

# INDEPENDENT ENVIRONMENTAL AUDIT

**Picton  
DA318-12-2004-i**

**Prepared for:**  
Allied Pinnacle  
4 The Crescent KINGSGROVE NSW  
2208

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## BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Allied Pinnacle (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

## DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
610.19097-R02-v1.0	31 August 2023	Sandy Lonergan	Brad Radloff	Sandy Lonergan

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## EXECUTIVE SUMMARY

SLR Consulting Australia Pty Ltd (SLR) was commissioned in November 2022 by Allied Pinnacle Pty Limited (Allied Pinnacle) to undertake an Independent Environmental Audit (IEA) for its food processing site, located at 330 Picton Road, Picton, New South Wales (the Site).

The IEA was performed in accordance with Condition 3.3 of Development Approval (DA) 318-12-2004-i, first approved on 9 August 2005. Three subsequent modifications have occurred, the first occurred in June 2007 to allow the relocation of the amenities building and a change to the sewage treatment system. The second occurred in February 2008 to allow for the rail siding on the Site. The third occurred in November 2017 relating to wastewater treatment and effluent application to land.

The Conditions of Consent consists of 76 conditions in total. SLR was engaged to conduct the IEA in accordance with Condition 3.3, with the scope of the audit limited to the three (3) year period since the last IEA was completed (2019).

The audit period was from October 2019 and October 2022, with SLR being supplied information from this period as requested.

Of the 76 Development Conditions, 44 (58%) were considered not triggered, hence 32 conditions were audited.

Of the 32 auditable conditions, compliance was achieved for 23 (72%) and non-compliance recorded for nine conditions (28%). Of the nine non-compliances, 4 (44%) related to noise conditions.

Of the remaining five (5) non-compliances identified, Condition 1.1 was triggered as not all conditions were complied with. A non-compliance was recorded as Allied Pinnacle did not receive auditor approval from the Department of Planning and Environment (DPE) prior to IEA commencing. Another non-compliance related to latest Annual Environmental Management Report (AEMR) not being available on the Allied Pinnacle website, whilst not all AEMR prepared in the audit period complied with the requirements of Condition 6.3. The final non-compliance related to the quarterly service of the AWTS being missed and exceedance of target requirements not being met on several occasions.

All non-compliances were assessed to be of a potential low risk to the community and environment.

The 2019 IEA achieved 72% compliance.

Of the 42 Environment Protection Licence (EPL) Conditions, five (5) were considered a note and another 14 were not triggered, hence 23 conditions were audited. Of the 23 auditable conditions, compliance was achieved for 20 (87%) and non-compliance recorded for three (3) conditions (13%).

Two of the three non-compliances relate to noise, of which one was for night time exceedance of limits and two were recorded as no evidence acoustic consultant undertook the monitoring in accordance with the condition in the EPL. It is noted that the acoustic report concluded that Allied Pinnacle operations were not the cause of the noise limit exceedance but other local influences such as motorway were the noise source.

The final non-compliance related to Environment Protection Authority (EPA) Annual Return being submitted outside the 60 days in 2021.

## EXECUTIVE SUMMARY

During the audit process it was evident that Allied Pinnacle personnel, particular the Site Manager, NSW WHSE Manager and National WHSE Manager there was a high degree of senior management commitment to minimising the impact on the environment.

The auditor recommended improvement was needed in terms of record keeping, particularly as there has been a number of key personal changes and the ability to track information was hindered but not having procedure in place on where to file certain information. Senior management acknowledge this deficiency and are already discussing how this will change moving forward. They are committed to improving these over the coming 12 months.

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- Appendix D Photographs from Site Audit
- Appendix E Correspondence from DPE and EPA
- Appendix F Registers of Attendance
- Appendix G Independent Audit Certification Form
- Appendix H Auditor CV and Approval Letter

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# 1 Introduction

## 1.1 Background

SLR Consulting Australia Pty Ltd (SLR) was commissioned in November 2022 by Allied Pinnacle to undertake an Independent Environmental Audit (IEA) for its food processing site, located at 330 Picton Road, Picton, New South Wales (the Site).

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

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

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

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

## 1.2 Audit Team

The audit team comprised solely of Sandy Lonergan (Lead Auditor, certified by SAI Global). Ms Lonergan has over 25 years auditing experience, has been a third party certification auditor for NCSI, has conducted numerous independent compliance audits for the Commonwealth Government, Planning Departments, and Environment Protection Authorities or equivalent in New South Wales and Queensland.

## 1.3 Audit Objectives

The audit objectives were:

1. To carry out the audit in accordance with Condition 3.3 of Development Approval (DA) 318-12-2004-i, first approved on 9 August 2005. It is noted that three subsequent DA modifications occurred, the first occurred in June 2007 to allow the relocation of the amenities building and with a change to the sewage treatment system. The second occurred in February 2008 to allow for the rail siding on the Site. The third modification occurred in November 2017 relating to wastewater treatment and effluent application to land.
2. To carry out the audit generally in accordance with the Department of Planning and Environment's document titled *Independent Audit Post Approval Requirements*, May 2020.



## 1.4 Audit Period

The audit period was from 23 October 2019 to the 24 October 2022.

## 1.5 Audit Scope

The IEA and subsequent report has been prepared pursuant to Condition 3.3 of DA-318-12-2004-i.

**Table 1** lists the requirements of this condition and indicates where each has been addressed in this IEA report.

**Table 1 Audit Condition and Where Each Requirement is Addressed in this Report**

Condition	Description of Condition	Where Addressed in this Report
3.3	Twelve months after the commencement of operations of the development, and every three years thereafter, or as otherwise agreed or required by the Director-General, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development.	This audit report
	The independent person or team shall be approved by the Director-General prior to the commencement of the Audit.	Appendix H
	An Environmental Audit Report shall be submitted for approval of the Director-General within one month of completion of the Audit.	Not applicable
	The audit shall:	
	a. Be carried out in accordance with ISO19001:2002 – Guidelines for Quality and /or Environmental Management Systems Auditing.	This audit report
	b. Assess compliance with the requirements of this consent, and other licences and approvals that apply to the development;	Sections 3.2, 3.3 and 3.4, Appendix A and Appendix B
	c. Assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under Condition 1.1 of this consent; and	Section 3.11 and Appendix C
	d. Review the effectiveness of the environmental management of the development including any environmental impact mitigation works.	Section 3.7
	The Director-General may require the Applicant to undertake works to address the findings or recommendations presented in the Report. Any such works shall be completed within such time as the Director General may require.	Not applicable

## 1.6 Report Structure

This report was structured as follows:

- Section 1 provides an introduction, background, description, scope of the audit, limitations and provides a guide to the structure of the report;
- Section 2 outlines the audit methodology. This includes the auditor approval, scope development, compliance evaluation and assessment criteria sections;
- Section 3 summarises the audit findings approval and documentation list including;
  - Compliance performance;
  - Summary of Agency Notices, Orders or Penalty Notices;
  - Non-compliances;
  - Previous audit recommendations;
  - Review of plans including sub-plans;
  - Environmental performance;
  - Consultation outcomes;
  - Complaints summary;
  - Incidents;
  - Actual versus predicted impacts;
  - Site inspections;
  - Site interviews; and
  - Key strengths.
- Section 4 outlines the recommendations from the audit for the non-compliances and opportunities for improvement; and
- Section 5 is the conclusion;
- Appendix A contains the complete list of all the conditions in the DA and details the audit findings;
- Appendix B contains the complete list of the all the EPL conditions and details of the audit findings;
- Appendix C contains the complete list of environmental performance predictions (mitigation and management measures) in the Environmental Impact Statement (EIS) as specified in the 2013 IEA for the site and details of the audit findings;
- Appendix D contains a selection of photographs from the site visit;
- Appendix E contains correspondence with Department of Planning and Environment (DPE) and Environmental Protection Authority (EPA);
- Appendix F contains Attendance Registers at the opening and closing meetings;
- Appendix G contains the completed Independent Audit Certification form; and
- Appendix H contains the audit team CVs and associated approval letter from the DPE.

## 1.7 Limitations

This report has been prepared for Allied Pinnacle to fulfil the requirements of the IEA as specified in the DA.

The scope of the audit, and subsequent report was limited and should not be used for any purpose other than that described above.

The following should be taken into account when reading and using this report:

- 1 One site visit was undertaken during this audit to familiarise the auditor with the site layout, site conditions and natural environment. Whilst the auditor requested to be shown all features of the sites impacted (environmentally) by the operations, the auditor has relied on information provided by Allied Pinnacle representatives during the site visit, including the selection of the areas of the site for the site inspection.
- 2 Allied Pinnacle provided (at their sole discretion) all of the documentation that has been accessible to the auditor. The auditor relied on the information and documentation provided and Allied Pinnacle to provide all relevant and pertinent information. It should be noted that the range of documentation provided may not have included all of the relevant environmental records held. The auditor asked to receive all relevant documentation. The auditor has not had the opportunity to verify any of the information provided nor have they had the opportunity to consult with any party other than Allied Pinnacle nominated representatives during this audit.

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## 2 Audit Methodology

### 2.1 Auditor Approval

Ms Lonergan was approved as the auditor by the Department of Planning and Environment (DPE) on the 8 July 2023. Refer to **Appendix H** for the auditor's CV and letter of approval from the DPE.

### 2.2 Scope Development

The auditor consulted with the following agencies and other relevant stakeholders to obtain their input into the Scope of the Audit:

- DPE;
- EPA; and
- Wollondilly Local Council.

Any correspondence received from the stakeholders is contained in **Section 3.8**.

### 2.3 Compliance Evaluation, Site Interviews and Inspection

The auditor used the following methodologies to gather evidence and evaluate compliance, where applicable:

- Consultation with key stakeholders
- A desktop review of records requested;
- Review of records on-site;
- Interviews with key personnel;
- Photographs from site visit/inspection; and
- Observations from the site visit/inspection.

The site visit was undertaken by Ms Lonergan, on the 16 June 2023 and involved attendance at the site induction, a site walk-around, taking photographs and interviews with key staff.

Information obtained and statements recorded during the interviews conducted whilst on Site were directly recorded as evidence (see **Appendices A, B and C**). The auditor also used the interviews as an opportunity to gain an appreciation of the extent to which the systems in place to manage environmental impacts from site operations were understood and implemented. Refer to **Section 3.13** for a list of the personnel interviewed.

## 2.4 Assessment Criteria

SLR adopted the compliance status descriptors outlined in Section 3.8 and reproduced below in **Table 2**, in the NSW Government, *Independent Audit Post Approval Requirements* May 2020.

**Table 2 Compliance Status Descriptors**

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

The following has been extracted from Section 3.8 from the *Independent Audit Post Approval Requirements*.

*The terms partial compliance, partial non-compliance or not verified or administrative non-compliance or other similar terms must not be used.*

*As part of the Audit evaluation, the auditor may make observations including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in Table 2.*

Note: As discussed with the DPE in October 2022, where a condition was related to a previous IEA period, it will now be listed as “Not triggered” as opposed to “Closed”.

## 3 Audit Findings

### 3.1 Approval and Document List

The following key documents were reviewed during the audit:

- DA318-12-2004-I - Conditions of Approval, MOD 3, November 2017;
- Environment Protection Licence (EPL No.) 12498;
- Allied Pinnacle, Picton Mill, NSW, Operational Environmental Management Plan, Revision 4, Effective date 15 April 2020, GHD;
- GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.
- OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.
- OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.
- Allied Pinnacle, Picton WHSE-001 Picton Pollution Incident Response Management Plan, V05, Issued: 15 November 2022;
- Allied Pinnacle, Picton WHSE-005 Picton Emergency Response Plan, Version No. V01, Issued: 15 November 2022;
- Extracts from Rapid Induct including sections on Traffic Rules, emergency/incidents, Picton Environmental Site Rules
- EPA Annual Return 6 July 2019 to 5 July 2020;
- EPA Annual Return 6 July 2020 to 5 July 2021;
- EPA Annual Return 6 July 2021 to 5 July 2022; and
- Various emails and letter correspondence between Allied Pinnacle and DPE.

### 3.2 Compliance Performance

Both the Development Consent Conditions and the Environment Protection Licence (EPL) for the site were audited as per the requirements of Condition 3.3. The EPL number for the site is 12498.

**Table 3** shows a summary of the findings of this audit in relation to the Development Consent Conditions, while **Table 4** shows a summary of the audit findings in relation to the EPL.

**Table 3 Summary Table of Compliance with DA318-12-2004-i**

Section	Total No. of Conditions	Conditions Audited	Compliance	Non-Compliance	Not Triggered
1	10	10	3	1	6
2	48	48	14	3	31
3	3	3	0	1	2
4	3	3	1	1	1
5	9	9	5	2	2
6	3	3	0	1	2
Total	76	76	23	9	44

**Table 4 Summary Table of Compliance with EPL 12498**

Section	Total No. of Conditions	Conditions Audited	Compliance	Non-Compliance	Not Triggered	Note
A	3	3	3	0	0	0
L	9	5	3	2	0	4
O	3	3	3	0	0	0
M	10	5	5	0	5	0
R	14	5	4	1	8	1
G	3	2	2	0	1	0
Total	42	23	20	3	14	5

### 3.3 Summary of Agency Notices, Orders or Penalty Notices

No order, nor penalty notices were issued to Allied Pinnacle during the audit period.

### 3.4 Non-compliances

**Table 5** summarises the non-compliances recorded against the DA conditions or EPL. Note in some instances the entire condition has not been documented in the table and .... is included at the end of these conditions. Refer to Appendix A or B for the condition in its entirety.

Three non-compliances relating to noise monitoring in the DA review, were also identified as non-compliances in the EPL review as the respective conditions are replicated.

**Table 5 Summary of DA and EPL Non-Compliances**

Section	Condition	Requirement (Summary)	Comment
1	1.1	<p>The Applicable must carry out the development generally in accordance with:</p> <ul style="list-style-type: none"> <li>a) Development Application DA-318-12-2004-i, lodged with the Department of Infrastructure, Planning and Natural Resources on 23 December 2004;</li> <li>b) the Environmental Impact Statement, <i>EIS For Grain Milling Facility, Picton Road, Maldon</i>, prepared by Kellogg Brown and Root Pty Ltd, dated 22 December 2004</li> </ul>	<p>Non-compliances identified in 2019/2020 reporting period, Condition 2.3 – Development was not operating within the allowable noise criteria for the site for two locations – Receiver 1 and 2.</p> <p>Condition 2.5 and 2.6 – the methodology used by the acoustic consultant was not specified within the Compliance report and the meteorological conditions were not as per the condition nor the EPL Condition.</p> <p>Condition 5.8 - the AWTS monitoring results taken on 11 February 2020 show the dissolved oxygen goal was not met 1.01 mgO<sub>2</sub>/L, goal is &gt;5mgO<sub>2</sub>/L. it was noted in the AEMR for 2019/2020 that <i>“The out-of-specification performance in February 2020 may be attributed to the lack of servicing in November 2019. Following maintenance of the AWTS, an additional sample was taken of the irrigation chamber and the results demonstrate that the chamber had returned to within the stated goals.”</i></p> <p>Dissolved oxygen goal not met in May 2021 and August 2021, 4.9 mgO<sub>2</sub>/L and 4.64 mgO<sub>2</sub>/L. Note in relation to these AWTS results, Allied Pinnacle consulted with the service company, as per the Water Monitoring and Management Plan (WMMP), who confirmed the system is working well, the water was in good condition and did not recommend any changes to the process.</p>



Section	Condition	Requirement (Summary)	Comment
2	2.3	<p>The Applicant shall design, construct, operate and maintain the development to ensure that the noise contributions from the development do not exceed the maximum allowable noise contribution limits specified in Table 1, at those locations and during those periods indicated. The maximum allowable noise contributions apply under meteorological conditions of:</p> <ul style="list-style-type: none"> <li>A) wind speed up to 3 m/s at 10 metres above ground level; or</li> <li>b) temperature inversion conditions of up to 3o C/100 m and wind speed up to 2 m/s at 10 metres above ground level.....</li> </ul>	<p>Non-compliance. The auditor could not verify if this condition was met with the 2019 noise monitoring was undertaken. The Compliance Report prepared by the acoustic consultant referred to the meteorological conditions in the Operational Noise and Vibration Management Plan which are not what is specified in this condition, nor the EPL Condition L3.6.</p> <p>SLR recommends Allied Picton confirm with the EPA as to which meteorological conditions are to be complied with. Then update OEMP accordingly.</p>
2	2.5	<p>For the purpose of assessing compliance with the LAeq<sub>(period)</sub> (being day, evening or night) and LAeq<sub>(15 minute)</sub> noise contribution limits specified in condition 2.3 noise from the development shall be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling (where the dwelling is more than 30 metres from the boundary). Notwithstanding, should direct measurement of noise from the development be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Secretary prior to the implementation of the assessment method. Section 4 of the Industrial Noise Policy shall also apply to the measures noise levels, where applicable.</p>	<p>Non-compliance. The auditor could not verify if this condition was met when the 2019 noise monitoring was undertaken.</p> <p>SLR recommends that during the next tri-annual noise monitoring that the company conducting the monitoring, specifically addresses this condition in their report to allow the auditor to determine compliance with this condition.</p>

Section	Condition	Requirement (Summary)	Comment
2	2.6	For the purpose of assessing compliance with the LA1 <sub>(1 minute)</sub> noise contribution levels specified under condition 2.3 of this consent, noise from the development shall be measured at 1 metre from the building façade. Notwithstanding, should direct measurement of noise from the development be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Secretary prior to the implementation of the assessment method.	Non-compliance. The auditor could not verify if this condition was met when the 2019 noise monitoring was undertaken.  SLR recommends that during the next tri-annual noise monitoring that the company conducting the monitoring, specifically addresses this condition in their report to allow the auditor to determine compliance with this condition.
3	3.3	<p>Twelve months after the commencement of operation of the development, and every three years thereafter, or as otherwise agreed or required by the Secretary, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Secretary prior to the commencement of the Audit. An <b>Environmental Audit Report</b> shall be submitted for the approval of the Secretary within one month of the completion of the Audit. The Audit shall:</p> <ul style="list-style-type: none"> <li>a) be carried out in accordance with <i>ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing</i>;</li> <li>b) assess compliance with the requirements of this consent, and other licences and approvals that apply to the development;</li> <li>c) assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this consent; and</li> <li>d) review the effectiveness of the environmental management of the development, including any environmental impact mitigation works.</li> </ul> <p>The Secretary may require the Applicant to undertake works to address the findings or recommendations presented in the Report. Any such works shall be completed within such time as the Secretary may require.</p>	Auditor was not approved prior to the commencement of the auditor. The auditor submitted all the documents to Allied Pinnacle in November 2022, however the previous Site Manager did not submit to the Department.

Section	Condition	Requirement (Summary)	Comment
4	4.1	Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request. This shall include provision of all documents at the site for inspection by visitors, and in an appropriate electronic format on the Applicant's internet site, should one exist.	The AEMR for 2020/2021 was located on the Allied Pinnacle website when reviewed instead of the 2021/22 AEMR.
5	5.4	<p>As part of the Operation Environmental Management Plan for the development, required under condition 5.3 of this consent, the Applicant shall prepare and implement the following Management Plans:</p> <p>a) a <b>Noise Management Plan</b> to detail measures to mitigate and manage noise during operation of the development. The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) procedures to ensure that all reasonable and feasible noise mitigation measures are applied during operation of the development, including those measures listed in condition 2.7;</li> <li>ii) a system to undertake periodic assessment of Best Available Technically Economically Achievable and Best Management Practices to minimise noise emissions at all times and to seek to achieve noise reduction in accordance with the goal prescribed in condition 2.7;</li> <li>iii) procedures to generate suitable documentation for annual environmental reporting, that demonstrates that the noise limits and noise goals specified under this consent, or best practice noise control operations, are being met;</li> <li>iv) identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits and noise goals specified under this consent;</li> </ul> <p>identification of activities that will be carried out in relation to the development and the associated noise sources;</p>	Non-compliance relate to the Noise Management Plan. Refer to Condition 2.3, 2.5 and 2.6 non-compliances.

