

Annual Environmental Management Report 2023

Allied Pinnacle, Kingsgrove

15-Apr-2024

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Allied Pinnacle, Kingsgrove

Client: Allied Pinnacle Pty Ltd

ABN: 85 161 203 005

Prepared by

AECOM Australia Pty Ltd

Awabakal and Worimi Country, Level 8, 6 Stewart Avenue, Newcastle West NSW 2302, PO Box 73, Hunter Region MC NSW 2310, Australia
T +61 2 4911 4900 F +61 2 4911 4999 www.aecom.com
ABN 20 093 846 925

15-Apr-2024

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Abbreviations

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

1.0 Introduction

AECOM Australia Pty Ltd. (AECOM) has prepared this Annual Environmental Management Report (AEMR) on behalf of Allied Pinnacle Pty Ltd. (Allied Pinnacle) for its Kingsgrove food processing site. The Kingsgrove site (the site) is located at Lot 1 DP 20025, 4 The Crescent, Kingsgrove, NSW, within the Georges River Council (GRC) Local Government Area (LGA) (refer **Figure 1**). This AEMR is in accordance with Condition 7.1 of the Development Consent DA 143-06-01 (the Consent) (as modified) and covers the period from 01 January 2023 to 31 December 2023 and has been prepared for submission to the Council and Director General.

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

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

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

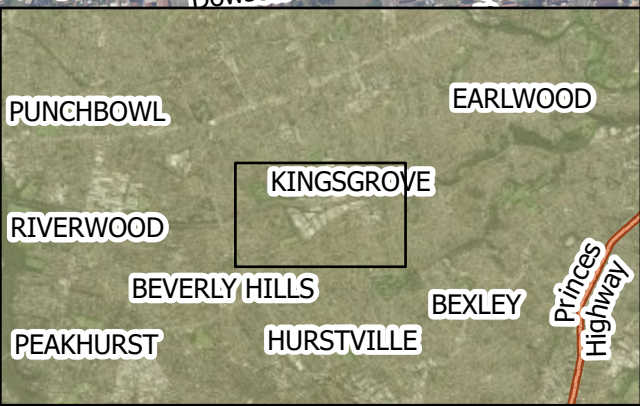
1.1 About the site ownership

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

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



- Allied Pinnacle Site
- Roads
- Railway



Site Location
Allied Pinnacle, Kingsgrove

23/02/2022
60565069

Fig. 1

N

Meters

2.0 Terms of reference

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

Table 1 Conditions of consent

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

3.0 Standards, Performance Measures and Statutory Requirements

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

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

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

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

The EMP and supporting documents provide the basis for assessing the site's environmental performance. The EMP also specifically addresses all environmental monitoring requirements and activities in relation to the site.

Table 2 Management Plans required by DA 134-06-01

Condition	Management Plan Required	Version / Date	Approval Status
3.1	Construction Management Plan	N/A – Construction activities were carried out by Goodman Fielder prior to Allied Pinnacle taking possession of the Kingsgrove site.	N/A
3.3	Construction Safety Study	N/A – Construction activities were carried out by Goodman Fielder prior to Allied Pinnacle taking possession of the Kingsgrove site and the Consent conditions.	N/A

