

Annual Environmental Management Report 2022

Allied Pinnacle, Kingsgrove

03-Jul-2023
Allied Pinnacle_AEMR_2022

Annual Environmental Management Report 2022

Allied Pinnacle, Kingsgrove

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Acronyms

Acronym	Meaning
AEMR	Annual Environmental Management Report
Allied Pinnacle	Allied Pinnacle Pty Ltd
DA	Development Approval
DG	Director General
DMS	Deflagration Management Strategy
DPE	Department of Planning and Environment (formerly 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	Workplace Health, Safety and Environment
WMP	Waste Management Plan

1.0 Introduction

AECOM Australia Pty Ltd. (AECOM) has prepared this Annual Environmental Management Report (AEMR) on behalf of Allied Pinnacle Pty Ltd. (Allied Pinnacle) for its Kingsgrove food processing site. The Kingsgrove site (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 is in accordance with Condition 7.1 of the Development Consent DA 143-06-01 (as modified) and covers the period from 01 January 2022 to 31 December 2022 and has been prepared for submission to the Council and Director General.

This AEMR identifies the environmental standards, performance measures, and statutory requirements established for the site and considers the environmental performance of site activities against these criteria. This report also summarises results recorded following the Environmental Management Plan (EMP) and other supporting management plans and strategies for the site. These include:

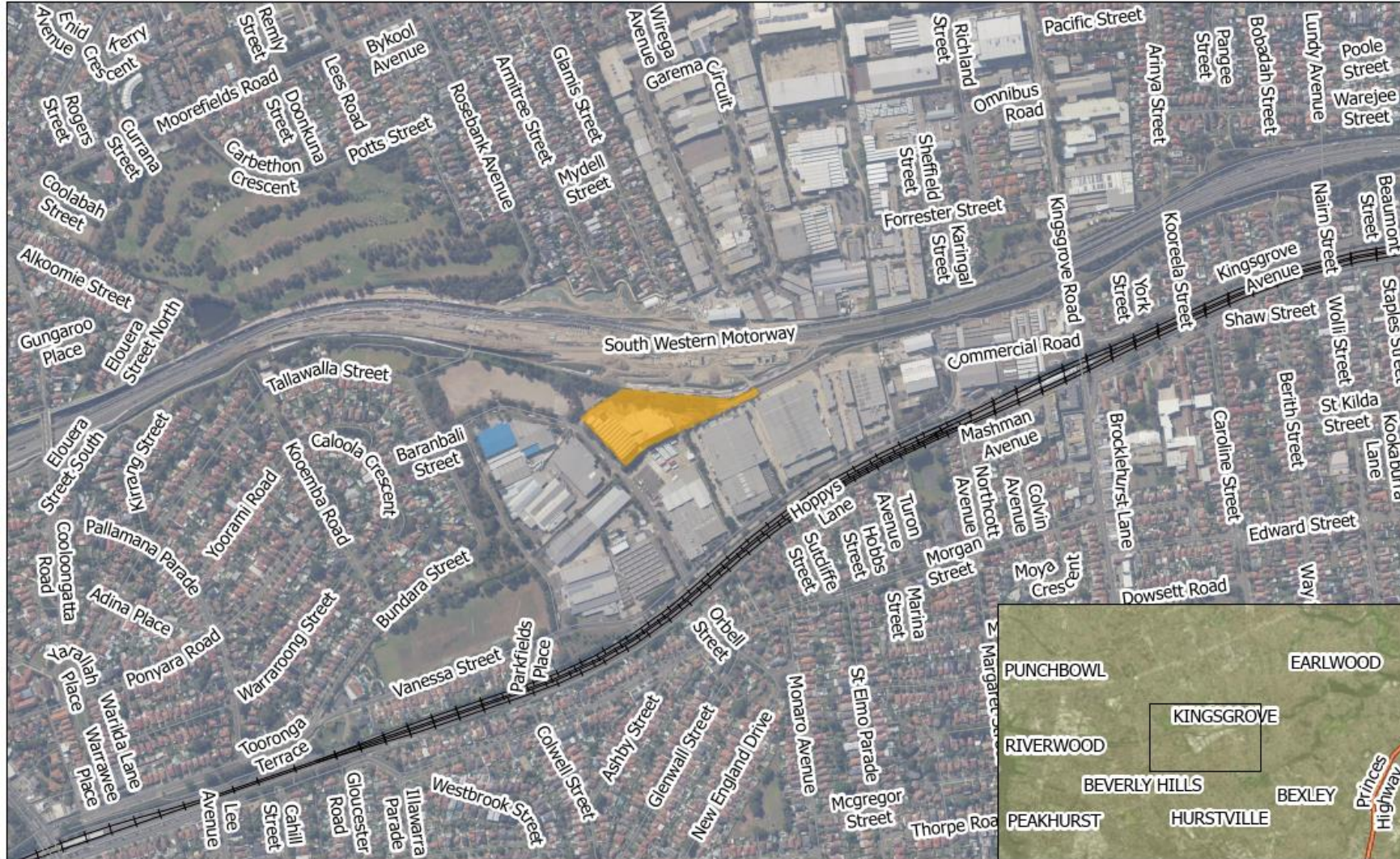
- Noise Management Strategy
- Air Quality Management Strategy
- Stormwater Management Strategy
- Traffic Management Plan
- Landscape Management Plan
- Waste Management Plan.