Section	Condition	Requirement (Summary)	Comment
5	5.8	<p>The Applicant must ensure the AWTS is serviced prior to any irrigation recommencing. The service report, together with records of those measurements are to be submitted to the Department prior to any irrigation recommencing and then on a quarterly basis. Before commencing each service, measurements are to be taken to demonstrate that the following target requirements have been met:</p> <p>a) faecal coliforms or <i>E.coli</i> (thermotolerant coliforms) must be less than 100 colony forming units per 100 ml in the irrigation chamber;</p> <p>b) dissolved oxygen in the irrigation chamber is more than 5 mg O<sub>2</sub>/L at 20 degrees Celsius; and</p> <p>c) free available chlorine in the irrigation chamber is between 0.01 and 2.0 mg/L.</p>	<p>Aerated Wastewater Treatment System monitoring was not undertaken for November 2019 and service report not completed. All quarterly monitoring and service reports have been completed since this time.</p> <p>Non-compliance also recorded for not meeting targets in terms of E.coli and dissolved oxygen.</p>
6	6.3	<p>The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Secretary, an <b>Annual Environmental Management Report</b> (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to:...</p>	<p>In general the AEMR met the condition however, the following discrepancy were identified:</p> <ul style="list-style-type: none"> <li>Copies of noise monitoring results not included in the 2019/20 AEMR.</li> <li>Wastewater volumes not included in the past three AEMRs.</li> <li>In 2021/22 report – Condition 1.1 and 5.8 where compliance level was stated as Compliant when non-compliances were recorded against dissolved oxygen levels in May and August 2021.</li> </ul>
<b>EPL Non-compliances</b>			
L	3.2	<p>Noise generated at the premises must not exceed the noise limits presented in the table below.</p> <p>Note: the noise limits represent the noise contribution from the Allied Mills premises. Refer to actual license for table.</p>	<p><i>This non-compliance was the same as one for Condition 2.3 in Conditions of Approval.</i></p> <p>Non-compliance identified was the noise emission from the operation of site exceeds the sleep disturbance noise criteria at Receivers 1 and 2. However the acoustic consultant concluded that “On the basis of the noise survey, the noise emission levels from Allied Pinnacle site are not acoustic apparent to nearby sensitive Receivers with the comparison of other existing noise sources such as road traffic noise.</p>

Section	Condition	Requirement (Summary)	Comment
L	3.5	Noise from the premises is to be measured at 1m from the dwelling façade of a residential receiver (specified in Condition L3.2) to determine compliance with the LA1 (1 minute) noise limits in condition L3.2.	<i>This non-compliance was the same as one for Condition 2.6 in Conditions of Approval.</i> Auditor could not verify if this condition was met, hence recorded as non-compliance.
R	1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	The EPA Annual Return was submitted late in 2021.

## 3.5 Previous Audit Recommendations

### 3.5.1 2013 IEA

As outlined in the 2017 IEA, all recommendations were implemented, where applicable and appropriate from the 2013 IEA undertaken by AECOM.

### 3.5.2 2017 IEA Recommendations – Status

**Table 6** summarises the recommendations made in the 2017 IEA in relation to the OEMP and associated sub-plans that have not been closed. These recommendations were intended to provide guidance for Allied Pinnacle in resolving the non-compliances identified. As part of this IEA, SLR has reviewed the status of the recommendations made that were considered open at the last IEA.

**Table 6 2017 IEA Recommendations for the OEMP and Sub-Plans**

Recommendation	Justification	Status
OEMP – Appendix C - Traffic Management Sub-Plan, Table 1 – Key Legislation and guidelines needs to be reviewed and updated	During the audit the auditor sighted two pieces of legislation that are no longer current, the Protection of the Environment Operations (Clean Air) Regulation 2002 is now 2010 and Road Transport (Mass, Loading & Access) Regulation 1996 has been repealed and replaced with 2005 Regulation.	Not implemented. Open as SLR has put forward this recommendation again as the information was not current.
OEMP – Appendix E – Landscape Management Sub-Plan, Section 3.2 to be update to reflect rezoning decision by Wollondilly Council.	DP&E advised on 24 May 2016 they accepted decision and additional landscape treatment L2 is no longer required.	Not implemented. Open as SLR has put forward this recommendation again as the information was not current.

All recommendation made in the 2017 IEA in relation to general recommendations are closed as per the 2020 IEA report.

**Table 7** summarises the status on the additional recommendations and opportunities for improvement that were still open at the completion of the last IEA report. Note any additional recommendation that were identified as closed in the previous IEA report have been removed from the table.

**Table 7 2017 IEA - Additional Recommendations and Opportunities for Improvement**

Opportunity	Justification	Status
AEMR to include daily treated effluent volumes for the year.	To determine if the maximum volume allow to be irrigated per day, 3,000L is being complied with.	Open as SLR has re-iterated this finding again as information was not current.

### 3.5.3 2020 IEA Report Recommendations – Status

**Table 8** summarises the recommendations made in the 2020 IEA report in relation for the OEMP and associated sub-plans. These recommendations were intended to provide guidance for Allied Pinnacle in resolving the non-compliances identified. All except one recommendation was implemented.

**Table 8 2020 IEA Recommendations for Improvement for Plans and Procedures**

Recommendation	Justification	Status
<b>Previous IEA</b>		
OEMP – Appendix C - Traffic Management Sub-Plan, Table 1 – Key Legislation and guidelines to be reviewed and updated.	During the audit the auditor sighted two pieces of legislation that are no longer current, the Protection of the Environment Operations (Clean Air) Regulation 2002 is now 2010 and Road Transport (Mass, Loading & Access) Regulation 1996 has been repealed and replaced with 2005 Regulation.	Completed – Table 36 in OEMP, Appendix C – Traffic Management Plan has been updated. Closed.
OEMP – Appendix C - Traffic Management Sub-Plan, Section 6.1 include Condition 2.34 requirement to enter and leave the site in a forward motion.	At present the facility rules under Section 6.1 does not stipulate this requirement.	OEMP, Appendix A NVMP, Table 18 – Operational mitigation measures specifies Condition 2.34 requirement and Section 26.1 of OEMP Appendix C Traffic Management Sub-Plan now includes this requirement. Closed.
OEMP – Appendix E – Landscape Management Sub-Plan, Section 3.2 to be up-date to reflect rezoning decision by Wollondilly Council.	DPE advised on 24 May 2016 they accepted decision and additional landscape treatment L2 is no longer required.	OEMP, Appendix E Landscape Management Sub-Plan, Revision 4, Effective 15/4/2020, Section 37.2 has been updated. Closed.
Update the Soil and Water Management Sub-Plan to include a management measure in relation 2.30.	The OEMP nor any other document reviewed covers condition 2.30, by incorporating into OEMP Sub-Plan greater chance of ensuring compliance.	OEMP, Appendix B – Water Monitoring and Management Plan Sub-Plan, Revision 4, Effective 15/4/2020, Condition 2.30 added to Table 25 and covered in Section 16.2. Closed.
<b>2019</b>		
Update Table 2 of the OEMP – Other relevant consent conditions to include Condition 5.5 of the Conditions of Consent. Alternatively update the Combined Implementation Checklist – Triennial Checklist to include OEMP three yearly formal review.	At present the OEMP does not addressed the requirements of the three yearly formal review of the OEMP. This would increase the chance of non-compliance in the future with this condition.	OEMP, Revision 4, Effective 15/4/2020, Table 2 has been updated to include Condition 5.5 OEMP review and also covered in Section 5.5.1. Closed.
Update Table 9 in OEMP to include reporting obligation for the Independent Environmental Audit.	Condition 3.3 requires the audit report to be submitted for approval of the Director General within one month of the completion of the Audit.	OEMP, Revision 4, Effective 15/4/2020, Table 9 has been updated to include Condition 3.3 reporting obligation. Closed.

Recommendation	Justification	Status
Rename Soil and Water Management Plan in OEMP to Water Monitoring Management Plan.	Currently it is confusing the correct name of the document. OEMP refers to the Soil & Water Monitoring Plan throughout and table of contents as Appendix B. However, the title is Soil and Water Management Sub Plan but the first sentence states "This Water Monitoring and Management Sub-Plan (WMMP) responds to the specific requirements of the Consent Conditions for Development Application DA-318-12-2004-I as modified by Modification approved on 30 November 2017. The WMMP forms part of the OEMP.... And supersedes the document formerly known as the Soil and Water Management Plan, July 2015.	OEMP, Revision 4, Effective 15/4/2020 including Appendix B has been updated. Closed.
Update Table 2 of the Soil and Water Management Plan to include Condition 2.12.	To assist with complying with the condition.	OEMP, Appendix B – Water Monitoring and Management Plan Sub-Plan, Revision 4, Effective 15/4/2020, Condition 2.30 added to Table 25 and covered in Section 16.2. Closed.
Update the WMMP implementation checklist in Appendix A to include Condition 2.12.	To assist with complying with the condition.	OEMP, Appendix F – Implementation checklist for the OEMP, Revision 4, Effective 15/4/2020. Not updated as yet. Open.
Updating the Landscaping Management Plan to include correct cross references in the Plan.	Currently Table 1 refers to Section 2, when correct location is Section 4. Also Section 4.3 in the table should be Section 4.4.	OEMP, Appendix D – Landscape Management Sub-Plan, Revision 4, Effective 15/04/2020, it would appear Table 1 has been updated. Deemed closed as entire OEMP including sub-plans need to be reviewed and updated as incorrect formatting throughout.
Updating the Traffic Management Plan to include the correct cross-referencing in the Plan in Table 1.	Currently Table 1 refers to Section 6.1 in last row when it should be Section 6.2.	OEMP, Appendix C – Traffic Management Plan Sub-Plan, Revision 4, Effective 15/4/2020, Table 1 has been updated. Closed.
<b>Additional Recommendations -2020</b>		
The latest version of the Conditions of Consent to be uploaded to the Allied Pinnacle website under Picton Site	Currently the original Consent Conditions are located on the website	Sighted latest version of the conditions on the website on 1 April 2023. Closed.



### 3.6 Review of Plans and Sub-Plans

During the audit, the auditor sighted and reviewed the latest version of the OEMP, including its sub-plans. It is evident that the OEMP has evolved over the past 15 years, since approval was granted for the facility. Recommendations from the review are captured and summarised in **Section 4.2** of this report.

The OEMP needs to be reviewed and format issues corrected.

### 3.7 Environmental Performance

Allied Pinnacle demonstrated a high level of effectiveness in terms of environmental management practices employed at the site. No environmental incidents have occurred on-site during this reporting period.

Allied Pinnacle has implemented numerous mitigation measures to minimise the impact on the environment, which are also outlined in the site's Operational Environmental Management Plan (OEMP) and many of these measures were observed during the site audit and recorded in **Appendix A**.

The OEMP also outlined a number of environmental inspections (monthly, quarterly and six monthly) to be conducted on site and the monitoring requirements under each of the sub-plans. Compliance was observed during this audit in relation to completion of the environmental inspections.

No environmental complaints or reportable environmental incidents were recorded during this reporting period. Refer to Sections 3.9 and 3.10 respectively for further details.

Record keeping needs to be addressed to ensure records are readily available for internal and external audits.

### 3.8 Consultation Outcomes

SLR sent emails to the DPE and EPA on 28 March 2023 and Wollondilly Shire Council on the 18 June 2023. Refer to Appendix E for extracts from the correspondence received.

### 3.9 Complaints Summary

No complaints have been recorded during this IEA period. Allied Pinnacle has an established and well documented complaints procedure. SLR noted that the complaints were recorded as an incident in the Allied Pinnacle system and the investigation outcomes recorded.

### 3.10 Incidents

Six environmental incidents were recorded during this IEA period of which none were considered reportable to the DPE and EPA. The six incidents are summarised in **Table 9**. The auditor queried Allied Pinnacle on evidence of corrective actions undertaken for some of the incidents.

A high level of environmental management was observed during the site visit. No environmental incidents were observed.

**Table 9 Environmental Incident Summary**

Incident & Investigation Report Number	Date of Incident	Type of Incident	Immediate Actions	Root Cause / Corrective Action	Evidence of Corrective Actions complete
005442	3/2/2020	Flour dumped onto ground during tanker loading through bottom valve which was open	Told driver to stop loading, tanker was moved and flour was cleaned up with shovels and brooms	Transport company asked to investigate and provided report indicating that driver was sufficiently familiar with tanker. (Murphy's Transport investigation). Driver not following procedures. Corrective action – organise suitable training for contract drivers (3/3/20 – closed)	Auditor sighted records of Transport company internal investigation into the incident and root cause was lack of training on new vehicles prior to them put into use. Also sighted limited training records.
005737	11/5/2020	Hydraulic leak from forklift	Employee identified oil leaking, turned off forklift, saw hydraulic hose had come loose. Spill kit used to clean up and witch's hats as a safety barrier.	Forklift taken out of service, contacted company to carry out repairs and then back in service (closed out 11/5/2020)	Site Manager explained this would have been handled under maintenance contract and therefore no separate Work Order or similar would have been generated.

Incident & Investigation Report Number	Date of Incident	Type of Incident	Immediate Actions	Root Cause / Corrective Action	Evidence of Corrective Actions complete
005827	12/6/2020	During unloading of B trailer as unloading – flour shifted (normal practice) but shot out of the top rear hatch seal	Approximately 4 kg was swept from the ground with smaller amount released into atmosphere.	Metals shims were removed from the top hatches of the taker during overhaul of the components. The levers should be adjustable, the levers have seized and are not able to be adjusted. The tanker was originally supplied with metal shims in place on top hatches. A makeshift metal shim was used by the driver to unload. Root cause – metal shims removed due to food safety concerns without identifying further potential risks ie environmental/operational.  Corrective action: replace with new parts (31/7/2020 – closed)  Stainless steel shims installed on #3 and #4 top hatches. (15/6/20 – closed)	Auditor sighted the corrective action work orders.
006672	15/6/2021	Oil leak from Bulk tanker stored in Warehouse loading areas	Cleaned up with spill kit	Arrange for the truck to be serviced and all the truck fleet to maintain their regular service schedules to reduce the risk of such issues.	Not reviewed.

Incident & Investigation Report Number	Date of Incident	Type of Incident	Immediate Actions	Root Cause / Corrective Action	Evidence of Corrective Actions complete
007182	7/2/2022	Millmix bin overflow and spilled Millmix over a large area of the external grounds. The high level sensor did not stop the mill.	Bulk Tanker driver raised the alarm, the mill was then suspended and clean up commenced.	<p>Contributing factors identified as bin measurement was not recorded correctly and the high level sensor had been bypassed.</p> <p>Corrective actions –</p> <ol style="list-style-type: none"> <li>1. Assess the high level sensor in Millmix to check if operational, if not install appropriate sensor.</li> <li>2. Toolbox with all staff onsite – high level sensors never to be bypassed. If there are operational issues with safety sensors these must always be escalated and hazard reports raised.</li> </ol>	Auditor sighted PO for new sensor and maintenance Work Order to install

Incident & Investigation Report Number	Date of Incident	Type of Incident	Immediate Actions	Root Cause / Corrective Action	Evidence of Corrective Actions complete
006319	7/1/2021	Underground fire feed pipe broke	Pumps switched off, fire impairment notice provided to insurer. Plumber contacted.	<p>Fire pump was suppose to have flange join, this was a coupling join not compliant. Further investigations discovered there were other areas of pipe work that were not compliant – this would comprise the fire protection on site in an emergency. Risk score changed to critical.</p> <p>Correction actions:</p> <ol style="list-style-type: none"> <li>1. Cut out the pipe with clamp join and replace with compliant flange mount pipe (closed 5/2/21)</li> </ol>	<p>Auditor queried Potential Risk of Incident as Minor when identified as critical. Minor related to environmental impact, whilst critical related to operational impact. Site Manager and NSW WHS Manager acknowledged that further training of personnel will be occurring to clarify classification of risk.</p> <p>Auditor queried corrective action for other areas identified as non-compliant in the initial investigations as not covered in corrective action. Site Manager explained that at the time of construction flanges were compliant with Codes at the time, however now they would be considered non-compliant.</p>

### 3.11 Actual versus Predicted Impacts

SLR audited the EIS mitigation and management measures (predictions), as outlined in the 2013 IEA, and the detailed findings of audit have been presented in Appendix C. SLR audited the same EIS predictions that were applicable to this IEA reporting period, to allow consistency between each IEA.

There were a number of commitments made in the EIS that have not either complied with, non-complied with 100% of the time or not been triggered. Of the 15 EIS predictions audited:

- Three (3) were not triggered;
- Seven (7) were complied with; and
- Five (5) were closed.

SLR recommends the following:

- Review of all EIS predictions to occur to determine which EIS predictions and commitments are relevant to the current operations based on risk and operating practices.
- Once this has been clarified an “update” set of EIS predictions can be available for the next IEA.

### 3.12 Site Inspection

Refer to detailed **Appendices A, B and C** for observations made during the site inspection, while **Appendix D** contains photographs taken during the site inspection.

### 3.13 Site Interviews

**Table 10** lists the personnel interviewed during the site visit component of the audit.

**Table 10 Personnel Interviewed During the Audit**

Name	Title
Mark Hughes	Site Manager
Maria Hooker	National WHSE Manager
Dominika Paldyna	NSW WHSE Manager

The interviews conducted allowed the auditor to form the opinion that the approach to environmental management and environmental controls (and operations more broadly) is well understood by senior staff.

### 3.14 Key Strengths

The following strengths in terms of environmental management were identified:

- Commitment from senior management to protection of the environment;
- Resources dedicated to environmental management within the business, with more resources to be allocated;
- Knowledge of senior management of their environmental management processes;
- Well established and documented OEMP, procedures;

- Regular inspections of key environmental issues; and
- Well established environmental training for employees and contractors. Spill training in the field is conducted on a regular basis. Also environmental induction refresher training occurs every two years as well.

## 4 Recommendations

### 4.1 Non-compliances

**Table 11** summarises the non-compliances identified during the audit against the DA conditions and EPL conditions and puts forward recommendations for Allied Pinnacle to consider to assist in resolving these.

**Table 11 Recommendations to Address Non-compliances with DA and EPL Conditions**

DA Condition	EPL Condition	Topic of Non-Compliance	SLR Recommendation
2.3 & 5.4 a)	L3.3	Exceedance of noise limits.	Prepare modification to the DA conditions to have the noise monitoring locations, noise limits etc reassessed. Zonings have changed.
2.5, 2.6 & 5.4a)	L3.5	Noise monitoring reports.	Ensure that Allied Pinnacle provide all relevant details to the acoustic companies quoting to complete the noise monitoring. That includes not only the relevant sections out of the ONMP, but also copies of Condition 2.3 to 2.6 of the DA and EPL licence conditions.
3.3	NA	Not receiving approval of auditor prior to auditor commencing	Define in Section 5.5.1 of the OEMP who is responsible for submitting documents to the DPE and ensuring approval has been received, prior to information being sent to auditor.
4.1	NA	The AEMR for 2020/2021 was located on the Allied Pinnacle website when reviewed instead of the 2021/22 AEMR.	September each year review the company's website to ensure latest documents are available. Noting that AEMR normally prepared in July/August each year.
5.8	NA	Did not carry out maintenance on AWTS in November 2019 which lead to targets not being met in terms of quality.	Update OEMP Appendix F – Implementation Checklist for the OEMP. Set dates/months when to conduct and align with servicing of AWTS and wastewater testing.  Eg. Quarterly checklist – January, April, July and October each year. Therefore AWTS service due same months, plus wastewater monitoring.
6.3	NA	AEMR	All conditions of consent are included in Appendix A.



## 4.2 Opportunities for Improvement

**Table 12** summarises the opportunities for improvement suggested for consideration by Allied Pinnacle to aid in environmental management on site and reduce the risk for potential environmental harm. These opportunities were identified during this IEA along with some recommendations from the previous IEA that were not implemented.

