparation and a four year period of maintenance and monitoring. The final inspections for the site (by the relevant statutory agency) were scheduled to be carried out four years from the date of final planting.

During the audit site inspection the riparian zones were found to be in good condition. Interviews with Allied Mills personnel confirmed that early in 2013 the Office of Environment and Heritage (OEH) signed off on these riparian restoration works as having been completed satisfactorily and returned the security bond to Allied Mills.

As the maintenance and monitoring period for the riparian zones is now complete, it is recommended that Allied Mills consult with the office of Environment and Heritage (OEH) to clarify the ongoing maintenance and monitoring requirements for these areas. Several conditions in the Development Consent (Conditions 2.23, 2.24 and 2.25) relate to management of the riparian zones and it is recommended that Allied Mills considers an application to modify these conditions in order to clarify the ongoing maintenance requirements for the riparian zones.
6.0 Recommendations

This IEA audited the Development Consent DA-318-12-2004-i (as modified), the EPL 12498, and the EIS for the Site (KBR, 2004), and identified a total of 20 non-compliances.

Table 7 presents key recommendations flowing from the audit in relation to all non-compliances identified during the audit. Table 7 is intended to provide guidance for Allied Mills in resolving these non-compliances.

Table 7 Consolidated Audit Recommendations

<table>
<thead>
<tr>
<th>Reference</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Consent DA-318-12-2004-i (as modified)</td>
<td></td>
</tr>
<tr>
<td>2.23</td>
<td>It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operations phase. If necessary, the VMP should then be updated to reflect the amendments and to outline any maintenance required.</td>
</tr>
<tr>
<td>2.24</td>
<td>It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operations phase.</td>
</tr>
<tr>
<td>4.1</td>
<td>It is recommended that the Consent, EPL, OEMP and VMP be provided on the website, as well as the AEMR and Audit reports, once they are finalised.</td>
</tr>
<tr>
<td>4.3</td>
<td>It is recommended that a Complaints Register be prepared and maintained on site.</td>
</tr>
<tr>
<td>5.3</td>
<td>It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the OEMP be kept on site. A copy of the updated OEMP should be submitted to DP&amp;I.</td>
</tr>
<tr>
<td>5.5</td>
<td>Recommendation as per Development Consent Condition 5.3</td>
</tr>
<tr>
<td>6.3</td>
<td>It is recommended that preparation of AEMRs be included as part of Allied Mills' existing quality system.</td>
</tr>
<tr>
<td>EIS (KBR, 2004)</td>
<td></td>
</tr>
<tr>
<td>11.2.3</td>
<td>Recommendation as per Development Consent Condition 5.3.</td>
</tr>
<tr>
<td>General</td>
<td></td>
</tr>
<tr>
<td>Generally</td>
<td>It is recommended that Allied Mills implement a Document Control System to store, manage and track documentation required for the Site.</td>
</tr>
<tr>
<td>Generally</td>
<td>It is recommended that Allied Mills implement a Compliance Tracking system to track the status of statutory requirements and to manage documentary evidence of compliance.</td>
</tr>
</tbody>
</table>
Appendix A

Audit Team Curricula
Vitae
Appendix A  Audit Team Curricula Vitae
Sharmin Lubonski
Associate Director

Qualifications
Bachelor of Science (Hons) (Environmental)
Master of Science (Environmental Technology)
Doctor of Philosophy (Environmental Economics and Corporate Social Responsibility)

Affiliations
DCCEE Registered NGERs Auditor
GHG Management Institute, GHG Verification and Advanced Accounting
IRCA Sustainability Assurance Professional
Environmental Managements Systems Auditor (Lead Auditor)
IEMA Environmental Auditor
Institute of Engineers (Hong Kong)
Institute of Environmental Economics (Australia)

Awards
University of Hong Kong RGC Award for Outstanding International Workshop/Conference (2004)
ICAC Award for Outstanding Research Project in Corporate Governance, Hong Kong (2001)

Publications and Technical Papers
Salahuddin, S. (2005) "Drivers and Barriers for Extended Producer Responsibility in Asia" PhD Thesis, University of Hong Kong

Career History
Sharmin is an environmental and sustainability professional with 13 years of experience, including extensive management system and compliance auditing. She has worked for major international companies in Australia, Hong Kong, Sweden, Portugal and the United Kingdom. Sharmin specialises in helping clients with environmental and sustainability risk management including:

- Auditing and verification (registered Lead Auditor).
- Management systems and reporting.
- Wide industry experience including infrastructure, manufacturing, retail (food, beverage and apparel), finance and telecommunications sectors.

Sharmin is a qualified Lead Environmental Auditor with experience in leading audit teams for internal, second party and third party audits for environmental, quality and social management systems and compliance audits. This includes for EMAS, ISO 14001, ISO 9000, ISO 14040, ISO 14020/24 and SA 8000. In addition Sharmin holds specialist qualifications and experience as a Registered Greenhouse and Energy Auditor (NGER audits) and Sustainability Assurance Professional (GRI and AA1000 audits).

Recent project experience:

- Lead Auditor, Independent Environmental Audit, Port Kembla Coal Terminal
- Audit reviewer, Independent Environmental Audit, Wilpinjong Coal Mine
- Audit reviewer, Independent Environmental Audit, Mt Owen Complex Xstrata Coal
- Lead Auditor, EMS Audit (ISO 14001), IF Nordic and Balticum
- Lead Auditor, EMS Audit, Vattenfall (water processing)
- Lead Auditor, EMS Audit (ISO 14001), Carlsberg
- Chief Company Auditor, Green Loans Audit Program
- Lead Auditor, Greenhouse Gas Management Plan and NGERs compliance, Endeavour Energy
- Lead Auditor, Environmental Audit, Water Supplies Department Hong Kong
- Lead Auditor, EMS Audit, Coca Cola Breweries
- Lead Auditor, EMS Audit (ISO 14001) ,Proctor & Gamble
- Lead auditor, Integrated Management Systems Audit, Downer EDI (ANZ)
- Project Manager, EMS Review, TPD/TiNSW
- Project Manager, EMS Review, Shoalhaven Defence Regional
- Internal Auditor, EMS review and audits (EMAS), Vodafone (Australia)
Detailed Experience

A cross-section of relevant projects are detailed below:

**Shoalhaven Defence Regional EMS Review, Brookfield Multiplex and Department of Defence** – Sharmin project managed the recent EMS Review for Department of Defence’s Shoalhaven Region (HMAS Albatross, HMAS Creswell, Beecroft Range and Jervis Bay). This included the review and re-development of the EMS risk register and the legal and other obligations register such as Commonwealth, State and Defence Policies that the region must adhere to.

**Integrated management systems development and implementation Downer EDI (ANZ)** – Sharmin was responsible for the environmental component of Downer EDI’s integrated management system (IMS) in accordance with ISO 14001. Her role included ensuring maintenance of the system for ISO certification, such as updates to the risk register, legal registers, conducting internal audits and liaising with the quality and OHS technical leads for the IMS to ensure Downer EDI’s overall compliance.

**EMS review and audits, Vodafone (Australia)** – Sharmin led all of Vodafone Australia’s internal and contractor EMS reviews and audits during her time as Corporate Responsibility Advisor. This involved working closely with a number of Joint Venture partner, contractors and sub-contractors, such as Kordia, Ericsson, Telstra and Optus. In addition she was responsible for working with the legal team to address compliance to any new and emerging legislation, which at the time was especially significant given the introduction of the National Greenhouse and Energy Reporting Act.

**EMS implementation (ISO 14001), Hewlett Packard (SE Asia)** – Sharmin project managed the development and implementation of Hewlett Packard’s EMS in the South East Asia region over a three year period. This included international, national and local government compliance, in particular around waste legislation requirements in Europe such as WEEE. Sharmin was also responsible for liaising with Hewlett Packard’s partners, contractors and sub-contractors to ensure compliance in instances where the company did not have direct control of the risk.

**EMS Procedure and Greenhouse Gas Management Plan for NGERS compliance, Endeavour Energy** – Sharmin was the lead auditor to ensure Endeavour Energy’s EMS and related procedures where in compliance with NGERS. This was particularly aimed at contractor’s who are responsible for a significant amount of the company’s NGER reporting data.

**GHG Audit and Abatement Option Analysis for Dartbrook Mine, Anglo American Coal**. Sharmin was the lead auditor for GHG in relation to NGERS compliance.

**Confidential Hydropower Project – Sustainability Integration Manager and Technical Lead.** Sharmin led an assessment of regional climatic differentiation and predicted climate change impact to inform the transmission infrastructure route selection process for a major international hydropower and transmission line project (overland and marine). In addition she is working to integrate sustainability across the project, with a focus on overarching sustainability goals, carbon assessment and climate risk assessment.

**Eastern Star Gas Liquefied Natural Gas (LNG) export facility, ESD assessment.** Sharmin led the identification of relevant project Ecologically Sustainable Development (ESD) initiatives as part of the Environment Impact Assessment process.

**Kingsgrove to Revesby Quadruplication, East Hills Signalling Maintenance Depot** – Sharmin project managed the preparation of greenhouse gas inventories, the identification of greenhouse gas mitigation opportunities and reporting.

**Transport Construction Authority, Evaluation of Carbon Neutrality for the Commuter Car Park and Interchange Program** – Sharmin project managed the preparation of greenhouse gas inventories, the identification of greenhouse gas mitigation opportunities and reporting.

**Kingsgrove to Revesby Quadruplication, Integrated Photovoltaic Noise Barrier Initiative, Schools and Community Education Program.** Sharmin led the development of training and educational materials for photovoltaic noise walls, for schools in vicinity of the K2RQ project. Key tasks included authoring education packages and leading the stakeholder engagement.


**RailCorp, Sustainability Strategy Benchmarking, Development and Options Analysis.** Sharmin was the sustainability benchmarking and CSR lead. The project aimed to determine Railcorp’s appetite for sustainability through:
• Defining CSR and Sustainability for RailCorp
• International and national benchmarking and performance against other rail systems and transport sectors
• Determine baseline Australian and NSW legislative compliance requirements relevant to RailCorp
• Provide an Executive Briefing of the study’s findings on sustainability options and on how green RailCorp wants and/or needs to be

Roads and Maritime Services, Princes Highway Upgrade, Foxground and Berry Bypass ESD chapter, Climate Change Risk Assessment and GHG assessment. Sharmin led the climate risk assessment, greenhouse gas assessment and authored the ESD chapter for the environmental assessment of the project.