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.

1.1 About the site ownership

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 to manufacture and distribute a range of grain-based baking supplies and food ingredients.

In January 2017, Pacific Equity Partners 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, Japan's Nisshin Seifun Group Inc purchased Allied Pinnacle from Pacific Equity Partners. For the purposes of this report, the business will be referred to as Allied Pinnacle from herein.



- Allied Pinnacle Site
- Roads
- Railway

Site Location
Allied Pinnacle, Kingsgrove

23/02/2022
80565069

Fig 1

N

Meters

0 50 100 200

Figure 1 Site location

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.	Sections 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 and Environment (DPE, formerly the Department of Planning, Industry and Environment) 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 provide the basis for assessing the site's environmental performance. 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 V01, 15 August 2022, Revised by Allied Pinnacle Revision 7.1, 26 April 2021, Revised by Allied Pinnacle Revision 7.0, 4 February 2021, revised by Allied Pinnacle Final V5.0, 5 June 2019, revised by Allied Pinnacle.	DPE approved the updated Operational Environmental Management Plan (Revision 7.0) March 2021 as part of the approved modification application DA-143-06-01 MOD 3. A post-approval request on 07 April 2021 from DPE relating to conditions within the Traffic Management Plan (TMP) was completed and approved on 13 April 2021. These changes to the

Consent Reference	Management Plan Required	Version / Date	Approval Status
		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.	TMP (Revision 7.1) are reflected in EMP Revision 7.1 dated 26 April 2021.
4.17	Traffic Management Plan	Revision 7.1 was approved by DPE on 13 April 2021. Revision 7.0 April 2021, revised by Applied Pinnacle Appendix E of Environmental Management Plan.	Following submission of the updated TMP as part of approved modification application DA-143-06-01 MOD 3. DPE issued a post-approval request on 07 April 2021 for additional information and updates to the TMP. DPE approved the updated TMP (Revision 7.1) on 13 April 2021 and was included in the updated EMP effective 26 April 2021.
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 DPE 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).	DPE 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	Amendment No. 10, 5 March 2021, revised by Allied Pinnacle Revision 1, 17 January 2014, revised by SKM. Emergency Plan, 27 August 2012, prepared by SKM.	Submitted to DPE on 6 September 2012. Resubmitted to DPE on 29 May 2013. Revised and submitted to DPE on 7 February 2014. Approved by DPE on 8 April 2014. Minor amendments to the document as required, currently numbered Amendment 10.

Consent Reference	Management Plan Required	Version / Date	Approval Status
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). DPE 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 carried out during the current annual reporting period (1 January 2022 to 31 December 2022) and actions that will likely 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 fulfilling 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 the process of meeting) the condition of the consent, or commitment made in the EMP.

The primary method of monitoring the site is through opportunistic observation and weekly site walkovers 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 issues or observations made during the walkover. Monitoring is discussed and analysed in Section 5.0.

The overall manufacturing activities on the site were relatively unchanged from 2021.

Periodic audits, namely the Independent Environmental Audit (IEA) and Independent Hazard Audit (IHA), are required under consent conditions 7.3 and 8.3, respectively. Other audits such as noise, compliance, and the aforementioned IEA and IHA may be required, given triggers outlined in the consent conditions or at the direction of DPE or EPA.

Allied Pinnacle completed all elements of the 2022 IEA and IHA during 2022. Audit reports for the IEA and IHA were submitted to DPE on 26-Oct-2022 and 17-Oct-2022, respectively.

