

Annual Environmental Management Report 2020

Allied Pinnacle, Kingsgrove

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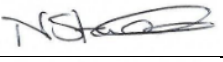
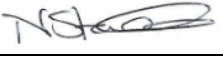
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Project Acronyms

Acronym	Meaning
AEMR	Annual Environmental Management Report
Allied Pinnacle	Allied Pinnacle Pty Ltd
DA	Development Approval
DG	Director General
DMS	Deflagration Management Strategy
DPIE	Department of Planning, Industry and Environment
EMP	Environmental Management Plan
GRC	Georges River Council
IEA	Independent Environmental Audit
IHA	Independent Hazard Audit
LGA	Local Government Area
SEE	Statement of Environmental Effects
TMP	Traffic Management Plan
WHSE	Welfare, Health, Safety and Environment
WMP	Waste Management Plan

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1.0 Introduction

This Annual Environmental Management Report (AEMR) has been prepared by AECOM Australia Pty Ltd. (AECOM) on behalf of Allied Pinnacle Pty Ltd. (Allied Pinnacle). The AEMR provides an overview of environmental activities occurring at the Allied Pinnacle operated Kingsgrove food processing site (the Site) and has been prepared in accordance with Condition 7.1 of the Development Consent DA 143-06-01 (as modified). The Site is located at Lot 1 DP 20025, 4 The Crescent, Kingsgrove, NSW within the Georges River Council (GRC) Local Government Area (LGA) (refer Figure 1). This AEMR covers the period from 01 January 2020 to 31 December 2020.

The food processing plant was originally expanded in 2001 by Goodman Fielder. The expansion involved the construction of new bulk silos and an additional packing line. In 2002 the Site was purchased by Allied Mills who managed all site activities undertaken in the manufacture and distribution of a range of grain-based baking supplies and food ingredients.

In January 2017, Pacific Equity Partners (PEP) Pinnacle Bakery and Integrated Ingredients business announced plans to acquire the Allied Mills business from GrainCorp and Cargill, with the transaction finalised in April 2017. The two businesses have been integrated to form Allied Pinnacle and have a large share in the frozen speciality baking, in-store baking and bakery ingredient market (Pacific Equity Partners, 2017). In 2019 Allied Pinnacle was purchased from PEP by Japan's Nisshin Seifun Group Inc. For the purposes of this report, the business will be referred to as Allied Pinnacle from herein.

This AEMR identifies the environmental standards, performance measures, and statutory requirements which have been established for the Site and considers the environmental performance of site activities against these criteria. This report also provides a summary of results recorded in accordance with the Environmental Management Plan (EMP) and other supporting management plans and strategies produced for the Site. These include:

- Noise Management Strategy
- Air Quality Management Strategy
- Stormwater Management Strategy
- Traffic Management Plan
- Landscape Management Plan
- Waste Management Plan.

Finally, the AEMR identifies all complaints or incidents of non-compliance recorded during the reporting period and summarises the actions taken to resolve such issues. The information contained within this AEMR has been provided by Allied Pinnacle site management personnel.

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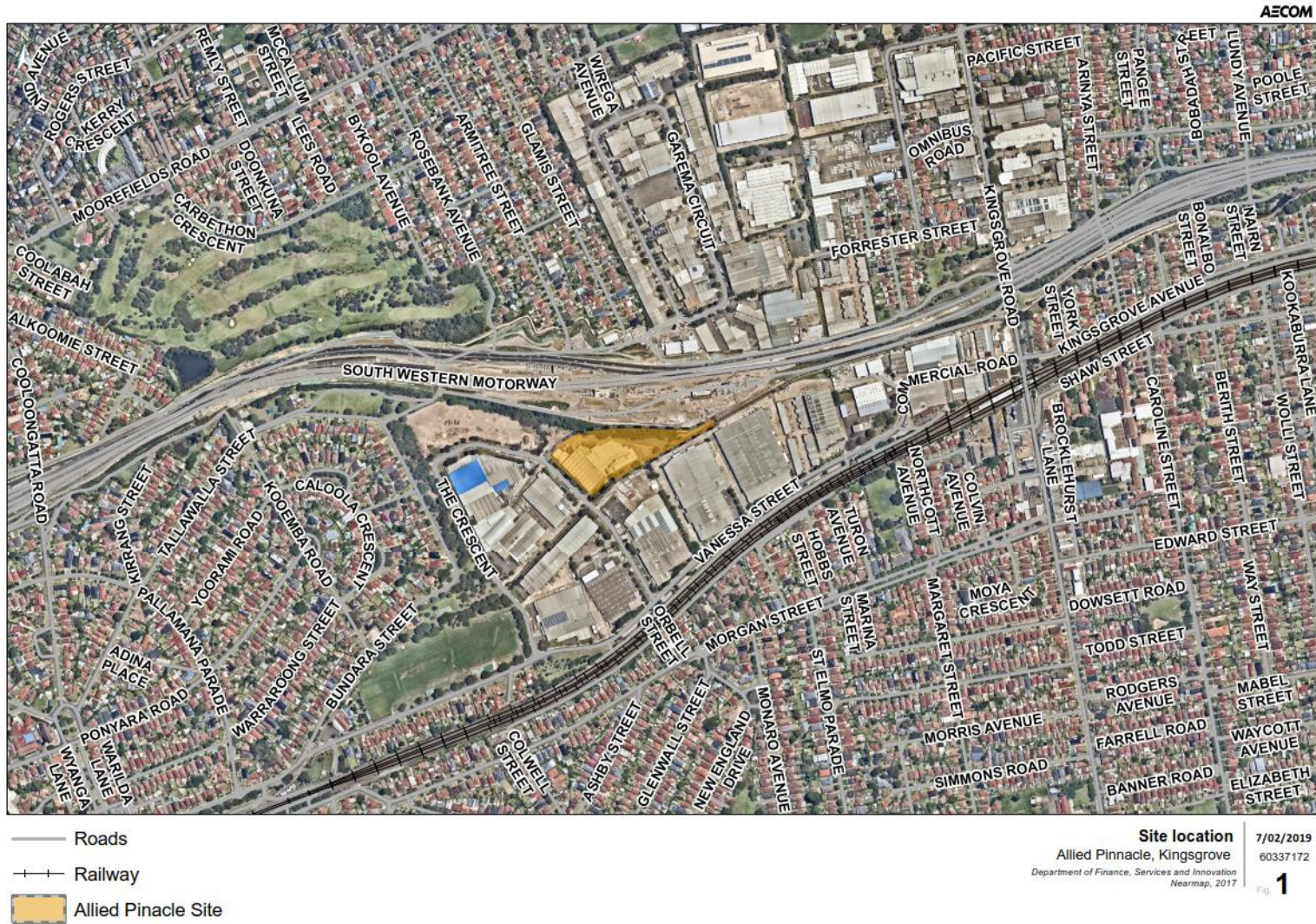


Figure 1 Site Location

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2.0 Terms of Reference

Condition 7.1, Schedule 2 of the Development Consent (DA 143-06-01) requires Allied Pinnacle to prepare and submit an AEMR for the approval of the Director-General and Council. Table 1 details the requirements of Condition 7.1 and cross-references the sections of this AEMR containing the requisite information.