Global Reporting Initiative
Sharmin is currently working in a number of reference groups for the development of GRI G4 and also worked with the United Nations representatives in South East Asia during the original GRI guidelines development. In addition Sharmin is a Sustainability Assurance Professional, registered and accredited to verify and assure GRI reports. Recent Global Reporting Initiative related projects that Sharmin has completed are listed below:

- Greenstreets, GRI training course: Non-financial accounting for accountants (GRI and Integrated Reporting) 2012
- Power Assets, Sustainability Report GRI Verification, 2012
- AECOM, Global Sustainability Report, 2011
- AECOM, Australia Sustainability Report, GRI Verification 2010 and 2011
- Eraring Energy, Sustainability Report 2010 and 2011
- Police Department, Sweden. Verification of GRI report 2010
- Rica Bank, Sustainability Report Verification 2010
- IF Nordic and Balticum, GRI reporting and verification 2008 and 2009
- Visit Sweden, Sustainability Report Verification 2009
- Dramaten, Sustainability Report Verification 2010
- Spendrups, Sustainability Report Verification 2010
- Swedish Post Office, Sustainability Report GRI Verification 2009
- Downer EDI, Sustainability Report and GRI Verification 2008

- Vodafone, Sustainability Report and GRI verification 2007 and 2008

Conferences
Industrial Ecology Conference (Annual)
Greening of Industry Conference (Annual)

Training
ISO 14000, 8000
ISO 26000
SA 8000
AA1000AS/GRI
Greenhouse gas protocol reporting and verification
NGERS reporting
Six Sigma

Languages
Fluent in Swedish, English, and Hindi/Urdu
Working knowledge of German and French
Basic knowledge of Chinese (Cantonese and Mandarin) and Polish

Professional History
2010 - Present
AECOM, Australia
Team Leader NSW and Associate Director, Sustainability and Climate Change
2009 - 2010
Respect Europe, Sweden
Manager, Sustainability and CSR
2008
Downer EDI, Australia
Manager, Sustainability Reporting
2007 - 2008
Vodafone Australia
Corporate Responsibility Advisor
2005 - 2007
Department of Environment and Climate Change NSW
Economist
2002 - 2005
Corporate Environmental Governance, Hong Kong
Consultant
2001 - 2002
Freshfields Bruckhaus Deringer, United Kingdom
Environmental and Planning Consultant
2000
Department of Environment, Transport and the Regions, United Kingdom
Executive Officer
Thomas Mitchell
Principal Consultant
Occupational Health, Safety and Risk

Qualifications
Masters Applied Science(OHS) - Melbourne
Graduate Diploma (Occ. Hazard Management)
Cert IV Assessment & Training
Lead Auditor OHSMS
Lead Auditor EMS

Affiliations
Member, Ergonomics Society of Australia
Member, Australian Acoustical Society
Member, Surf Life Saving Association
Past Assessor, Queensland Mines Rescue
Past Instructor, St. Johns Ambulance
Past Executive Committee Member, Ergonomics Society NSW
Past Member, Federal Technical Committee of the Safety Institute of Australia

Awards
2009 NSW Safe Work Commendation Awards for Safety Solution

Publications and Technical Papers
2 Books, 2 Chapters, 3 International Conference Papers and 65 Published/Presented Works

Career History
Thomas Mitchell has 30 years experience occupying various executive and senior management roles in multinational organisations delivering innovative Work Health and Safety (WHS) and Environmental management services. He has held a position of Lecturer and Senior Research Officer with University of Ballarat (Victorian Institute of Occupational Safety and Health) generalising in Safety Engineering, Safety in Design, Industrial Hygiene and Ergonomics and specialising in Risk Management, Compliance Auditing and Management Systems, Training and Education.

Thomas has worked across all business and industry sectors and has provided consultancy, training and auditing services for industry, trade unions, and government inspectorates.

Thomas has also undertaken OHS research projects for the National Occupational Health and Safety Commission, Coal Industry Research Program, Mining and Quarrying Association and WorkCover equivalent programs in NSW, Victoria and South Australia. Thomas is committed to making significant contributions to his profession through solution focused research, advice and education.

Professional History
2012 - Present
AECOM: Principal Consultant/Lead Auditor, EHS & Risk

2011 - 2012
Coffey Environments: Principal, OHS

2008 - 2010
Caterpillar/Bucyrus Australia: State Manager, EHS

2006 - 2008
Bartter Enterprises/Steggles: Regional Manager OHSIM

1992 - 2006
Safety System Management P/L: Director/Consultant

1990 - 1999
University of Ballarat, VIOSH: Lecturer/Senior Researcher

1987 – 1990
Phillip Morris Ltd: OHS Management Coordinator

1983 – 1987
BHP Australia Coal P/L: Open Cut Mine OH&S Advisor

1980 – 1983
UTAH Development P/L: Quality/Environment Technician

18-Oct-2012
Detailed Project Experience

Security/Manufacturing: Compliance Audit Program (CAP) [Tyco International (VIC)] (2013)
Principal Consultant/Lead Auditor
CAP Audits and consultancy advice for Victorian Service and Contract Installation businesses.

Lead Auditor – Safety in Design Statutory Compliance and Governance Conformance Design Review.

Lead Auditor - WHS Statutory Compliance Audits for regulation of spray painting booths.

Lead Auditor Statutory Compliance Audits for regulation of hazardous chemicals.

Lead Auditor WHS Statutory Compliance audits initiated by WorkCover NSW on regulation of specific hazards: asbestos, hazardous chemicals, noise and lead.

Lead Auditor Program of Enforceable Undertakings (EU) Audit throughout the Department of Defence and the Australian Defence Forces spanning all services and all groups.

Government: NSW Roads and Maritime Services Safety In Design (CHAIR) Road Infrastructure Variation (2012)
Principal Consultant/Facilitator Facilitate CHAIR Study and Risk Analysis for road design and Infrastructure projects.


Principal Consultant/Facilitator Facilitate CHAIR Study and Risk Analysis for fourteen (14) Mine Water Supply Infrastructure projects.

University of Technology (NSW): Hazardous Material Reinspection Program (2012)
Principal Consultant Re-inspection of Property and Verification of Hazardous Materials Registers and Management Plans.

Xstrata Ravensworth North (NSW): Contractor Audit Program (2012 to 2013)
Principal Consultant/Auditor Contractor Management Systems Audits for Mine Construction and Commissioning (MIA; Water/Tailings; Rail).

Principal Consultant BFI Audits and consultancy advice on WHS legislative compliance requirements at National Defence installations.

Tyco International (NSW): Compliance Audit Program (CAP) (2012)
Principal Consultant/Lead Auditor CAP Audits and consultancy advice for NSW Service and Contract Installation businesses.

Thiess/Sydney Harbour Trust (NSW): HAZOP and Safety In Design (CHAIR) HMAS Platypus Submarine Base Remediation Project (2012)
Principal Consultant/Facilitator Development and delivery of comprehensive HSE Risk Management Plan for Design/Planning, Construction and Disposal requirements project.

Principal Consultant/Facilitator Facilitate CHAIR Study and Risk Analysis for Mine Extension and Power Supply Infrastructure projects.

Project Director Development and delivery of comprehensive HSE Risk Management Plan for Coal Handling and Preparation Plant (CHPP) project.

Principal Consultant Development of Asbestos Management Plan to identify, segregate and manage lawful disposal of asbestos containing materials (ACM) and validation of ground materials.

Townsville Port Authority (QLD): Port of Townsville Extension Project (2012)
Principal Consultant Development of EIS and risk management plans for the expansion project regarding OHS and Hazard Management; Security; and Emergency Response.
Lend Lease Barangaroo and Wollongong Port Authority Asbestos Management Plan for Validation and Re-Use of Ground Materials (2012)
Principal Consultant
Development of Asbestos Management Plan to identify, segregate and manage lawful disposal of asbestos containing materials (ACM) and validation of ground materials for re-use.

Principal Consultant
Advise on structure and content of OHS Management System documentation.

Principal Consultant
Provide review of SafetyMan (Defence OHS-MS) Plant and Structures policy, procedures and forms to conform with Commonwealth WHS legislation requirements.

Principal Consultant
Audit and consultancy advice on WHS legislative compliance requirements for Australian Defence Organisation (ADO) estate, property and plant.

Principal Consultant
Development and delivery of comprehensive Environmental Management Plan for the Gas Storage Facility Construction project.

Principal Consultant/Project Manager
Consultancy services to AsA radar installation across Australian mainland, Norfolk and Christmas Islands.

Principal Consultant
Consultancy services to Arrow pipeline and storage installation, Queensland.

NSW Police - Stakeholder Hazardous Material Consultation Program (2011)
Project Director / Principal Consultant

Defence: Estate/Property Hazardous Material Management Program (2011)
Project Director
Management of client and client’s agent project management and issue management.

Caterpillar (Bucyrus)/Vale Coal Australia Excavator Build Project (2010)
Project Director / Principal Consultant
Development and delivery of comprehensive HSE Risk Management Plan for build projects.

OHS and The Ageing Workforce in Coal Mining (2003-2004)
Project Manager/Principal Research Consultant
The NSW Coal Industry is faced with a reduction in employment numbers coinciding with fewer young people joining the industry and existing employees aging. The research suggests a need for the industry to act now to address the issue and to look beyond the physical ability of workers to issues such as work transition programs and “all of work life” health initiatives.

Project Manager/Principal Research Consultant
This project investigated ergonomic and human factors associated with two types of estuarine oyster farming (a) seafood production (b) pearl production. The study found significant physical demands associated with gross manual handling, repetitive work and fine motor/precision work requirements.

Longitudinal Analysis of Noise Induced Hearing Loss Trends in the NSW Coal Industry. (University of Newcastle, 2000-2004)
Project Manager/Principal Research Consultant
Project Summary: The aim of this research project is to investigate trends associated with noise induced hearing loss in the New South Wales coal industry during the period, 1989 to 2000.

Principal Occupational Health and Safety
Numerous and varied roles and clients. Development, Implementation, Monitoring and Auditing of OHS and Environmental Management Systems. Lead Auditor for both OHSMS and EMS. Services spanning all industry and private and public sectors.

Framework for Developing and Implementing Noise Management Programs at Mining and Quarry Sites in South Australia (1997)
Project Manager/Principal Researcher
Noise exposure constitutes the most prevalent occupational hazard affecting Australian mining and quarrying workers. This project produced a framework for developing and implementing a noise management program at mining and quarrying sites within South Australia.