4.1 Noise

Table 3 reports on environmental actions 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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>No excessive noise was reported during the reporting period</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 consent conditions.</p>	✓																			

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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 onsite if there is a dust leak in this area so it can be responded to.</p>	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	Meeting Condition or Commitment?
		<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> <p>Six-monthly silo inspections and testing were undertaken, which found no issues.</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 implements dust control measures and undertakes system maintenance 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 are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001). No visible dust exiting the manufacturing building was reported during the reporting period.</p>	✓
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> .	<p>Vehicles and equipment exhausts were visually monitored (periodically at the entry to the site) to ensure that release of black/white smoke did not exceed 10 seconds.</p> <p>No exhaust smoke from vehicles for more than 10 seconds was reported during the reporting period.</p> <p>A preventative maintenance system for all plant and machinery is implemented to ensure</p>	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	Meeting Condition or Commitment?
		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 and maintained in unsealed areas.	✓
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 and maintained in unsealed areas.	✓
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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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 are 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	Bunding 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 are 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 during weekly visual inspection activities. Stormwater pits were checked weekly during routine visual inspections and maintenance undertaken when necessary (e.g. removal of leaves and debris). Checks are 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.	No stormwater or water pollution incidents or complaints were recorded during the reporting period.	✓

4.4 Traffic

Table 6 reports on environmental actions 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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"> Describe the routes which will be used by trucks associated with the development; Outline the hours during which trucks will operate in the vicinity of the site; Indicate the average and maximum number of daily and weekly truck movements which will be associated with the proposed development; 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. - Manage the arrival and departure of trucks such that on-street parking of trucks does not occur* 	<p>Allied Pinnacle submitted an updated TMP (Revision 7.0) to DPE associated with application DA-143-06-01 MOD 3 following consultation with Georges River Council and RTA on 5 February 2021.</p> <p>DPE sent Allied Pinnacle a request for further information, including:</p> <ul style="list-style-type: none"> - <i>The Heavy Vehicle Haulage Route is not consistent with that of The Department's Assessment Report, specifically the left turn onto Kingsgrove Road from Commercial Road, which could not be safely performed by a 19m articulated vehicle. Please provide a revised Heavy Vehicle Haulage Route figure demonstrating the haulage route continuing straight onto Kingsgrove Avenue, then left onto Bexley Road.</i> - <i>Include a revised Mitigation Measures section clearly outlining the measures and procedures that will be implemented to address the impacts of traffic listed in Condition 4.17(d).</i> - <i>Pursuant to Conditions 4.18-4.19, evidence of consultation with RMS (RTA) and Council in respect to the development of the Traffic Management Plan.</i> 	<p style="text-align: center;">✓</p> <p>*Conditions of this consent condition were met, with updated conditions associated with EMP Revision 7.1 being effective as of 26 April 2021</p>

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	Meeting Condition or Commitment?
	<p>e. Incorporate monitoring to ensure the requirements of the Traffic Management Plan are being met (refer to Condition 6.4).</p> <p>f. Incorporate a Driver Code of Conduct and a formal complaints procedure*</p> <p>Sections marked with * were effective as of 26 April 2021 with updated EMP</p>	<p>Following the amendment of the TMP, the updated TMP (Revision 7.1) was approved on 13 April 2021. The revised TMP was then included in revision 7.1 of the updated EMP, which was published and enacted effective 26 April 2021</p>	
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.	<p>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 onsite 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.</p> <p>The requirements of Revision 7.1 of the TMP were communicated to Netlogix Australia, which provides transport services for the site, which requires drivers to undertake an induction every two years, communicating the requirements of the TMP.</p>	✓
EMP Performance Measure (Table 4-1) 'Traffic'	No notable impact to the surrounding community from traffic generated at the Kingsgrove site.	<p>No traffic incidents or complaints were recorded during the reporting period.</p> <p>Trucks were parked on the crescent, waiting to enter the facility on seven occasions. The impact on the surrounding community was considered minimal. The dates of impact were:</p> <ul style="list-style-type: none"> 31 March 2022 	✓

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	Meeting Condition or Commitment?
		<ul style="list-style-type: none"> • 22 April 22 • 3 June 22 • 15 July 22 • 28 October 22 • 11 November 22 • 30 November 22 	