Condition	Management Plan Required	Version / Date	Approval Status
3.5	Environmental Management Plan	<p>Final V02, 18 April 2023, Revised by Allied Pinnacle</p> <p>Final V01, 15 August 2022, Revised by Allied Pinnacle</p> <p>Revision 7.1, 26 April 2021, Revised by Allied Pinnacle</p> <p>Revision 7.0, 4 February 2021, revised by Allied Pinnacle</p>	<p>DPE approved the updated Operational Environmental Management Plan (Revision 7.0) March 2021 as part of the approved modification application DA-143-06-01 MOD 3.</p> <p>A post-approval request on 07 April 2021 from DPE relating to conditions within the Traffic Management Plan (TMP) was completed and approved on 13 April 2021. These changes to the TMP (Revision 7.1) are reflected in EMP Revision 7.1 dated 26 April 2021.</p> <p>Document was reviewed with new control version (V01) under WHSE Management System with all required changes made.</p> <p>Document reviewed an updated to V02, to include new logo.</p>
4.17	Traffic Management Plan	<p>Revision 7.1 was approved by DPE on 13 April 2021.</p> <p>Revision 7.0 April 2021, revised by Applied Pinnacle</p> <p>Appendix E of Environmental Management Plan.</p>	<p>Following submission of the updated TMP as part of approved modification application DA-143-06-01 MOD 3. DPE issued a post-approval request on 07 April 2021 for additional information and updates to the TMP.</p> <p>DPE approved the updated TMP (Revision 7.1) on 13 April 2021 and was included in the updated EMP effective 26 April 2021.</p>
4.26	Waste Management Plan	Appendix G of Environmental Management Plan.	As per Environmental Management Plan.
4.29	Landscape Management Plan	Appendix F of Environmental Management Plan.	As per Environmental Management Plan.
5.1	Fire Safety Study	Report # 21069FSS, prepared by Environmental Audits of Australia (EAA).	<p>Submitted to NSW DPE and NSW Fire Brigades on 24 October 2001.</p> <p>The 2019 Hazard Audit confirmed the study is still relevant and that updates to the study are not required.</p>
5.2	Deflagration Management Strategy	Deflagration Strategy Support, May 2014, prepared by AECOM Australia (AECOM, 2014).	<p>DPE approved the Deflagration Management Strategy on 17 December 2015.</p> <p>The Hazard Audit 2019 confirmed the strategy is still relevant and that updates to the strategy are not required.</p>

Condition	Management Plan Required	Version / Date	Approval Status
5.3(a)	Emergency Plan	V02, 18 April 2023, revised by Allied Pinnacle V01, 25 May 2022, revised by Allied Pinnacle Amendment No. 10, 5 March 2021, revised by Allied Pinnacle	Submitted to DPE on 6 September 2012. Resubmitted to DPE on 29 May 2013. Revised and submitted to DPE on 7 February 2014. Approved by DPE on 8 April 2014. New document approval version V01 to update to new format and control under WHSE system. Document was reviewed and updated to new version (V02) as required annually.
5.3(b)	Safety Management System	Made up of numerous documents and procedures within the site document database.	Allied Pinnacle submitted a document mapping the contents of its Safety Management System (SMS) against the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No. 9 (DP&E, 2011). DPE approved the SMS mapping document on 28 October 2015.
6.1	Environmental Monitoring Program	Section 9.2 of Environmental Management Plan.	As per Environmental Management Plan.

4.0 Environmental actions

This section of the report describes the environmental actions carried out during the current annual reporting period (1 January 2023 to 31 December 2023) and actions that will likely be carried out in the following year. To describe the actions that have been carried out, AECOM has considered the environmental undertakings that the applicant has committed to fulfilling under the EMP and supporting documents and provided details on the applicant's compliance with these requirements.

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

The primary method of monitoring the site is through opportunistic observation and weekly site walkovers which incorporate visual inspection and testing of critical infrastructure. The results of these inspections are summarised in Environmental Inspection Reports, which allow for accurate detailing of any issues or observations made during the walkover. Monitoring is discussed and analysed in **Section 5.0**.

The overall manufacturing activities on the site were relatively unchanged from 2022.

Periodical audits, namely the Independent Environmental Audit (IEA) and Independent Hazard Audit (IHA), are required under consent conditions 7.3 and 8.3 respectively. Other audits such as noise, compliance, and the forementioned IEA and IHA may be required given triggers outlined in the Consent conditions or at the direction of DPE or EPA. All elements of the previous 2022 IEA and IHA have been completed. The next IEA and IHA is due in the 2025 reporting period.

Table 3 reports on environmental actions carried out during the reporting period. It is anticipated that the relevant conditions and commitments will continue to be met in the next reporting period and that site actions will continue to be carried out in accordance with the Environmental Management Plan and related management plans.