**Table 12 Recommendations for Improvement for Plans, Procedures**

2023	Justification
Update Section 4 OEMP to include NSW WHSE Manager and the National and NSW WHSE managers roles for the site.	To update OEMP to reflect new NSW WHSE Manager position and to have clear roles and responsibilities defined.
Update Appendix A to Appendix E in the OEMP.	Incorrect formatting means that the Table of Contents in each of the plans do not match what is in the Sub-Plans.
Update Appendix A – NVMP – state the correct meteorological conditions (Condition 2.3 of the development consent and Condition L3.6 of the EPL) in the ONVMP.	Currently incorrect meteorological conditions are included in the Plan and subsequently the acoustic consultants for 2016 and 2019 monitoring has referenced incorrect data in the ONVMP and not referred to the EPL nor Consent conditions.
Update Appendix A – NVMP – Section 12.2.1 – consult with the EPA and determine what meteorological conditions are to be adhered to for the tri-annual noise monitoring.	Section 12.2.1 refers to metrological conditions that do not align with development consent nor EPL Condition 3.6.
Update Appendix A – NVMP – Section 12.3 – second paragraph needs to amend wording to be consistent with first paragraph in this Section.	Contradicting as whether 3 yearly monitoring is required or only recommended. As all other documents refer to three yearly monitoring, auditor recommending changing the wording from recommended to required.
Update Appendix B – WMMP – Section 20, refers to Appendix A	There is no Appendix A in the Sub-Plan.

**Table 13** outlines additional recommendations for Allied Pinnacle to consider.

**Table 13 Additional Recommendations**

Opportunity	Justification
Allied Pinnacle to consider preparing AEMR themselves.	Current company is not including all conditions of consent, incorrect statement of compliance with conditions when non-compliant, incorrect referencing.  If Allied prepared auditor believes this would lead to increased compliance and understanding of the evidence needed to ensure compliance on on-going basis.
Annual Environmental Management Reports – consider adding the actual Certificates of Analysis to the reports in an Appendix.	Ensures that Allied Pinnacle has copy of the results in one location. The data will be readily available for any external auditor or if results need to be located for internal reasons.

Opportunity	Justification
<p>AEMR – Appendix A Compliance Tracking table to include all conditions of consent. For example Condition 2.30, 2.34 missing</p>	<p>At present not all conditions are included, therefore incomplete. Refer back to GHD AEMR 2019/2020 which includes all conditions.</p> <p>Not able to verify compliance in relation to preparing AEMR. Not listed in table and therefore compliance could not be determined.</p>
<p>AEMR – Appendix A Compliance Tracking Table – needs to ensure the entire condition is included not partial as it can lead to misinterpretation of requirements and therefore inaccurate assessment of compliance on annual basis.</p>	<p>For example, Condition 5.4 states</p> <p>5.4 As part of the Operation Environmental Management Plan for the development, required under condition 5.3 of this consent, the Applicant shall prepare and <b>implement</b> the following Management Plans:</p> <p>a) a Noise Management Plan to detail measures to mitigate and manage noise during operation of the development. The Plan shall include, but not necessarily be limited to</p> <p>As a result implementation of the management plans 5a to 5e has not been considered or assessed in Compliance Tracking Table.</p>
<p>2020/21 and 2021/22 AEMR – Appendix A Compliance Tracking Tables Condition 2.29 – comments related to previous period and therefore no evidence of compliance was included in Comments section</p>	<p>Compliance level was listed as compliant however no evidence provided to justify this finding.</p>
<p>2020/21 AEMR – Appendix A Compliance Tracking Tables Condition 3.3 – recommended that person responsible for updating compliance table reviews all aspects of the condition. For example this condition was considered “Not triggered” when in fact the Secretary (Department) requested Allied Pinnacle to undertake works to address the findings or recommendations in the report.</p>	<p>Letter was sent to Allied Pinnacle on 21 April 2020 which was within the 2020/2021 AEMR period as it covers the period from 1 April 2020 to 31 March 2021.</p>
<p>2019/2020 AEMR – Appendix A Compliance Tracking Table Condition 3.3 – as above – the person completing the table needs to review all aspects of the condition.</p> <p>Also condition requires report to be submitted within one month of completion to the Department.</p>	<p>No evidence of when IEA was submitted to Allied Pinnacle from SLR and no evidence of when submitted to the DPI&amp;E.</p>

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## 5 Conclusions

SLR was engaged in December 2022 to conduct the IEA. The audit period was between October 2019 and October 2022, with SLR being supplied information as requested to validate complaint status during this period.

Of the 76 Development Conditions, 44 (58%) were considered not triggered, hence 32 conditions were audited.

Of the 32 auditable conditions, compliance was achieved for 23 (72%) and non-compliance recorded for nine conditions (28%). Of the nine non-compliances, 4 (44%) related to noise conditions.

Of the remaining five (5) non-compliances identified, Condition 1.1 was triggered as not all conditions were complied with. A non-compliance was recorded as Allied Pinnacle did not receive auditor approval from the DPE prior to IEA commencing. Another non-compliance related to latest AEMR not being available on the Allied Pinnacle website, whilst not all AEMR prepared in the audit period complied with the requirements of Condition 6.3. The final non-compliance related to the quarterly service of the AWTS being missed and exceedance of target requirements not being met on several occasions.

All non-compliances were assessed to be of a potential low risk to the community and environment.

The 2019 IEA achieved 72% compliance, same result this audit.

Of the 42 EPL Conditions, five (5) were considered a note and another 14 were not triggered, hence 23 conditions were audited. Of the 23 auditable conditions, compliance was achieved for 20 (87%) and non-compliance recorded for three (3) conditions (13%).

Two of the three non-compliances relate to noise, of which one was for night time exceedance of limits and two were recorded as no evidence acoustic consultant undertook the monitoring in accordance with the condition in the EPL. It is noted that the acoustic report concluded that Allied Pinnacle operations were not the cause of the noise limit exceedance but other local influences such as motorway were the noise source.

The final non-compliance related to EPA Annual Return being submitted outside the 60 days in 2021.


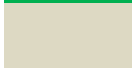
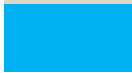
During the audit process it was evident that Allied Pinnacle personnel, particular the Site Manager, NSW WHSE Manager and National WHSE Manager there was a high degree of senior management commitment to minimising the impact on the environment.

The auditor recommended improvement was needed in terms of record keeping, particularly as there has been a number of key personal changes and the ability to track information was hindered but not having procedure in place on where to file certain information. Senior management acknowledge this deficiency and are already discussing how this will change moving forward. They are committed to improving these over the coming 12 months.

# APPENDIX A

## Detailed Audit Findings

**Key:**

	Compliant
	Not triggered
	Non-compliant

Note

**Table 14 Detailed Audit Findings – Conditions of Consent**

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Scope of Development				

<p>1.1</p>	<p>The Applicable must carry out the development generally in accordance with:</p> <ul style="list-style-type: none"> <li>a) Development Application DA-318-12-2004-i, lodged with the Department of Infrastructure, Planning and Natural Resources on 23 December 2004;</li> <li>b) the Environmental Impact Statement, <i>EIS For Grain Milling Facility, Picton Road, Maldon</i>, prepared by Kellogg Brown and Root Pty Ltd, dated 22 December 2004</li> <li>c) additional information relating to air quality, traffic, waste water, visual amenity impacts and responding to issues raised in submissions prepared by Kellogg Brown and Root Pty Ltd, including the Visual Assessment: Additional Information report prepared by Garry Stanley and dated March 2004, all submitted to the Department on 12 April 2005;</li> <li>d) additional information relating to construction noise prepared by Heggies Australia and dated 28 April 2005;</li> <li>e) <i>Aboriginal Heritage Assessment, Final Report for the Proposed Allied mills Flour Mill, Picton NSW</i>, prepared by Austral Archaeology Pty Ltd, dated May 2005, and submitted to the Department 2 June 2005;</li> <li>f) additional information relating to operational noise prepared by Heggies Australia and dated 10 June 2005;</li> <li>g) MOD 1;</li> <li>h) MOD 2;</li> <li>i) MOD 3; and</li> <li>j) the conditions of this consent.</li> </ul>		<p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 3, 8 August 2019. P-ENV-02.</li> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road Maldon. SLR, SLR Ref 610.19168-R01, Version v1.0, December 2019.</li> <li>• SLR Offer of Service – Operational Noise Compliance Monitoring, Allied Pinnacle Picton, dated 6 July 2022.</li> <li>• Email from Allied Pinnacle to SLR dated 14 March 2022 requesting SLR proceed with quotation dated 6 July 2022.</li> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, April 2020. Noise and Vibration Management Sub-Plan. GHD. P-</li> </ul>	<p>Non-compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<p>ENV-02a Picton OEMP Appendix A, Revision 3, Effective 08.08.2019</p> <ul style="list-style-type: none"> <li>• Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Exceedances at Receiver 1 and 2 predicted/measured. Condition 2.3 and EPL Condition L3.6.</li> <li>• Wind speed incorrect in NVMP and SLR report – both mention 5m/s whilst this condition and EPL refer to 3 m/s. Condition 2.3 and EPL Condition L3.6.</li> <li>• Operational Noise Survey, Allied Pinnacle, 330 Picton Road, Maldon, SLR Report Number 610.16992-R02, version 1.1 dated 6 July 2017. Monitoring undertaken on 15 December 2016. Non-compliance with three year interval between noise monitoring as per ONVMP Section 12.3.</li> <li>• Condition 5.8 – AWTS dissolved oxygen goal not met in February 2020 and quarterly service of the AWTS was not carried out in November 2019.</li> <li>• Condition 5.8 - AWTS dissolved oxygen goal not met in May 2021 and August 2021.</li> </ul>	

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1.2	a) If there is any inconsistency between the plans and documentation listed under Condition 1.1 above, the most recent document prevails to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency.		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>P-ENV-02c Picton OEMP, Appendix C – Allied Pinnacle, Picton Mill, NSW, Traffic Management Sub-Plan, GHD, Revision 4, 15 April 2020.</li> </ul> <p>The Traffic Management Plan approved in 2015 prevails over the EIS traffic predictions.</p>	Compliant
<b>Statutory Requirements</b>				
1.3	The Applicant shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals.	Site visit: current EPL available on site.	<p>Websites and documentation viewed:</p> <ul style="list-style-type: none"> <li>Review of the Public Register on 1 April 2023 on EPA website showed current version of the EPL 12498 was issued on 9 April 2018.</li> <li>Allied Pinnacle website had the current EPL for the site as of 1 April 2023.</li> <li>DA-318-12-2004-I MOD 3 issued on 30 November 2017 was also located on Allied Pinnacle website on 1 April 2023.</li> </ul>	Compliant
<b>Dispute Resolution</b>				



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1.4	<p>In the event that a dispute arises between the Applicant and Council or the Applicant and a public authority other than the Department, in relation to a specification or requirement applicable under this consent, the matter shall be referred by either party to the Secretary, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding on all parties. For the purpose of this condition, "public authority" has the same meaning as provided under section 4 of the Act.</p> <p>Note: Section 121 of the Environmental Planning and Assessment Act 1979 provides mechanisms for resolution of disputes between the Department, the Secretary, councils and public authorities.</p>		This condition has not been triggered during the current audit period.	Not triggered
<b>Compliance</b>				
1.5	<p>Prior to each of the events listed from a) to c) below, or within such period otherwise agreed by the Secretary, the Applicant shall certify in writing to the satisfaction of the Secretary, that it has complied with all conditions of this consent applicable prior to that event. Where an event is to be undertaken in stages, the Applicant may, subject to the agreement of the Secretary, stage the submission of compliance certification consistent with the staging of activities relating to that event.</p> <p>a) commencement of any physical works on the site;          b) commencement of construction of the development; and          c) commencement of operation of the development..</p>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1.6	Notwithstanding condition 1.5 of this consent, the Secretary may require an update report on compliance with all, or any part, of the conditions of this consent. Any such update shall meet the requirements of the Secretary and be submitted within such period as the Secretary may agree.	<p>During the site audit, the auditor requested to view records uploaded to Major Projects External Portal, however there were no documents or records anywhere under Allied Pinnacle and the auditor could not verify when documents submitted. Auditor emailed the DPE contact on Friday 16 June seeking confirmation of when documents were submitted. Auditor wanted to verify the date in the AEMR prepared by third party. Auditor considered third party sighted evidence.</p> <p>Response received from DPE on 18 June 2023 advising 2019 IEAR was submitted on 20/3/20 2019 IEAR response was submitted on 24/4/20</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>Letter from DPI&amp;E dated 21 April 2020, <i>The Department requests that within four weeks from the date of this letter you provide response to recommendations contained in the audit report to addresses identified non-compliances with the consent, including proposed implementation timeframes.</i></li> <li>Allied Pinnacle Picton Site – Environmental audit 2019 – Action Plan.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021. Appendix A – Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table 2020/21.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022. Appendix A – Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table 2021/22.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1.7	The Applicant shall meet the requirements of the Secretary in respect of the implementation of any measure necessary to ensure compliance with the conditions of this consent, and general consistency with the documents listed under condition 1.1 of this consent. The Secretary may direct that such a measure be implemented in response to the information contained within any report, plan, correspondence or other document submitted in accordance with the conditions of this consent, within such time as the Secretary may agree.		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendix A - Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021. Appendix A – Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table 2020/21.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022. Appendix A – Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table 2021/22.</li> </ul>	Not triggered
<b>Provision and Protection of Public Infrastructure</b>				
1.8	The Applicant shall: <ul style="list-style-type: none"> <li>a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development;</li> <li>b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</li> </ul>	Allied Pinnacle confirmed that this condition has not been triggered in this reporting period.	This condition was applicable to the 2009-2013 IEA. This condition will only be triggered if any new modification to the original DA is approved and relates to public infrastructure.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1.9	The Applicant shall upgrade the Picton Water Mains to ensure supply of water to the site, in accordance with the requirements specified by the Sydney Water Corporation.	Allied Pinnacle confirmed that this condition has not been triggered in this reporting period.	This condition was applicable to the 2009-2013 IEA. This condition will only be triggered if any new modification to the original DA is approved and the water mains are impacted.	Not triggered
<b>Structural Adequacy of Early Works</b>				
1.10	<p>Within two months of the date of the approval of DA 318-12-2004-I MOD 3, the Applicant must:</p> <p>a) obtain and provide copies to the Secretary all necessary building certificate(s) from Council for any structures proposed as part of DA 318-12-2004-I MOD 3 that have been constructed or partially constructed prior to the approval of DA 318-12-2004-I MOD 3; and</p> <p>b) ensure that all new structures, and any alterations or additions to existing structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendix A - Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table</li> </ul>	Not triggered
<b>Environmental Performance</b>				
<b>Noise Impacts – Construction Noise and Vibration</b>				
2.1	<p>Except as permitted by condition 2.2, the Applicant shall undertake all construction activities associated with the development that would generate an audible noise at any residential premises between the following hours:</p> <p>a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive;</p> <p>b) 7:00 am to 1:00 pm on Saturdays; and</p> <p>c) at no time on Sundays or public holidays.</p>	Allied Pinnacle confirmed that this condition has not been triggered in this reporting period.	This condition was applicable to the 2009-2013 IEA. This condition will only be triggered if any new modification to the original DA is approved and includes construction works.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.2	In accordance with the document described in condition 1.1d) the Applicant is permitted to undertake four continuous concrete slip operations during the course of the construction period, outside of the hours specified in condition 2.1. The Applicant shall only undertake these night-time construction activities once the noise mitigation measures specified in the approved Construction Noise Management Protocol (condition 5.2) have been fully implemented. The Applicant shall apply its best endeavours to ensure that construction noise does not exceed the background noise by more than 5 dB(A) when these night-time construction works are being carried out.		This condition was applicable to the 2009-2013 IEA. This condition will only be triggered if any new modification to the original DA is approved and includes construction works.	Not triggered
<b>Noise Impacts – Operational Noise</b>				

<p>2.3</p>	<p>The Applicant shall design, construct, operate and maintain the development to ensure that the noise contributions from the development do not exceed the maximum allowable noise contribution limits specified in Table 1, at those locations and during those periods indicated. The maximum allowable noise contributions apply under meteorological conditions of:</p> <p>a) wind speed up to 3 m/s at 10 metres above ground level; or b) temperature inversion conditions of up to 3o C/100 m and wind speed up to 2m/s at 10 metres above ground level.</p>	<p>SLR asked what is the status of the Modification that was “open” and was this addressed in the Noise Impact Assessment for the Modification and the changes made in both the EPA and Consent. The National WHSE Manager advised they are not aware of any. However they will consider lodging modification to DA request relating to noise receivers and noise levels.</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>Email from Allied Pinnacle to EPA dated 9 July 2020 requesting review of noise limits for the site based on rezoning having occurred.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022. Table 11 – References Email from EPA to Allied Pinnacle dated 24 May 2022 advising that to alter the noise limited in the EPL it would be best to align this change with the DPE consent for the site.</li> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, April 2020. Noise and Vibration Management Sub-Plan. GHD. P-ENV-02a Picton OEMP Appendix A, Revision 3, Effective 08.08.2019</li> <li>Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Exceedances at Receiver 1 and 2 predicted/measured. Wind speed incorrect in ONVMP and SLR report – both mention 5m/s whilst this condition and EPL refer to 3 m/s.</li> </ul>	<p>Non-compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<p>The report did not record the meteorological conditions to confirm monitoring was undertaken under the conditions specified in this Condition.</p>	
2.4	<p>Notwithstanding condition 2.3, the Applicant shall implement all reasonable and feasible measures to achieve a noise contribution goal at Location 1 of 33 dB(A) LA<sub>equ</sub> (night). At a minimum, the Applicant shall implement the following measures:</p> <p>a) during the night-time all truck movement shall be in the forward direction only;</p> <p>b) during the night-time all forklift movements will be limited to being within the confines of the warehouse building;</p> <p>c) during the night-time the Applicant shall not cause or permit a train to be broken up, shunted, or unloaded at the site; and</p> <p>d) additional attenuation to the exhaust fans detailed in the document listed under condition 1.1f).</p> <p>If the Applicant undertakes a noise impact assessment, in accordance with the EPA's <i>Industrial Noise Policy</i>, that demonstrates that the appropriate noise criteria can be complied with at all relevant receiver locations without the noise mitigation measures prescribed in this condition, then the Applicant may, with the approval of the EPA and the Secretary, cease to implement those measures.</p>		<p>Document reviewed:</p> <ul style="list-style-type: none"> <li>• P-ENV-02c Picton Operational Environmental Management Plan (OEMP), Appendix C – Allied Pinnacle, Picton Mill, NSW, Traffic Management Sub-Plan, GHD, Revision 4, 15.04.2020. Sections 4 and 6 outlines the noise management measures to be implemented at the site both in terms of plan and equipment selection (Table 7) and operational mitigation measures (Table 8).</li> <li>• Allied Pinnacle – Environmental Management System induction presentation.</li> <li>• Allied Pinnacle Incident database – Raid Induct Safety Management System – Incident Database (Complaints Register) – no complaints received during this reporting period for noise from the site.</li> <li>• Extract from Picton Site Induction – Induction driver noise mitigation measures. Speed limits and traffic rules outlined.</li> </ul>	Compliant