4.5 Landscape Management

Table 7 reports on environmental actions carried out during the current reporting period in relation to landscape 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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 regular basis. 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 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	Meeting Condition or Commitment?
Consent Condition 4.26	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: <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 onsite, transported, and disposed of off-site. 	A Waste Management Plan is included in Revision 5 of the Environmental Management Plan. The plan was prepared as per the requirements of consent condition 4.26. Storage vessels are onsite for various waste streams (i.e. general waste, waste paper and plastic and oil waste). The storage vessels were regularly monitored, and checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
EMP Performance Measure (Table 4-1) 'Waste'	All waste to be correctly stored on site and disposed of by an appropriately licenced contractor.	No waste-related complaints were recorded during the reporting period. The weekly monitoring report recorded multiple cases of minimal litter on site, which was then disposed of accordingly.	✓

4.7 Hazards and Site Safety

Table 9 reports on environmental actions 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 dust, 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 2022

Consent Condition / Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2022	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 for the 2022 reporting period, for which all identified elements have been actioned.	✓

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.

During the reporting period, there were two weeks when weekly environmental monitoring was not undertaken. These are described below in Table 10.

Table 10 Weekly environmental monitoring not undertaken

Date (week commencing)	Reason
03-Jan-2022	Factory shutdown
26-Dec-2022	Factory shutdown

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 51,787 tonnes and is presented for each month in Table 11.

Table 11 Production output during the reporting period

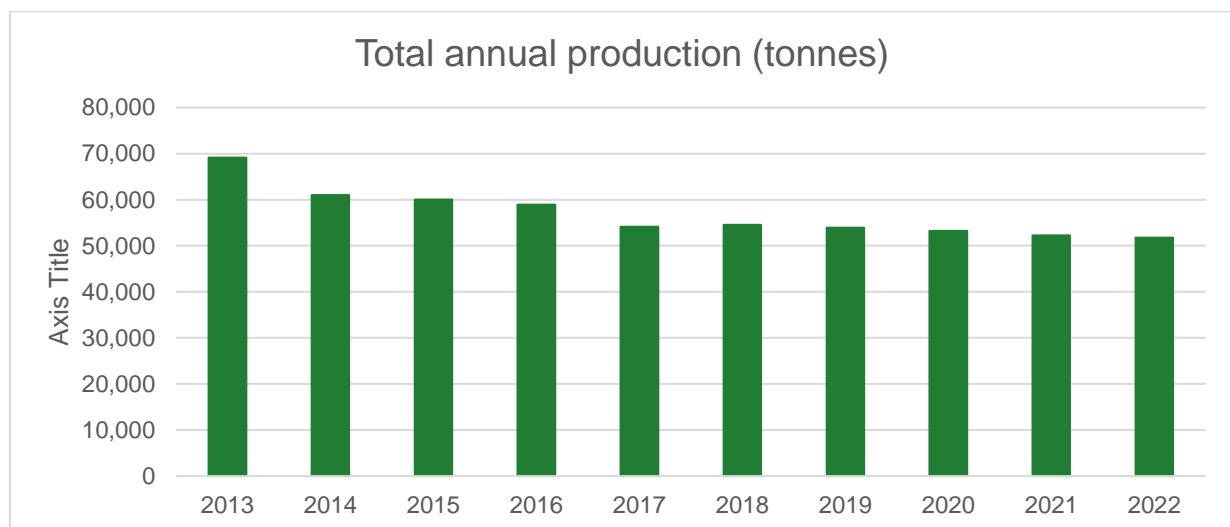
Month	Monthly production (tonnes)
January 2022	3,988
February 2022	4,417
March 2022	4,302
April 2022	3,514
May 2022	4,053
June 2022	4,325
July 2022	4,352
August 2022	4,472
September 2022	4,480
October 2022	4,636
November 2022	5,149
December 2022	4,099
Total	51,787

5.1.2 Identification of Trends

A comparison of annual production for the current reporting period against historical records is provided in Table 12 and shown graphically in Figure 2. Total annual production has decreased compared to 2021 and is approximately 25% less than the 2013 production and 1% less than 2021 production. Overall production trends have been decreasing from the 2013 reporting period and are within the approved limit of 150,000 tonnes per annum for the site.

Table 12 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
2021	52,268
2022	51,787

**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 2022 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 13 along with the monthly production data.