Table 3 Summary of environmental management actions undertaken in 2023

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?																			
Noise																						
Condition 4.5	<p>Noise emissions from operations at the site must not exceed the following criteria:</p> <p>Project-Specific Residential Noise Limits</p> <table border="1" data-bbox="454 416 1048 616"> <thead> <tr> <th rowspan="2">Receiver</th> <th colspan="3">Noise Limits (LAeq) dBA</th> </tr> <tr> <th>Day (7am - 6pm)</th> <th>Evening (6pm-10pm)</th> <th>Night (10pm-7am)</th> </tr> </thead> <tbody> <tr> <td>Residents to the North-West (Baranbali Street and Sth Tallawarra St)</td> <td>48</td> <td>42</td> <td>41</td> </tr> <tr> <td>Resident to the North (Armitree Street)</td> <td>44</td> <td>42</td> <td>37</td> </tr> <tr> <td>Residents to the West (North Tallawarra Street</td> <td>47</td> <td>44</td> <td>37</td> </tr> </tbody> </table>	Receiver	Noise Limits (LAeq) dBA			Day (7am - 6pm)	Evening (6pm-10pm)	Night (10pm-7am)	Residents to the North-West (Baranbali Street and Sth Tallawarra St)	48	42	41	Resident to the North (Armitree Street)	44	42	37	Residents to the West (North Tallawarra Street	47	44	37	<p>No noise complaints were recorded during the reporting period.</p> <p>No excessive noise was reported during the reporting period</p>	✓
Receiver	Noise Limits (LAeq) dBA																					
	Day (7am - 6pm)	Evening (6pm-10pm)	Night (10pm-7am)																			
Residents to the North-West (Baranbali Street and Sth Tallawarra St)	48	42	41																			
Resident to the North (Armitree Street)	44	42	37																			
Residents to the West (North Tallawarra Street	47	44	37																			
Condition 6.3	<p>If substantiated community noise complaints occur, the Director-General may direct the applicant to commission and pay the full cost of a noise audit. Should any noise audit demonstrate an exceedance of the project-specific residential noise limits outlined in Condition 4.5 (using distance attenuation calculations), the applicant shall employ mitigation measures to reduce noise impacts from the site, to the satisfaction of the Director-General. Should noise complaints be received, the Director-General may direct the applicant to commission and pay the full cost of a noise audit. Should any noise audit demonstrate an exceedance of the project specific residential noise limits outlined in Condition 4.5, the applicant shall employ mitigation measures to reduce noise impacts from the site, to the satisfaction of the Director-General.</p>	<p>Allied Pinnacle was not directed to prepare a noise audit during the reporting period.</p> <p>A noise audit was undertaken previously in January 2016, and noise attenuation was installed in September 2016. Subsequent noise monitoring confirmed compliance with the project-specific residential noise limits identified in the Consent conditions.</p>	✓																			
EMP Performance Measure (Table 4-1) 'Noise'	<p>No nuisance noise will be emitted from the Kingsgrove site.</p>	<p>No noise complaints were recorded during the reporting period.</p> <p>Noise management measures are implemented at the site. The production area and processing equipment are fully enclosed within existing buildings to minimise noise emissions from site operations.</p> <p>Drivers are instructed to avoid using compression braking and hard acceleration when on the identified heavy vehicle haulage route for the site.</p>	✓																			

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Air quality			
Consent Condition 4.12	Alarms and shut off valves shall be installed on silos to prevent overfilling.	Alarms and cut-off valves were installed on the silos prior to commissioning. Dust sensors have been added to the silo room area to notify personnel onsite if there is a dust leak in this area so it can be responded to. Weekly visual monitoring was carried out to check for external dust emissions from the silo exhaust vents. These checks were documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001). Six-monthly silo inspections and testing were undertaken, which found no issues.	✓
Consent Condition 4.13	Dust emissions from equipment must comply with the <i>Clean Air (Plant and Equipment) Regulation 1997</i> (which has now been repealed by the <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i>).	Allied Pinnacle implements dust control measures and undertakes system maintenance to minimise dust emissions. Weekly visual monitoring was carried out to check for external dust emissions from the silo exhaust vents. These checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001). No visible dust exiting the manufacturing building was reported during the reporting period.	✓
Consent Condition 4.14	Emissions from vehicles associated with the site must comply with the <i>Clean Air (Motor Vehicles and Motor Vehicle Fuel) Regulation 1997</i> .	Vehicles and equipment exhausts were visually monitored (periodically at the entry to the site) to ensure that release of black/white smoke did not exceed 10 seconds. No exhaust smoke from vehicles for more than 10 seconds was reported during the reporting period. A preventative maintenance system for all plant and machinery is implemented to ensure vehicles associated with the site comply with these guidelines.	✓