An Ergonomic Assessment of the Worker, Equipment and Animal Interactions When Using Mechanical Aids for Sheep Shearing and Crutching. (WorkCover NSW 1996/97)
Project Director/Researcher
To reduce the level of injury among workers who operate, and will operate, new and emerging technologies for the shearing and crutching of sheep. This project published a research report to benefit and improve ergonomics in the agriculture sector.
Effectiveness of Attenuation Treatments in Underground Coal Mining (1995/97)  
Project Manager/Research Team Coordinator  
An investigation of the degradation and deterioration of noise absorption treatments used extensively in underground coal mining operations. The study aims to review the condition of in-situ absorption noise treatments fitted to underground coal mining equipment.

Noise Management for Coal Mine Sites (1995/96)  
Project Manager/Principal Researcher  
A collaborative research activity involving VIOOSH Australia and the NSW Joint Coal Board to develop and publish an Industry Code of Practice for Noise Management at Coal Mine Sites.

Project Coordinator/Auditor  
Environmental Impact Assessment to support the company’s application to extend and develop its mineral lease. Environmental aspects of noise, blasting and vibration considered and assessed. Community consultation and field survey assessment, analysis and reporting.

Project Manager/Principal Researcher  
A research needs analysis based on OHS performance as measured by the compensation claims experience of the Australian Black Coal Industry. The study aimed to identify research trends, monitor and assess injury and disease prevalence and make recommendations to the industry as to priority topics for future research activities.

Project Coordinator/Auditor  

Project Content Adviser/Lecturer  
A joint training initiative for employee representatives, front line supervisors and engineering personnel. Individual enterprise projects sponsored by: Bonlac Foods; BHP Collieries; Comsteel; Australian Automotive Air; Queensland Alumina.

South Blackwater Coal – OHS & Environmental Management Systems Audit (1993-95)  
Project Coordinator/Auditor  
Audit and review of the OHS and Environmental Management Systems of South Blackwater Mine operations in Central Queensland. The scope of the project encompassed open-cut and underground mining.

A Database of Noise Control Solutions in the Mining Industry (1991-92)  
Project Manager/Research Team Coordinator /Publisher  
A research initiative sponsored by Worksafe Australia aimed at providing a noise control resource to the mining industry. Mining operations were visited in Queensland, New South Wales, Victoria, Tasmania, South Australia and Western Australia. Examples of noise control methods for mining equipment are documented and have been published in a report for use by members of the mining community.

S.H.A.R.E. Phase III (1990-92)  
Project Coordinator/Principal Researcher  
A research project sponsored by the Victorian Occupational Health and Safety Commission to collect and disseminate simple, cost-effective solutions to occupational health and safety problems. A database of 700 solutions has been produced covering topics including noise, manual handling, machine guarding, airborne contaminants and chemicals.

Hellyer Mine Tasmania – OHS & Environmental Management Systems Audit (1990-91)  
Project Coordinator/Auditor  
Audit and review of the OHS and Environmental Management Systems of Hellyer Mine operations in North Western Tasmania. The scope of the project encompassed underground mining, silver/lead/zinc (including gold/copper) processing, and mineral concentrate handling and transport. Environmental aspects included ground contamination, natural water and recycled water quality, dust, noise, hydrocarbon (fuel oils and lubricants) and remediation works.
Appendix B

DP&I Approval of Audit Team
Appendix B  DP&I Approval of Audit Team
Allied Mills, Picton (DA-318-12-2004-i)
Consultant Endorsement - Independent Environment Audit

Dear Mr Maher,

I refer to your email correspondence on 26 September 2013 in relation to the Independent Environmental Audit (IEA) required under condition 3.3 of the Minister’s consent for the above development.

The Department understands that a team led by Ms Sharmin Lubonski at AECOM was proposed to undertake the IEA. However, due to unforeseen circumstances Ms Lubonski is now unable to undertake this work. The Department is satisfied Mr Thomas Mitchell is qualified to lead the audit in place of Ms Lubonski. This approval is conditional upon his independence from the project.

Should you have any enquiries, please contact Kerry Hamann on the above referenced details.

Yours sincerely

Chris Ritchie
Manager – Industry
Industry, Social Projects and Key Sites
As the Director-General’s nominee

1/10/13
Appendix C

Audit Meeting Agenda
Appendix C  Audit Meeting Agenda
# Meeting Agenda

**Subject**  
Allied Mills Picton Independent Environmental Audit

**Venue**  
Allied Mills Picton office

**Participants**  
Thomas Mitchell, Jessica Miller, Steve Bower, Maria Hooker, Jane Tulloch

**File/Ref No.**  
60308047

**Date**  
23 October 2013

**Distribution**  
As above

**Time**  
9:00 am - 3:00 pm

## Day 1 – Wednesday 23 October 2013

<table>
<thead>
<tr>
<th>No</th>
<th>Content</th>
<th>Time</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>• Site Inductions</td>
<td>9:00</td>
<td>Site Office</td>
</tr>
<tr>
<td></td>
<td>• Introductions &amp; Audit Purpose</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>• General environmental site inspection</td>
<td>10:00</td>
<td>In field</td>
</tr>
<tr>
<td></td>
<td>Lunch</td>
<td>12:00</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>• Review of Development Consent, Environmental Protection Licence and Environmental Impact Statement and review of documentary evidence.</td>
<td>13:00</td>
<td>Site Office</td>
</tr>
<tr>
<td></td>
<td>Day End</td>
<td>15:00</td>
<td></td>
</tr>
</tbody>
</table>
Appendix D

Audit Protocol: Development Consent DA-318-12-2004-i (as modified)
Appendix D  Audit Protocol: Development Consent DA-318-12-2004-i (as modified)
<table>
<thead>
<tr>
<th>Reference</th>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1(a) Development Application DA-318-12-2004-i lodged with the Department of Infrastructure, Planning and Natural Resources on 20 December 2004, as readied by Mod 51-6-2007 and DA-318-12-2004 Mod 2.</td>
<td>Apart from a few discrete non-compliances, the Site has been operated largely in accordance with the Environmental Impact Statement, ISS for Grain Milling Facility, Picton Road, Maldon (PB, 2004) and the relevant modifications during the audit period.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(b) The Environmental Impact Statement, ISS for Grain Milling Facility, Picton Road, Maldon, prepared by Kellogg Brown and Root Pty Ltd, dated 29 December 2004.</td>
<td>Apart from a few discrete non-compliances, the Site has been operated largely in accordance with the Environmental Impact Statement, ISS for Grain Milling Facility, Picton Road, Maldon (PB, 2004) during the audit period.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(c) Additional information relating to air quality, traffic, waste water, visual amenity impacts and responding to issues raised in submissions prepared by Kellogg Brown and Root Pty Ltd, including the Visual Assessment: Additional information report prepared by Garry Stanley and dated March 2004, all submitted to the Department on 12 April 2005;</td>
<td>Section 1.5 of the OEMP specifies that obligations and intercepts outlined in these documents have been incorporated into the OEMP.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(d) Additional information relating to construction noise prepared by Heggies Australia and dated 26 April 2005;</td>
<td>This relates to construction noise and vibration. Recommendations were incorporated into the OEMP (John Holland, July 2005) for the project.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(e) Additional information relating to operational noise prepared by Heggies Australia and dated 10 June 2005; and</td>
<td>This information relates to the relocation of the amenity building. Refer to audit findings in 1.1(a) above.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(f) Environmental Impact Statement, EIS for Grain Milling Facility, Picton Road, Maldon (PB, 2004) prepared by KBR, dated 22 December 2004; and</td>
<td>This information relates to the relocation of the rail siding. Additional requirements were incorporated into the conditions of consent. Refer to 1.1(a) above.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.1(g) Mod 51-6-2007, prepared by KBR, dated 30 May 2007;</td>
<td>This modification relates to the rail siding. Additional requirements were incorporated into the conditions of consent. Refer to 1.1(a) above.</td>
<td>Not Triggered</td>
<td></td>
</tr>
<tr>
<td>1.1(h) DA-318-12 Mod 2, prepared by KBR, dated 17 October 2007; and</td>
<td>This modification relates to the relocation of the rail siding. Additional requirements were incorporated into the conditions of consent. Refer to 1.1(a) above.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.2 The condition of this consent.</td>
<td>Not Triggered</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) the conditions of this consent and any document listed from condition 1.1(a) to 1.1(h) inclusive, and the conditions of this consent shall prevail to the extent of the inconsistency;</td>
<td>In the event of an inconsistency between:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) any document listed from condition 1.1(a) to 1.1(h) inclusive, and any other document listed from condition 1.1(a) to 1.1(h) inclusive, the most recent document shall prevail to the extent of the inconsistency.</td>
<td>The conditions of this consent shall prevail to the extent of the inconsistency.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.3 The Applicant shall ensure that all licenses, permits and approvals are obtained and maintained as required throughout the life of the development.</td>
<td>The audit that was not required a finding to be made on this point.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.4 The applicant shall carry out the development generally in accordance with:</td>
<td>This has not been required during the audit period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Development Application DA-318-12-2004-i, lodged with the Department of Infrastructure, Planning and Natural Resources on 20 December 2004, as readied by Mod 51-6-2007 and DA-318-12-2004 Mod 2.</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) The Environmental Impact Statement, ISS for Grain Milling Facility, Picton Road, Maldon, prepared by Kellogg Brown and Root Pty Ltd, dated 29 December 2004.</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Additional information relating to air quality, traffic, waste water, visual amenity impacts and responding to issues raised in submissions prepared by Kellogg Brown and Root Pty Ltd, including the Visual Assessment: Additional information report prepared by Garry Stanley and dated March 2004, all submitted to the Department on 12 April 2005;</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Additional information relating to construction noise prepared by Heggies Australia and dated 26 April 2005;</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Additional information relating to operational noise prepared by Heggies Australia and dated 10 June 2005;</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>f) Environmental Impact Statement, EIS for Grain Milling Facility, Picton Road, Maldon (PB, 2004) prepared by KBR, dated 22 December 2004; and</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>g) Mod 51-6-2007, prepared by KBR, dated 30 May 2007;</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>h) DA-318-12 Mod 2, prepared by KBR, dated 17 October 2007; and</td>
<td>Complies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.5 Prior to each of the events listed from a) to c) below, or within such period otherwise agreed by the Director-General, the Applicant shall certify in writing to the satisfaction of the Director-General, that it has complied with all conditions of this consent applicable prior to that event. Where an event is to be undertaken in stages, the Applicant may, subject to the agreement of the Director-General, stage the submission of compliance certification consistent with the staging of activities relating to that event.</td>
<td>The auditors viewed a copy of the Allied Mills Pre-Construction Compliance Report (KBR, November 2006), which demonstrated compliance with conditions relating to a) and b) of this condition. The auditors also viewed letters to DP&amp;I (dated 22 November 2006 and 20 March 2007) submitting the report and responding to the comments. The auditors did not view any response from OIPF about this report.</td>
<td>Not Triggered</td>
<td></td>
</tr>
<tr>
<td>a) commencement of any physical works on the site;</td>
<td>The auditors viewed a copy of the Pre-Operation Compliance Report (PB, December 2008), and a copy of a letter from OIPF (dated 24 February 2009) responding to the submission of the Pre-Operation Compliance Report and approving commencement of operations.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) commencement of construction of the development;</td>
<td>This has not been required during the audit period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) commencement of operation of the development.</td>
<td>This has not been required during the audit period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.6 The conditions that relate to the implementation of the amenity or health or safety to public infrastructure.</td>
<td>The auditors viewed evidence of Allied Mills responding to additional requests by OIPF in relation to compliance with consent conditions (for example, additional noise measures implemented).</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>1.8 The Applicant shall repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development.</td>
<td>This has not been required during the audit period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.9 The Applicant shall upgrade the Picton Water Meter to ensure supply of water to the site, in accordance with the requirements specified by the Sydney Water Corporation.</td>
<td>The auditors viewed evidence that these upgrades were completed as per the requirements.</td>
<td>Complies</td>
<td></td>
</tr>
</tbody>
</table>
Construction Noise and Vibration

Except as permitted by condition 2.2, the Applicant shall undertake all construction activities associated with the development that would generate an audible noise at any residential premises between the following hours:
(a) 7:00 am to 6:00 pm, Mondays to Fridays; inclusive;
(b) 7:00 am to 9:00 pm on Saturdays; and
(c) at no time on Sundays or public holidays.