At the previous request from the DPE, an estimate of potential traffic movements at the 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 the 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 2022 reporting period. This was estimated by calculating the monthly truck/tonne average 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 13 and Table 14 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 the 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 13 and Table 14 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 13 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 2022 data</i>	710	163	23	150,000 (Annual)
January 2022	217	86.25	17	3,988
February 2022	233	88	13	4,417
March 2022	228	86	11	4,302
April 2022	209	78	10	3,514
May 2022	239	86.75	11	4,053
June 2022	248	91.25	12	4,325
July 2022	274	98.75	13	4,352
August 2022	257	94.75	12	4,472
September 2022	251	94.75	13	4,480
October 2022	257	97.25	13	4,636
November 2022	293	110.25	15	5,149
December 2022	240	88.25	11	4,099
Total	2,946			51,787

5.3.2 Identification of Trends

Historically, traffic movements recorded as part of day-to-day operations are limited to movements generated due to product delivery and dispatch, per the TMP. During the 2016 review of the TMP, the distinction between product loads bound for the warehouse and bulk tanker loads (bound for bulk delivery) was clarified. Consequently, monitoring activities have been expanded beyond product dispatch to reflect all production-related traffic movements to and from the site.

A comparison of traffic monitoring data for the current reporting period against historical traffic monitoring results is provided in Table 14 and is shown graphically in Figure 3.

The total number of annual truck movements recorded decreased by 50% from the previous reporting period from 5,858 to 2946. The total annual production decreased 1% from 52,268 to 51,787 tonnes from the 2021 reporting period. The number of truck movements during the reporting period is the

lowest in reported history and has dramatically decreased in comparison 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 month's production accounting for the time between recording production and receipt of goods/dispatch of goods. Tonnes produced per truck movement for the period averaged 17.61, with the highest being in February (18.96) and the lowest in July (15.88).

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 14 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 2022 data</i>	8,533	163	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	99	53,195
2021	5,858	112	52,268
2022	2,946	92	51,787