<p>2.5</p>	<p>For the purpose of assessing compliance with the LAeq (period) (being day, evening or night) and LAeq (15 minute) noise contribution limits specified in condition 2.3 noise from the development shall be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling (where the dwelling is more than 30 metres from the boundary). Notwithstanding, should direct measurement of noise from the development be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's <i>Industrial Noise Policy</i>). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Secretary prior to the implementation of the assessment method. Section 4 of the <i>Industrial Noise Policy</i> shall also apply to the measures noise levels, where applicable.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019.  Auditor could not verify if this condition was complied with as no evidence in the report. No evidence of approval from the Secretary for the alternate method, as required by this condition and Condition 2.6.</li> <li>Email from SLR Consulting to Allied Pinnacle dated 23 July 2020 advising I can confirm I conducted the noise monitoring under the noise policy as per conditions below. The only exception is the attended noise monitoring location at some receivers because the monitoring locations determined in EPA is not accessible, this is detailed in the report.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendix A - Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table – Condition 2.5.</li> </ul>	<p>Non-compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.6	<p>For the purpose of assessing compliance with the LA1(1 minute) noise contribution levels specified under condition 2.3 of this consent, noise from the development shall be measured at 1 metre from the building façade. Notwithstanding, should direct measurement of noise from the development be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's <i>Industrial Noise Policy</i>). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Secretary prior to the implementation of the assessment method.</p>		<p>Documents viewed:</p> <p>Auditor could not verify if this condition was complied with as no evidence in the report. No evidence of approval from the Secretary for the alternate method, as required by this condition and Condition 2.6.</p> <ul style="list-style-type: none"> <li>Email from SLR Consulting to Allied Pinnacle dated 23 July 2020 advising I can confirm I conducted the noise monitoring under the noise policy as per conditions below. The only exception is the attended noise monitoring location at some receivers because the monitoring locations determined in EPA is not accessible, this is detailed in the report.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendix A - Development Application DA 318-12-2004-I MOD 3 Compliance Tracking Table – Condition 2.5.</li> </ul>	Non-compliant
<b>Visual Amenity Impacts – Screening of the Development</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.7	Landscaping Treatments L1 and L2 (as specified in section 8.5.4 of the EIS) along the boundaries of the site shall be implemented during the first stage of construction works, and prior to the commencement of any building works for the mill. The tree and shrub species to be used in Landscape Treatments L1 and L2 shall be determined in consultation with Council.		This condition was applicable to the 2009-2013 IEA.	Not triggered
2.8	Unless otherwise approved with the Secretary, the Applicant shall extend Landscape Treatment L2 along the entire length of the shared property boundaries between the site and the adjacent properties to the east and west of the site.		Documents viewed: <ul style="list-style-type: none"> <li>Sighted in previous IEA period but is relevant to the current period.</li> </ul> Note: Email from DPE to Allied Pinnacle, dated 24 May 2016, confirmation that additional Landscape Treatment L2 is no longer required.	Compliant
<b>Visual Amenity Impacts – Lighting</b>				
2.9	The Applicant shall ensure that no lights are directed towards private residences or roads, and that lighting is consistent with Australian Standard <i>AS4282(INT) 1995: Control of Obtrusive Effects of Outdoor Lighting</i> .	Site Audit: During the site audit, the auditor observed that placement of the lighting continued to be adequate.	Documents viewed: <ul style="list-style-type: none"> <li>Internal emails dated 21 March 2023 from Allied Pinnacle confirming “we have replaced all out Picton site lights in mid-2021 with LED for energy saving purpose but no additional lighting was installed.</li> <li>Rapid Induct Safety Management System – Incident Database (Complaints Register) – no complaints received in regards to lighting during this IEA period.</li> </ul>	Compliant
<b>Visual Amenity Impacts – Building Facade</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.10	Prior to the commencement of building works for the development, the Applicant shall submit, for the approval of the Secretary, details of the external façade for the building and structures, including demonstration of the façade(s) on an external finishing board. The finishing board shall clearly show the materials to be used for the building façade including details of external treatments of the structures and buildings (such as painting, and other external features aimed at reducing the bulk of the building and to improve the general appearance of the development), especially for the elevated elements. The finishing board shall demonstrate that the external treatments of the structures and buildings are non-reflective and of sufficient design quality to minimise the visual affects of the development, as far as is reasonable and feasible.		This condition was applicable to the 2009-2013 IEA. This condition will only be triggered if any new modification to the original DA is approved and reactivates this condition.	Not triggered
<b>Soil and Water Quality Impacts – General</b>				
2.11	The Applicant shall carry out the development to minimise adverse impacts to aquatic/ riparian environments and to not cause erosion/ sedimentation, or increase flood levels of protected waters. The Applicant shall consult with DPI and the NSW Department of Primary Industries (Fisheries) regarding the design of all proposed works within, or connecting to, any protected waters.	Site visit: the auditor observed ground conditions to be generally stable.  Site Manager confirmed that no works have been carried out in the aquatic/riparian environments in this reporting period.	Document viewed: <ul style="list-style-type: none"> <li>P-ENV-02c Picton Operational Environmental Management Plan (OEM)P, Appendix B – Water Monitoring and Management Sub-Plan, GHD, Revision 4, 15 April 2020.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.12	The Applicant shall not excavate or place materials on protected land, or otherwise affect the flow of protected waters unless otherwise approved by DPI, in consultation with the Department of Primary Industries(Fisheries).	<p>Site visit: the auditor observed no excavated materials as per this condition.</p> <p>Site Manager confirmed no excavation or placement of materials on protected land has occurred in this reporting period.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>P-ENV-02c Picton Operational Environmental Management Plan (OEM)P, Appendix B – Water Monitoring and Management Sub-Plan, GHD, Revision 4, 15 April 2020.</li> <li>Completed Monthly Watercourse Inspection records – dated 21/11/2019, 17/2/2020, 21/6/2020, 15/9/2020, 11/12/2020, 16/3/2021, 25/6/2021, 11/8/2021 (watercourse grass need cutting), 11/2/2022 and 16/9/2022.</li> <li>Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.13	Section 120 of the <i>Protection of the Environment Operations Act 1997</i> must be complied with in the carrying out of the development, except as expressly provided by a licence under that Act for the development.		Documents viewed: <ul style="list-style-type: none"> <li>• EPA Annual Return – 06/07/2019 to 05/07/2020.</li> <li>• EPA Annual Return – 06/07/2020 to 05/07/2021.</li> <li>• EPA Annual Return – 07/04/2021 to 05/07/2022.</li> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• EPA website – EPL12498 – No non-compliances recorded in three reporting period.</li> </ul> No recorded instances of unauthorised discharges to water or pollution of waters.	Compliant
<b>Soil and Water Quality Impacts – Erosion and Sediment Control</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.14	All site drainage and measures described in the Soil and Water Management Plan (condition 5.2) shall be implemented prior to commencement of any other construction works at the site. Until the site has been fully stabilised, all such measures shall be inspected and maintained on a weekly basis, and immediately following any rainfall events, to ensure their efficient operation. Decommissioning of sediment and erosion controls shall be coordinated with revegetation and rehabilitation activities.	Site Manager confirmed that there has been not construction works during this reporting period.	Not applicable to this reporting period.	Not triggered
<b>Soil and Water Quality Impacts – Protection of Riparian and Protected Waters During Works</b>				
2.15	Prior to the commencement of any earthworks or vegetation clearing at the site, vegetation to be protected, including the area designated as Riparian Zone A in condition 2.19, is to be fenced off with clearly visible, durable, and appropriately signposted exclusion fencing.	Site Manager confirmed that there has been not construction works during this reporting period.	Not applicable to this reporting period.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.16	<p>A <b>Works Plan</b> for all earthworks affecting protected waters at the site is to be prepared, based on an understanding of stream dynamics and environmentally sensitive stream rehabilitation practices. The Plan shall include:</p> <ul style="list-style-type: none"> <li>a) detailed plans of the existing and proposed protected waters, Riparian Zones specified in condition 2.19, vegetation, geomorphic features (including top of bank, dam wall and spillway, bank and toe of bank) and any other relevant feature (structures, services, utilities, etc.);</li> <li>b) representative cross-sections of protected land, protected waters and Riparian Zones, showing both existing and proposed ground surface levels, and fully representing the variety of landforms associated with the proposal;</li> <li>c) detailed designs of the bioswale that is to replace Watercourse B and its outlet structure into Watercourse A, and any other outlet structure that may be required;</li> <li>d) detailed designs of any stabilisation works and how they are to be undertaken;</li> <li>e) detailed designs and the methods of construction of stormwater outlets demonstrating that they would be designed in accordance with the Department's guideline: <i>Stormwater Outlet Structures to Streams (For pipes, culverts, drains and spillways - Version 1)</i>;</li> <li>f) detailed designs and the methods of construction of scour protection works including a surveyed plan drawing and a representative cross section and long section (extending 10 metres beyond the structure) showing existing and proposed ground surface and water levels;</li> </ul>	<p>Site Manager confirmed that there has been no construction works during this reporting period.</p>	<p>Not applicable to this reporting period.</p>	<p>Not triggered</p>

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<ul style="list-style-type: none"> <li>g) details on the staging or sequencing of the proposed works; and</li> <li>h) contingency measures in the event of flooding during construction.</li> </ul>			
2.17	All works within protected waters are to be monitored after each storm event. If there are signs of erosion or instability, stabilisation works shall be undertaken in accordance with DPI's.	Site Manager confirmed that there has been not construction works during this reporting period.	Not applicable to this reporting period.	Not triggered
<b>Soil and Water Quality Impacts – Rehabilitation: Establishing the Riparian Zones</b>				
2.18	<p>The Applicant shall rehabilitate the site to:</p> <ul style="list-style-type: none"> <li>a) protect any remnant local native riparian vegetation at the site wherever it is reasonably possible to do so; and</li> <li>b) restore any Riparian Zones (condition 2.14), including the area within protected waters, that are disturbed or otherwise affected by the development to a state that is reasonably representative of the natural ecotone.</li> </ul>		This condition was applicable to the 2009-2013 IEA.	Not triggered



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.19	<p>The Applicant shall establish two Riparian Zones at the site, in accordance with the following requirements:</p> <ul style="list-style-type: none"> <li>a) Riparian Zone A shall be a minimum of 40 metres from the top of each bank of the major tributary of Carriage Creek located in the north western portion of the site (including the reservoir). The Riparian Zone shall be measured horizontally landward from the top of the bank and at right angles to the alignment of the bank, including beneath any crossings, unless otherwise approved by DPI;</li> <li>b) Riparian Zone B shall be a total width of no less than 10 metres for the full length of the bioswale which is replacing the existing watercourse alignment of the minor tributary that runs through the centre of the site into the central dam.</li> </ul> <p>Following the completion of bulk earthworks at the site, a registered surveyor must undertake a survey that clearly shows the location and extent of the Riparian Zones, to the satisfaction of DPI.</p>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.20	<p>Unless otherwise agreed with DPI, the restored Riparian Zones:</p> <ul style="list-style-type: none"> <li>a) shall be fully structured and consist of a diverse range of native plant species and communities local to the area that emulate the original natural situation;</li> <li>b) shall have a revegetated buffer zone of at least 10 metres beyond any disturbed areas in the Riparian Zones (if the existing vegetation is significantly degraded or is likely to give rise to weed invasion);</li> <li>c) shall have plant densities as listed below, unless otherwise detailed in the Vegetation Management Plan;               <ul style="list-style-type: none"> <li>i) Riparian Zone A: At least 1 tree or 1 shrub (in approximately equal numbers) alternately planted at 1 plant per square metre and in addition, groundcover plants at 4 plants per square metre;</li> <li>ii) Riparian Zone B (bioswale): Native grasses only required to the outside edge of Riparian Zone A, and thence plantings as per Watercourse A; and</li> <li>iii) The Reservoir: Within the reservoir, and below the contour equal to the broad crest level of the spillway, macrophytes are to be densely planted to assist in water quality polishing.</li> </ul> </li> </ul>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<p>d) may be rehabilitated using a combination of methods provided the required densities and clear evidence of the plants' ability to survive are achieved by the end of the maintenance period; shall have no exotic plant species, other than temporary sterile covercrops, planted within, or within 10 metres of them;</p> <p>e) shall have no exotic plant species, other than temporary sterile cover crops, planted within, or within 10 metres of them.</p> <p>f) shall have no non-ecologically functioning work or activity (such as accessways) located within them except for the culverts and the approved rail siding passing over via culverts;</p> <p>g) shall use only soils that naturally occur at the site, which are not proof rolled or subjected to other unsuitable compaction;</p> <p>h) shall be established, rehabilitated and maintained in a manner that does not adversely impact on the Aboriginal Objects contained within Heritage Conservation Zone 1; and</p> <p>i) shall use only certified weed free and contaminant free mulch.</p> <p>Note: There is nothing in this consent that permits any adverse impact to the Aboriginal Objects identified in the vicinity of Heritage Conservation Zone 1 during the course of restoring or managing Riparian Zone A.</p>		<p>This condition was applicable to the 2009-2013 IEA.</p>	<p>Not triggered</p>

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.21	The nature and function of scour protection measures shall meet the requirements of DPI. Wire mesh structures and concrete grouting are not permitted for use with rip rap scour protection unless specifically approved by the Secretary.		This condition was applicable to the 2009-2013 IEA.	Not triggered
2.22	The surface of any landformed areas in, or likely to affect, Riparian Zones shall be progressively graded to a smooth and even slope free from holes or ridges. Batter slopes shall not be steeper than a grade of 1V:3H, unless otherwise agreed by DPI.		This condition was applicable to the 2009-2013 IEA.	Not triggered
<b>Soil and Water Quality Impacts – Rehabilitation: Maintaining the Riparian Zones</b>				
2.23	Prior to the commencement of any construction activities, the Applicant shall prepare and submit for approval a <b>Vegetation Management Plan</b> in accordance with the Department’s guideline <i>How to Prepare a Vegetation Management Plan – Version 4</i> . The Plan shall include drawings that clearly show the approved extent of the Riparian Zones, address all matters relating to Riparian Zone protection, including vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the Department is to be advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation.	Site Manager confirmed that there has been not construction works during this reporting period.	Not applicable to this reporting period.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.24	The rehabilitated Riparian Zones shall be maintained and monitored for a period of at least two years after final planting, or where other revegetation methods are used, two years after plants are of tubestock size and are at the densities specified in the Vegetation Management Plan. Maintenance shall include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, protection from any mowing or slashing on adjacent land, mulching and any other requirements necessary for achieving successful vegetation establishment.		This condition was applicable to the 2009-2013 IEA.	Not triggered
2.25	Immediately after completion of initial planting/seeding and every six months thereafter for the duration of the maintenance period the Applicant shall submit to DPI a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.25A	<p>Prior to carrying out any construction works associated with the rail siding, the Applicant shall:</p> <ul style="list-style-type: none"> <li>a) obtain a permit for the proposed construction works under Part 3A of the Rivers and Foreshore Improvement Act 1948;</li> <li>b) submit a copy of this permit to the Department; and</li> <li>c) revise the Soil and Water Management Plan in the Construction Environment Management Plan to incorporate measures that would be implemented to manage and monitor the construction works associated with the rail siding, in consultation with DPI, and to the satisfaction of the Secretary.</li> </ul>	<p>Site Manager confirmed that there has been no construction works associated with the rail siding during this reporting period.</p>	<p>Not applicable to this reporting period.</p>	<p>Not triggered</p>
<b>Soil and Water Quality Impacts – Salinity Management</b>				
2.26	<p>The Applicant shall implement the recommendations of the Report prepared by Environmental Investigation Services dated December 2004 in Volume 2 of the EIS.</p>		<p>Not applicable to this reporting period.</p>	<p>Not triggered</p>
2.27	<p>Prior to the commencement of any construction activities, the Applicant shall obtain consent under Section 90 of the <i>National Parks and Wildlife Act 1974</i> to destroy and salvage the following Aboriginal heritage items (as specified in the document listed under condition 1.1e):</p> <ul style="list-style-type: none"> <li>a) AMP IF 4, being an isolated find on the south-western side of the dam; and</li> <li>b) AMP OCS 1, being a scatter of artefacts on the south-eastern fringe of the dam.</li> </ul>	<p>Site Manager confirmed that there has been not construction works during this reporting period.</p>	<p>Not applicable to this reporting period.</p>	<p>Not triggered</p>

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.28	Prior to the commencement of any construction activities, the Applicant shall establish and fully secure the area identified as a 'potential archaeological deposit' (PAD) in the vicinity of AMP IF 4 and OCS 1 as shown in Fig.6.1 of the document listed under condition 1.1e). Prior to the commencement of any construction activities in the PAD area, the Applicant shall permit representatives of the Aboriginal community to undertake a cultural salvage excavation of the area. The Applicant shall not commence construction activities in the PAD area until the cultural salvage excavation has been completed to the satisfaction of the DECC.	Site Manager confirmed that there has been not construction works during this reporting period.	Not applicable to this reporting period.	Not triggered

<p>2.29</p>	<p>Prior to the commencement of any construction works at the site, the Applicant shall</p> <p>a) fully establish and secure Heritage Conservation Zone 1 in the north-western end of the site (as shown in Fig.6.1 of the document listed under condition 1.1e);</p> <p>b) fully establish and secure Heritage Conservation Zone 2 incorporating the area surrounding a scarred tree (AMP ST 1) with at least a diameter of 30 metres. The Zone shall be enclosed by a permanent fence that restricts access into the Zone for the duration of the development (including construction activities); and</p> <p>c) implement suitable drainage measures in the vicinity of Heritage Conservation Zone 2 to ensure ponding or other impacts do not occur in a manner which would effect the root zone of the tree.</p> <p>The Applicant shall manage the Heritage Conservation Zones in accordance with the management measures specified in the approved Cultural Heritage Management Plan.</p>	<p>Site audit: The auditor observed the following:</p> <ul style="list-style-type: none"> <li>Secured Heritage Conservation Zone 1 sighted and fenced.</li> <li>Sighted the fence surrounding the scarred tree (Zone 2).</li> <li>Fallen tree branch located in the Zone 2, it was not removed as per Aboriginal stakeholder requirements.</li> <li>Sighted no storage of chemicals or substances used for equipment and vehicle maintenance directly up-gradient of either of the zones.</li> </ul> <p>Site Manager and NSW WHSE Manager advised they have seven year management plan for the area now with Wori Woolywa regarding the management of the heritage areas. It covers weed management and cultural burn.</p> <p>Site manager showed on his computer system that invoices were paid which covered weed management and cultural burn.</p>	<p>The first part of this condition was applicable to the 2009-2013 IEA. The manage element of the condition is applicable to this audit.</p> <p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, P-ENV-02d Picton OEMP Appendix D, Revision 3, 08-08 2019. Cultural Heritage Management Sub-Plan.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendix A – Heritage Conservation Zone 1 was maintained on the following dates 9/11/2019, 24/11/2019, 30/11/2019, 1/12/2019. Spraying has progressed in preparation of fire treatment.</li> <li>PO4500 483 790 - Invoice Number 2006006 dated 22 June 2020 from Wori Woolywa for weed treatment – 9/11/19, 24/11/19, 30/11/19, 18/4/20, 27/6/20.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> </ul> <p>Table 11 – Status – 2019/20 Progressing – Company Wori Woolywa attended the site</p>	<p>Compliant</p>
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			<p><i>to complete Phase 1 of heritage area. This included weed spraying in preparation for fire treatment in 2020.</i></p> <p><i>Status 2020/21 – Closed. Weed treatment continued on 18 April 2020 and 27 June 2020 during this reporting period.</i></p> <p>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</p> <ul style="list-style-type: none"> <li>• Tax Invoice from Tahmoor Rural Services – to supply tractor/slasher to carry out vegetation removal as requested – PO 4500710221 dated 14 December 2022.</li> <li>• Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> <li>• Wori Woilywa – Letter to Vegetation Management Estimates for 10.6 Hectares for Allied Mills.</li> <li>• Letter from Allied Pinnacle to Wori Woilywa dated 23 July 2020 – Permission to Conduct Cultural Burn on Allied Pinnacle Site. Heritage area A.</li> <li>• Wori Woilywa Invoice No. 2006006 dated 22/6/2020 for mapping services and weed treatment from November 2019 to June 2020.</li> </ul>	
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<ul style="list-style-type: none"> <li>Allied Pinnacle Purchase order 4500553410 – Order Date 23/7/2020 – covers weed management and cultural burn.</li> </ul>	
2.30	The Applicant shall not disturb the original fabric of the culvert under the Great Southern Railway line in the carrying out of the development.	Site Manager confirmed that if any construction activities were to occur they would not disturb the original fabric of the culvert.	Documents viewed: <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020.</li> </ul>	Compliant
<b>Flora and Fauna</b>				
2.31	The Applicant shall minimise any clearing in the carrying out of the development.	Site Manager confirmed that there was no clearing works during this reporting period.	Not applicable to this reporting period.	Not triggered
2.32	Where practicable, vegetation that is cleared shall be retained for use as native mulch in landscaped areas. Any vegetation or other material removed from the area of operations shall be disposed of lawfully to an appropriate site where the material cannot be swept into protected waters during a flood. Cleared vegetation must not be burned at the site.	Site Manager confirmed that there was no clearing works during this reporting period.	Not applicable to this reporting period.	Not triggered
<b>Traffic and Transport Impacts</b>				
2.33	The Applicant shall obtain a Section 138 Approval from Council with RTA concurrence for works within the road reserve of Picton Road.	Site Manager confirmed that there was no construction works during this reporting period.	Not applicable to this reporting period.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.34	Vehicular access to the site shall be via a single entry point from Picton Road, and vehicles shall only enter and leave the site in a forward direction.	Site visit: The auditor observed vehicle access to site was only occurring from a single entry point off Picton Road. Vehicles were also travelling in forward motion.	Document reviewed: <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. Appendix C – Traffic Management Sub-Plan. Section 23.4 of the Traffic Plan states one entry to site and two exits.</li> </ul>	Compliant
2.35	Prior to the commencement of on-site works, the applicant shall provide written notification of the commencement date to the RTA.		Not applicable to this reporting period.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.36	<p>The intersection of the site access road with Picton Road shall be constructed, at full cost to the Applicant, in accordance with RTA standards and requirements, and in consultation with Council. The junction treatment shall be a Seagull Layout in accordance with the <i>RTA Road Design Guide</i> and shall be constructed within three months the commencement of on site works, unless otherwise approved by the RTA. Prior to the implementation of the Seagull Layout, the use of the existing access shall be limited to a maximum of ten cars per hour and one truck per hour, and appropriate signage shall be provided to warn vehicles approaching the access. In addition, the intersection shall meet the following requirements:</p> <ul style="list-style-type: none"> <li>a) the site access location shall have a minimum Safe Intersection Sight Distance of 225 metres in both directions, unless otherwise agreed with the RTA;</li> <li>b) landscaping and fencing shall not restrict vehicle site lines on Picton Road; and</li> <li>c) a suitable drainage treatment shall be provided across the driveway to prevent water proceeding onto, or undermining the travel lane of Picton Road. Geometric road design shall be in accordance with the RTA's <i>Road Design Guide</i> and pavement design shall be in accordance with the <i>AUSTROADS Pavement Design Guide</i>.</li> </ul>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.37	The Applicant must obtain approval from the RTA for each specific roadwork on Picton Road prior to the commencement of that work. For each specific change to Picton Road the Applicant shall submit detailed design plans, and all relevant additional information as may be required by the RTA, to the RTA for assessment and approval. Construction activities on Picton Road shall be carried out by a pre-qualified contractor, in accordance with the requirements of the RTA. All roadworks associated with the development shall be at no cost to the RTA.	Site Manager confirmed that there have been no specific roadworks on Picton Road during this reporting period.	Not applicable to this reporting period.	Not triggered
2.38	Prior to commencement of work within the road reserve of Picton Road, the Applicant shall apply for a Road Occupancy Licence from the RTA. The application shall include a Traffic Management Plan, prepared and submitted in accordance with the RTA's requirements. Should the Plan require a reduction of the speed limit, a Direction to Restrict would also be required.	Site Manager confirmed that there has been no work within the road reserve of Picton Road during this reporting period.  It is noted that a development adjacent to the mill is under construction and work within the road reserve is occurring relating to that development.	Not applicable to this reporting period.	Not triggered
2.39	The development shall be designed and constructed such that road traffic noise on Picton Road is minimised by use of durable materials, in accordance with the DECC's <i>Environmental Criteria for Road Traffic Noise</i> and with consideration of the RTA's <i>Environmental Noise Management Manual</i> .		This condition was applicable to the 2009-2013 IEA.	Not triggered
2.40	No advertising signs or structures would be allowed within Picton Road road reserve.	Site audit: The auditor observed no advertising signs or structures within the Picton Road road reserve.	Not applicable.	Compliant