Reference Requirement Evidence Audit Finding

2. ENVIRONMENTAL PERFORMANCE

1. General

Reference Requirement Evidence Audit Finding

2.4

Noise Impacts

The Environmental Control Plan (Greenfield Mill - Point Noorina Noise and Vibration Control (John Holland, October 2005)) sets out the requirements for any noise-related works. John Holland was the contractor responsible for implementing these measures.

2.3

Preparation Noise

The Applicant shall design, construct, operate and maintain the development to ensure that the noise contributions from the development do not exceed the maximum allowable noise contribution limits specified in Table 1, of those locations and during those periods indicated. The maximum allowable noise contribution limits apply under meteorological conditions of:
(a) wind speeds up to 3 m/s at 10 metres above ground level, or
(b) temperature inversion conditions of up to 3°C/100 m and wind speeds up to 2 m/s at 10 metres above ground level.

Table 1 - Maximum Allowable Noise Contributions

<table>
<thead>
<tr>
<th>Day/Time</th>
<th>Level (L_{day})</th>
<th>Level (L_{night})</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location 1</td>
<td>52</td>
<td>47</td>
</tr>
<tr>
<td>Location 2</td>
<td>51</td>
<td>47</td>
</tr>
<tr>
<td>Location 3</td>
<td>50</td>
<td>47</td>
</tr>
<tr>
<td>Location 4</td>
<td>50</td>
<td>47</td>
</tr>
<tr>
<td>Location 5</td>
<td>50</td>
<td>47</td>
</tr>
<tr>
<td>Location 6</td>
<td>50</td>
<td>47</td>
</tr>
</tbody>
</table>

Noise monitoring undertaken (reports dated 19 August 2009, 25 March 2010 and 31 October 2010) indicated that the noise levels at Location 1 during the evening and at locations during the night-time. Further monitoring was undertaken (report dated 31 October 2013) and also included exceedances at Location 1 during the evening, and at Locations 1-5 during the night-time. The exceedances were attributed to the cumulative noise impacts of the construction works.

The report concluded that additional noise control measures at the site were not necessary as no significant benefit would be gained (given the current ambient noise levels from other noise sources largely exceeding the Allied Mills contribution).

2.2

Screening of the Development

Landscape Treatments L1 and L2 (as specified in section 8.5.4 of the EIS) along the boundaries of the site shall be implemented during the first stage of construction works, and prior to the commencement of any building works for the site. The trees and shrubs specified to be used in Landscape Treatments L1 and L2 shall be determined in consultation with Council.

The Environmental Control Plan (John Holland, July 2006) noted that no complaints regarding lighting have been received during the audit period.

2.1

Lighting

During the site visit the auditors observed that lighting was implemented and was in good condition.

The Engineering and Technical Services Department (CMEP (John Holland, July 2006)) stated that additional attenuation to the exhaust fans detailed in the document listed under condition 1.1f).

2.0 of the Allied Mills Pre-Construction Compliance Report (November 2006), confirming that the lighting design complied with AS3004.2 and AS2207. No complaints regarding lighting have been received during the audit period.

Auditor Report

Appendix D - Audit Protocol Development Consent DA 318-12-2004-ii DRAFT

Recommendation Made

DRAFT
2.18 All works within protected waters are to be monitored after each storm event. If there are signs of erosion or instability, stabilisation works shall be undertaken in accordance with DWE’s requirements.

2.19 The Applicants shall establish two Riparian Zones at the site, in accordance with the following requirements:

(a) Riparian Zone A shall be a minimum of 40 metres from the top of each bank of the major tributary of Carriage Creek located in the north western portion of the site (including the reservoir). The Riparian Zone A shall be measured horizontally landward from the top of the bank and at right angles to the alignment of the bank, including banks and any other riparian zones, unless otherwise approved by DWE; and

(b) Riparian Zone B shall be a total width of no less than 10 metres for the full length of the tributary, excluding the existing sediments and the streambed cut-offs that runs through the centre of the site into the central dam.

Following completion of bank works at the site, a surveyed report must undertake a survey that clearly shows the location and extent of the Riparian Zones, to the satisfaction of DWE.

2.20 Unless otherwise agreed with DWE, the restored Riparian Zones:

(a) shall be fully structurally and consist of a diverse range of native plant species and communities that simulate the original natural vegetation; and

(b) shall have a vegetated buffer zone of at least 10 metres beyond any disturbed areas in the Riparian Zone (if the existing vegetation is significantly degraded or is likely to give rise to weed invasion);

(c) shall have plant densities as listed below, unless otherwise detailed in the Vegetation Management Plan:

- Riparian Zone A: At least 1 tree or 1 shrub (in approximately equal numbers) alternately planted at 1 plant per square metre in addition, groundcover plants at 4 plants per square metre.

- Riparian Zone B (Brown): Native grasses only required to the outside edge of Riparian Zone A, and non-native grass species permitted in riparian areas.

- The Reservoir: Within the reservoir, and below the contour equal to the broad crest level of the reservoir, macrophytes are to be densely planted to assist in water quality polishing.

2.21 The nature and function of soil protection measures shall meet the requirements of DWE. These measures are necessary to prevent soil erosion and to meet the constructional requirements specified in condition 2.18. Where appropriate, these measures will be implemented prior to commencement of any other construction works at the site. During the site visit the auditors observed ground control measures were managed in accordance with the CEMP, specifically the Environmental Control Plan Greenfield Mill - Picton Site and Water Management (John Holland, October 2006).

2.22 The surface of any landfished areas is to be controlled at Riparian Zones shall be progressively graded to a smooth and even slope free from holes or ripples. Bauer slopes shall not be steeper than grade of 1:13, unless otherwise agreed by DWE.

During the site visit the auditors observed that the established areas were in good condition, with no deviation from the initial plan. Interviews with Allied Mills personnel confirmed that OEH has signed off on these riparian restoration works as having been completed satisfactorily.

DRAFT

Appendix C - Audit Protocol Development Consent DA 318-12-2004-i DRAFT
2.23 Rehabilitation: Maintaining the Riparian Zones
Prior to the commencement of any construction activities, the Applicant shall prepare and submit to the Environmental Control Plan Greenfield Mill - Picton a Vegetation Management Plan in accordance with the Department's guidelines for the preparation of a Vegetation Management Plan. The Plan shall include drawings that clearly show the approved extent of the Riparian Zones, address all matters relating to Riparian Zone protection, including vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species, reto the area to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the Department is to be advised of the person responsible for any weed or vegetative propagation prior to the commencement of the propagation.

This was confirmed within section 2.0 of the Allied Mills Pre-Construction Compliance Report (2008, November 2006) submitted to the OPAL which states that the Vegetation Management Plan Grain Milling Facility, Picton Road Maldon (Total Earth Care, 28 June 2006) was prepared in agreement with the Department of Natural Resources (DNR) and included a copy of the VMP at Appendix D. It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operational phase. The VMP should then be updated to reflect the amendments and outline any maintenance required.

2.24 The rehabilitated Riparian Zone shall be maintained and monitored for a period of at least two years after final planting, or where other rehabilitation methods are used, two years after plants are established, removal of rootstocks, and site rehabilitation, establishment methods, performance monitoring and any other requirements necessary for achieving successful vegetation establishment.

Yes, evidence was produced to show that these monitoring reports were prepared or submitted to DNR. It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operational phase.

2.25 Immediately after completion of initial planting and every six months thereafter for the duration of the maintenance period the Applicant shall submit to DNR a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. Within the monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings), have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.

No. The Applicant has not submitted any copies of the monitoring reports.

2.26 Prior to carrying out any construction works associated with the rail siding, the Applicant shall:

- a) obtain a permit for the proposed construction works under Part 3A of the Rivers and Foreshore Improvement Act 1948;
- b) fully establish and secure Heritage Conservation Zone 2 incorporating the area surrounding a protected Aboriginal site (letter from DWE dated 19 September 2007).

The Applicant reviewed evidence that the 3A permit was amended to allow for the rail siding construction works (letter from DWE dated 19 September 2007).

2.27 Prior to the commencement of any construction activities, the Applicant shall obtain consent under Section 90 of the National Parks and Wildlife Act 1974 to destroy and salvage the following Aboriginal heritage items (as specified in the document listed under condition 1.1.34):

- AMP IF 4, being an isolated find on the south-western side of the dam; and
- AMP - OCS 1, being a scatter of artifacts on the south-eastern fringe of the dam.

The Applicant reviewed copies of the section 90 consent (Appendix D) dated 15 August 2008.

2.28 Prior to the commencement of any construction activities, the Applicant shall establish and fully secure the site as a biological-archaeological deposit (PAD) in the vicinity of AMP IF 4 and OCS 1 as shown in Figure 1 of the document listed under condition 1.1.34. Prior to the commencement of any construction activities in the PAD area, the Applicant shall submit representations to the Aboriginal community to undertake a salvage excavation of the area. The Applicant shall not commence construction activities in the PAD area until the cultural salvage excavation has been completed to the satisfaction of the DECC.