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Consent Condition 4.15	All site activities are to be carried out in a manner to minimise generation (or emission) of wind-blown or traffic generated dust. All activities in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust using the measures proposed in the SEE.	Trafficable areas onsite are sealed to reduce exposure to dust, and site speed limits are enforced. Landscaping is in place and maintained in unsealed areas.	✓
Consent Condition 4.16	All areas at the site are to be carried out in a manner to minimise generation (or emission) of wind-blown or traffic generated dust. All areas in or on the premises must be maintained in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust, using the measures proposed in the SEE.	Trafficable areas onsite are sealed to reduce exposure to dust, and site speed limits are enforced. Landscaping is in place and maintained in unsealed areas.	✓
EMP Performance Measure (Table 4-1) 'Dust'	No visible dust or odours noted leaving the Kingsgrove site.	No air quality incidents or complaints were recorded during the reporting period.	✓
Stormwater			
Condition 4.6	A spill tank must be placed beneath coupling points of the edible oil tanker and the above ground edible oil tank.	Occasional spot checks confirmed spill trays were used on trucks in accordance with the Stormwater Management Strategy. Spot checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
Condition 4.7	Tankers supplying edible oil must use brake interlocks.	Brake interlocks are a condition of entry to the site for edible oil tankers.	✓
Condition 4.8	Bunding must be provided around the edible oil tank, with a minimum capacity of 110% the volume of the tank.	The bund capacity and condition were checked during weekly visual inspection activities. Checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Condition 4.9	Stormwater isolation valves must be installed at all stormwater exit points from the site.	The correct function of isolation valves was checked during weekly visual inspection activities. Stormwater pits were checked weekly during routine visual inspections and maintenance undertaken when necessary (e.g. removal of leaves and debris). Checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
EMP Performance Measure (Table 4-1) 'Stormwater'	No notable impact to the nearby waterways from water pollution at the Kingsgrove site.	No stormwater or water pollution incidents or complaints were recorded during the reporting period.	✓

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Traffic Condition 4.17	<p>Within 3 months of the approval of application DA-143-06-01 MOD 3, the Application must submit an updated Traffic Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ol style="list-style-type: none"> Describe the routes which will be used by trucks associated with the development Outline the hours during which trucks will operate in the vicinity of the site Indicate the average and maximum number of daily and weekly truck movements which will be associated with the proposed development Describe in detail what measures and procedures will be implemented to: <ul style="list-style-type: none"> - Minimise the number of trucks which will be used to transport goods; - Minimise noise and vibration associated with truck traffic; - Ensure trucks travel in a safe manner; - Minimise road damage; - Minimise air pollution from exhaust; and - Record and respond to complaints regarding traffic; - Manage the arrival and departure of trucks such that on-street parking of trucks does not occur*. Incorporate monitoring to ensure the requirements of the Traffic Management Plan are being met (refer to Condition 6.4) Incorporate a Driver Code of Conduct and a formal complaints procedure* <p>Sections marked with * were effective as of 26 April 2021 with updated EMP</p>	<p>Allied Pinnacle submitted an updated TMP (Revision 7.0) to DPE associated with application DA-143-06-01 MOD 3 following consultation with Georges River Council and RTA on 5 February 2021.</p> <p>DPE sent Allied Pinnacle a request for further information, including:</p> <ul style="list-style-type: none"> - <i>The Heavy Vehicle Haulage Route is not consistent with that of The Department's Assessment Report, specifically the left turn onto Kingsgrove Road from Commercial Road, which could not be safely performed by a 19m articulated vehicle. Please provide a revised Heavy Vehicle Haulage Route figure demonstrating the haulage route continuing straight onto Kingsgrove Avenue, then left onto Bexley Road.</i> - <i>Include a revised Mitigation Measures section clearly outlining the measures and procedures that will be implemented to address the impacts of traffic listed in Condition 4.17(d).</i> - <i>Pursuant to Conditions 4.18-4.19, evidence of consultation with RMS (RTA) and Council in respect to the development of the Traffic Management Plan.</i> <p>Following the amendment of the TMP, the updated TMP (Revision 7.1) was approved on 13 April 2021. The revised TMP was then included in revision 7.1 of the updated EMP, which was published and enacted effective 26 April 2021</p>	<p style="text-align: center;">✓</p> <p>*Conditions of this consent condition were met, with updated conditions associated with EMP Revision 7.1 being effective as of 26 April 2021</p>
Condition 4.19	The applicant shall review and, where necessary, update the Traffic Management Plan annually as part of the AEMR, and as directed by the Director-General.	As above	<p style="text-align: center;">✓</p>