Table 1 Consent Requirements and Cross-reference to AEMR Section where each requirement is addressed

DA Condition	Requirement	AEMR Cross-reference
7.1	Twelve months after commissioning the food processing plant, and annually thereafter for the duration of the development, the Applicant must submit an Annual Environmental Management Report to the Director-General and the Council. This report must:	This AEMR
(a)	Identify all the standards, performance measures, and statutory requirements the development is required to comply with.	Section 3.0
(b)	Review the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.	Section 4.0 and 5.0
(c)	Identify all the occasions during the previous year when these standards, performance measures, and statutory requirements have not been complied with.	Section 6.1
(d)	Include a summary of any complaints made about the development, and indicate what actions were taken (or are being taken) to address these complaints.	Section 6.3
(e)	Include the detailed reporting from the Environmental Monitoring Program (see Conditions 6.1 - 6.5) and identify any trends in the monitoring over the life of the project.	Section 5.0
(f)	Where non-compliance is occurring, describe what actions are or will be taken to ensure compliance, who will be responsible for carrying out these actions, and when these actions will be implemented.	Section 7.0

3.0 Standards, Performance Measures and Statutory Requirements

Condition 1.2 of the Consent requires the Applicant to carry out the development in general accordance with the DA and subsequent modifications to the Consent (Notice of Modification dated 17 April 2012), the Statement of Environmental Effects (SEE) prepared for the Site (Benbow Associates, 2001), and the conditions of the Consent issued by the Minister.

Under the conditions of the Consent, Allied Pinnacle is required to prepare and implement various management plans for the Site, as detailed in Table 2. This includes an EMP which specifies relevant statutory requirements and sets standards and performance measures for relevant environmental issues; these are in addition to those identified within the conditions of the Consent.

The current EMP has been submitted to the Department of Planning, Industry and Environment (DPIE) and includes the following:

- Noise Management Strategy
- Air Quality Management Strategy
- Stormwater Management Strategy
- Traffic Management Plan
- Landscape Management Plan
- Waste Management Plan.

The EMP and supporting documents therefore provide the basis for assessing environmental performance of the Site. The EMP also specifically addresses all environmental monitoring requirements and activities in relation to the Site.

Table 2 Management Plans Required by Development Consent DA 143-06-01

Consent Reference	Management Plan Required	Version / Date	Approval Status
3.1	Construction Management Plan	N/A – Construction activities were carried out by Goodman Fielder prior to Allied Pinnacle taking possession of the Kingsgrove site.	N/A
3.3	Construction Safety Study	N/A – Construction activities were carried out by Goodman Fielder prior to Allied Pinnacle taking possession of the Kingsgrove site and the consent conditions.	N/A
3.5	Environmental Management Plan	Final V5.0, 5 June 2019, revised by Allied Pinnacle. Final V03.1, 29 March 2017, revised by Allied Pinnacle. Final V03, 17 November 2015, revised by Allied Pinnacle. Final V01, 24 May 2012, prepared by SKM.	N/A

Consent Reference	Management Plan Required	Version / Date	Approval Status
4.17	Traffic Management Plan	Appendix E of Environmental Management Plan.	A revised Traffic Management Plan (TMP) was prepared as a requirement of DA-143-06-01 MOD 3. TMP updated at direction of DPIE, currently undergoing review with Georges River Council prior to resubmission to DPIE.
4.26	Waste Management Plan	Appendix G of Environmental Management Plan.	As per Environmental Management Plan.
4.29	Landscape Management Plan	Appendix F of Environmental Management Plan.	As per Environmental Management Plan.
5.1	Fire Safety Study	Report # 21069FSS, prepared by Environmental Audits of Australia (EAA).	Submitted to NSW DPIE and NSW Fire Brigades on 24 October 2001. The 2019 Hazard Audit confirmed the study is still relevant and that updates to the study are not required.
5.2	Deflagration Management Strategy	Deflagration Strategy Support, May 2014, prepared by AECOM Australia (AECOM, 2014).	DPIE approved the Deflagration Management Strategy on 17 December 2015. The Hazard Audit 2019 confirmed the strategy is still relevant and that updates to the strategy are not required.
5.3(a)	Emergency Plan	Revision 1, 17 January 2014, revised by SKM. Emergency Plan, 27 August 2012, prepared by SKM.	Submitted to DPIE on 6 September 2012. Resubmitted to DPIE on 29 May 2013. Revised and submitted to DPIE on 7 February 2014. Approved by DPIE on 8 April 2014. Minor changes were made to the document as part of a revision on 17 September 2019.
5.3(b)	Safety Management System	Made up of numerous documents and procedures within the site document database.	Allied Pinnacle submitted a document mapping the contents of its Safety Management System (SMS) against the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No. 9 (DP&E, 2011). DPIE approved the SMS mapping document on 28 October 2015.
6.1	Environmental Monitoring Program	Section 9.2 of Environmental Management Plan.	As per Environmental Management Plan.

4.0 Environmental Actions

This section of the report describes the environmental actions that have been carried out during the current annual reporting period (1 January 2020 to 31 December 2020) and actions that are likely to be carried out in the following year. To describe the actions that have been carried out, AECOM has considered the environmental undertakings that the Applicant has committed to fulfil under the EMP and supporting documents, and provided details on the applicant's compliance with these requirements.

The tables in the following sections set out the environmental areas of concern and the matters relevant to the implementation of the conditions of consent and/or performance measures identified in the EMP and supporting documents. They describe the actions that have been carried out in relation to those matters over the past year, actions that are likely to be carried out in the following year, and illustrate whether the Site is currently meeting (or is in progress of meeting) the condition of the Consent, or commitment made in the EMP.

The primary method of monitoring for the Site is through opportunistic observation and weekly site walk overs which incorporate visual inspection and testing of critical infrastructure. The results of these inspections are summarised in Environmental Inspection Reports which allow for accurate detailing of any major issues or observations made during the walk over. Other monitoring for specific issues (for example, traffic and waste) is undertaken in accordance with the EMP. This detailed monitoring is discussed and analysed in Section 5.0.

The overall manufacturing activities on the Site were relatively unchanged from 2019.

Elements of the 2019 EIA and IHA that are still outstanding and are shown in Section 7.0. The next IEA and IHA will be due in 2022 unless the Director-General directs otherwise. A compliance audit was also not undertaken by the DPIE as there were no major issues or breaches of regulations at the Site during the reporting period.

4.1 Noise

Table 3 reports on environmental actions that have been carried out during the reporting period in relation to noise. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Noise Management Strategy.