Section 2.3 of the Pre-Construction Compliance Report (2008, November 2006) and the Final Aboriginal Cultural Salvage Excavation report (Austral Archaeology, June 2007) confirm that the Aboriginal community undertook a cultural salvage excavation of the area and signed a letter confirming completion.

2.29 Prior to the commencement of any construction activities, the Applicant shall:

- a) fully establish and secure Heritage Conservation Zone 1 in the north-western end of the site (as shown in Figure 1 of the document listed under condition 1.1.34);
- b) fully establish and secure Heritage Conservation Zone 2 incorporating the area surrounding a protected Aboriginal site (AMP ST 1) with a depth of 30 metres. The Zone shall be encircled by a permanent fence that restricts access into the Zone for the duration of the development (including construction activities); and
- c) implement suitable drainage measures in the vicinity of Heritage Conservation Zone 2 to ensure flooding or other impacts do not occur in a manner which would affect the root zone of the trees.

This was observed by the auditors during the site visit.

2.30 The Applicant shall manage the heritage zones and managed generally in accordance with Proposed Allied Mills Flour Mill, Picton, NSW Aboriginal Heritage Management Plan (Total Earth Care, April 2005). During construction of the heritage zones were managed through the Environmental Control Plan Greenfield Mill - Picton Riparian Works Plan (John Holland, July 2005).

The Applicant shall manage the heritage conservation zones in accordance with the management measures specified in the approved Cultural Heritage Management Plan.

This was confirmed within reports supplied to the auditors and the Department of Natural Resources (DNR) and included a copy of the VMP at Appendix D. It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operational phase.

2.31 The Applicant shall maintain any fencing in the carrying out of the development.

This was confirmed within section 2.0 of the Allied Mills Pre-Construction Compliance Report (2008, November 2006) submitted to the OPAL which states that the Vegetation Management Plan Grain Milling Facility, Picton Road Maldon (Total Earth Care, 28 June 2006) was prepared in agreement with the Department of Natural Resources (DNR) and included a copy of the VMP at Appendix D. It is recommended that Allied Mills consider an application to modify this condition to clarify the maintenance requirements during the (post-construction) operational phase. The VMP should then be updated to reflect the amendments and outline any maintenance required.

2.32 Where practicable, vegetation that is cleared shall be retained for use as native nursery in landscaped areas. Any vegetation or other material removed from the areas of operations shall be disposed of in a suitable manner where the material cannot be re-located as part of the development. Cleared vegetation must not be burned at the site.

This is stated in the Environmental Control Plan Greenfield Mill - Picton, Vegetation and Flora Management Plan (John Holland, July 2005).

Appendix D - Audit Protocol Development Consent DA 318-12-2004-i DRAFT
### Traffic and Transport Impacts

#### General

<table>
<thead>
<tr>
<th>Reference</th>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.33</td>
<td>The applicant shall obtain a written approval from Council with RTA concurrence for works within the road reserve of Picton Road.</td>
<td>The auditors viewed evidence that the approval was obtained.</td>
<td>Complete</td>
</tr>
<tr>
<td>2.34</td>
<td>Vehicle access to the site shall be via a single entry point from Picton Road, and vehicles shall only enter and leave the site in a forward direction.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.35</td>
<td>Prior to the commencement of site works, the applicant shall provide written notification to the Director-General for Road Traffic Noise of the proposed road works.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Road Traffic Noise

- Prior to the commencement of any roadworks associated with the development, the applicant shall apply for a Road Occupancy Licence from the RTA. The application shall include a Traffic Management Plan, prepared and submitted in accordance with the RTA’s requirements. Should the Plan require a reduction of the speed limit, a Direction to Reduce would also be required.

- Design of internal vehicle movements, car parking and pedestrian facilities shall be in accordance with AUSTROADS standards and the RTA’s requirements.

### Air Quality Impacts

- The applicant shall design, construct, operate and maintain the development in a manner that minimizes dust emissions from the site.

### Noise Substations

- The applicant shall comply with the Noise Substation Board under the Mine Subsidence Compensation Act 2002.

### Waste Generation and Management

- The applicant shall not cause, permit or allow any waste generated by the development or from outside the site to be received at the site storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under Protection of the Environment Operations Act 1997. This condition applies in wastes for which a licence under the Protection of the Environment Operations Act 1997 is required.
DEVELOPMENT CONSENT DA S04/00880

Reference: DEVELOPMENT CONSENT DA S04/00880

Evidence: 

Audit Finding: 

3.1 Within 90 days of the commencement of operation of the development, or as may be agreed by the Director-General, and during a period in which the development is operating under design speed and normal operating conditions, the Applicant shall undertake an audit to confirm the noise emission performance of the development. The program shall meet any requirements of the DECC, and shall include: a) noise monitoring, consistent with the NSW Industrial Noise Policy (DECC, 2000), to assess compliance with condition 2.3 of this consent; b) methodologies, location and frequency for noise monitoring; c) identification of monitoring sites at which pre and post-development noise levels can be recorded; and d) details of any actions in the Complaints Register (condition 4.3 of this consent) relating to noise impacts.

The Noise Monitoring and Air Quality Verification Report (Heggies, 19 August 2009) was submitted to the DECC. The auditors could not confirm whether this noise monitoring was undertaken within the required timeframe. However, the auditors viewed a letter from DP&I (dated 22 October 2009) in response to the submission of this report.

Sampling was undertaken from 30 June to 10 July 2009 and the report was due by 7 August 2009. The report submitted to DP&I is dated 19 August 2009, so was twenty days late. The letter from DP&I (dated 22 October 2009) requested additional information related to exceedance of noise criteria. In response, additional monitoring was undertaken (Verification of Mill/Noise Emission (Heggies, 23 March 2010)). This report stated that a Noise Management Plan had been prepared in a letter dated 26 December 2009. The additional monitoring was the first stage of the Plan. Further noise monitoring was undertaken (AECOM, October 2013) and exceedances were indicated, however the report concluded that additional noise controls would not provide significant benefit.

Not Compliant

3.2 Within three months of the commencement of operations of the development, or as otherwise agreed with the DECC and the Director-General, the Applicant shall sample and analyse each of the categories of dust to confirm the emission of particulate matter from controlled emissions. Sampling shall comply with the DECC approved method TM 1.1, unless otherwise agreed with the DECC. When the particulate concentration is greater than those listed below, the corresponding sampling frequency shall be:

- 5 mg/m^3 for all emission points except those for the screening process; and
- 10 mg/m^3 for the screening process.

No Action was taken to implement remedial measures to be determined to reduce particulate matter to levels required by condition 4.3 of this consent. The Proposal Register shall detail the proposed remedial measures, with a timetable for implementation, to be approved by the Director-General and the DECC.

The VMP be provided on the website, as well as the AEMR and in the Complaints Register. It is recommended that the Consent, EPL, OEMP and any other documents are made available on the website.

A website does exist for the site however no documents are made available on the website.

Not Compliant - Recommendation Made

3.3 Noise monitoring data after the commencement of operation of the development, and every three years thereafter, or as otherwise agreed by the DECC and the Director-General, the Applicant shall sample and analyse each of the categories of noise to confirm the emission of noise from controlled emissions. Sampling shall comply with the DECC approved method TM 1.1, unless otherwise agreed with the DECC. When the noise emission performance is greater than those listed below, the corresponding sampling frequency shall be:

- a) noise monitoring, consistent with the NSW Industrial Noise Policy (DECC, 2000), to assess compliance with condition 2.3 of this consent; b) methodologies, location and frequency for noise monitoring; c) identification of monitoring sites at which pre and post-development noise levels can be recorded; and d) details of any actions in the Complaints Register (condition 4.3 of this consent) relating to noise impacts.

No Action was taken to implement remedial measures to be determined to reduce noise impacts to levels required by condition 2.3 of this consent. The Proposal Register shall detail the proposed remedial measures, with a timetable for implementation, to be approved by the Director-General and the DECC.

Noise monitoring was undertaken on 30 June, 1 July 2009, so was 3 weeks late. No evidence was provided to show that the report was submitted to DECC.

Not Compliant

4.1 Community Information, Consultation and Engagement

4.1 Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request. This shall include provision of all documents at the site for inspection by visitors, and in an appropriate electronic format on the Applicant’s Internet site, within one week.

There is no evidence that an environmental audit was undertaken twelve months after commencement of operation. The process of recording complaints is not evident in the DP&I and Audit Reports, once it are finalized.

Not Compliant - Recommendation Made

Appendix C - Audit Protocol Development Consent DA 010-12-2004-i DRAFT
### 5. COMMUNITY CONCERNS

#### 5.1 The Applicant shall prepare and implement a Construction Environmental Management Plan to address the following environmental performance issues:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
<tr>
<td>b) details of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
<tr>
<td>c) measures to monitor and manage dust emissions</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
<tr>
<td>d) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
<tr>
<td>e) a description of the roles and responsibilities for all relevant employees involved in the construction of the development.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
<tr>
<td>f) complaints handling procedures during construction</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
</tbody>
</table>

#### 5.2 As part of the Construction Environmental Management Plan the Applicant shall prepare and implement the following Management Plans:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
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</tr>
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<td>b) a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
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<td>c) measures to monitor and manage dust emissions</td>
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<tr>
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</tr>
<tr>
<td>e) a description of the roles and responsibilities for all relevant employees involved in the construction of the development.</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
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<td>f) complaints handling procedures during construction</td>
<td>A review of the CEMP was undertaken by the auditors, and it was found to comply with these requirements.</td>
<td>Complies</td>
</tr>
</tbody>
</table>

#### 5.2.1 Construction Environmental Management Plan

- The plan shall be submitted to the approval of the Director-General no later than one month prior to the commencement of construction works for the development, or within such period otherwise agreed by the Director-General.
- Construction works shall not commence until written approval of the Plan has been received from the Director-General.
- The Plan was submitted to the approval of the Director-General.
- The Plan shall address the requirements of the Department, the Australian Rail Track Corporation, Council and the DECC, and shall include, but not necessarily be limited to:
  - details of the community notification measures that have been undertaken prior to construction, and the Management Plans listed under condition 5.2 of this consent.
  - a description of proposed measures to ensure the continued integrity of the culverts under the Great Southern Railway line, including scour protection works on the railway crossing flanking the culverts.
  - a pro-active and reactive strategy for dealing with noise complaints, including how noise notifications or consultations shall be undertaken.
  - a monitoring program during construction works associated with the development.
  - a construction noise management protocol to detail measures to mitigate and manage noise during construction works. The protocol shall be prepared with reference to the Australian Standard AS 2436-1981: Guide to Noise Control on Construction, Maintenance and Demolition Works, and shall include, but not necessarily be limited to:
    - construction noise objectives for each relevant receiver commensurate with the noise limits and noise guidelines set under the consent.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a construction noise management protocol to detail measures to mitigate and manage noise during construction works.
    - a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.
    - a description of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
    - a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.
    - measures to monitor and manage dust emissions.
    - details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
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    - details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
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    - measures to monitor and manage dust emissions.
    - details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
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    - measures to monitor and manage dust emissions.
    - details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
    - a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.
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    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
    - a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.
    - measures to monitor and manage dust emissions.
    - details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
    - a description of the roles and responsibilities for all relevant employees involved in the construction of the development.
    - a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant.
    - a description of all activities to be undertaken that are likely to affect the visual amenity of the area, including all interim activities during construction.
5.3 The Applicant shall prepare and implement an Operation Environmental Management Plan to detail the environmental framework, practices and procedures to be followed during operation of the development. The Plan shall include, but not necessarily be limited to:

5.3(a) a description of all activities and other information that the Applicant is required to fulfil as a condition of the development, including all consents, permits, approvals and consents.