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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.41	Design of internal vehicle movements, car parking and pedestrian facilities shall be in accordance with AUSTRROADS standards and the RTA's requirements.		This condition was applicable to the 2009-2013 IEA.	Not triggered
<b>Hazards and Risk Impacts</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.42	<p>The Applicant shall implement the recommendations of the <i>Hazard and Risk Analysis Study Report</i> prepared by Kellogg Brown and Root dated November 2004 in Volume 2 of the EIS. In particular, the Applicant shall:</p> <ul style="list-style-type: none"> <li>a) design and construct the chlorine room in accordance with the Australian Standard <i>AS 2927-200: the storage and handling of liquefied chlorine gas</i>, and to ensure that the ventilation system is sufficient to provide extraction at all times;</li> <li>b) prior to the commencement of its construction, undertake and submit a Final Hazard Analysis in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis</i> with a particular focus of possible chlorine releases;</li> <li>c) prior to the commencement of construction, conduct and submit to the Director- General for approval, a Hazard and Operability Study of the development chaired by a suitably qualified and independent person or team, carried out in accordance with the Department's publication <i>Hazardous Industry Planning Advisory Paper No. 8 - HAZOP Guidelines</i>. In particular, the Study shall review the proposed chlorine extraction and ventilation system to ensure that it operates under confirmed gas detection, and shall include a program for the implementation of all recommendations made by the Study.</li> </ul>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	d) prior to the commencement of operation certify to the satisfaction of the Director- General that all the prevention and protection measures listed in Table 4.1 of the Report have been implemented. The certification shall include the details of those measures implemented, and shall, where any proposed measure is not implemented, fully justify the reasons for not implementing that measure.			
<b>Air Quality Impacts</b>				



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.43	The Applicant shall design, construct, operate and maintain the development in a manner that minimises dust emissions from the site.	<p>Site visit: The auditor observed no visual dust emissions during the on audit. Existing controls appear to be operating effectively.</p> <p>Production Manager: Advised there are over 20 dust collectors/controls in place around the facility to minimise dust emissions. The Production team undertakes the filter changes on the dust collection system as required.</p> <p>The dust controls are part of Allied Pinnacle SAP Maintenance Program.</p>	<p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Rapid Induct Safety Management System – Incident Database (complaints register). No recorded instances of dust emissions related complaints from the site.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.44	The raw material storage bunkers shall be maintained in a condition that effectively eliminates wind generated dust emissions.	<p>Site visit: The auditor observed no visual dust emissions during the on audit. Existing controls appear to be operating effectively.</p> <p>Production Manager: Advised there are over 20 dust collectors/controls in place around the facility to minimise dust emissions. The Production team undertakes the filter changes on the dust collection system as required.</p> <p>The dust controls are part of Allied Pinnacle SAP Maintenance Program.</p>	<p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>• EPA Annual Return – 06/07/2019 to 05/07/2020.</li> <li>• EPA Annual Return – 06/07/2020 to 05/07/2021.</li> <li>• EPA Annual Return – 06/07/2021 to 05/07/2022.</li> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• Review of EPA website – no non-compliances recorded during the three EPA annual returns.</li> <li>• Rapid Induct Safety Management System – Incident Database (complaints register). No recorded instances of dust emissions related complaints from the site.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.45	Dust collection systems with bag type dust collectors shall be provided to all potential sources of dust production during operation of the development.	<p>Production Manager: Advised there are over 20 dust collectors/controls in place around the facility to minimise dust emissions. The Production team undertakes the filter changes on the dust collection system as required.</p> <p>The dust controls are part of Allied Pinnacle SAP Maintenance Program.</p>	<p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Review of EPA website – no non-compliances recorded during the three EPA annual returns.</li> <li>Rapid Induct Safety Management System – Incident Database (complaints register). No recorded instances of dust emissions related complaints from the site.</li> </ul>	Compliant
<b>Mine Subsidence</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2.46	The Applicant shall carry out the development in accordance with any requirements specified in an approval issued by the Mine Subsidence Board under the <i>Mine Subsidence Compensation Act 1961</i> .		This condition was applicable to the 2009-2013 IEA.	Not triggered
<b>Waste Generation and Management</b>				
2.47	The Applicant shall not cause, permit or allow any waste generated by the development or from outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under <i>Protection of the Environment Operations Act 1997</i> . This condition only applies to wastes for which a licence under the <i>Protection of the Environment Operations Act 1997</i> is required.		<p>This condition is also stipulated in the EPL, Conditions L5.1 and L5.2.</p> <p>Documents viewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022.</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Review of EPA website – no non-compliances recorded during the three EPA annual returns.</li> </ul> <p>No non-compliances were recorded the AEMRs.</p>	Compliant

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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
<b>Environmental Monitoring and Reporting</b>				
<b>Noise Monitoring</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3.1	<p>Within 90 days of the commencement of operation of the development, or as may be agreed by the Secretary, and during a period in which the development is operating under design loads and normal operating conditions, the Applicant shall undertake a program to confirm the noise emission performance of the development. The program shall meet any requirements of the EPA, and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) noise monitoring, consistent with the <i>NSW Industrial Noise Policy</i> (EPA, 2000), to assess compliance with condition 2.3 of this consent;</li> <li>b) methodologies, location and frequency for noise monitoring;</li> <li>c) identification of monitoring sites at which pre- and post-development noise levels can be ascertained; and</li> <li>d) details of any entries in the Complaints Register (condition 4.3 of this consent) relating to noise impacts.</li> </ul> <p>A report providing the results of the program shall be submitted to the Secretary within 28 days of completion of the testing required under a). If the noise monitoring indicates that the operation of the development, under design loads and normal operating conditions will lead to greater noise impacts than permitted under condition 2.3 of this consent, then the Applicant shall investigate details of remedial measures to be implemented to reduce noise impacts to levels required by that condition. If necessary, the Report shall include details of the proposed remedial measures, with a timetable for implementation, to be approved by the Secretary and the EPA.</p>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
<b>Air Quality Verification</b>				
3.2	<p>Within three months of the commencement of operations at the development, or as otherwise agreed with the EPA and the Secretary, the Applicant shall sample and analyse each of the 32 emission points from the development for particulate matter emissions. Sampling ports shall comply with the EPA approved method TM-1, unless otherwise agreed with the EPA. Where the particulate concentration in the emissions are greater than those listed below, the Applicant shall identify necessary remedial measures to meet the concentrations:</p> <ul style="list-style-type: none"> <li>a) 5 mg/m3 for all emission points except those for the screening process;and</li> <li>b) 100 mg/m3 for emissions points for the screening process.</li> </ul> <p>Within 28 days of the sampling and analysis undertaken in this condition the Applicant shall submit to the Secretary and the EPA, a report detailing the outcomes of that sampling and analysis. Where necessary, the report shall include details of the proposed remedial measures, with a timetable for implementation, to be approved by the Secretary and the EPA.</p>		This condition was applicable to the 2009-2013 IEA.	Not triggered
<b>Auditing</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3.3	<p>Twelve months after the commencement of operation of the development, and every three years thereafter, or as otherwise agreed or required by the Secretary, the Applicant shall commission an independent, qualified person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Secretary prior to the commencement of the Audit. An <b>Environmental Audit Report</b> shall be submitted for the approval of the Secretary within one month of the completion of the Audit. The Audit shall:</p> <p>e) be carried out in accordance with <i>ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing</i>;</p> <p>f) assess compliance with the requirements of this consent, and other licences and approvals that apply to the development;</p> <p>g) assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this consent; and</p> <p>h) review the effectiveness of the environmental management of the development, including any environmental impact mitigation works.</p> <p>The Secretary may require the Applicant to undertake works to address the findings or recommendations presented in the Report. Any such works shall be completed within such time as the Secretary may require.</p>	<p>During the site audit, the auditor requested to view records uploaded to Major Projects External Portal, however there were no documents or records anywhere under Allied Pinnacle and the auditor could not verify when documents submitted. Auditor emailed the DPE contact on Friday 16 June seeking confirmation of when documents were submitted. Auditor wanted to verify the date in the AEMR prepared by third party.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle – Independent Environmental Audit Picton, SLR, SLR Ref No 610.19097.00000-R01-v1.0 dated 15 March 2020. This audit covered 24 October 2016 to 23 October 2019.</li> <li>Letter from DPI&amp;E dated 21 April 2020, <i>The Department requests that within four weeks from the date of this letter you provide response to recommendations contained in the audit report to addresses identified non-compliances with the consent, including proposed implementation timeframes.</i></li> <li>Allied Pinnacle Picton Site – Environmental audit 2019 – Action Plan.</li> <li>This audit report. SLR was engaged in November 2022 to conduct the three-yearly independent which covers the period 24 October 2019 to 23 October 2022.</li> <li>Email from DPE on 18 June 2023 advising auditor was not approved to conduct the IEA covering the period 2019-2022 prior to the commencement of the audit.</li> </ul>	Non-compliant
Community Information, Consultation and Involvement				



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4.1	Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request. This shall include provision of all documents at the site for inspection by visitors, and in an appropriate electronic format on the Applicant's internet site, should one exist.		<p>Documents sighted on Allied Pinnacle website under Site Map/Work health, safety &amp; environmental documents/Picton.</p> <ul style="list-style-type: none"> <li>• Picton Emergency Response Plan – Picton WHSE-005 Picton Emergency Response Plan, Version No: V01, Issued: 15/11/2022.</li> <li>• Picton WHSE-001 - Picton Pollution Incident Response Management Plan, Version 05, issued 15/11/2022.</li> <li>• Consolidated consent – DA</li> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, Date Issued: April 2020</li> <li>• Allied Pinnacle – Independent Environmental Audit Picton, SLR, SLR Ref No 610.19097.00000-R01-v1.0 dated March 2020.</li> <li>• EPA Licence 12498 (Issued on 9 April 2018).</li> <li>• Picton AEMR 2020/21 (Rev 0, 12 August 2021). This AEMR has been superseded by the 2021/22 AEMR.</li> </ul>	Non-compliant
<b>Complaints Procedure</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4.2	<p>Prior to the commencement of construction of the development, the Applicant shall ensure that the following are available for community complaints:</p> <ul style="list-style-type: none"> <li>a) a 24-hour, toll-free telephone number on which complaints about the development may be registered;</li> <li>b) a postal address to which written complaints may be sent; and</li> <li>c) an email address to which electronic complaints may be transmitted.</li> </ul> <p>The Applicant shall ensure that the telephone number, postal address and email address are made known to the local community and any potentially affected neighbours prior to the commencement of construction.</p>		This condition was applicable to the 2009-2013 IEA.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4.3	<p>The Applicant shall record details of all complaints received through the means listed under condition 4.2 of this consent in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) the date and time, where relevant, of the complaint;</li> <li>b) the means by which the complaint was made (telephone, mail or email);</li> <li>c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</li> <li>d) the nature of the complaint;</li> <li>e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.</li> </ul> <p>The Complaints Register shall be made available for inspection by the EPA and the Secretary upon request.</p>	<p>Site Audit: Auditor viewed the on-line Complaints Register (database – known as the Rapid Induct Safety Management System – Incident Database) on-site and confirmed no complaints have been received in this reporting period.</p>	<p>Document reviewed:</p> <ul style="list-style-type: none"> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. Section 5.4.2.</li> <li>• RAPID Incidents Register October 2019 to October 2022.</li> </ul>	Compliant
<b>Environmental Management Construction</b>				
<b>Construction Environmental Management Plan</b>				

<p>5.1</p>	<p>The Applicant shall prepare and implement a <b>Construction Environmental Management Plan</b> to outline environmental management practices and procedures to be followed during construction of the development. The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant;</li> <li>b) statutory and other obligations that the Applicant is required to fulfil during construction including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</li> <li>c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan:             <ul style="list-style-type: none"> <li>i) measures to monitor and manage dust emissions;</li> <li>ii) measures to monitor and minimise soil erosion and the discharge of sediment and other pollutants to lands and/ or waters during construction activities; and</li> <li>iii) measures to monitor and control noise emissions during construction works;</li> <li>iv) measures to ensure the cultural heritage areas established under conditions 2.21 and 2.22 are suitably managed and protected during construction activities;</li> </ul> </li> <li>d) a description of the roles and responsibilities for all relevant employees involved in the construction of the development;</li> </ul>		<p>This condition was applicable to the 2009-2013 IEA.</p>	<p>Not triggered</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	e) the Management Plans listed under condition 5.2 of this consent; and			
	f) complaints handling procedures during construction. The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of construction works for the development, or within such period otherwise agreed by the Secretary. Construction works shall not commence until written approval of the Plan has been received from the Secretary.			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
5.2	<p>As part of the Construction Environmental Management Plan for the development, required under condition 5.1 of this consent, the Applicant shall prepare and implement the following Management Plans:</p> <p>a) an <b>Soil and Water Management Plan</b> to ensure that all erosion and sediment controls associated with the development are consistent with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004).. The Plan shall address the requirements of the Department, the Australian Rail Track Corporation, Council and the EPA, and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) details of the works at the site that may cause erosion, sedimentation or other pollution during construction activities;</li> <li>ii) details of erosion, sediment and pollution control measures and practices to be implemented during construction of the development, with particular emphasis on the measures proposed to avoid adverse impacts to the protected waters and protected lands;</li> <li>iii) details of proposed measures to ensure the continued integrity of the culverts under the Great Southern Railway line, including scour protection works on the watercourses flowing towards the culverts;</li> <li>iv) design specifications for diversionary works, banks and sediment basins;</li> <li>v) a monitoring program during construction works associated with the development; and</li> <li>vi) details of the decommissioning of all erosion and sediment controls and any water diversion structures.</li> </ul>		This condition was applicable to the 2009-2013 IEA.	Not triggered

	<p>b) a <b>Construction Noise Management Protocol</b> to detail measures to mitigate and manage noise during construction works. The Protocol shall be prepared with reference to the Australian Standard <i>AS 2436-1981: Guide to Noise Control on Construction, Maintenance and Demolition sites</i>, and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) construction noise objectives for each relevant receiver commensurate with the noise limits and noise goals specified under this consent;</li> <li>ii) a clear description of the construction activities (and timing of those activities) likely to affect the acoustic amenity of nearby residents; especially for night time construction activities;</li> <li>iii) details of the community notification measures that have been undertaken prior to construction, the outcomes of any consultation that has arisen from that notification, and any proposed future notifications or consultations;</li> <li>iv) management methods and procedures to ensure that all reasonable noise mitigation measures are applied, in accordance with best practice, during construction works to protect the amenity of nearby residents, which for night-time works shall include as a minimum:       <ul style="list-style-type: none"> <li>• construction timetabling to minimise noise impacts;</li> <li>• installation of noise reduction barriers around night time work areas;</li> <li>• selection of plant and equipment on acoustic performance, and quieter methods of construction;</li> <li>• as far as practicable, restrictions to the unnecessary simultaneous operation of noisy plant and equipment;</li> <li>• contingency measures to be taken if a noise complaint is made during night-time construction</li> </ul> </li> </ul>			
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	activities;			
	v) a pro-active and reactive strategy for dealing with noise complaints, including how noise complaints would be followed up and a response provided to the complainant as soon as practicable; vi) noise monitoring, reporting and response procedures; and vii) internal compliance audits of all plant and equipment.			
<b>Operational Environmental Management Plan</b>				



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
5.3	<p>The Applicant shall prepare and implement an <b>Operation Environmental Management Plan</b> to detail an environmental management framework, practices and procedures to be followed during operation of the development. The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;</li> <li>b) a description of the roles and responsibilities for all relevant employees involved in the operation of the development;</li> <li>c) overall environmental policies and principles to be applied to the operation of the development;</li> <li>d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved, where appropriate;</li> <li>e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this consent; and</li> <li>f) the Management Plans listed under condition 5.4 of this consent.</li> </ul> <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of operation of the development, or within such period otherwise agreed by the Secretary. Operation shall not commence until written approval has been received from the Secretary.</p>		<p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>• Letter from DPE dated 18 May 2020 <i>I refer to the OEMP which was submitted in accordance with Condition 3.3 of Schedule 2.... The Department ....is satisfied that it has been updated to reflect the findings of the Independent Environmental Audit. ... concludes the plan addresses the requirements of Condition 5.3 to have an OEMP prepared and implemented...</i></li> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020.</li> <li>• Service records for fan maintenance checks for 30 March 2020 (Order: 300054297) and 26 February 2020 (Order 300053083); and</li> <li>• Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Exceedances at Receiver 1 and 2 predicted/measured. Condition 2.3 and EPL Condition L3.6.</li> </ul>	Compliant