Table 3 Summary of Noise Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?																			
Consent Condition 4.5	<p>Noise emissions from operations at the Site must not exceed the following criteria:</p> <p>Project-Specific Residential Noise Limits</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver</th> <th colspan="3">Noise Limits (LAeq) dBA</th> </tr> <tr> <th>Day (7am - 6pm)</th> <th>Evening (6pm-10pm)</th> <th>Night (10pm-7am)</th> </tr> </thead> <tbody> <tr> <td>Residents to the North-West (Baranbali Street and Sth Tallawarra St)</td> <td>48</td> <td>42</td> <td>41</td> </tr> <tr> <td>Resident to the North (Armitree Street)</td> <td>44</td> <td>42</td> <td>37</td> </tr> <tr> <td>Residents to the West (North Tallawarra Street</td> <td>47</td> <td>44</td> <td>37</td> </tr> </tbody> </table>	Receiver	Noise Limits (LAeq) dBA			Day (7am - 6pm)	Evening (6pm-10pm)	Night (10pm-7am)	Residents to the North-West (Baranbali Street and Sth Tallawarra St)	48	42	41	Resident to the North (Armitree Street)	44	42	37	Residents to the West (North Tallawarra Street	47	44	37	<p>No noise complaints were recorded during the reporting period.</p> <p>Existing noise attenuation controls include acoustic louvres on the blower plant (installed following a noise audit undertaken in January 2016).</p>	✓
Receiver	Noise Limits (LAeq) dBA																					
	Day (7am - 6pm)	Evening (6pm-10pm)	Night (10pm-7am)																			
Residents to the North-West (Baranbali Street and Sth Tallawarra St)	48	42	41																			
Resident to the North (Armitree Street)	44	42	37																			
Residents to the West (North Tallawarra Street	47	44	37																			
Consent Condition 6.3	<p>If substantiated community noise complaints occur, the Director-General may direct the Applicant to commission and pay the full cost of a noise audit. Should any noise audit demonstrate an exceedance of the project specific residential noise limits outlined in Condition 4.5 (using distance attenuation calculations), the Applicant shall employ mitigation measures to reduce noise impacts from the Site, to the satisfaction of the Director-General.</p> <p>Should noise complaints be received, the Director-General may direct the Applicant to commission and pay the full cost of a noise audit. Should any noise audit demonstrate an exceedance of the project specific residential noise limits outlined in Condition 4.5, the Applicant shall employ mitigation measures to</p>	<p>Allied Pinnacle was not directed to prepare a noise audit during the reporting period.</p> <p>A noise audit was undertaken previously in January 2016 and noise attenuation was installed in September 2016. Subsequent noise monitoring confirmed compliance with the project specific residential noise limits identified in the conditions of consent.</p>	✓																			

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
	reduce noise impacts from the Site, to the satisfaction of the Director-General.		
EMP Performance Measure (Table 4-1) 'Noise'	No nuisance noise will be emitted from the Kingsgrove site.	<p>No noise complaints were recorded during the reporting period.</p> <p>Noise management measures are implemented at the Site. The production area and processing equipment are fully enclosed within existing buildings, to minimise noise emissions from site operations.</p> <p>Drivers are instructed to avoid using compression braking and hard acceleration when on the identified heavy vehicle haulage route for the Site.</p>	✓

4.2 Air Quality

Table 4 reports on environmental actions that have been carried out during the current reporting period in relation to air quality. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Air Quality Management Strategy.

Table 4 Summary of Air Quality Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.12	Alarms and shut off valves shall be installed on silos to prevent overfilling.	<p>Alarms and cut off valves were installed on the silos prior to commissioning.</p> <p>Dust sensors have been added to the silo room area to notify personnel on site if there is a dust leak in this area so it can be responded to.</p> <p>Weekly visual monitoring was carried out to check for external dust emissions from the silo exhaust vents. These checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).</p>	✓
Consent Condition 4.13	Dust emissions from equipment must comply with the <i>Clean Air (Plant and Equipment) Regulation 1997</i> (which has now been repealed by the <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i>).	<p>Allied Pinnacle implement measures to control dust emissions and undertake maintenance of the system to minimise dust emissions.</p> <p>Weekly visual monitoring was carried out to check for external dust emissions from the silo exhaust vents. These checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).</p>	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.14	Emissions from vehicles associated with the Site must comply with the <i>Clean Air (Motor Vehicles and Motor Vehicle Fuel) Regulation 1997</i> .	Vehicles and equipment exhausts were visually monitored (periodically at entry onto Site) to ensure that release of black/white smoke did not exceed 10 seconds. A preventative maintenance system for all plant and machinery is implemented to ensure vehicles associated with the Site comply with these guidelines.	✓
Consent Condition 4.15	All site activities are to be carried out in a manner to minimise generation (or emission) of wind-blown or traffic generated dust. All activities in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust using the measures proposed in the SEE.	Trafficable areas onsite are sealed to reduce exposure to dust and site speed limits are enforced. Landscaping is in place in areas that have not been sealed.	✓
Consent Condition 4.16	All areas at the Site are to be carried out in a manner to minimise generation (or emission) of wind-blown or traffic generated dust. All areas in or on the premises must be maintained in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust, using the measures proposed in the SEE.	Trafficable areas onsite are sealed to reduce exposure to dust and site speed limits are enforced. Landscaping is in place in areas that have not been sealed. Landscaping is maintained.	✓
EMP Performance Measure (Table 4-1) 'Dust'	No visible dust or odours noted leaving the Kingsgrove site.	No air quality incidents or complaints were recorded during the reporting period.	✓

4.3 Stormwater

Table 5 reports on environmental actions that have been carried out during the current reporting period in relation to stormwater. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Stormwater Management Strategy.

Table 5 Summary of Stormwater Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.6	A spill tank must be placed beneath coupling points of the edible oil tanker and the above ground edible oil tank.	Occasional spot checks confirmed spill trays were used on trucks in accordance with the Stormwater Management Strategy. Spot checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
Consent Condition 4.7	Tankers supplying edible oil must use brake interlocks.	Brake interlocks are a condition of entry to the Site for edible oil tankers.	✓
Consent Condition 4.8	Bundling must be provided around the edible oil tank, with a minimum capacity of 110% the volume of the tank.	The bund capacity and condition were checked during weekly visual inspection activities. Checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
Consent Condition 4.9	Stormwater isolation valves must be installed at all stormwater exit points from the Site.	The correct function of isolation valves was checked regularly. Stormwater pits were checked weekly during routine visual inspections and maintenance undertaken when necessary (e.g. removal of leaves and debris). Checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
EMP Performance Measure (Table 4-1) 'Stormwater'	No notable impact to the nearby waterways from water pollution at the Kingsgrove site. On 11 August 2020 an Allied Pinnacle tanker arrived on site with a damaged hydraulic lift leg at the read right	The incident was reported to the Site Manager who sent a Mechanic to repair the damaged leg. Kingsgrove staff took photos and applied spill mats. The spill was contained, and no fluid entered the stormwater drains. The damaged	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
	hand side of the vehicle which began slowly leaking hydraulic fluid.	hydraulic lift leg was repaired to prevent further incident.	

4.4 Traffic

Table 6 reports on environmental actions that have been carried out during the current reporting period in relation to traffic. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Traffic Management Plan.