5.3(b) overall environmental policies and principles to be applied to the operation of the development; Section 3.3 of the OEMP fulfils these requirements.

5.3(c) procedures to ensure that reasonable and feasible noise mitigation measures are applied during operation of the development; Table 6-1 of the Noise Management Sub-plan fulfils these requirements.

5.3(d) a system to undertake periodic assessment of Best Available Technically Economically Achievable and Best Management Practices to minimise noise emissions at all times and to seek to achieve noise reduction in accordance with the goal prescribed in condition 2.7.

5.3(e) procedures to generate suitable documentation for environmental reporting, that is, the noise reduction of the noise and noise goals specified under this condition, or best practice noise control operations, are being met.

5.3(f) the Management Plans listed under condition 5.4 of this consent. Appendix A and Appendix E of the OEMP fulfil these requirements.

5.4 The Applicant shall prepare and implement the following Management Plans:

5.4(a) Water Management and Plan to detail measures that will be employed to manage water on the site, to minimise soil erosion and the discharge of sediments and other pollutants to land and/or waters throughout the life of the development. The Plan shall be based on best environmental practice and shall address the requirements of the Department, the Australian Rail Track Company, Council and the DECC. The Plan shall include, but not necessarily be limited to:

5.4(b) Noise Management and Plan to detail measures that will be employed to manage noise during operation of the development. The Plan shall include, but not necessarily be limited to:

5.4(c) Traffic Management Strategy to detail measures required for the management of heavy vehicles to and from the site. The Strategy shall meet the requirements of Council, the RTA, and the DECC. Appendix C of the OEMP provides the Traffic Management Sub-plan.

5.4(d) Monitoring and Management Sub-plan to outline measures to ensure that appropriate development and operation of the site to meet all relevant criteria for the treated effluent for irrigation;

5.4(e) Heritage Management Sub-plan to detail measures to ensure that appropriate development and operation of the site to adequately implement the site. It is recommended that the OEMP is not being adequately implemented at the site. It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the OEMP be kept on site. A copy of the updated OEMP should be submitted to DPA.

5.4(f) Cultural Heritage Management Plan to outline measures to ensure that appropriate development and operation of the site to meet all relevant criteria for the treated effluent for irrigation;

5.4(g) Landscape Management Sub-plan to detail measures to ensure that appropriate development and operation of the site to meet all relevant criteria for the treated effluent for irrigation.
### Appendix D - Audit Protocol Development Consent DA 318-12-2004

#### DEVELOPMENT CONSENT DA 318-12-2004

<table>
<thead>
<tr>
<th>Reference</th>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>3(b) result of consultation with Council and the DECC to determine appropriate species for landscaping on the site and...</td>
<td>Table 4.1 of the Landscape Management Sub-plan provides the flora species and planting rates. This requirement was also discussed in a letter to DP&amp;I dated 6 February 2009 in response to DP&amp;I comments on the draft OEMP.</td>
<td>Complies</td>
<td></td>
</tr>
<tr>
<td>3(c) a program to ensure that all landscaped areas on the site are maintained in a tidy, healthy and weed-free state.</td>
<td>Section 4.2 of the Landscape Management Sub-plan fulfils these requirements.</td>
<td>Complies</td>
<td></td>
</tr>
</tbody>
</table>

#### Section 5.5

Every three years after the commencement of operation of the development, the Applicant shall undertake a formal review of the OEMP required under condition 5.3 of this consent. The review shall ensure that the OEMP is up-to-date and all changes to procedures and practices prior to the review are fully incorporated into the OEMP. The Applicant shall notify the Director-General of the completion of the review, and shall supply a copy of the updated OEMP to the Director-General and any other party upon request.

The OEMP was prepared in February 2009. There is no evidence to indicate that the OEMP has been reviewed since 2009. It is recommended that the OEMP be reviewed, updated and implemented, and a copy of the updated OEMP be kept on site. A copy of the updated OEMP should be submitted to DP&I.

Not Compliant - Recommendation Made
6. ENVIRONMENTAL REPORTING

6.1 The Applicant shall notify the DECC and the Director-General of any incident with actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the DECC and the Director-General within seven days of the date on which the incident occurred. There have been no environmental incidents. Not Triggered

6.2 The Applicant shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 6.1, within such period as the Director-General may require. This has not been required during the audit period. Not Triggered

Note: Condition 6.2 of this consent does not limit or preclude the DECC from requiring any action to address the cause or impact of any incident, in the context of the DECC’s statutory role in relation to the development. This has not been required during the audit period. Not Triggered

6.3 The Applicant shall, throughout the lifetime of the development, prepare and submit for the approval of the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to:

a) details of compliance with the conditions of this consent;
b) a copy of the Complaints Register (refer to condition 4.3 of this consent) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were addressed and resolved;
c) identification of any circumstances in which the environmental impacts and performance of the development during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition 1.1 of this consent, with details of additional mitigation measures applied to the development to address recurrence of these circumstances;
d) results of all environmental monitoring required under the consent and other approvals, including interpretations and discussion by a suitably qualified person; and
e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the development have not been achieved, indicating the reason for failure to meet the goal and the action taken to prevent recurrence of this type of incident.

The Applicant shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the development. The Director-General may require the Applicant to address certain matters in relation to the environmental performance of the development in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Applicant shall make copies of each AEMR available for public inspection on request.

ADMRs have been submitted to date. The first ADMR for the site is currently being prepared. It is recommended that preparation of ADMRs be included as part of Allied Mills’ existing quality system. Not Compliant - Recommendation Made
Appendix E   Audit Protocol: EPL 12498
## Administrative Conditions

### A1 What the licence authorises and regulates

This licence authorises the carrying out of the scheduled activities listed below at the premises. 

<table>
<thead>
<tr>
<th>Activity</th>
<th>Permitted Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture/Processing</td>
<td>50000 T</td>
</tr>
<tr>
<td>General Agriculture Processing</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
- The noise emission limits identified in this licence apply under all meteorological conditions. 
- The noise emission limits are based on the most affected point of the premises.
- The licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, and industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.

### A2 Premises or plant to which this licence applies

This licence applies to the following premises.

<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allied Mills</td>
<td>Picton</td>
</tr>
<tr>
<td>NSW 2571</td>
<td>60308047</td>
</tr>
</tbody>
</table>

### A3 Information supplied to the EPA

This was noted, however the audit did not require a finding to be made on this point.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>A3.1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Limit Conditions

#### 1 Pollution of Waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997. No such breaches of section 120 have occurred during the audit period.

L1.2 This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence. This was noted, however the audit did not require a finding to be made on this point.

#### 2 Waste

L2.1 The licence must not cause, permit or allow any waste generated outside the premises to be disposed at the premises, except as expressly permitted by the licence. Interviews with Allied Mills staff and the site visit conducted by the auditors confirmed that the site continues to be operated in this manner. Complies

L2.2 This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises. This was noted, however the audit did not require a finding to be made on this point. Not Triggered

#### 3 Noise Limits

**L3.1 Operating Noise Limits:**

Maximum allowable noise contribution: As exceedances of these criteria have occurred during the audit period. 

**L3.2 Noise Limits:**

Noise generated from the premises must not exceed the noise limits presented in the table below. No exceedances of these criteria have occurred during the audit period. 

<table>
<thead>
<tr>
<th>Activity</th>
<th>Noise Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day: is defined as the period from 7am to 6pm Mondays to Saturdays and 8am to 6pm Sundays and Public Holidays</td>
<td></td>
</tr>
<tr>
<td>Evening: is defined as the period from 7pm to 10pm Mondays to Saturdays and 8am to 6pm Sundays and Public Holidays</td>
<td></td>
</tr>
<tr>
<td>Night: is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Noise Limit</th>
<th>Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day</td>
<td>61</td>
</tr>
<tr>
<td>Evening</td>
<td>61</td>
</tr>
<tr>
<td>Night</td>
<td>53</td>
</tr>
</tbody>
</table>

Notes:
- The noise emission limits identified in this licence apply under all meteorological conditions except:
  - During rain and wind speeds (at 10m height) greater than 3 m/s; and
  - Under "non-significant weather conditions".

- The noise limits represent the noise contribution from the Allied Mills premises.

- Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy, January 2000).

### Auditing Noise Limits

**L3.3 Noise from the premises:**

Noise from the premises is to be measured at the most affected point or within 30m of the dwelling. This was noted, however the audit did not require a finding to be made on this point.

### Evidence

<table>
<thead>
<tr>
<th>Component</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise</td>
<td></td>
</tr>
</tbody>
</table>

**Note:** Field meteorological indicators for non-significant weather conditions are described in NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.

**Reference:**
- NSW Industrial Noise Policy, January 2000.
**OPERATING CONDITIONS**

- **Activities must be carried out in a competent manner**
  - During the site is undertaken by the auditors, operations at Allied Mills were observed to be undertaken in a competent manner.

- **Maintenance of site and equipment**
  - All plant and equipment installed at the premises or in connection with the licensed activity:
    - must be maintained in a proper and efficient condition; and
    - must be operated in a proper and efficient manner.

**MONITORING AND RECORDING CONDITIONS**

- **Monitoring records**
  - 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.
  - All records required to be kept by this licence must be:
    - kept for at least 4 years after the monitoring or event to which they relate took place; and
    - kept in a legible form.

- **Recording of pollution complaints**
  - The record of a complaint must be made by the licensee in relation to pollution arising from any activity to which this licence applies.
  - The record must be kept for at least 4 years after the complaint was made.

- **Telephone complaints file**
  - 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.

- **Annual return documents**
  - The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:
    - a Statement of Compliance; and
    - a Monitoring and Compliance Summary.
  - The Annual Return must be prepared in respect of each reporting period, except as provided below.