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Condition 6.4	The applicant must monitor compliance with the Traffic Management Plan described in Condition 4.17. Monitoring must occur within three months of commissioning the mixing plant, and every six months thereafter.	All site activities were undertaken in accordance with the existing TMP during the reporting period. Records are kept of delivery and dispatch vehicles that are onsite to inform scheduling activities. Traffic monitoring data is presented in Section 5.3 of the AEMR, along with an analysis of the results and comparison to historical data to identify any evident trends. The requirements of Revision 7.1 of the TMP were communicated to Netlogix Australia, which provides transport services for the site, which requires drivers to undertake an induction every two years, communicating the requirements of the TMP.	✓
EMP Performance Measure (Table 4-1) 'Traffic'	No notable impact to the surrounding community from traffic generated at the Kingsgrove site.	No traffic incidents or complaints were recorded during the reporting period.	✓
Landscape management			
Condition 4.29	The applicant must prepare and implement a detailed Landscape Management Plan for the development. This plan must: a. Describe in detail how the site will be landscaped, including the location and species of all planting; and Explain how this landscaping will be managed and maintained over time.	Landscaping activities were undertaken in accordance with the Landscape Management Plan. Landscaping was managed and maintained by a contractor on a regular basis. Maintenance activities undertaken during the current reporting period included: <ul style="list-style-type: none"> • Slashing/mowing of grassed areas; • Trimming/shaping of shrubs; • Collection of fallen branches and debris; and General maintenance works as required.	✓
EMP Performance Measure (Table 4-1) 'Aesthetic Impacts / Landscaping'	No aesthetic impact to the surrounding community.	No landscaping-related complaints were recorded during the reporting period.	✓

Consent Condition/ Performance Measure	Relevant Condition, Performance Measure or Safeguard	Actions carried out in 2023	Meeting Condition or Commitment?
Waste Management			
Condition 4.26	The applicant must prepare and implement a Waste Management Plan for the development in consultation with Council. This plan must describe in detail the waste management system, including: <ul style="list-style-type: none"> a. The types and quantities of waste which will be generated at the site; and How waste will be stored onsite, transported, and disposed of off-site.	A Waste Management Plan is included in Version 02 of the Environmental Management Plan. The plan was prepared as per the requirements of consent condition 4.26. Storage vessels are onsite for various waste streams (i.e. general waste, waste paper and plastic and oil waste). The storage vessels were regularly monitored, and checks are documented in Kingsgrove Environmental Monitoring Forms (Document number KV-Form-001).	✓
EMP Performance Measure (Table 4-1) 'Waste'	All waste to be correctly stored on site and disposed of by an appropriately licenced contractor.	No waste-related complaints were recorded during the reporting period.	✓
Hazards and site safety			
Condition 5.4	Dangerous Goods storage must be in accordance with the Australian Dangerous Goods Code, relevant Australian Standards, and WorkCover requirements. Spill clean-up kits and procedures must be made available and used in the event of a spill.	A WorkCover Notification of Hazardous Chemicals has been completed for the Site (NDG035076, 13 February 2015). Should any significant changes occur to the quantity, location or manner of storage of the relevant chemicals, WorkCover will be notified of the amendment. Spill kits are stocked and provided at the oils station.	✓
Condition 8.3	Twelve months after the commencement of operations, and every three years thereafter, unless the Director-General directs otherwise, the applicant must commission and pay the full cost of a comprehensive hazard audit. The hazard audit must: <ul style="list-style-type: none"> a. Be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Director-General; b. Be conducted in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No.5 "Hazard Audit Guidelines"</i>; and Include, but not be limited to, a review of the site safety management system and a review of all entries made in the incident register since the previous audit.	Planager undertook an IHA for the 2022 reporting period, for which all identified elements have been actioned.	✓

5.0 Analysis of Environmental Monitoring Results

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

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

During the reporting period, there were two weeks when weekly environmental monitoring was not undertaken. These are described below in **Table 4**.