Table 6 Summary of Traffic Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.17	<p>Within 3 months of the approval of application DA-143-06-01 MOD 3, the Application must submit an updated Traffic Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ol style="list-style-type: none"> a. Describe the routes which will be used by trucks associated with the development; b. Outline the hours during which trucks will operate in the vicinity of the Site; c. Indicate the average and maximum number of daily and weekly truck movements which will be associated with the proposed development; d. Describe in detail what measures and procedures will be implemented to: <ul style="list-style-type: none"> - Minimise the number of trucks which will be used to transport goods; - Minimise noise and vibration associated with truck traffic; - Ensure trucks travel in a safe manner; - Minimise road damage; - Minimise air pollution from exhaust; and - Record and respond to complaints regarding traffic. e. Incorporate monitoring to ensure the requirements of the Traffic Management Plan are being met (refer to Condition 6.4). 	<p>An updated Traffic Management Plan (TMP) was prepared as a requirement of DA-143-06-01 MOD 3. The TMP was submitted to DPIE on 5 September 2019. DPIE requested further detail be included in the TMP. Allied Pinnacle has updated the TMP consistent with directions from DPIE and is currently consulting with Georges River Council and DPIE prior to resubmission to DPIE. Allied Pinnacle is maintaining ongoing dialogue with DPIE on this issue.</p>	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.19	The Applicant shall review and, where necessary, update the Traffic Management Plan annually as part of the AEMR, and as directed by the Director-General.	As above	✓
Consent Condition 6.4	The Applicant must monitor compliance with the Traffic Management Plan described in Condition 4.17. Monitoring must occur within three months of commissioning the mixing plant, and every six months thereafter.	All site activities were undertaken in accordance with the existing TMP during the reporting period. Records are kept of delivery and dispatch vehicles that are on site to inform scheduling activities. Traffic monitoring data is presented in Section 5.3 of the AEMR along with an analysis of the results and comparison to historical data to identify any evident trends.	✓
EMP Performance Measure (Table 4-1) 'Traffic'	No notable impact to the surrounding community from traffic generated at the Kingsgrove site.	A complaint was received on 13 August 2020 from a member of the public who reported that a Sugar Australia tanker was parked around the corner on The Crescent for 1 hour 45mins before speeding down the road towards Vanessa Street, making a rude gesture towards them, and making an illegal righthand turn onto Vanessa Street. Sugar Australia was informed of the incident in breach of road rules and TMP regarding the restriction of righthand turns out of The Crescent. Sugar Australia confirmed the illegal righthand turn into Vanessa Street, but disputed the claim of speeding and rude gesture. The outcomes of the investigation were communicated to the complainant who was advised to notify both Allied Pinnacle and the police should further incidents relating to the righthand turn occur. Allied Pinnacle tankers were also notified of the incident.	✓

4.5 Landscape Management

Table 7 reports on environmental actions that have been carried out during the current reporting period in relation to land management. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Landscape Management Plan.

Table 7 Summary of Landscape Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2019	Meeting Condition or Commitment?
Consent Condition 4.29	The Applicant must prepare and implement a detailed Landscape Management Plan for the development. This plan must: <ol style="list-style-type: none"> Describe in detail how the Site will be landscaped, including the location and species of all planting; and Explain how this landscaping will be managed and maintained over time. 	Landscaping activities were undertaken in accordance with the Landscape Management Plan. Landscaping was managed and maintained by a contractor on a fortnightly basis. Regular maintenance activities undertaken during the current reporting period included: <ul style="list-style-type: none"> Slashing/mowing of grassed areas; Trimming/shaping of shrubs; Collection of fallen branches and debris; and General maintenance works as required. 	✓
EMP Performance Measure (Table 4-1) 'Aesthetic Impacts / Landscaping'	No aesthetic impact to the surrounding community.	No landscaping related complaints were recorded during the reporting period.	✓

4.6 Waste Management

Table 8 reports on environmental actions that have been carried out during the current reporting period in relation to waste management. Waste generated as a result of site activities is managed in accordance with the Waste Management Plan. Allied Pinnacle will continue to review the waste requirements of the Site on an annual basis and update the Waste Management Plan if required.

Table 8 Summary of Waste Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 4.26	<p>The Applicant must prepare and implement a Waste Management Plan for the development in consultation with Council. This plan must describe in detail the waste management system, including:</p> <ol style="list-style-type: none"> The types and quantities of waste which will be generated at the Site; and How waste will be stored on-site, transported, and disposed of off-site. 	<p>A Waste Management Plan is included in Revision 5 of the Environmental Management Plan. The plan was prepared as per requirements of consent condition 4.26.</p> <p>Storage vessels are on-site for various waste streams (i.e. general waste, waste paper and plastic and oil waste). The storage vessels were regularly monitored and checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).</p>	✓
EMP Performance Measure (Table 4-1) 'Waste'	<p>All waste to be correctly stored on site and disposed of by an appropriately licenced contractor.</p> <p>Over the weekend of the 17-18 October 2020 a broken roller bin pierced a waste oil bag stored within the bin causing 80L of waste oil to leak onto the floor of the oil room within a bunded area. The leak was detected on the 19 October 2020.</p>	<p>Spill kits were applied to the area and Sanikleen attended to clean the area and oil was disposed of. Spill caused by placement of oil bag into the damaged bin which was not assessed as to if it would damage the bag prior to disposal of the oil bag. The damaged bin was subsequently disposed of on 06 November 2020. Training was provided to the supervisor regarding disposal of waste oil and container use.</p>	✓

4.7 Hazards and Site Safety

Table 9 reports on environmental actions that have been carried out during the current reporting period in relation to hazard management. Hazards and site safety are currently managed by the site Deflagration Management Strategy (DMS) and the Emergency Management Plan. The DMS Report covers the management of dusts, control systems, extraction systems and fail-safe systems employed, whilst the Emergency Management Plan details emergency procedures for the Site.

Table 9 Summary of Hazard Management Actions Undertaken during 2020

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2020	Meeting Condition or Commitment?
Consent Condition 5.4	Dangerous Goods storage must be in accordance with the Australian Dangerous Goods Code, relevant Australian Standards, and WorkCover requirements. Spill clean-up kits and procedures must be made available and used in the event of a spill.	A WorkCover Notification of Hazardous Chemicals has been completed for the Site (NDG035076, 13 February 2015). Should any significant changes occur to the quantity, location or manner of storage of the relevant chemicals, WorkCover will be notified of the amendment. Spill kits are stocked and provided at the oils station.	✓
Consent Condition 8.3	Twelve months after the commencement of operations, and every three years thereafter, unless the Director-General directs otherwise, the Applicant must commission and pay the full cost of a comprehensive hazard audit. The hazard audit must: <ul style="list-style-type: none"> a. Be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Director-General; b. Be conducted in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No.5 "Hazard Audit Guidelines"</i>; and c. Include, but not be limited to, a review of the site safety management system and a review of all entries made in the incident register since the previous audit. 	Planager undertook an IHA in 2019.	✓

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5.0 Analysis of Environmental Monitoring Results

In accordance with Schedule 2, Condition 7.1(e) of the Consent, this section presents an analysis of the detailed environmental monitoring undertaken during the reporting period and identification of any trends in the results compared to previous years. In order to compare current monitoring results against historical results, only environmental aspects with specific, quantified monitoring results are included in this section (noise, transport and waste monitoring).