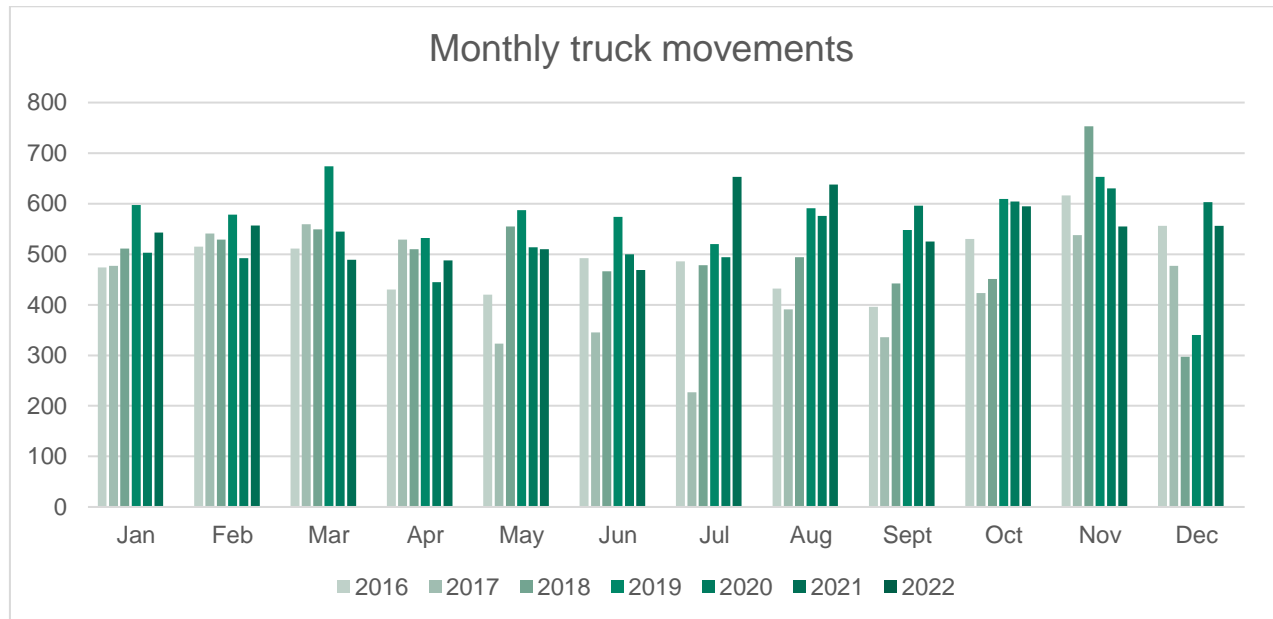


Figure 3 Comparison of historic monthly truck monitoring data

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 wherever possible. All paper and putrescible waste are 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 and disposal of outdated chemicals. 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 receipt or transfer processes. This is collected by an oil recycling company.
- Special waste is generated in small quantities during plant maintenance and removed from the 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 15. The proportion of General Waste (non-putrescible) that was recycled or disposed of to landfill for the current reporting period is provided in Table 16. The 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 15 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
Annual quantities from predictions in WMP ¹	364	390	104	2,600 ²	520	0
Monthly quantities from predictions in WMP ¹	30	33	9	217	43	0
January 2022	55.84	18.86	0	0	0	0
February 2022	85.82	37.14	0	90	0	0
March 2022	113.78	40.64	0	0	0	0
April 2022	40.44	23.94	0	0	0	0
May 2022	35.94	29.31	0	4,730	0	0
June 2022	61.22	36.48	0	90	0	0
July 2022	35.58	26.47	11,500	0	0	0
August 2022	42.10	30.57	0	0	0	0
September 2022	60.54	27.01	0	90	0	0
October 2022	38.28	25.03	0	0	0	0
November 2022	63.42	29.50	0	0	0	0
December 2022	53.30	25.98	0	180	0	0
Total	686.26	350.93	11,500	5,180	0	0
Average monthly	57.19	29.24	958.33	431.67	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 16 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)	153.35	197.58
Percentage of total	44	56
Average weekly (tonnes)	2.95	3.80

5.4.2 Identification of trends

A comparison of annual waste quantities for the current reporting period against historical results is provided in Table 17.

The quantity of General Waste (putrescible) generated at the site has reduced from a high of 965.57 in 2020 to 686.26 in 2022. Although this is a significant decrease from previous reporting periods, it is still higher compared to the previous reporting period in 2021 of 665.93. It is almost three times the average

annual amount of General Waste (putrescible) generated between 2013-2019. The General Waste (putrescible) in 2022 is the second highest annual quantity to date and follows the highest (965.57 tonnes) in 2020.

As shown in Table 15, the higher waste volume is primarily due to waste recorded in February (85.82 tonnes), and March (113.78 tonnes), which amount to around 29% of the total annual volume of putrescible waste. All months produced an exceedance in monthly predicted waste amount, with the 2022 average monthly amount being 57.19, which is 25.4 tonnes higher than the monthly average predicted in the WMP. Increases are generally associated with clear out of expired stock.

A total of 11,500 litres of Hazardous Waste was generated on site in the reporting period. All 11,500 litres of Hazardous waste were generated in July. This was associated with clean out of the grease traps on 07 July and 11 July 2022. In the previous reporting period, 132 litres of Hazardous Waste were produced due to a clear out of old chemicals from the engineering store. Hazardous waste production on site would likely continue to be associated with events of this nature.

Allied Pinnacle is 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 that identify, investigate and action improvement measures to reduce risk of non-conforming stock.

The amount of non-putrescible General Waste to landfill increased in the 2022 reporting period from 103.46 tonnes in 2021 to 153.35 tonnes. The total amount of non-putrescible General Waste, at 350.93 tonnes, is within the amount predicted by the WMP, 390 tonnes (an average of 7.5 tonnes per week).

Of the General Waste (non-putrescible) generated on site during the reporting period, approximately 44% was disposed of to landfill, and 56% was recycled, compared to 64% in the previous year.

The quantity of Liquid Waste generated at the site increased significantly in the reporting period, primarily due to the disposal of food grade oil following a mixing overdose in May leading to 4,730 litres of liquid waste being generated. Further liquid disposal was recorded in February (90 litres), September (90 litres) and December (180 litres). The WMP predicts a weekly average of 50 litres of liquid waste, a total of 2,600 litres per annum. The liquid waste generated exceeded this prediction by 2,580 litres.

Liquid Waste volumes have varied during operation with no apparent trend. Higher volumes are generally associated with specific events and isolated incidents, rather than routine operations. Liquid waste generated at the site has exceeded predictions every year with the exception of 2015 and 2016. Exceedances in 2013, 2014, 2017, 2019, 2020, 2021 and 2022 were the result of isolated incidents, the outcomes of which are addressed in the respective AEMR periods.