**Compliance**

- **R1.1**
  - Complies

- **CQ.11**
  - Complies

- **CQ.12**
  - Complies

- **CQ.13**
  - Complies

- **CQ.14**
  - Not Compliant

- **CQ.15**
  - Not Compliant

- **CQ.16**
  - Not Compliant

- **CQ.17**
  - Not Compliant

- **CQ.18**
  - Not Compliant
Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act. This has not been required during the audit period.

The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. This has not been required during the audit period.

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 request may require a report which includes any or all of the following information:
- the cause, time and duration of the event;
- the type, volume and concentration of every pollutant discharged as a result of the event;
- 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;
- 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;
- details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- any other relevant matters.

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.

A copy of this licence must be kept at the premises to which the licence applies. An electronic copy of the EPL was viewed by the auditors during the site visit. Complies

The licence must be produced to any authorised officer of the EPA who asks to see it. This was noted, however the audit did not require a finding to be made on this point. Not Triggered

The licence must be available for inspection by any employee or agent of the licensee working at the premises. An electronic copy of the EPL was viewed by the auditors during the site visit. Complies

Completed Pollution Reduction Programs (PRP)

This has been completed, as noted in the EPL itself. Not Triggered
Appendix F

Audit Protocol: *EIS for Grain Milling Facility, Picton Road, Maldon* (KBR, 2004)
Appendix F  Audit Protocol: *EIS for Grain Milling Facility, Picton Road, Maldon* (KBR, 2004)
 ENVIRONMENTAL IMPACT STATEMENT, EIS FOR GRAIN MILLING FACILITY (KBR, 2004)

11. Environmental Mitigation and Management

11.2 Mitigation Measures

11.2.1 Geology and Soils

During Construction
- To prevent contamination of soils, any concrete spill would be broken up and disposed of on-site recycling or local licensed waste management facilities. Any fuel spill on site would be buried and located by the equipment and personnel on site. All spills would be cleaned up, and any materials removed from the site and disposed of to licensed waste disposal facilities. Any necessary reports would be completed and submitted as required.
- To minimise erosion, erosion control through effective soil and surface water management throughout the earthworks program will be required, and can be achieved by the principles outlined in the Bluebook (Landcom 2004). In areas where dispersive soils will be exposed for a significant period of time treatment including the applications of gypsum will be undertaken.
- Elevated water levels will be minimised. To mitigate the impacts of exposure of sodic soils, gypsum will be applied to exposed surfaces during construction and site development phases. Lime stabilisation/modification and or gypsum application requirements for drainage channels and exposed cut faces will be assessed by detailed site investigations prior to and during construction works.
- To counter low phosphorus concentrations and improve fertility for revegetation, consideration should be given to the general application of a fertiliser with a significant proportion of elemental phosphorus.

11.2.2 Salinity

The proposed construction works will be designed and undertaken using the following building techniques to address salinity impact mitigation and ongoing management:
- Provision of a layer of free draining sand or fine gravel beneath building slabs to limit saline water contact with the slab and provide protection to the damp proof membrane;
- Use of a correctly installed damp course and membranes rather than a vapour proof membrane (orange premium and orange super membranes);
- Copper or polyethylene piping for under-slab drinking water services. Unplasticised PVC (UPVC) pipes for waste water;
- A system of groundwater monitoring will be installed and monitored initially at three monthly intervals. The wells will be located within the irrigation area at a general spacing of approximately 50m and downstream of any other water retention structures;
- Regular inspection of the sediment load in drainage channels, basins and the creek will be undertaken;
- During periods of drought special monitoring and maintenance may be required to assess the condition and maintenance requirements of the artificial lines and other facilities.

Construction management strategies
The proposed construction works will be designed and undertaken using the following building techniques to address salinity impact mitigation and ongoing management:
- Provision of a layer of free draining sand or fine gravel beneath building slabs to limit saline water contact with the slab and provide protection to the damp proof membrane;
- Use of a correctly installed damp course and membranes rather than a vapour proof membrane (orange premium and orange super membranes);
- Copper or polyethylene piping for under-slab drinking water services. Unplasticised PVC (UPVC) pipes for waste water;
- A system of groundwater monitoring will be installed and monitored initially at three monthly intervals. The wells will be located within the irrigation area at a general spacing of approximately 50m and downstream of any other water retention structures;
- Regular inspection of the sediment load in drainage channels, basins and the creek will be undertaken;
- During periods of drought special monitoring and maintenance may be required to assess the condition and maintenance requirements of the artificial lines and other facilities.

11.2.3 Hydrology and Water Quality

Construction Phase
Soil and Water Management Plan
A Soil and Water Management Plan (SWMP) would be prepared in accordance with Managing Urban Stormwater: Soils and Construction (EPA, 1997). The plan would include details of erosion control measures to be used during temporary earthworks, sequencing of construction, pollution control measures, details of treatment measures such as flocculation, and management of pollution control works.

The SWMP would also provide details of water washing facilities at the exit site, and dust suppression measures to be employed during dry weather.

The existing larger pond, located north of the proposed mill buildings, would be used as a sedimentation pond during the construction period. It is planned that this pond would be filled at the end of the construction period, to meet Allied Mills’ requirement that there be no standing water near the mill during operation.

A detailed drawing of the sediment basin will incorporate a primary outlet, an emergency spillway, internal buffer gardens and outlet protection to minimise sources.

A detailed drawing of the proposed erosion and sediment control would be prepared before construction, based on the following principles:
- Sediment would be controlled by silt mesh and hay bales to the perimeter of the wash area.
- Water would be controlled so that sediment can be directed to a series of ponds and captured, so that only clean water can pass from the final pond.
- Erosion would be controlled by seeding the newly formed banks and limiting the excavation plant to the main work area in the site.
- Any areas that require quick control would be protected by fine mesh/mattting staked to the bank.
- Runoff protection would be installed at the base of banks until ground cover (grass) had sufficiently established to control erosion.
- Overland flow from areas above the site would be directed to pipelines under the road.

Appendix F - Audit Protocol: EIS for Grain Milling Facility, Picton Road, Maldon (KBR, 2004)
11.2.3 Pollution Control

The spill risk during the construction phase would be minimised by accessing an access road and bunded waste disposal area. Construction of an impervious bunded storage area at this location would minimise the risk of pollution. The area would be drained by an oil/grease separator, which would be sized to contain potential spills. It is envisaged that the drainage system and interceptor at this location would be a permanent pollution control measure.

The construction site would be managed in accordance with the NSW EPA guidelines for construction sites, bunding and spill management.

These requirements are noted in the Environmental Control Plan Greenfield Mill – Picton Soil and Water Management (John Holland, October 2006).

11.2.3 Waste Water

Waste water from washing down would be controlled to bunded areas, to prevent contamination to the surrounding waterways. Waste from these areas would be removed regularly and disposed of to the appropriate areas, as per authorities' standard requirements.

These requirements are noted in the Environmental Control Plan Greenfield Mill – Picton Soil and Water Management (John Holland, October 2006).

11.3.3 Pollution Risk to Loading Areas, Bunded Waste Storage Area and Hazardous Chemical Store

Operational Phase

- The following mitigation measures arising from the Site Pollution Assessment (contained in Volume 2) are proposed as an integral part of the drainage design:
  - A drainage system will be installed at the base of the cut faces to ensure that seepage does not pond at the base of the cuts.
  - The finalised earthworks levels for the proposed development will be graded to a slope of at least 1:3 to prevent ponding of surface water. In low points with a potential to accumulate surface water, subsurface soil drainage will be provided to assist the removal of the surface water.
  - Vehicle movements in unpaved areas of the site will be restricted, particularly during and following wet periods, to prevent compaction of the surface soils. Disturbance of the vegetative cover and development of wheel ruts which may lead to surface ponding.
  - Soak-away pits will not be used for the disposal of any waste water or rainwater run-off at the site.
  - Subsoil drains will be installed in areas where groundwater discharge may occur from the underlying shale or soil profiles, such as retained cut slopes and significant changes in grade.

- The NSW Government’s Rivers and Estuaries Policy, which specifically aims to protect the health of our waterways, requires that the following plans be prepared:
  - A Management Plan for Drainage
  - A Management Plan for Waste Water
  - A Management Plan for the Protection of Vegetation and Fauna

- The concept drainage design is illustrated in Figure 7.5 and would be based on the following principles:
  - The proposed bioswale is a shallow, vegetated depression running parallel to the access road, with a drainage system of bioswales to convey water to the reservoir, resulting in improvements to water quality and ecology.

- The concept design compensates for this approach downstream of the access road, by using a system of bioswales to convey water to the reservoir, resulting in improvements to water quality and ecology.

- Since most watercourses across the site are not 'rivers', flow paths would be modified or re-aligned to avoid infrastructure. Disturbed areas would be revegetated. Extensive native revegetation would be undertaken along the Carriage Creek tributary, as described in Section 10.4

- turf would be kept in the mill buildings close to the load out areas, in a clearly marked location. The spill response protocol includes educating staff on the consequences of pollution, containing spillages as quickly as possible and preventing dust generation.

- The waste storage area would be bunded and the hazardous chemical store located in an isolated position away from the mill buildings. This store would be fitted with a sump of adequate capacity to contain spills. The maintenance workshop would be constructed with an impervious floor and interceptors to contain any spills.

- Environmental Management Plan

An operational Environmental Management Plan (EMP) would be prepared for water quality management, to include:

- a schedule for maintenance of the drainage system, in particular keeping grass short in the vicinity of the mill buildings so that drainage is efficient and standing water is eliminated
- a schedule for maintaining the shut-off gate, cleaning culverts and trash racks
- a program for quarterly sampling from the reservoir to monitor reservoir water quality.

This schedule should start before construction, so that any impacts of construction can be identified.

These requirements are noted in the Environmental Control Plan Greenfield Mill – Picton Soil and Water Management (John Holland, October 2006).

11.4.4 Flora and Fauna

The potential impact on flora and fauna at the site is minimal, provided the following mitigation measure are implemented during construction and incorporated into a detailed design:

- Maintain a buffer zone at least 40 m wide from the top of each bank of the Carriage Creek tributary, wetland and tributaries on the site, to protect the watercourse and its riparian vegetation from the construction and operational impacts of the proposed development.
- Place site fences and sediment ponds around construction areas on the site to prevent runoff of sediment and nutrient-enriched waters into nearby drainage lines and tributary waterways. This would be achieved by installing 50 mm sand drain lines and 0.12 m high sedimentation ponds.