<p>5.4</p>	<p>As part of the Operation Environmental Management Plan for the development, required under condition 5.3 of this consent, the Applicant shall prepare and implement the following Management Plans:</p> <p>b) a <b>Noise Management Plan</b> to detail measures to mitigate and manage noise during operation of the development. The Plan shall include, but not necessarily be limited to:</p> <p>v) procedures to ensure that all reasonable and feasible noise mitigation measures are applied during operation of the development, including those measures listed in condition 2.7;</p> <p>vi) a system to undertake periodic assessment of Best Available Technically Economically Achievable and Best Management Practices to minimise noise emissions at all times and to seek to achieve noise reduction in accordance with the goal prescribed in condition 2.7;</p> <p>vii) procedures to generate suitable documentation for annual environmental reporting, that demonstrates that the noise limits and noise goals specified under this consent, or best practice noise control operations, are being met;</p> <p>viii) identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits and noise goals specified under this consent;</p> <p>ix) identification of activities that will be carried out in relation to the development and the associated noise sources;</p>	<p>Site visit: The auditor observed the following elements of the OEMP being implemented:</p> <ul style="list-style-type: none"> <li>• All equipment appeared to be adequately maintained and kept in good working order.</li> <li>• Noise mitigation measures were implemented on-site.</li> </ul>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road Maldon. SLR, SLR Ref 610.19168-R01, Version v1.0, December 2019.</li> <li>• SLR Offer of Service – Operational Noise Compliance Monitoring, Allied Pinnacle Picton, dated 6 July 2022.</li> <li>• Email from Allied Pinnacle to SLR dated 14 March 2022 requesting SLR proceed with quotation dated 6 July 2022.</li> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, April 2020. Noise and Vibration Management Sub-Plan. GHD. P-ENV-02a Picton OEMP Appendix A, Revision 3, Effective 08.08.2019</li> <li>• Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Exceedances at Receiver 1 and 2 predicted/measured. Condition 2.3 and EPL Condition L3.6.</li> <li>• Wind speed incorrect in ONVMP and SLR report – both mention 5m/s whilst this condition and EPL refer to 3 m/s. Condition 2.3 and EPL Condition L3.6.</li> </ul>	<p>Non-compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	x) development of reactive and pro-active strategies for dealing promptly with any noise complaints xi) proposed on-going community consultation measures; xii) noise monitoring and reporting procedures.		<ul style="list-style-type: none"> <li>Operational Noise Survey, Allied Pinnacle, 330 Picton Road, Maldon, SLR Report Number 610.16992-R02, version 1.1 dated 6 July 2017. Monitoring undertaken on 15 December 2016. Non-compliance with three year interval between noise monitoring as per ONVMP Section 12.3.</li> <li>Extract from Picton Site induction – Screen shot of the Speed Limits/ Traffic Rules to be applied to the site.</li> <li>Allied Mills –Environmental Management System Induction Presentation includes Noise Module which covers mitigation measures to be implemented on-site.</li> <li>Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> </ul>	

	<p>c) a <b>Water Monitoring and Management Plan</b> to outline measures that will be employed to manage water on the site, to minimise soil erosion and the discharge of sediments and other pollutants to lands and/ or waters throughout the life of the development. The Plan shall be based on best environmental practice and shall address the requirements of the Department, the Australian Rail Track Corporation, Council and the EPA. The Plan shall include, but not necessarily be limited to:</p> <p>i) consideration of all reasonable and feasible options to avoid discharge to ground and/or ambient waters including methods to minimise the volume of contaminated water and effluent generated;</p> <p>ii) description of the criteria for nomination of areas as clean or dirty and identification of clean and dirty surface water areas on site maps;</p> <p>iii) details of water management and monitoring measures to be implemented, including measures to ensure the continued integrity of the culverts under the Great Southern Railway line;</p> <p>iv) characterisation of wastewater qualities and quantities for reuse on-site and specification of wastewater reuse areas on site maps for the development;</p> <p>v) details of irrigation management practices to ensure there is no off-site impact through the use of treated effluent for irrigation;</p> <p>vi) a program for monitoring effluent and receiving soil and waters to ensure the suitable operation of the sewage treatment plant, and the ongoing viability of the land and waters receiving the effluent under the irrigation</p>	<p>Site visit: The auditor observed the following elements of the OEMP being implemented:</p> <ul style="list-style-type: none"> <li>• No runoff or ponding on irrigation area.</li> <li>• Protected land was free of foreign materials and flow of protected waters on site remain unobstructed.</li> <li>• Scour protection measures in place and appeared to be well maintained.</li> <li>• Maintenance records of cleaning of drainage pits, culverts and trash racks.</li> <li>• Grass in the drainage systems for stormwater was short as per the sub-plan.</li> </ul>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. P-ENV-02b - Appendix B, Revision 4, Effective 15.04.2020 GHD – Water Monitoring and Management Sub-Plan</li> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• Completed Monthly Watercourse Inspection records – dated 21/11/2019, 17/2/2020, 21/6/2020, 15/9/2020, 11/12/2020, 16/3/2021, 25/6/2021, 11/8/2021), 11/2/2022 and 16/9/2022.</li> <li>• No non-compliances were recorded the AEMRs or EPA website.</li> <li>• Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> </ul>	<p>Compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	scheme;			
	vii) details of the remedial actions to be taken in response to an exceedance of concentration limits or other performance criteria for the treated water, or if there are predicted or actual adverse weather conditions, or complaints received regarding irrigation activities; viii) specific details shall be provided in relation to the times, locations, volumes and qualities of the water to be irrigated, including how the quality of water to be used for irrigation will be assessed.			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<p>d) a <b>Traffic Management Strategy</b> to outline minimum requirements for the movement of heavy vehicles to and from the site. The Strategy shall meet the requirements of Council, the RTA, and the EPA, should there be any. The Code shall include, but not necessarily be limited to:</p> <p>i) driver training to ensure that noisy practices such as the use of compression engine brakes are avoided or minimised;</p> <p>ii) best exhaust emission and noise practice in the selection and maintenance of vehicle fleets</p> <p>iii) speed limits to be observed along routes to and from, and within the site;</p> <p>iv) movement scheduling where practicable to minimise noise impacts during sensitive time of the day;</p> <p>v) behavioural requirements and load coverage specifications for drivers;</p> <p>vi) a system of audited management practices that identifies non-conformances, initiates and monitors corrective and preventive actions (including disciplinary action for breaches of procedures), and assesses the implementation and improvement of the Strategy; and</p> <p>vii) clauses in conditions of employment or contracts for drivers that require adherence to the noise minimisation procedures and facilitate implementation of disciplinary actions for breaches of the procedures.</p>	<p>Site visit: The auditor observed the following elements of the Traffic Management Sub-Plan being implemented:</p> <ul style="list-style-type: none"> <li>• Adherence to the 10 km/hr speed limit on-site.</li> <li>• Vehicles refraining from excessively accelerating and decelerating.</li> <li>• Ensuring loads were covered.</li> <li>• Vehicles did not idle excessively.</li> </ul>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. P-ENV-02b - Appendix C, Revision 4, Effective 15.04.2020 GHD – Traffic Management Sub-Plan</li> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• Extract from Picton Site induction – Screen shot of the Traffic Rules to be applied to the site.</li> <li>• Extract from Picton Site induction – Picton Environmental Site Rules.</li> <li>• No non-compliances were recorded the AEMRs or EPA website.</li> </ul>	<p>Compliant</p>

	<p>e) a <b>Cultural Heritage Management Plan</b> to outline measures to ensure that the two Heritage Conservation Zones are suitably managed during the life of the development. The Plan shall be prepared in consultation with the EPA, and Aboriginal community, and shall clearly demonstrate how the issues and requirements of these entities have been addressed. Where the Plan is not consistent with the requirements of these entities, then a full justification for that inconsistency must be provided.</p>	<p>Site audit: The auditor observed the following:</p> <ul style="list-style-type: none"> <li>Secured Heritage Conservation Zone 1 sighted and fenced.</li> <li>Sighted the fence surrounding the scarred tree (Zone 2).</li> <li>Fallen tree branch located in the Zone 2, it was not removed as per Aboriginal stakeholder requirements.</li> </ul>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. P-ENV-02b - Appendix D, Revision 3, Effective 08.08.2019 GHD – Cultural Heritage Management Sub-Plan</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> <li>Wori Woilywa – Letter to Vegetation Management Estimates for 10.6 Hectares for Allied Mills.</li> <li>Letter from Allied Pinnacle to Wori Woilywa dated 23 July 2020 – Permission to Conduct Cultural Burn on Allied Pinnacle Site. Heritage area A.</li> </ul>	<p>Compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<ul style="list-style-type: none"> <li>Wori Woolywa Invoice No. 2006006 dated 22/6/2020 for mapping services and weed treatment from November 2019 to June 2020.</li> <li>Allied Pinnacle Purchase order 4500553410 – Order Date 23/7/2020 – covers weed management and cultural burn.</li> </ul>	
	<p>f) a <b>Landscape Management Plan</b> to outline measures to ensure appropriate development and maintenance of landscaping on the site. The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) details of all landscaping to be undertaken on the site with specific reference to screening landscaping and the timing of landscaping works;</li> <li>ii) maximisation of flora species endemic to the locality in landscaping the site;</li> <li>iii) results of consultation with Council and the EPA to determine appropriate species for landscaping on the site; and</li> <li>iv) a program to ensure that all landscaped areas on the site are maintained in a tidy, healthy and weed free state.</li> </ul>	<p>Site audit: The auditor observed the landscaped areas were well maintained. No litter or pooled water was accumulating within the landscaped area. Moving of the grassed areas was evident.</p>	<p>Document viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 3, August 2019. Landscape Management Sub-Plan.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021. <i>Table 11 – Status – 2019/20 Progressing – Company Wori Woollywa attended the site to complete Phase 1 of heritage area. This included weed spraying in preparation for fire treatment in 2020.</i></li> <li>Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21 February 2022, 18 May 2022 and 23 August 2023.</li> </ul>	<p>Compliant</p>



<p>5.5</p>	<p>Every three years after the commencement of operation of the development the Applicant shall undertake a formal review of the OEMP required under condition 5.3 of this consent. The review shall ensure that the OEMP is up-to-date and all changes to procedures and practices prior to the review are fully incorporated into the OEMP. The Applicant shall notify the Secretary of the completion of the review, and shall supply a copy of the updated OEMP to the Secretary and any other party upon request.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle Picton Mill, NSW, Operational Environment Management Plan - P-ENV-02 Picton OEMP, Revision 4: Effective 15.04.2020 GHD                  Document history and status table added. – updated in August 2018 as per IEA 2017 Action Plan, September 2018, added document History and Status information and August 2019, - Appendix F – added 3 monthly check for emergency evacuation area. Added document number to control in site QMS. Revision 4 – April 2020                  OEMP Appendix A – NVMP – Revision 3 08/08/2019, OEMP Appendix B WMMP, Revision 4, 15/04/2020, OEMP Appendix C TMP, Revision 4, 15/04/2020, OEMP Appendix D CHMP, Revision 3, 08/08/2018                  OEMP Appendix E LMP, Revision 4, 15/04/2020</li> <li>Letter from DPE dated 18 May 2020  <i>I refer to the OEMP which was submitted in accordance with Condition 3.3 of Schedule 2.... The Department ....is satisfied that it has been updated to reflect the findings of the Independent Environmental Audit. ... concludes the plan addresses the requirements of Condition 5.5 which requires the OEMP to be formally reviewed every three years.</i></li> </ul>	<p>Compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
<b>Effluent Irrigation Area</b>				
5.6	When applying effluent to land, the Applicant must ensure: <ul style="list-style-type: none"> <li>a) There is no surface water runoff beyond the irrigation area as identified in Figure 1 at <b>Appendix A</b> of this consent;</li> <li>b) Spray does not drift beyond the boundary of the site; and</li> <li>c) The quantities of nutrients, salt, hydraulic load and organic material are effectively absorbed through annual soil monitoring (refer to condition 5.9).</li> </ul>	Auditor did not see any evidence of surface water runoff beyond the irrigation area.	Documents viewed: <ul style="list-style-type: none"> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>• Annual Review of Wastewater Treatment and Effluent Irrigation – Picton Mill – Lanfax Laboratories, July 2021</li> <li>• Annual Review of Wastewater Treatment and Effluent Irrigation – Picton Mill – Lanfax Laboratories, June 2020</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
5.7	<p>Within two months of the approval of MOD 3, the Applicant must ensure the irrigation area identified in <b>Appendix A</b> of this consent is managed and maintained as follows:</p> <p>a) a diversion bank of no higher than 200 mm must be constructed between the road and the irrigation area to divert runoff away from the irrigation area and into the tree row;</p> <p>b) any depressions capable of ponding water (such as natural depressions or wheel tracks) in the irrigation area must be regularly removed by levelling with top soil;</p> <p>c) the irrigation area must be regularly mowed to a length of 100 mm; and</p> <p>d) pasture or fodder crops must only be harvested when dry.</p>	<p>Auditor sighted the diversion bank during the site visit. Irrigation area being maintained.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Annual Review of Wastewater Treatment and Effluent Irrigation – Picton Mill – Lanfax Laboratories, July 2021</li> <li>Annual Review of Wastewater Treatment and Effluent Irrigation – Picton Mill – Lanfax Laboratories, June 2020</li> </ul>	Compliant
<b>AWTS Maintenance and Monitoring Requirements</b>				

<p>5.8</p>	<p>The Applicant must ensure the AWTS is serviced prior to any irrigation recommencing. The service report, together with records of those measurements are to be submitted to the Department prior to any irrigation recommencing and then on a quarterly basis. Before commencing each service, measurements are to be taken to demonstrate that the following target requirements have been met:</p> <p>d) faecal coliforms or <i>E.coli</i> (thermotolerant coliforms) must be less than 100 colony forming units per 100 ml in the irrigation chamber;</p> <p>e) dissolved oxygen in the irrigation chamber is more than 5 mg O<sub>2</sub>/L at 20 degrees Celsius; and</p> <p>f) free available chlorine in the irrigation chamber is between 0.01 and 2.0 mg/L.</p>	<p>During the site audit, the auditor requested to view records uploaded to Major Projects External Portal, however there were no documents or records anywhere under Allied Pinnacle and the auditor could not verify when documents submitted.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Section 13 – 2019/2020 – Environmental Action Plan – Corrective Action 2019/20- 4 Non-compliance - Appendix A – Condition 5.8 – Service records confirm the AWTS was serviced quarterly except November 2019. Also E-coli and dissolved oxygen levels did not meet targets specified.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022. Section 6.2 – <i>Monitoring records confirmed that the AWTS was monitored quarterly in accordance with Consent Condition 5.8. The results indicated that the parameters were consistently within the stated goals except for dissolved oxygen in May 2021 and August 2021, which were slightly lower than specification.</i></li> <li>Service records sighted for the following dates: 10/8/2020, 12/11/2020 and 13/02/2021</li> </ul>	<p>Non-compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<ul style="list-style-type: none"> <li>• Certificates of analysis for ALS wastewater monitoring results (November 2019 to - EW1904937, EW2005074, EW2001048, EW2101991, EW2103394, EW2104726, EW2200526, and EW2202154</li> <li>• EW22021154 – non-compliance with dissolved oxygen level 4.02mg/L.</li> <li>• Letters from Allied Pinnacle to Department of Planning – Submitted via post approval document portal dated – AWTs sampling results – 21/7/2022 (Feb sampling), 25/11/2021 (9/11/21 sample), 13/9/2021(10/8/21), 15/6/2021 (14/5/21), 17/2/21 (8/2/21), 16/11/2020 (10/11/2020) and 17/8/2020 (6/8/20).</li> </ul>	

<p>5.9</p>	<p>Within two months of the determination of MOD 3, the Applicant must update and implement the Water Monitoring and Management Plan, as required by Condition 5.4 b), to the satisfaction of the Secretary, to include:</p> <p>a) an annual soil monitoring program for the irrigation area in accordance with the DEC Guideline; and</p> <p>b) the management and monitoring requirements detailed in conditions 5.6 to 5.8 inclusive.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle, Picton Mill, NSW Operational Environment Management Plan, Revision 4, 15 April 2020. P-ENV-02b - Appendix B, Revision 4, Effective 15.04.2020 GHD – Water Monitoring and Management Sub-Plan</li> <li>GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021.</li> <li>OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022.</li> <li>Completed Monthly Watercourse Inspection records – dated 21/11/2019, 17/2/2020, 21/6/2020, 15/9/2020, 11/12/2020, 16/3/2021, 25/6/2021, 11/8/2021 (watercourse grass need cutting), 11/2/2022 and 16/9/2022.</li> <li>No non-compliances were recorded the AEMRs or EPA website.</li> <li>Quarterly and six monthly inspections of stormwater system 16 August 2021, 15 November 2021, 18 May 2021, 21</li> </ul>	<p>Compliant</p>
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			February 2022, 18 May 2022 and 23 August 2023.	
<b>Environmental Reporting</b>				
<b>Incident Reporting</b>				
6.1	The Applicant shall notify the EPA and the Secretary of any incident with actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred.	Site Manager – confirmed no reportable incidents occurred during the period.	Documentation and websites viewed: <ul style="list-style-type: none"> <li>Incident Register (electronic) – no reportable incidents</li> <li>EPA Website – EPL 12498 – no incidents recorded.</li> </ul>	Not triggered
6.2	The Applicant shall meet the requirements of the Secretary to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 6.1, within such period as the Secretary may require. Note: Condition 6.2 of this consent does not limit or preclude the EPA from requiring any action to address the cause or impact of any incident, in the context of the EPA's statutory role in relation to the development.	Site Manager – confirmed no reportable incidents occurred during the period.	Documentation and websites viewed: <ul style="list-style-type: none"> <li>Incident Register (electronic) – no reportable incidents</li> <li>EPA Website – EPL 12498 – no incidents recorded.</li> </ul>	Not triggered
<b>Annual Performance Reporting</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
6.3	<p>The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Secretary, an <b>Annual Environmental Management Report (AEMR)</b>. The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) details of compliance with the conditions of this consent;</li> <li>b) a copy of the Complaints Register (refer to condition 4.3 of this consent) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were address and resolved;</li> <li>c) identification of any circumstances in which the environmental impacts and performance of the development during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition 1.1 of this consent, with details of additional mitigation measures applied to the development to address recurrence of these circumstances ;</li> <li>d) results of all environmental monitoring required under this consent and other approvals, including interpretations and discussion by a suitably qualified person; and</li> </ul>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• GHD, Allied Pinnacle, Picton Mill, NSW, 2019/20 Annual Environmental Management Report, Rev 0, August 2020. Appendices did not contain all monitoring SLR Compliance Report for noise monitoring. Only conclusion discussed in Section 4.3 but not all monitoring results included in table format or as an Appendix.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2020/21 Annual Environmental Management Report, Rev 0, 12 August 2021. Missing volumes of AWTS wastewater being discharged. Appendix A Compliance table does not include all conditions of the consent.</li> <li>• OptimE, Allied Pinnacle, Picton Mill 2021/22 Annual Environmental Management Report, Rev 0, August 2022. Appendix A Compliance table does not include all conditions of the consent. Missing volumes of AWTS wastewater being discharged.</li> </ul> <p>Notes: Quarterly and six monthly monitoring results are included in table format within the AEMR. Laboratory certificates of analysis have not been included.</p>	Non-compliant


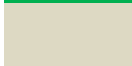
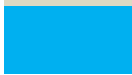


Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<p>e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the development have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident.</p> <p>The Applicant shall submit a copy of the AEMR to the Secretary every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the development. The Secretary may require the Applicant to address certain matters in relation to the environmental performance of the development in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Secretary may require. The Applicant shall make copies of each AEMR available for public inspection on request.</p>			