Table 4 Gaps in weekly environmental monitoring

Week commencing	Reason
14 August 2023	Site manager on leave
27 November 2023	Site manager on leave
22 December 2023 – 8 January 2024	Factory shutdown

5.1 Annual Production

5.1.1 Monitoring Results

Annual production is limited under Schedule 2, Condition 1.3 of the Consent to 150,000 tonnes per annum. Production output remained within the approved limits during the reporting period at 50,791 tonnes and is presented for each month in **Table 5**.

Table 5 Production output during the reporting period

Month	Monthly production (tonnes)
January 2023	4,289
February 2023	4,543
March 2023	4,425
April 2023	3,287
May 2023	4,845
June 2023	3,828
July 2023	3,984
August 2023	4,556
September 2023	4,238
October 2023	4,483
November 2023	4,702
December 2023	3,611
Total	50,791

5.1.2 Identification of Trends

A comparison of annual production for the current reporting period against historical records is provided in **Table 6** and shown graphically in **Figure 2**. Total annual production has decreased compared to 2022 (1.9% decrease) and is 26.5% less than the 2013 production. Overall production trends have been decreasing from the 2013 reporting period and are within the approved limit of 150,000 tonnes per annum for the site.

Table 6 Historic annual production volumes

Year	Total annual production (tonnes)
2013	69,142
2014	61,000
2015	60,065
2016	58,912
2017	54,148
2018	54,562
2019	53,947
2020	53,195
2021	52,268
2022	51,787
2023	50,791

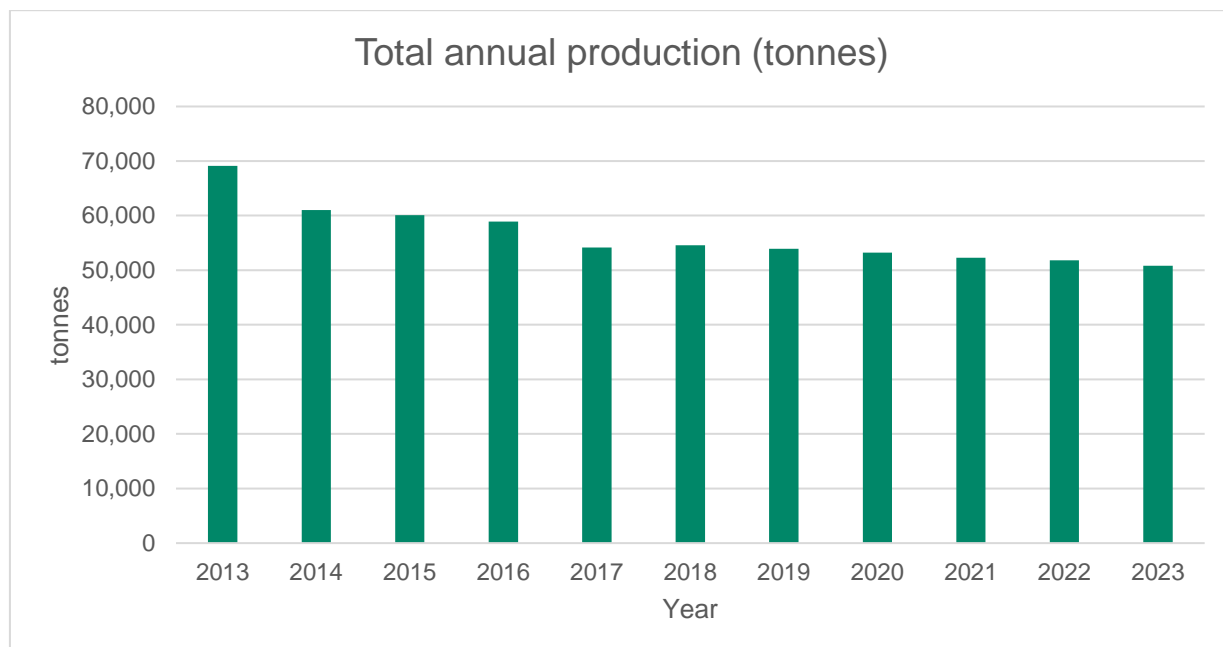


Figure 2 Historic annual production volumes

5.2 Noise

The AEMR documents unresolved noise complaints from the previous reporting year as well as noise complaints that occur in the current reporting year. No noise complaints were registered during the 2022 reporting period, and there were no unresolved complaints from previous periods, as indicated in **Section 4.0**.