Other environmental aspects included as part of the Environmental Monitoring Program (air quality, stormwater and landscaping) do not have quantifiable results and a review of the Site's performance against these aspects is provided previously in Section 4.0.

5.1 Annual Production

5.1.1 Monitoring Results

Annual production is limited under Schedule 2, Condition 1.3 of the Consent to 150,000 tonnes per annum. Production output remained within the approved limits during the reporting period at 53,195 tonnes and is presented for each month in Table 10.

Table 10 Production output during the reporting period

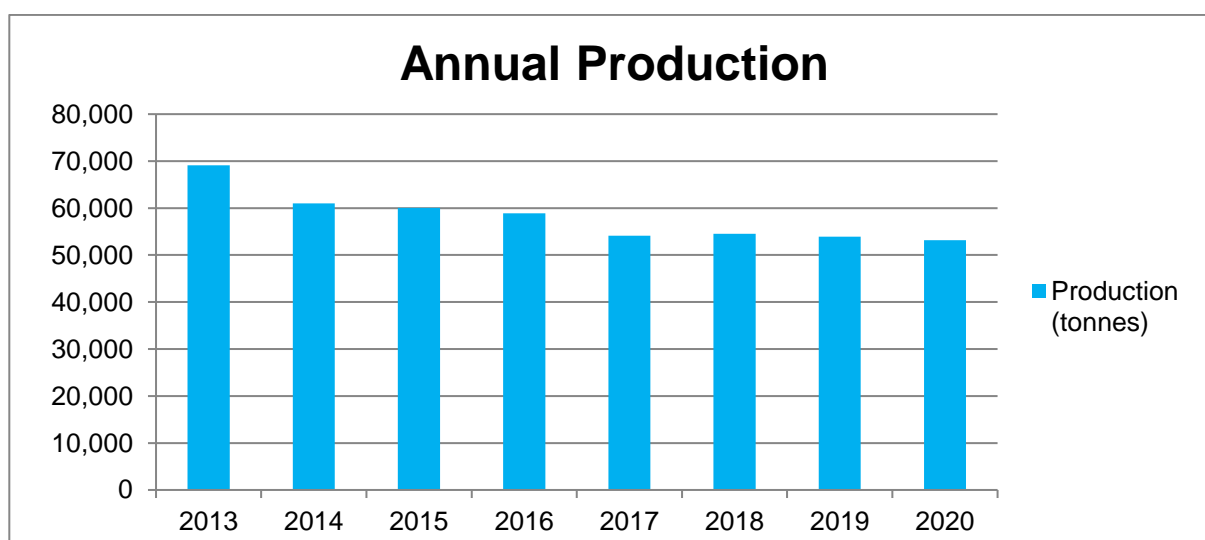
Month	Monthly production (tonnes)
January 2020	3,423
February 2020	3,855
March 2020	6,186
April 2020	4,238
May 2020	2,952
June 2020	4,274
July 2020	5,182
August 2020	4,193
September 2020	4,910
October 2020	4,505
November 2020	5,460
December 2020	4,017
Total	53,195

5.1.2 Identification of Trends

A comparison of annual production for the current reporting period against historical records is provided in Table 11 and shown graphically in Figure 2. Total annual production has decreased compared to 2019 and is approximately 23% less than the 2013 production. Overall production trends have been decreasing from the 2013 reporting period and are still well within the approved limit of 150,000 tonnes per annum for the Site.

Table 11 Historic Annual Production Volumes

Year	Total annual production (tonnes)
2013	69,142
2014	61,000
2015	60,065
2016	58,912
2017	54,148
2018	54,562
2019	53,947
2020	53,195

**Figure 2** Historic annual production volumes

5.2 Noise

The AEMR documents unresolved noise complaints from the previous reporting year as well as noise complaints that occur in the current reporting year. No noise complaints were registered during the 2020 reporting period, and there were no unresolved complaints from previous periods, as indicated in Section 4.1.

5.3 Traffic

5.3.1 Monitoring Results

The Site records the total number of truck movements each month, from which weekly and daily truck movements can be extrapolated. Total monthly truck movements and average weekly/daily truck movements for the reporting period are presented in Table 12 along with the monthly production data.

At the previous request from the DPIE an estimate of potential traffic movements at the full approved production capacity of 150,000 tonnes per annum was undertaken. It is noted that traffic generation is not directly correlated with production, as deliveries of raw materials and final product may differ depending on the product. However, an estimate of potential maximum truck movements was calculated based on the traffic and production data for the 2020 reporting period. This was estimated

by calculating the average of the monthly truck/tonne for the period and multiplying this by the full production volume of 150,000 tonnes. Potential maximum truck movements at full production capacity are included in Table 12 and Table 13 for reference.

It is noted that traffic projections were presented in the Traffic Impact Statement (Rhodes Thompson Associates, 2001) prepared as part of the SEE for expansion of the Site. The maximum number of trucks per day was projected to be 97 during the day and afternoon shifts and 12 during the night shift, with a total of 109 daily truck movements. This equates to a total of 763 truck movements per week, 3,315 truck movements per month, and 39,785 truck movements per annum. These projections are also shown in Table 12 and Table 13 for comparison with the current year's reporting data.

It is also noted that the Consent for the project does not specify a limit on truck movements. However, Condition 4.17 requires the Traffic Management Plan to '*indicate the average and maximum number of daily and weekly truck movements which will be associated with the proposed development*'. The Traffic Management Plan included in Revision 3.1 of the Environmental Management Plan dated 29 March 2017, includes the same traffic values reported in the SEE, as provided above.

Table 12 Truck movements during the reporting period

Month	Total monthly truck movements	Average weekly truck movements	Average daily truck movements	Monthly production (tonnes)
<i>Projected maximum predicted in Traffic Impact Statement and Traffic Management Plan</i>	3,315	763	109	150,000 (Annual)
<i>Potential maximum at full production, based on 2019 data</i>	1,399	322	45	150,000 (Annual)
January 2020	477	95	15	3,423
February 2020	541	135	19	3,855
March 2020	559	140	20	6,186
April 2020	529	132	19	4,238
May 2020	323	81	12	2,952
June 2020	345	86	12	4,274
July 2020	227	57	8	5,182
August 2020	391	98	14	4,193
September 2020	336	84	12	4,910
October 2020	423	106	15	4,505
November 2020	538	134	19	5,460
December 2020	477	119	17	4,017
Total				53,195

5.3.2 Identification of Trends

Historically, traffic movements recorded as part of day to day operations have been limited to movements generated as a result of product delivery and dispatch; in accordance with the TMP. During review of the TMP (undertaken during the 2016 reporting period) the distinction between product loads bound for the warehouse and bulk tanker loads (bound for bulk delivery) has been clarified. Consequently, monitoring activities have been expanded beyond product dispatch to reflect all production related traffic movements to and from site.