# APPENDIX B

## Detailed Audit Findings – Environment Protection Licence

**Key:**

	Compliant
	Not triggered
	Non-compliant

Note

**Table 15 Detailed Audit Findings – EPL Conditions**

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status						
<b>A1 What the licence authorises and regulates</b>										
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Schedule Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Agricultural processing</td> <td>General agricultural processing</td> <td>&gt;100,000-250,000 T processed</td> </tr> </tbody> </table>	Schedule Activity	Fee Based Activity	Scale	Agricultural processing	General agricultural processing	>100,000-250,000 T processed	<p>Site visit: The auditor observed only activities specified in the EPL being carried out on-site.</p>	<p>Documentation viewed</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul> <p>EPA website – Public Register – No non-compliances, complaints or incidents recorded for the facility in past three years.</p>	Compliant
Schedule Activity	Fee Based Activity	Scale								
Agricultural processing	General agricultural processing	>100,000-250,000 T processed								
<b>A2 Premises or plant to which this licence applies</b>										
A2.1	<p>The licence applies to the following premises:</p> <p>Allied Mills                      330 Picton Road                      Maldon NSW 2571                      Lot 32 DP 731012</p>	<p>Site visit: The auditor observed compliance with this condition.</p>		Complaint						

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> <li>a. the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</li> <li>b. the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</li> </ul>		<p>EPA Website viewed:</p> <ul style="list-style-type: none"> <li>• EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>• EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>• EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul> <p>EPA website – Public Register – No non-compliances, complaints or incidents recorded for the facility in past three years.</p>	Complaint
<b>2 Limit Conditions</b>				
L1 Pollution of Waters				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Site visit: The auditor observed compliance with this condition.	<p>EPA website viewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul> <p>EPA website – Public Register – No non-compliances, complaints or incidents recorded for the facility in past three years.</p>	Compliant
<b>L2 Waste</b>				
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Site visit: The auditor observed compliance with this condition.	<p>EPA website viewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul> <p>EPA website – Public Register – No non-compliances, complaints or incidents recorded for the facility in past three years.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence.			Note
<b>L3 Noise limits</b>				
L3.1	Operating Noise Limits Maximum allowable noise contribution			Note
L3.2	Noise generated at the premises must not exceed the noise limits presented in the table below.  Note: the noise limits represent the noise contribution from the Allied Mills premises.  Refer to actual license for table.		Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Exceedances at Receiver 1 and 2 predicted/measured.	Non-compliant
L3.3	Note: For the purpose of Condition L3.2:  Day: is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays;  Evening: is defined as the period from 6pm to 10pm;  Night: is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.			Note

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
L3.4	<p>To determine compliance with Condition L3.2, noise from the premises is to be measured at the most affected point or within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary.</p> <p>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy, January 2000).</p> <p>A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the “Environmental Noise Management – NSW Industrial Noise Policy, January 2000”.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Operational Noise Survey, Allied Mills, 330 Picton Road, Maldon, SLR, Report Number 610.16992-R02, version 1.1, dated 6 July 2017. Monitoring undertaken on 15 December 2016.</li> <li>Email dated 23 July 2020 from SLR to Allied Pinnacle confirming Section 11 was complied with.</li> </ul>	Compliant
L3.5	<p>Noise from the premises is to be measured at 1m from the dwelling façade of a residential receiver (specified in Condition L3.2) to determine compliance with the LA1 (1 minute) noise limits in condition L3.2.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Compliance Survey, Operational Noise Monitoring, Allied Pinnacle Picton, 330 Picton Road, Maldon, SLR, Report Number 610.19168-R01, Version No V1.0, dated December 2019. Monitoring undertaken on 27 to 29 November 2019. Auditor could not verify if this condition was complied with.</li> </ul>	Non-compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
L3.6	The noise emission limits identified in this licence apply under all meteorological conditions except: <ol style="list-style-type: none"> <li>during rain and wind speeds (at 10m height) greater than 3m/s; and</li> <li>under "non-significant weather conditions".</li> </ol>			Note
	Note: Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.			Note
<b>3 Operating Conditions</b>				
<b>O1 Activities must be carried out in a competent manner</b>				
O1.1	Licensed activities must be carried out in a competent manner. This includes: <ol style="list-style-type: none"> <li>the processing, handling, movement and storage of materials and substances used to carry out the activity; and</li> <li>the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</li> </ol>	Site visit: The auditor observed that Allied Pinnacle was generally complying with this condition.	EPA website viewed: <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul> EPA website – Public Register – No non-compliances, complaints or incidents recorded for the facility in past three years.	Compliant
<b>O2 Maintenance of plant and equipment</b>				



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a. must be maintained in a proper and efficient condition; and b. must be operated in a proper and efficient manner	Site visit: The auditor observed that Allied Pinnacle was generally complying with this condition. All equipment and plant appeared to be working in a proper and efficient manner.		Compliant
<b>03 Dust</b>				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Site visit: The auditor observed that Allied Pinnacle was complying with this condition.	No complaints were received during this IEA period.	Compliant
<b>4 Monitoring and Recording Conditions</b>				
<b>M1 Monitoring Records</b>				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.		No monitoring is required under this EPL.	Not triggered
M1.2	All records required to be kept by this licence must be: a. in a legible form, or in a form that can readily be reduced to a legible form; b. kept for at least 4 years after the monitoring or event to which they relate took place; and c. produced in a legible form to any authorised officer of the EPA who asks to see them		Not triggered.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <ul style="list-style-type: none"> <li>a. the date(s) on which the sample was taken;</li> <li>b. the time(s) at which the sample was collected;</li> <li>c. the point at which the sample was taken; and</li> <li>d. the name of the person who collected the sample</li> </ul>		No samples are required to be collected under the EPL.	Not triggered
<b>M2 Recording of pollution complaints</b>				
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.		Records of complaints were available during the audit. Incident Report 005061.	Complaint
M2.2	<p>The record must include details of the following:</p> <ul style="list-style-type: none"> <li>a. the date and time of the complaint;</li> <li>b. the method by which the complaint was made;</li> <li>c. any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</li> <li>d. the nature of the complaint;</li> <li>e. the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>f. if no action was taken by the licensee, the reasons why no action was taken.</li> </ul>		Records of complaints were available during the audit. Incident Report 005061.	Complaint

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Records of complaints were available during the audit. Incident Report 005061.	Complaint
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		No complaints were received during this IEA period.	Not triggered
<b>M3 Telephone Complaints line</b>				
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.		Allied Pinnacle website reviewed and compliance with this condition. Customer Service number is 1300 369 869.	Complaint
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Allied Pinnacle website reviewed and compliance with this condition.	Complaint
M3.3	The preceding two conditions do not apply until 3 months after: <ol style="list-style-type: none"> <li>the date of the issue of this licence or</li> <li>if this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation</li> </ol>		This condition does not relate to this IEA reporting period.	Not triggered
<b>5 Reporting Conditions</b>				
R1 Annual return documents				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ul style="list-style-type: none"> <li>a. Statement of Compliance; and</li> <li>b. Monitoring and Complaints Summary.</li> </ul> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>• EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>• EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Complaint
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>• EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>• EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>• EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Complaint

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ul style="list-style-type: none"> <li>a. the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</li> <li>b. the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</li> </ul> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	National WHS & Environment Manager advised that the licence has not been transferred during this IEA.		Not triggered
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <ul style="list-style-type: none"> <li>a. in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</li> <li>b. in relation to the revocation of the licence - the date from which notice revoking the licence operates.</li> </ul>	National WHS & Environment Manager advised that the licence has not been surrendered or revoked during this IEA period.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').		Documents viewed: <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021. Non-compliant.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Non-compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.		Documents viewed: <ul style="list-style-type: none"> <li>EPA Annual Return - 06/07/2018 to 05/07/2019. Submitted 15 August 2019.</li> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R1.7	<p>Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a. the licence holder; or</p> <p>b. by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Compliant
R1.8	A person who has been given written approval to certify a certificate of compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review of this licence.			Note
<b>R2 Notification of environmental harm</b>				
R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	Site Manager – no incidents have occurred which relate to environmental harm during this IEA period.	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle Incident Register.</li> </ul>	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	NSW WHSE Manager advised no incidents have occurred which relate to environmental harm during this IEA period.	Documents viewed: <ul style="list-style-type: none"> <li>Allied Pinnacle Incident Register.</li> </ul>	Not triggered
<b>R3 Written report</b>				
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: <ol style="list-style-type: none"> <li>where this licence applies to premises, an event has occurred at the premises; or</li> <li>where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,</li> </ol> and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	NSW WHSE Manager advised no incidents have occurred which relate to environmental harm during this IEA period.	Documents viewed: <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Not triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	NSW WHSE Manager advised no request has been made by the EPA during this IEA reporting period.		Not triggered



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <ol style="list-style-type: none"> <li>the cause, time and duration of the event;</li> <li>the type, volume and concentration of every pollutant discharged as a result of the event;</li> <li>the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</li> <li>the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</li> <li>action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</li> <li>details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</li> <li>any other relevant matters.</li> </ol>	NSW WHSE Manager advised no request has been made by the EPA during this IEA reporting period.	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>EPA Annual Return – 06/07/2019 to 05/07/2020. Submitted 21 August 2020.</li> <li>EPA Annual Return – 06/07/2020 to 05/07/2021. Submitted 9 December 2021.</li> <li>EPA Annual Return – 06/07/2021 to 05/07/2022. Submitted 2 September 2022.</li> </ul>	Not triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	NSW WHSE Manager advised no request has been made by the EPA during this IEA reporting period.		Not triggered
<b>6 General conditions</b>				
G1 Copy of licence kept at premises or plant				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site visit – current EPL was available during visit.	Allied Pinnacle website had current EPL available.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NSW WHSE Manager confirmed no request has been made by any authorized officer during this IEA reporting period.		Not triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	NSW WHSE Manager confirmed that it is available if requested.		Compliant

# APPENDIX C

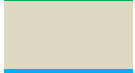
## Detailed Audit Findings – EIS Predictions

ENVIRONMENTAL IMPACT STATEMENT FOR GRAIN MILLING FACILITY, PICTON, MALDON (KBR, 2004)

**Key:**



Compliant



Not triggered



Non-compliant

Note

**Table 16 Detailed Audit Findings – EIS - Environmental Mitigation and Management Measures (Section 11)**

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
<b>8.6.6 Traffic</b>				
8.6.6	The total heavy good vehicle traffic generation from the site will be in the order of 16 trips per day to and from the site.		This EIS requirements has been superseded by the latest version of the Traffic Management Plan.	Note
<b>11.2.1 Geology and Soils</b>				
11.2.1	During Operations To mitigate against subsidence, the following design criteria would be adopted: <ul style="list-style-type: none"> <li>• Maximum vertical subsidence: 600 mm</li> <li>• Maximum ground strains of +/- 2 mm per metre (mm/m)</li> <li>• Maximum tilt of 6 mm/m (i.e. 1 in 167)</li> </ul>		This was noted, however the audit did not require a finding at this point in time.	Not triggered
<b>11.2.2 Salinity</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.2	<p>During operations</p> <p>On completion of the construction period, monitoring and maintenance of the development in relation to soil and groundwater conditions should be undertaken at regular intervals. A monitoring system including the following activities should be implemented:</p> <ul style="list-style-type: none"> <li>• Regular inspections of all drainage facilities constructed for the proposed development at initial weekly inspection intervals to assist in early identification of saline seepage, bank stability, salt scalds etc</li> <li>• A system of groundwater monitoring will be installed and monitored initially at three monthly intervals. The wells will be located within the irrigation area at a general spacing of approximately 50 m and downstream of any other water retention structures.</li> <li>• Regular inspection of the sediment load in drainage channels, basins and the creek will be undertaken.</li> <li>• During periods of drought special monitoring and maintenance may be required to assess the condition and maintenance requirements of the artificial liners and other facilities.</li> </ul>		<p>This EIS requirement has been superseded by MOD3 conditions and associated Water Monitoring Management Plan.</p>	<p>Note</p>
<p><b>11.2.3 Hydrology and Water Quality</b></p>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.3	<p>Operational phase</p> <p><i>Pollution Risk Loading Areas, Bunded Waste Storage Area and Hazardous Chemical Store</i></p> <p>The hard-standing surface of the mill facility would be graded away from the building to prevent running into the loading bay. Therefore any spills that may occur would not interact with runoff and could be cleaned up quickly, with no risk of entering the peripheral drains or water courses. A 'spill kit' containing tarpaulins, brushes, spades, booms and bollards would be kept in the mill building close to the load out areas, in a clearly marked location. The spill response protocol includes educating staff on the consequences of pollution, containing spills as quickly as possible and preventing dust generation.</p> <p>The waste storage area would be bunded and the hazardous chemical store located in an isolated position away from the mill buildings. This store would be fitted with a sump of adequate capacity to contain spills.</p> <p>The maintenance workshop would be constructed with an impermeable floor and interceptors to contain any spills.</p>	<p>Site visit: The auditor observed several spill kits located around the facility.</p> <p>Site Manager confirmed spill kits have been used during this reporting period and recorded as environmental incident.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Pinnacle, Operational Environmental Management Plan, Revision 4. Section 5.2.3.</li> <li>Picton WHSE-001 Picton Pollution Incident Response Management Plan, Version No. V05, issued 13 November 2022.</li> <li>Allied Pinnacle Environmental Management System Induction presentation. This is located on Allied Pinnacle Rapid Induct website.</li> </ul>	Compliant
11.2.3	<p>Environmental Management Plan</p> <p>An operational Environmental Management Plan (EMP) would be prepared for water quality management, to include:</p> <ul style="list-style-type: none"> <li>A schedule of maintenance of the drainage system, in particular to keep grass short in the vicinity of the mill buildings so that drainage is efficiency and standing water is eliminated.</li> <li>A schedule for maintaining the shut-off-gate, cleaning culverts and trash racks.</li> <li>A program of quarterly sampling from the reservoir to monitor reservoir water quality. This should start before construction, so that any impacts from construction can be identified.</li> </ul>	<p>Site visit: The auditor observed the grass was kept short in the vicinity of the mill buildings.</p>	<p>This EIS requirement has been superseded by MOD3 conditions and associated Water Monitoring Management Plan.</p>	Note

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
<b>11.2.5 Air Quality</b>				
11.2.5	<p>During Operation</p> <p>To minimise emissions from vehicles associated with the proposed works, the following measures should be implemented:</p> <ul style="list-style-type: none"> <li>Machinery and vehicles are to be maintained in good working order, have appropriate exhaust pollution controls and meet Australian Standards for exhaust emissions.</li> <li>Any equipment not in use for extended periods of time is to be switched off.</li> <li>The proposed flour mill is to incorporate equipment and procedures to minimise any contamination from cement dust generated from the cement works.</li> <li>A cooperative approach to dust monitoring is to be developed between Blue Circle and Allied Mills during operations.</li> </ul>	<p>Site visit: the auditor observed:</p> <ul style="list-style-type: none"> <li>Machinery and vehicles being maintained in good working order through maintenance program.</li> <li>Equipment not being used switched off.</li> </ul>		Compliant
<b>11.2.6 Sewage Treatment</b>				
11.2.6	<p>Mitigation and management measures applicable to the facility are as follows:</p> <ul style="list-style-type: none"> <li>No irrigation during high winds condition and storage of effluent until more suitable meteorological conditions prevail</li> <li>Release of water for irrigation at a distance of greater than 70 m from the mill.</li> <li>Monitoring of pasture health for the irrigation area. Should any die-back be identified, revegetation would be undertaken with saline tolerant plant species including wheatgrass, rhodes grass, pioneer and couch grass.</li> </ul>	<p>Site visit: The auditor observed that:</p> <ul style="list-style-type: none"> <li>Irrigation has recommenced.</li> <li>Irrigation area is greater than 70 metres from the mill.</li> </ul>	<p>This EIS requirement has been superseded by MOD3 conditions and associated Water Monitoring Management Plan.</p>	Note

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.6	<p>Specific salinity considerations for the implementation of the effluent irrigation system will include the following measures to reduce infiltration to the perched water table or deeper regional groundwater flow:</p> <ul style="list-style-type: none"> <li>• The irrigation area will have a relatively uniform slope to prevent surface ponding of the irrigation water. Earthworks may be necessary during the removal of the existing dams, access road and other features within the proposed irrigation area to create a uniform slope.</li> <li>• Installation of an automated soil moisture monitoring system as part of spray irrigation infrastructure to assist personnel with monitoring the irrigation site to reduce over watering of the irrigation areas.</li> <li>• A subsoil collector drain will be installed on the lower side of the irrigation area above the creek/dam to intercept seepage that occurs as a result of the spray irrigation. The seepage collected by the drain will be returned to the sewage treatment plant.</li> <li>• Installation of a monitoring system to assess the performance of the irrigation system including the amount of surface water run-off, subsurface seepage and accumulation of salt in the surface soils in the lower section of the irrigation areas. The monitoring program will be designed to provide an early warning of the increase in saline conditions associated with the irrigation system.</li> </ul> <p>The above considerations are designed to reduce the development of a perched water table that may mobilise and transport salt within the shallow subsurface soils at the site.</p>	<p>Site Manager and Production Manager confirmed that the neither the automatic soil moisture monitoring systems, nor the subsoil collector drain or installation of a monitoring system have been installed as outlined in the EIS.</p>	<p>This EIS requirement has been superseded by MOD3 conditions and associated Water Monitoring Management Plan.</p>	<p>Note</p>

**11.2.7 Waste Management**



Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.7	<p>During operations:</p> <p>Office wastes: the office would be designed to provide space for paper recycling facilities. Waste paper and card board would be separated for removal by a recycling contractor.</p> <p>Mixed wastes: a dedicated bunded waste disposal area would be provided for waste collections bins, which would be removed by a licensed waste disposal contractor.</p> <p>Maintenance workshop: waste oils would be stored in a bunded area for removal by a licensed waste oil recycling contractor.</p> <p>General waste would be stored in the on-site bunded waste for removal by licensed contractor.</p> <p>Laboratory: Chemical waste would be stored within the laboratory for removal by specialist contractor.</p>	<p>Site visit: The auditor observed the following waste management practices being employed:</p> <ul style="list-style-type: none"> <li>Designated bins for recycling of paper and card board in the office areas.</li> <li>General waste stored in general waste disposal area, awaiting removal.</li> </ul> <p>Site Manager and NSW WHSE Manager advised</p> <ul style="list-style-type: none"> <li>WasteFlex used to collect General Waste</li> <li>Cardboard collected by Grimms on behalf of Veolia.</li> </ul>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Mills, Picton Mill, NSW, Operational Environment Management Plan, Revision 4, April 2020.</li> <li>Appendix F – Combined implementation checklist.</li> <li>GRIMA recycling – Summary Reports for the following months – February 2022, April 2022, June 2022, July 2022, August 2022.</li> <li>Wasteflex Invoices for General Waste - March 2021 (Tax Invoice Number 282465), June 2021 (Tax Invoice Number 296002), October 2021 (Tax Invoice Number 314762), May 2022 (Tax Invoice Number 1014836), August 2022 (Tax Invoice Number 1033338).</li> </ul>	Compliant
<b>11.2.9 Socio-Economic Impact</b>				
11.2.9	<p>Potential negative social or economic impacts that could arise from construction and operation would be managed through accepted design and management strategies, such as regulated hours of operation and erosion control measures. Perimeter landscape planting of a buffer zone along Picton Road would assist in screening the buildings.</p>	<p>Site visit: The auditor observed the ground conditions to be generally stable, the site was well maintained and landscaping along Picton Road boundary was evident.</p>		Compliant
<b>11.2.10 Noise</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.10	<p><b>Site Noise Barriers</b></p> <p>Noise barriers, solid hoardings and/or other noise barriers would be erected around critical work areas where they are likely to be effective, to act as acoustical barriers and to minimise noise emissions.</p>	<p>Site visit: The auditor observed the noise mitigation controls were incorporated into the design and construction of the facility. No additional external noise barriers have been constructed.</p>		Complaint
11.2.10	<p><b>Operator Instruction</b></p> <p>Operators would receive training to raise their awareness of potential noise problems and to increase their use of techniques to minimise noise emissions. Opportunities for providing “real time” feedback about noise to operators would be implemented where feasible. This approach has been found to greatly assist operators in minimising emissions from certain types of plant and equipment.</p>		<p>Documents viewed:</p> <ul style="list-style-type: none"> <li>Allied Mills Environmental Management System Induction presentation. This is located on Allied Mills Rapid Induct website. Module: Noise outlines noise limits, along with practices to be implemented by employees to minimise noise emissions.</li> <li>Induction records for employees that have attended the Environmental Management System Induction and Picton Site Induction – Lachlan White, Danny Boys and Mark Hughes.</li> </ul>	Compliant
<b>11.2.11 Aboriginal Heritage</b>				
11.2.11	<p><b>Stop Work Provision</b></p> <p>All Aboriginal objects and places are protected in New South Wales. If Aboriginal archaeological material or deposits are encountered that are not described in this report, works within 100 metre radius of the find would cease immediately, to allow a qualified archaeologist to make an assessment of the find. The archaeologist may need to consult with the DEC Aboriginal Heritage Unit regarding the finds.</p>	<p>Site Manager advised that no construction activities have occurred in this IEA reporting period.</p>		Not triggered
<b>11.2.12 Non-Aboriginal Heritage</b>				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11.2.12	<p>The following recommendations would be considered when developing the detailed design for the proposal:</p> <ul style="list-style-type: none"> <li>No original fabric from the culvert to be disturbed in any way</li> <li>A photographic recording to take place before and during the proposed works and the resulting record to be forwarded to the Wollondilly Shire Council Picton &amp; District Historical and Family History Society.</li> </ul>	<p>Site Manager confirmed no works have occurred in the area between October 2016 and October 2019.</p>		Not triggered
<b>11.2.13 Visual Impact</b>				
11.2.13	<p>It is recommended that the site be landscaped to ameliorate the most significant visual impacts from Picton and Menangle Roads. Wollondilly Shire Council has established objectives and criteria for landscaping in its Development Control Plan (DCP) No. 20 -Industrial Development. The recommendations of this DCP are discussed in Chapter 8 of this EIS,</p> <p>To meet Wollondilly Shire Council’s landscape objectives for the mill site, and to mitigate against adverse viewed from Picton Road and Menangle Roads identified in this analysis, a landscaping strategy would be implemented using earth mounding, native trees and shrubs. The broad principles recommended for a landscape master plan for the mill site are also discussed in Chapter 8.</p> <p>The colour of the built form of the mill is an important consideration in lessening the visual impact of the development against the landscape. The colours of the built form components of the development, combined with perimeter landscape of mounding and planting, would enable the mill to visually recede in the landscape.</p>	<p>Site visit: The auditor observed the landscaping that has been implemented on site and it has been well maintained and vegetation appears in good condition.</p>		Compliant