The concept drainage design is illustrated in Figure 7.5 and would be based on the following principles:

- The proposed bioswale is a shallow, vegetated depression running parallel to the access road, with a drainage system of bioswales to convey water to the reservoir, resulting in improvements to water quality and ecology.

- Since most watercourses across the site are not 'rivers', flow paths would be modified or re-aligned to avoid infrastructure. Disturbed areas would be revegetated. Extensive native revegetation would be undertaken along the Carriage Creek tributary, as described in Section 10.4

- turf would be kept in the mill buildings close to the load out areas, in a clearly marked location. The spill response protocol includes educating staff on the consequences of pollution, containing spillages as quickly as possible and preventing dust generation.

- The waste storage area would be bunded and the hazardous chemical store located in an isolated position away from the mill buildings. This store would be fitted with a sump of adequate capacity to contain spills. The maintenance workshop would be constructed with an impervious floor and interceptors to contain any spills.

These requirements are noted in the Environmental Control Plan Greenfield Mill – Picton Soil and Water Management (John Holland, October 2006).

During the site visit the auditors observed correspondence from DPI (dated 04 February 2009) approving the OEMP for the site. However the OEMP was not provided to the auditors and no evidence was provided to indicate that the OEMP is implemented on the site.

It is recommended that an OEMP be prepared and implemented at the site. The OEMP should include the information set out in this commitment.
11.2.9 Socio-Economic Impact

11.2.4 Sewage Treatment

- Before clearing trees or bushes from the site, they should be checked for the presence of active nests of birds (that is, those nests containing fertile eggs or nestlings) and arboreal mammals (such as possums). These plants should not be removed or pruned until animals that are nesting in them have completed their breeding cycle.
- Check trees or bushes for animals before and after felling or pruning. Injured animals should be taken to a local vet, or the local wildlife rescue service should be notified.

11.2.6 Vibration Control

- The contractor would be required to employ the Best Available Technology (BAT) and the Best Management Practices (BMP) to minimise the extent of adverse acoustical and vibration impacts. The contractor would be required to employ the Best Available Technology (BAT) and the Best Management Practices (BMP) to minimise the extent of adverse acoustical and vibration impacts.

11.2.5 Air Quality

- Dust control and erosion control measures. Perimeter landscape planting of a buffer zone would be managed through accepted design and management strategies, such as regulated vegetation for use as native mulch in areas that are proposed for landscaping.
- When dust generation is a problem, the stockpiles should be kept damp by watering until it can be covered.

11.2.7 Waste Management

- The site has a system to manage preventative maintenance of plant and machinery. One air quality monitor is located on the building rooftop to monitor dust emissions.

11.2.7 Waste Management

- The proposed approach to sustainable waste management is outlined in Table 11.1.

<table>
<thead>
<tr>
<th>Waste Type</th>
<th>Waste Management Solution</th>
</tr>
</thead>
</table>
| Organic    | Mixed waste: A dedicated, bonded waste disposal area would be provided for mixed collection housed within the waste management centre on an easily accessible site.
|           | Industrial waste: Mixed waste would be stored in the no-risk disposal unit used for the mixed waste disposal centre. |
|           | Contaminated waste: Mixed waste would be stored within the designated hazardous waste disposal centre. |

11.2.3 Socio-Economic Impact

- Potential negative social or economic impacts that could arise from construction and operation would be managed through accepted design and management strategies, such as regulated hours of operation and erosion control measures. Perimeter landscape planting of a buffer zone along Picton Road would assist in screening the buildings.

11.2.10 Noise

- In order to reduce and mitigate construction noise and vibration, strategies should be consistent with Australian Standard AS 2436-1981 Guide to Noise Control on Construction, Maintenance and Demolition Sites. The contractor would be required to employ the Best Available Technology (BAT) and the Best Management Practices (BMP) to minimise the extent of adverse acoustical and vibration impacts.

- This Melbourne is outlined in the Environmental Control Plan Greenfield A4 - Picton Noise and Vibration Control (John Holland, March 2006). Operational waste management was observed during the site visit. The auditors observed the handling of the different waste streams for recycling or disposal off site.
## ENVIRONMENTAL IMPACT STATEMENT, EIS FOR GRAIN MILLING FACILITY (KBR, 2004)

<table>
<thead>
<tr>
<th>Reference</th>
<th>Requirement</th>
<th>Evidence</th>
<th>Audit Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.2.10</td>
<td>Permissible Hours of Work</td>
<td>Construction would take place during normal daytime construction hours: 7.00 am to 6.00 pm Monday to Friday</td>
<td>These standard construction hours are noted in the Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006)</td>
</tr>
<tr>
<td>11.2.10</td>
<td>Work Practices for 7.00 am Start Time</td>
<td>The contractor and sub-contractors would be required to minimise noise from vehicles on the construction site before the 7.00 pm start time. For example, vehicles would not be queued outside the work site in front of residential receivers before 7.00 am.</td>
<td>The Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006) notes that, where practical, earth mounds or screening would be provided to act as acoustical barriers.</td>
</tr>
<tr>
<td>11.2.10</td>
<td>Permissible Hours of Operation</td>
<td>Particular attention would need to be paid to the hours of use of noisy equipment such as noisemakers and angle grinders. While the general hours of work would be based on normal DEC requirements, noise-intensive activities would be minimised (e.g. during the first hour or so of the daytime construction).</td>
<td>The Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006) notes that noisy activities would be minimised to cause the least disruption to the community.</td>
</tr>
<tr>
<td>11.2.10</td>
<td>Site Noise Planning</td>
<td>Where practical, the layout and positioning of noise-producing plant and activities would be optimised to minimise noise and vibration emission levels, e.g. minimising the occurrence of equipment ‘clustering’.</td>
<td>This is noted in the Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006).</td>
</tr>
<tr>
<td>11.2.10</td>
<td>Site Noise Barriers</td>
<td>Noise barriers, solid hoardings and/or other noise barriers would be erected around critical work areas where they are likely to be effective, to act as acoustical barriers and to minimise noise emissions.</td>
<td>The Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006) notes that, where practical, earth mounds or screening would be provided to act as acoustical barriers.</td>
</tr>
<tr>
<td>11.2.10</td>
<td>Site PA System</td>
<td>Use of a PA system within the construction site would be restricted. If required, PA speakers would be located so that their pointing axis was directed away from the nearest sensitive receivers.</td>
<td>This requirement is noted in the Environmental Control Plan Greenfield Mill - Picton Noise and Vibration Control (John Holland, October 2006).</td>
</tr>
<tr>
<td>11.2.11</td>
<td>Aboriginal Heritage</td>
<td>The use of a PA system is not specifically detailed in the Picton Noise and Vibration Control (John Holland, October 2006) notes that the PA system is not operating in the area and a letter confirming its completion.</td>
<td>The PA system is not operating in the area and a letter confirming its completion.</td>
</tr>
<tr>
<td>11.2.12</td>
<td>Non-Aboriginal Heritage</td>
<td>The auditors also viewed evidence that DP&amp;I had provided an aerial photography of the area and signed a letter confirming its completion.</td>
<td>The Picton Noise and Vibration Control (John Holland, October 2006) notes that the PA system is not operating in the area and a letter confirming its completion.</td>
</tr>
<tr>
<td>11.2.12</td>
<td>Stop Work Provision</td>
<td>All Aboriginal objects and artifacts are protected in New South Wales. If Aboriginal archaeological material or deposits are encountered that are not described in this report, works within a 100-metre radius of the find would cease immediately, to allow a qualified archaeologist to take possession of the find and assist in its removal.</td>
<td>This was noted in the Environmental Control Plan Greenfield Mill - Picton Aboriginal &amp; European Cultural Heritage (John Holland, July 2006).</td>
</tr>
<tr>
<td>11.2.13</td>
<td>Visual Impact</td>
<td>It is imperative that any Aboriginal archaeological testing be conducted before the start of any bulk earth works, to allow time to obtain any permits and consents if in situ artefacts deposits are located.</td>
<td>This was noted in the Environmental Control Plan Greenfield Mill - Picton Aboriginal &amp; European Cultural Heritage (John Holland, July 2006).</td>
</tr>
<tr>
<td>11.2.13</td>
<td>Visual Impact</td>
<td>The construction of the development, combined with perimeter landscape of mounding and planting, would enable the mill to visually recede in the landscape.</td>
<td>This has not been required during the audit period.</td>
</tr>
</tbody>
</table>

### Note

During the site visit the auditors did not observe any disturbance to the culvert. The Environmental Control Plan Greenfield Mill - Picton Aboriginal & European Cultural Heritage (John Holland, July 2006) includes some detail on the control measures used to protect culverts during construction.
### 11.2.14 Traffic and Transport

The provision of a Type C intersection at the junction of the site access road and Picton Road would provide adequate capacity and ensure safe turning conditions for vehicles entering and leaving the site. The expected volume of trips generated by the development during both construction and under normal operating conditions would not require any further upgrade to the existing road network.

During construction, the majority of vehicles are expected to arrive and depart the site outside the peak hours observed on the surrounding road network. Even with the addition of construction-related traffic, the volumes on the main routes leading to the site would be well below those experienced during the peak hours.

The internal layout and parking provisions have been checked for compliance with Wollondilly Council DCP No. 7 and AS 2890.2-2002. All proposed internal vehicle movements and circulation can be adequately accommodated within the site and are free of conflict. During the site visit the auditors observed that the design of the facility has satisfied these requirements.

**Audit Finding:** Complies

### 11.2.15 Hazard and Risk

1. In reviewing the hazard analysis prepared by Allied Mills, KBR has made the following recommendations relating to the proposed facility. These actions relate to the chlorine room.
   1. Undertake a design review of the proposed chlorine room to ensure that, as a minimum, the system meets the requirements of AS 2927-2001. Verify that the ventilation system is sufficiently strong to provide extraction (especially if the door to the chlorine room is open).
   2. Conduct dispersion analyses of possible chlorine releases to ensure that the ground level concentration does not exceed injury thresholds. Re-evaluate the risk and verify that it is in accordance with Allied Mills requirements.
   3. Conduct a Hazard & Operability (HAZOP) review of the proposed chlorine extraction and ventilation system, to ensure that it operates under confirmed chlorine gas detection.

**Evidence:**
- A compliance review of the chlorine room was undertaken and was included in Appendix K of the Allied Mills Pre-Construction Compliance Report (KBR, November 2006).
- A Final Hazard Analysis was undertaken and was included in Appendix K of the Allied Mills Pre-Construction Compliance Report (KBR, November 2006).
- A HAZOP was undertaken and was included in Appendix K of the Allied Mills Pre-Construction Compliance Report (KBR, November 2006).

**Audit Finding:** Complies