A comparison of traffic monitoring data for the current reporting period against historical traffic monitoring results is provided in Table 13 and is shown graphically in Figure 3.

The total number of annual truck movements recorded decreased during the current reporting period corresponding to the marginally lower total annual production similar to the 2019 reporting period. The truck movements remain largely consistent with the previous reporting period. It is noted that traffic generation does not correlate directly to production levels and may fluctuate depending on market demand and supply chain requirements.

There is no correlation between monthly production and monthly truck movements or monthly truck movements and the following or prior months production accounting for time between recording production and receipt of goods / dispatch of goods. There was a similar volume of truck movements from January – April at which point the 2020 volume reduces significantly. This continues until the last quarter where 2020 numbers recover closer to 2019 levels then surpass them significantly in December.

Traffic movements within the reporting period remained well below the projected maximum traffic movements estimated for a full production scenario, as shown in Figure 3.

Table 13 Comparison of historical truck monitoring data

Year	Annual total truck movements	Average weekly truck movements	Total annual production
<i>Projected maximum predicted in Traffic Impact Statement and Traffic Management Plan</i>	39,785	763	150,000
<i>Potential maximum at full production, based on 2019 data</i>	16,780	322	150,000
2013	3,893	75	69,142
2014	3,775	73	61,000
2015	3,840	74	60,065
2016	6,578	127	58,912
2017	6,502	125	54,148
2018	6,803	131	54,562
2019	6,035	116	53,974
2020	5,166	106	53,195

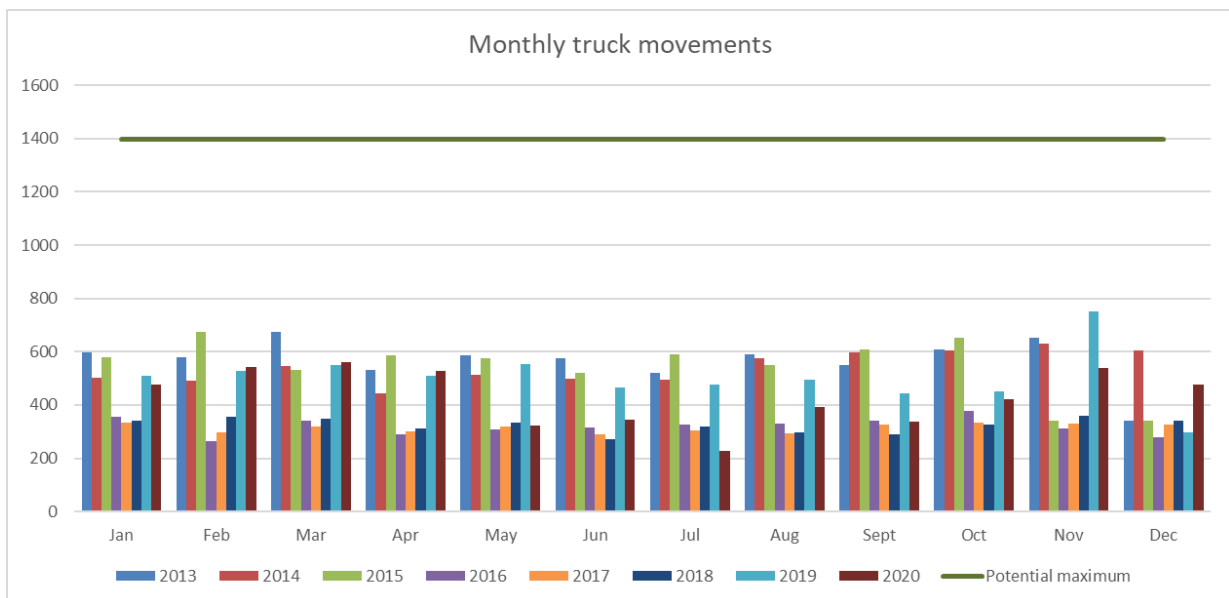


Figure 3 Comparison of historic monthly truck monitoring data

Note: The Traffic Impact Statement (2001) predicted a maximum of 3,315 trucks per month

5.4 Waste

5.4.1 Monitoring Results

Allied Pinnacle continues to source recycling options for waste management where-ever possible. All paper waste and putrescible waste is removed from the Site for recycling or disposal. Waste streams include the following:

- General Waste (putrescible) is generated by the production process and generally comprises edible (for livestock) material from flush outs through cleaning. This material is recycled as feed for livestock.
- General Waste (non-putrescible) includes general site waste and paper waste which is recycled. These recyclables and wastes are removed off site by licensed contractors.
- Hazardous Waste includes small quantities of chemical waste generated from analytical testing in the test baking/laboratory area. These wastes are removed off site by a licensed contractor.
- Liquid Waste is in the form of oil used in food manufacturing. This is generated in small quantities during overflow from receival or transfer processes. This is collected by an oil recycling company.
- Special waste is generated in small quantities during plant maintenance and removed from site by a licenced contractor.
- There continues to be no restricted waste generated at the Site.

Monthly waste quantities generated for each waste stream during the current reporting period are provided in Table 14. The proportion of General Waste (non-putrescible) that was recycled or disposed of to landfill for the current reporting period is provided in Table 15. Average weekly quantities provided in the table are from the Waste Management Plan as provided in Revision 3.1 of the Environment Management Plan dated 29 March 2017.

Table 14 Monthly waste quantities generated during the reporting period

Month	Waste Stream					
	General Waste (putrescible) (tonnes)	General Waste (non-putrescible) (tonnes)	Hazardous Waste (litres)	Liquid Waste (litres) ²	Special Waste	Restricted Waste
<i>Annual quantities from predictions in WMP¹</i>	364	390	104	2,600 ²	520	0
<i>Monthly quantities from predictions in WMP¹</i>	30	33	9	217	43	0
January 2020	40.34	19.8	0	130	0	0
February 2020	89.33	25.92	0	0	0	0
March 2020	100.28	23.68	0	0	0	0
April 2020	228	24.56	0	0	0	0
May 2020	114.82	20.56	0	1100	0	0
June 2020	42.94	23.16	0	450	0	0
July 2020	60.92	27.36	0	0	0	0
August 2020	57.72	23.58	0	0	0	0
September 2020	73.18	27.18	0	540	0	0
October 2020	72.24	21.82	0	310	0	0
November 2020	48.52	23.71	0	130	0	0
December 2020	37.28	23.65	0	0	0	0
Total	965.57	284.98	0	2660	0	0
Average monthly	80.46	23.75	0	221.67	0	0

¹ Waste Management Plan as provided in Revision 3.1 of the Environment Management Plan provides indicative weekly quantities, from which these monthly and annual quantities have been calculated.

² Liquid Waste predictions have been converted from kg to litres using a specific gravity of 0.92.

Table 15 Proportion of General Waste (non-putrescible) recycled or disposed of to landfill during the reporting period

Parameter	General Waste (non-putrescible)	
	Non-recyclable (disposed of to landfill)	Recycled
Total (tonnes)	90.6	194.8
Percentage of total	31.79%	68.21%
Average weekly (tonnes)	1.7	3.8

5.4.2 Identification of Trends

A comparison of annual waste quantities for the current reporting period against historical results is provided in Table 16.