# APPENDIX D

## Photographs from Site Visit

Photo 1 Allied Mills



**Photo 2 Site Audit Photos – Walk Around – including Stormwater management**





**Photo 3 Weighbridge and Site Entrance**



**Photo 4 Warehouse Area & Lighting**



Photo 5 Recycling Skip

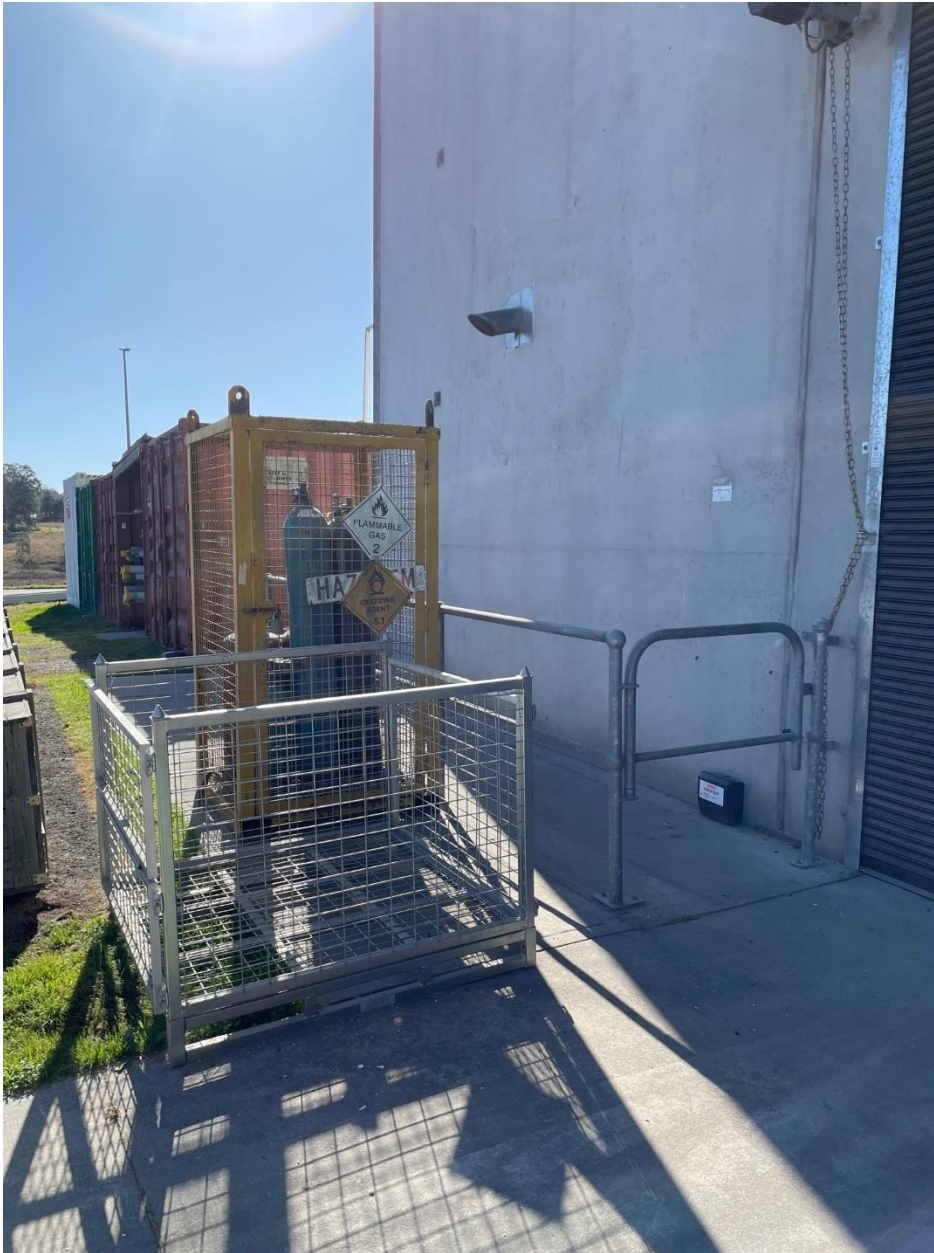




**Photo 6 Fenced Off Heritage Area – Zone B**



Photo 7 Flammable Gas Storage





**Photo 8** Truck Loading



**Photo 9** Truck Loading Area



**Photo 10 Spill Kit Near Train Facility**





**Photo 11** Inside Spill Kit



Photo 12 Spill Control Station – Oil and Fuel Spill Kit





**Photo 13 Landscaping and Stormwater Management**





**Photo 14 Irrigation Area**



# APPENDIX E

## Correspondence Extracts from DPE and EPA

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## DPE – Email received 28 March 2023

Hi Sandy,

Thank you for consulting the department on the upcoming IEAR for Allied Mills at Picton.

In addition to the requirements under the consent conditions, please review compliance with the relevant noise impact assessment criteria and associated management measures.

Kind regards,

## EPA – Email received 3 April 2023

Hi Sandy,

Thanks for talking to me today in relation to your enquiry on EPL No. 12498 (Licence) held by Allied Pinnacle Pty Limited (Licensee) for activities undertaken at 330 Picton Road, Maldon (Premises). The EPA understands that you have been engaged to undertake an IEA as conditioned in DA-318-12-2004 (Consent).

As discussed, the EPA can provide the following in relation to your enquiry:

1. *Advising of any particular environmental issue(s) that the Department would like me to focus on during the audit*

The Licence contains conditions relating to a number of environmental considerations, including the pollution of waters; waste; and dust emissions whilst also conditioning the emission of noise from the Premises and requiring monitoring and reporting in relation to noise levels at a number of receivers.

2. *Providing Department's feedback on the environment performance of the operation since October 2019 to October 2022*

The EPA's Public Register contains information on the Licensee's annual returns (including whether any non-compliances for the period were disclosed) and any regulatory action taken by the EPA in relation to non-compliances with the Licence. The EPA's Public Register can be found at <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers>  
In the event of the EPA directly receiving a complaint in relation to activities at the Premises, the EPA would routinely contact the Licensee to advise of the complaint and seek information. The Licensee should be in a position to provide information on whether they have been contacted by the EPA in relation to complaints received.

3. *Provide copies of any letters/email correspondence with Allied Pinnacle regarding environmental matters since October 2019*

The Licensee should be in a position to provide you with copies of any correspondence received from the EPA.

4. *Confirmation that Annual Returns were submitted on time since 23 October 2019*

The EPA's Public Register contains information on the Licensee's annual returns including the date the Annual Return was received.

5. *Advise of any environmental complaints received since 23 October 2019*

Please see previous response to enquiry 2.

I hope that this assists with your enquiry.

If you have any further enquiries in relation to the Licence, please submit them to [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

Thank you,

# APPENDIX F

## Attendance Registers



### Allied Pinnacle - IEA

#### REGISTER OF ATTENDANCE

16<sup>th</sup> June 2023

Allied Pinnacle Office – 330 Picton Road  
Picton

OPENING MEETING – 9AM		
Name	Position	
Mania Hooker	National WHSE Manager	<i>[Signature]</i>
Darwinie Parry	NSW WHSE Manager	<i>[Signature]</i>
Mark Hughes	Site Manager	<i>[Signature]</i>

CLOSING MEETING		
Name	Position	





### Allied Pinnacle - IEA

#### REGISTER OF ATTENDANCE <sup>16<sup>th</sup></sup> June 2023

Allied Pinnacle Office – 330 Picton Road  
Picton

OPENING MEETING – 9AM	
Name	Position
/	

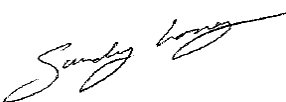
CLOSING MEETING	
Name	Position
Mark Hughes	Site Manager
Darwinia Rindye	NW WHK
Mania Hooker	National WHSE Manager

Filename: Picton - Register of Attendance - June 2023.docx



# APPENDIX G

## Independent Audit Certification Form

<b>Independent Audit Certification Form</b>	
Project Name	Allied Pinnacle Pty Ltd
Consent No.	DA318-12-2004-i
Description of Project	Food processing facility
Project Address	330 Picton Road, Picton New South Wales
Proponent	As above
Title of Audit	Independent Environmental Audit, Picton, DA318-12-2004i
Date:	31 August 2023
<b>Independent Audit</b>	
<p>I declare that I undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> <li>The audit has been undertaken in accordance with the relevant approval condition(s) and the <i>Independent Audit Post Approval Requirements (Department 2019)</i>;</li> <li>The findings of the audit are reported truthfully, accurately and completely;</li> <li>I have exercised due diligence and professional judgement in conducting the audit;</li> <li>I have acted professionally, objectively and in an unbiased manner;</li> <li>I am not related to any proponent, owner or operator of the project neither as employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent or child.</li> <li>I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent or child;</li> <li>neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and</li> <li>I have not accepted, not intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the development, their employees or any interested parties. I have not knowingly allowed, not intend to allow my colleagues to do so.</li> </ul> <p>Note:</p> <ol style="list-style-type: none"> <li>Under Section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</li> <li>The Crimes Act 1900 contains other offences relating to false and misleading information; section 307B (giving false or misleading information - maximum penalty 2 years imprisonment or 200 penalty units, or both).</li> </ol>	
Name of Auditor	Sandy Lonergan
Signature	
Qualification	Bach of AppSc (EAM) and Lead Auditor
Company	SLR Consulting Australia Pty Ltd
Address	120 High Street North Sydney



# APPENDIX H

## Auditor CV & Approval Letter

Ms Dominika Paldyna  
NSW WHSE Coordinator  
330 Picton Road  
MALDON, NSW, 2571

08/07/2023

Dear Ms Paldyna

**Allied Mills Flour and Maize Mill (DA 318-12-2004)  
Independent Auditor 2023**

I refer to your request of 19 June 2023 seeking approval of Ms Sandy Lonergan of SLR as the auditor for the upcoming Independent Environmental Audit of Allied Mills Flour and Maize Mill (the development), in accordance with Schedule 2, Condition 3.3 of the development approval DA 318-12-2004, as modified (the consent).

Having considered the qualifications and experience of Ms Lonergan, the Planning Secretary endorses the appointment of Ms Lonergan to undertake the audit in accordance with Schedule 2, Condition 3.3 of the consent. This approval is conditional on Ms Lonergan being independent of the development and maintaining certification as lead or principal auditor with a relevant industry body.

Please ensure this correspondence, including the independent audit declaration form are appended to the Independent Audit Report.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. The auditor may wish to have regard to the Independent Audit Post Approval Requirements (Department 2020 or as updated). A copy of this guideline can be located at <http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

- consultation with the relevant agencies;
- a compliance table indicating the compliance status of each condition of consent and any relevant EPL;
- not use the term “partial compliance”;
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

Within one month of the completion of the audit, you are to submit a copy of the audit report to the Planning Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Planning Secretary, it is recommended that you review the report to ensure it complies with the relevant consent condition.

Department of Planning and Environment



Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to [Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

# CURRICULUM VITAE



## SANDY LONERGAN

### TECHNICAL DIRECTOR

#### Acoustics & Vibration, Asia-Pacific

### QUALIFICATIONS

BAppSC	1993	Bachelor of Applied Science – Environmental Assessment and Management (University of Newcastle)
Dip PM		Diploma in Project Management
		Qualified Lead Auditor for Management Systems Team Audits
		Qualified Lead Auditor for Quality Audits (ISO9001)
		Qualified Lead Auditor of Occupational Health and Safety Management Systems
		Qualified Lead Auditor for Environmental Management Systems (ISO14001)
		Certificate of Wastewater Treatment, Meadowbank TAFE (1994)

### EXPERTISE

- Project management
- Environmental compliance audits
- Development and auditing of environmental management systems to ISO/IEC14001
- Quality, health and safety and ISO17025 auditing
- System development and management to ISO/IEC17025, ISO/IEC9001 and ISO18001
- Due diligence audits
- Environmental management plans
- Environmental monitoring programs

Sandy has worked as an environmental consultant since graduating from the University of Newcastle.

Her experience provides her with the flexibility to analyse non-technical and technical issues in a logical and systematic manner, to distinguish key issues, identify options and put forward appropriate solutions. She has developed into a diligent and effective Project Manager.

Between 2006 and 2011 she was the Operational and Environmental Manager of an emissions testing company. Her primary responsibility was to run the company (project manage), which included but not limited to planning (quoting – price, time, resources), contract management, scheduling, ensuring client requirements were met, communicating with internal and external stakeholders, customer feedback (complaint management).

Her role included developing in-house systems to improve the efficiency of the business whilst at the same time as reducing risk to the business. Sandy also developed, implemented and maintained the company's NATA accreditation to ISO/IEC17025 for the company.

Sandy has experience over 25 years experience in project managing a range of projects across a variety of industries. She has experience across a range of industries, including but not limited to road, rail, coal seam gas, coal, petroleum (refineries), meat industry, food manufacturers and glass manufacturing.

Sandy is a qualified quality, health & safety, environmental auditor to the relevant international standards. She has been previously engaged by NCSI to conduct EMS certification audits on their behalf.

Sandy has over 20 years' experience in conducting environmental audits ranging from compliance to due diligence.

Since joining SLR she was the Project Director of all Air Quality projects and more recently transferred into the Acoustic team to be the Project Manager on key Transport for NSW projects.

Due to her expertise in management systems and auditing skills she was SLR Quality and NATA manager for 8 years, which included conducting and managing the company's internal and external audits in relation to ISO9001 & ISO/IEC17025.

<b>PROJECTS</b>	
	<b>Environmental Audits</b>
<b>Development Consent of Allied Mills (2022)</b>	Independent Environmental Audit of Allied Pinnacle facility at Kingsgrove for NSW Department of Planning and Environment
<b>Development Consent of Allied Mills (2020)</b>	Independent Environmental Audit of Allied Pinnacle facility at Picton for NSW Department of Planning and Environment
<b>Development Consent of Allied Mills (2019)</b>	Independent Environmental Audit of Allied Pinnacle facility at Kingsgrove for NSW Department of Planning and Environment
<b>Mayfield Concept Plan Concept Approval</b>	Independent Environmental Audit for Port of Newcastle
<b>Elf Farm Supplies Project Approval</b>	Three yearly Independent Environmental Audit for NSW Department of Planning and Environment
<b>Mayfield No. 4 Berth Development Consent</b>	Independent Environmental Audit for Port of Newcastle for NSW Department of Planning and Environment
<b>Development Consent of Allied Mills (2017)</b>	Independent Environmental Audit of Allied Mills facility at Picton for NSW Department of Planning and Environment
<b>Elf Farm Supplies Project Approval</b>	Independent Environmental Audit for NSW Department of Planning and Environment
<b>Fairview and Arcadia Valley Project Areas of Coal Seam Gas</b>	Third Party Compliance Environmental Audit for Santos
<b>Coal Seam Gas Project Development</b>	Environment Protection and biodiversity Conservation Act (EPBC) Audit for Santos for Commonwealth Government
<b>Fairview Project Area</b>	Third Party Compliance Environmental Audit for Santos
<b>Fairview and Arcadia Project Areas</b>	Third Party Compliance Environmental Audit for Santos
<b>Shoalhaven Starches</b>	Annual Environmental Compliance Audits for Department of Planning
<b>OSI International Foods (Australia) Pty Ltd</b>	Due diligence environmental audits for smallgoods processing facilities in Qld, NSW and SA
<b>NSCI</b>	ISO/IEC 14001 Certification audits on behalf of NSCI including Rockdale Beef, Baiada Poultry, Tetra Pak, Panasonic, BlueScope Steel
	<b>HSE Audits</b>
<b>LNG Development Project in PNG</b>	Internal HSE Gap Audit against client specifications for ERIAS

	<b>Project Management</b>
<b>Warringah Freeway Upgrade – Noise Treatment Program - Transport for NSW</b>	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$4,800,000
<b>Sydney Metro – Noise Abatement Program</b>	Project Manager for Sydney Metro for SLR Consulting – budget for the project is approximately \$100,000
<b>M6 Stage 1 – Noise Treatment Program – Transport for NSW</b>	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$250,000
<b>WestConnex – Noise Treatment Program – Transport for NSW</b>	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$300,000
<b>Freight Noise Abatement Program (FNAP) (2017 – 2018)</b>	Project Manager for Transport for NSW for SLR Consulting – budget for 2017 \$750,000-\$1,000,000
<b>At Property Treatment Program (FY 2017)</b>	Project Manager for Sydney Metro for Transport for NSW – budget \$500,000
<b>Department of Defence Asbestos Management and Dust Monitoring Program</b>	Project Manager for Department of Defence – 12 months – budget \$200,000
<b>Background Ambient Air Monitoring Study, Coal Seam Gas Field, Qld</b>	Project Manager for Santos – 12 months – budget \$250,000
<b>Fairview and Arcadia Valley Project Areas of Coal Seam Gas – Third Party Audit</b>	Project Manager for Santos – budget - \$130,000
	<b>Environmental Management Systems</b>
<b>Fitzroy Tower Services Ltd</b>	Gap Audit against ISO 14001:2015 and supporting updating system to meet revised standard.
<b>Fujifilm Australia Pty Ltd</b>	Development of ISO/IEC 14001 compliant environmental management system
<b>Manildra Flour Mill</b>	Development of ISO/IEC 14001 compliant environmental management system
<b>Shoalhaven Starches</b>	Development of ISO/IEC 14001 compliant environmental management system
	<b>MEMBERSHIPS</b>
<b>Professional membership</b>	Environment Institute of Australia

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