Table 17 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
Annual quantities from predictions in WMP ¹	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
2021	666	291	132	4,510	0	0
2022	686	351	11,500	5,180	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 DPE 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 Workplace 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 Allied Pinnacle in relation to the complaint or incident, including any follow up contact with the complainant/reporter; and
- If Allied Pinnacle took no action 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

No incident reports were submitted during the 2022 reporting period.

Table 18 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 19. Complaints are not categorised as incidents for the purposes of this report section; complaints are discussed in Section 6.3.

Table 19 Summary of incidents for the site

Date	Details	Action Taken
06-Apr-2022	Soy oil delivery was undertaken with the wrong attachment causing high-velocity soy oil to overflow into the receival cabinet.	The area was marked off for safety, and a spill kit was used to clean up. The spill kit was replenished and ready for the next incident.

6.3 Complaints Received During the Current Reporting Period

No complaints were recorded for the site during the current reporting period, as shown in Table 20.

Table 20 Summary of historical complaints received for the site

Date	Complaint Received	Action Taken
No complaints were recorded during the reporting period		

7.0 Recommendations and Action Plan

Recommendations identified through the AEMR process 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 site's environmental performance 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 reducing and are also well below the levels predicted in the SEE for the expansion of the site.

Waste quantities have slightly increased in the reporting period for General Waste (putrescible) and were still above predicted levels in the WMP. Most higher quantities are associated with specific circumstances rather than inefficiencies in general operations at the site. However, the monthly waste amount in the WMP was exceeded each month. It is noted that putrescible waste is sold as stock feed, reducing the site's waste contribution to landfill.

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 of the development. Allied Pinnacle will continue to engage with the local community, Council, the DPE 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.

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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

Appendix A Recommendations and Action Plan

Table A1 Recommendations and Action Plan for 2022 AEMR

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
Environmental Management Plan				
Consent condition 3.7	The Applicant must review and update the Environmental Management Plan regularly, or as directed by Director-General.	The EMP (version V01) was updated on 15 August 2022.	R. Ferris	August 2022
2022 Environmental Audit				
Consent condition 7.3	An IEA should be undertaken by an independent external audit team or auditor in accordance with the requirements outlined in Condition 7.3 of the Development Consent. Allied Mills will outline the requirements for the audit with the external auditor commissioned to complete this work in line with guidelines in the EMP.	The IEA was submitted to DPE on 26-Oct-2023	R. Ferris	October 2022
Table 9 IEA, Consent condition 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... Recommend AEMR has a section on submission to Council and Director General. Allied Pinnacle has a third party that prepares the AEMR, therefore they should be reviewing this requirement on a yearly basis.	The introduction of the AEMR has been updated to include that the AEMR has been prepared for submission to the Director General and Council.	AECOM	July 2023
Table 9 IEA, Consent condition 7.4	Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director- General may require the Applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Director General. Recommend Allied Pinnacle review their system and ensure they have processes in place to track and record when reports/documents are submitted to regulatory authorities and their associated responses. The auditor noted that DPIE now require everything to be	Allied Pinnacle is reviewing procedures to ensure that periodic reporting is tracked.	R. Ferris	September 2023

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
	submitted via a portal instead of emails and it is difficult to ascertain when documents are lodged.			
Table 9 IEA, Consent condition 8.4	<p>Within one month of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the Applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Director General.</p> <p>Recommended that Allied Pinnacle approach DPIE and seek change to this condition. One month does not appear to be sufficient time to commission and conduct the audit. Two months would be more appropriate based on how long the last audit took and in line with the IEA submission timeframe.</p>	Allied Pinnacle to review recommendation and advise any action planned/taken	R. Ferris	September 2023
2022 Hazard Audit				
Consent condition 8.3	An IHA should be undertaken by an independent external audit team or auditor in accordance with the requirements outlined in Condition 8.3 of the Development Consent. Allied Mills will outline the requirements for the audit with the external auditor commissioned to complete this work in line with guidelines in the EMP.	The IHA was submitted to DPE on 17-Oct-2023	R. Ferris	October 2022
Table E1 IHA , Action 1	Set up schedule and procedure to ensure Safety Data Sheets (SDS) are reviewed periodically (and updated as required)	A check of SDS is scheduled to occur every six months.	R. Ferris	November 2023
Table E1 IHA , Action 4	Explain (or detail) in the Environment Management Plan where the PIRMP information is detailed (it seems to currently be included in Section 7 and some other information included elsewhere) and ensure all required details are provided	Allied Pinnacle to review recommendation and advise any action planned/taken	R. Ferris	September 2023