The quantity of General Waste (putrescible) generated at the Site has increased significantly in 2020 compared to the previous reporting period and is over four times the average annual amount of General Waste (putrescible) generated between 2013-2019. The General Waste (putrescible) in 2020 is the highest annual quantity to date. As shown in Table 14, the higher waste volume is primarily due

to waste recorded in March (100.28 tonnes), April (228 tonnes) and May (114.82 tonnes) which amount to around 45% of the total annual volume of putrescible waste. The increase relates to:

- 40 tonnes of damaged stock removed in March due to storm damage in January
- 200 tonnes of non-conforming product due to mixing issue in April
- 60 tonnes of raw material from supplier with metal contamination
- Additional stock write-off from 2019 which was removed in 2020
- Further contaminated raw materials from supplier

Due to these major incidents of increased putrescible waste, the annual quantity has exceeded the predicted quantities in the WMP (340 tonnes).

Allied Pinnacle are continuing to focus on improving the 'right time first time' approach to production to reduce the amount of non-conforming product. This has included:

- Contact with vendors regarding product non-conformance regarding contaminated materials.
- Product quality systems which identify, investigate and action improvement measures to reduce risk of non-conforming stock.

Of the General Waste (non-putrescible) generated on site during the reporting period, approximately 32% was disposed of to landfill and 68% was recycled. This is a minor decrease to the previous year (2018) during which 69% of non-putrescible waste was recycled.

No Hazardous Waste was generated on Site in the reporting period, consistent with the previous three reporting periods.

The quantity of Liquid Waste generated at the Site reduced significantly however still exceeded predictions in the Waste Management Plan, albeit by 60L². The large volume of Liquid Waste in May relates to a write off of about 1000 Litres of unused CME oil following a product trial.

Liquid Waste volumes have varied in the last six years with no apparent trend. Higher volumes are generally associated with specific events and isolated incidents, rather than general routine operations. The quantities of Liquid Waste removed off site in 2013, 2014, 2017, 2018 and 2019 were higher than the predictions made in the Waste Management Plan, whilst 2015 and 2016 were below and 2020 levels were only slightly above. 2013, 2014, 2017 and 2019 levels were a result of isolated incidents, the outcomes of which are addressed in previous AEMR periods.

Table 16 Comparison of historical waste monitoring data

Year	Waste Stream					
	General Waste (putrescible) (tonnes)	General Waste (non-putrescible) (tonnes)	Hazardous Waste (litres)	Liquid Waste (litres)	Special Waste	Restricted Waste
<i>Annual quantities from predictions in WMP¹</i>	364	390	104	2,600 ²	520	0
2013	144	258	111	5,241	0	0
2014	146	265	70	2,625	0	0
2015	170	277	50	165	0	0
2016	285	287	20	1,680	360	0
2017	377	349	0	5,880	0	0
2018	147	280	0	4,710	0	0
2019	307	286	0	6,560	0	0
2020	965	284	0	2,660	0	0

¹ Waste Management Plan as provided in Revision 3.1 of the Environment Management Plan provides indicative weekly quantities, from which these annual quantities have been calculated.

² Liquid Waste predictions have been converted from kg to litres using a specific gravity of 0.92.

6.0 Non-Compliance, Incidents and Complaints

Under Condition 8.1 of the Consent, the Proponent is required to notify the DPIE of any accident or potential incident with actual or potential off-site impacts on people or the biophysical environment. A summary of non-compliance is required under Condition 7.1 (f) which states “*Where non-compliance is occurring, describe what actions are or will be taken to ensure compliance, who will be responsible for carrying out these actions, and when these actions will be implemented.*”

General responsibilities and actions for responding to non-compliances are detailed in the EMP. These include:

- The NSW Welfare, Health, Safety and Environment (WHSE) Coordinator is to be informed immediately
- The WHSE Coordinator must identify an appropriate corrective action
- The WHSE Coordinator must communicate the appropriate corrective action to the Site Manager
- The Site Manager must then implement the corrective action or delegate authority over the action to an appropriate person
- Any non-compliance and the actions taken are to be recorded and included in the AEMR; and
- If the non-compliance constitutes a pollution event that may cause material environmental harm, the emergency response procedure will be followed, and the appropriate government authorities will be notified immediately.

All incidents and complaints are recorded in the Incident Reporting Database:

- The date and time, of the complaint or incident
- The means by which the complaint or incident was made
- Any personal details that were provided, or
- Any action(s) taken by the Allied Pinnacle Kingsgrove in relation to the complaint or incident, including any follow up contact with complainant/reporter; and
- If no action was taken by Allied Pinnacle Kingsgrove in relation to the complaint or incident, the reason(s) why no action was taken.

6.1 Non-compliances Recorded during the Current Reporting Period

Three incident reports were submitted during the 2020 reporting period. However, the nature of the incidents were deemed to be of a housekeeping nature not to constitute non-compliance as described in the 2019 IEA.

Table 17 Summary of Non-compliances for the Site

Details of Non-Compliance	Audit Finding
General non-compliances not reported in audits, reports or similar	
No general non-compliances during the current reporting period.	

6.2 Incidents Recorded During the Current Reporting Period

A summary of the incidents reported during the current reporting periods is provided below in Table 18. Complaints are not categorised as incidents for the purposes of this report section; complaints are discussed in Section 6.3.

Table 18 Summary of Incidents for the Site

Date	Details	Action Taken
19 October 2020	On or before the weekend of the 17-18 October 2020 a broken roller bin pierced a waste oil bag stored within the bin causing 80L of waste oil to leak onto the floor of the oil room. The leak was detected on the 19 October 2020.	Spill kits were applied to the area and Sanikleen (the on-site cleaning services contractor) attended to clean the area and oil was disposed of. The spill was determined to be caused by placement of oil bag into the damaged bin. The damaged bin was subsequently disposed of on 06 November 2020. Training was provided to the supervisor regarding disposal of waste oil and container use.
11 August 2020	An Allied Pinnacle tanker arrived on site with a damaged hydraulic lift leg at the rear right hand side of the vehicle which began slowly leaking hydraulic fluid.	The incident was reported to the Site Manager who sent a Mechanic to repair the damaged leg. Kingsgrove staff took photos and applied spill mats. The spill was contained, and no fluid entered the stormwater drains. The damaged hydraulic lift leg was repaired to prevent further incident.

6.3 Complaints Received During the Current Reporting Period

One complaint was recorded for the Site during the current reporting period and is shown in Table 19.

Table 19 Summary of Historical Complaints Received for the Site

Date	Complaint Received	Action Taken
13 August 2020	A complaint was received on 13 August 2020 from a member of the public who reported that a Sugar Australia tanker was parked around the corner on The Crescent for 1 hour 45mins before speeding down the road towards Vanessa Street, making a rude gesture towards them, and making an illegal righthand turn onto Vanessa Street.	Sugar Australia was informed of the incident in breach of road rules and TMP regarding the restriction of righthand turns out of The Crescent. Sugar Australia confirmed the illegal righthand turn into Vanessa Street, but disputed the claim of speeding and rude gesture. The outcomes of the investigation were communicated to the complainant who was advised to notify both Allied Pinnacle and the police should further incidents relating to the righthand turn occur. Allied Pinnacle tankers were also notified of the incident.

7.0 Recommendations and Action Plan

Recommendations identified through the AEMR process (such as resolving complaints) have been put forward as general recommendations in Appendix A. The actions taken or proposed to be undertaken to address each of the recommendations are provided, along with the person responsible for ensuring the actions are carried out and the proposed timing.

Allied Pinnacle commits to the actions set out in Appendix A in order to ensure compliance with the conditions of the Consent.

8.0 Conclusion

The Allied Pinnacle Kingsgrove site operates a comprehensive environmental management program. The results of the AEMR for the current period demonstrate that the environmental performance of the Site is generally meeting expectations and indicate that site personnel are following site procedures and meeting their environmental responsibilities. A review of current environmental actions indicates that the Site is routinely monitored on a weekly basis and this process has been demonstrated to ensure the effective management and maintenance of infrastructure and activities on site.

The results of the detailed monitoring undertaken for traffic and waste have been included in this AEMR. Traffic movements at the Site appear to be generally stable and are well below the levels predicted in the SEE for the expansion of the Site.

Waste quantities have increased in the reporting period for General Waste (putrescible) however the higher quantities are associated with specific circumstances rather than inefficiencies in general operations at the Site. It is noted that putrescible waste is sold as stock feed, reducing the Site's waste contribution to land fill.

Allied Pinnacle participated in the NSW Energy Savings Scheme during the reporting period. A voluntary assessment was undertaken in 2020 with the aim to reduce energy use associated with compressed air systems. Opportunities to improve these systems are being implemented by Allied Pinnacle.

Non-compliances, incidents and complaints are handled through a site review process managed through the incident reporting database. The database ensures that all identified issues are accurately detailed and appropriately addressed in a timely manner.

The results of the current AEMR demonstrate that the environmental actions currently undertaken on site are adequate to effect compliance with the standards, performance measures, and statutory requirements the development is required to comply with. Allied Pinnacle will continue to engage with the local community, Council, the DPIE and other regulatory authorities when required to ensure the efficient operation of the facility and to prevent or minimise harm to the environment.

9.0 References

AECOM (2014) *AMA Kingsgrove Processing Plant, Risk Management: Deflagration Strategy Support*. Newcastle, AECOM Australia.

Allied Pinnacle (2019) *Kingsgrove KV – Environmental Management Plan including PRIMP*, Revision 5.0, Effective Date 5 June 2019, Allied Pinnacle Pty Ltd.

Benbow Associates (2001) *Statement of Environmental Effect (SEE) for the Proposed Expansion to Existing Manufacturing Facilities at Goodman Fielder Limited, Kingsgrove*. Sydney, Dick Benbow & Associates Pty Ltd.

DP&E (2015) *Allied Pinnacle Kingsgrove, 2015 Compliance Audit Campaign, Compliance Audit Report August 2015*. NSW: Department of Planning & Environment.

DP&E (2012) *Notice of Modification - DA143-06-01 MOD 2*. NSW: Department of Planning & Infrastructure.

DP&E (2011) *Hazardous Industry Planning Advisory Paper (HIPAP) No. 9 Safety Management*. NSW: Department of Planning.

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Planager (2019) 2019 Hazard Audit Report, Allied Pinnacle, Kingsgrove NSW, Planager Pty Ltd.

Rhodes Thompson Associates (2001) *Traffic Impact Statement, Proposed Industrial Expansion Ref: 21-070R (3)*, prepared by Rhodes Thompson Associates on behalf of Goodman Fielder Ltd.

SLR (2019) Allied Pinnacle – Independent Environmental Audit, SLR Consulting Pty Ltd.

Appendix A

Recommendations and Action Plan

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Appendix A Recommendations and Action Plan

Table A1 Recommendations and Action Plan for 2020 AEMR

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
General recommendations and actions not covered within audits, reports or similar as detailed in the following sections				
Project Approval – (Condition 4.17)	Within 3 months of the approval of modification application DA-143-06-01 MOD 3, the Application must submit an updated Traffic Management Plan to the satisfaction of the Secretary.	An updated TMP was prepared as a requirement of DA-143-06-01 MOD 3. The TMP was submitted to DPIE on 5 September 2019. DPIE requested further detail be included in the TMP. Allied Pinnacle is currently consulting with Georges River Council, TfNSW prior to resubmission with DPIE following 12/3/21. Allied Pinnacle is maintaining ongoing dialogue with DPIE on this issue.	J. Wilkins	March 2021
2016 Environmental Audit – Outstanding actions				
Project Approval – Condition 4.17(d)	The Applicant must prepare and implement a Traffic Management Plan for the development.	An updated TMP was prepared as a requirement of DA-143-06-01 MOD 3. The TMP was submitted to DPIE on 5 September 2019. DPIE requested further detail be included in the TMP. Allied Pinnacle is currently consulting with Georges River Council prior to resubmission with DPIE following 12/3/21. Allied Pinnacle is maintaining ongoing dialogue with DPIE on this issue.	J. Wilkins	March 2021
Project Approval – Condition 4.18	The Applicant must develop the Traffic Management Plan in consultation with the RMS and Council.	An updated TMP was prepared as part of DA-143-06-01 MOD 3. RMS and Council reviewed the TMP as part of the public exhibition of the	J. Wilkins	March 2021

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
		<p>modification application and confirmed the proposed TMP was adequate.</p> <p>The TMP was submitted to DPIE on 5 September 2019. DPIE requested further detail be included in the TMP. Allied Pinnacle is currently consulting with Georges River Council prior to resubmission with DPIE following 12/3/21. Allied Pinnacle is maintaining ongoing dialogue with DPIE on this issue.</p>		
2019 Environmental Audit				
Table 8 IEA	Review to be undertaken of Section 4 – Conclusion of the Traffic Management Plan prepared by McLaren Traffic Engineering dated 14th August 2018 and determine if any of the outcomes are a “must” or remain “should”.	Action has been completed	R. Herron	July 2020
Table 8 IEA	Transport agreements / contracts to be reviewed to include key environmental responsibilities are part of the terms and conditions.	Action has been completed	J. Wilkins	July 2020
2019 Hazard Audit				
Table E1 IHA – Action 1	Ensure that the exhaust ventilation on all lines is interlocked with plant operation. It is noted that, as this change would be run as a project requiring some time for design and implementation, in the interim, a check will be added to the mixing sheets to confirm that the exhaust ventilation is on before commencing mixing. This will be completed by the operators.	Action has been completed	V. Singh	September 2020
Table E1 IHA – Action 2	Schedule fail-safe testing of exhaust systems interlocks in maintenance and testing management system.	Action has been completed	V. Singh	September 2020
Table E1 IHA – Action 7	Formal Rescue Plan is required for each Confined Space entry.	Action has been completed	H. Lam	August 2020

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