5.3 Traffic

5.3.1 Monitoring Results

The site records the total number of truck movements each month, from which weekly and daily truck movements can be extrapolated. Total monthly truck movements and average weekly/daily truck movements for the reporting period are presented in **Table 7** along with the monthly production data.

At the previous request from DPE, an estimate of potential traffic movements at the approved production capacity of 150,000 tonnes per annum was undertaken. It is noted that traffic generation is not directly correlated with production, as deliveries of raw materials and the final product may differ depending on the product. However, an estimate of potential maximum truck movements was calculated based on the traffic and production data for the 2023 reporting period. This was estimated by calculating the monthly truck/tonne average for the period and multiplying this by the full production volume of 150,000 tonnes. Potential maximum truck movements at full production capacity are included in **Table 7** and **Table 8** for reference.

It is noted that traffic projections were presented in the Traffic Impact Statement (Rhodes Thompson Associates, 2001) prepared as part of the SEE for the expansion of the site. The maximum number of trucks per day was projected to be 97 during the day and afternoon shifts and 12 during the night shift, with a total of 109 daily truck movements. This equates to a total of 763 truck movements per week, 3,315 truck movements per month, and 39,785 truck movements per annum. These projections are also shown in **Table 7** and **Table 8** for comparison with the current year's reporting data.

It is also noted that the Consent for the project does not specify a limit on truck movements. However, Condition 4.17 requires the Traffic Management Plan to '*indicate the average and maximum number of daily and weekly truck movements which will be associated with the proposed development*'. The Traffic Management Plan included in Revision V02 of the Environmental Management Plan dated 18 April 2023 includes the same traffic values reported in the SEE, as provided above.

Table 7 Truck movements during the reporting period

Month	Total monthly truck movements	Average weekly truck movements	Average daily truck movements	Monthly production (tonnes)
<i>Projected maximum predicted in Traffic Impact Statement and Traffic Management Plan</i>	3,315	763	109	150,000 (Annual)
<i>Potential maximum at full production, based on 2023 data</i>	894	224	32	150,000 (Annual)
January 2023	343	85.75	11	4,289
February 2023	399	99.75	14	4,543
March 2023	388	97	13	4,425
April 2023	252	63	8	3,287
May 2023	389	97.25	13	4,845
June 2023	325	81.25	11	3,828
July 2023	291	72.75	9	3,984
August 2023	357	89.25	12	4,556
September 2023	212	53	7	4,238
October 2023	236	59	8	4,483
November 2023	258	64.5	9	4,702
December 2023	182	45.5	6	3,611
Total	3,632			50,791

5.3.2 Identification of Trends

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

A comparison of traffic monitoring data for the current reporting period against historical traffic monitoring results is provided in **Table 8** and is shown graphically in **Figure 3**.

The total number of annual truck movements recorded decreased by 17.47% from the previous reporting period from 4401 to 3632. The total annual production decreased 1.92% from 51,787 to 50,791 tonnes from the 2022 reporting period. The number of truck movements during the reporting period is the lowest in reported history and has significantly decreased in comparison with the previous reporting period. It is noted that traffic generation does not correlate directly to production levels and may fluctuate depending on market demand and supply chain requirements.

There is no correlation between monthly production and monthly truck movements or monthly truck movements and the following or prior month's production accounting for the time between recording production and receipt of goods/dispatch of goods. Tonnes produced per truck movement for the period averaged 14.67, with the highest being in September (19.99) and the lowest in February (11.39).

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

Table 8 Comparison of historical truck monitoring data

Year	Annual total truck movements	Average weekly truck movements	Total annual production (tonnes)
<i>Projected maximum predicted in Traffic Impact Statement and Traffic Management Plan</i>	39,785	763	150,000
<i>Potential maximum at full production, based on 2023 data</i>	10,728	224	150,000
2013	3,893	75	69,142
2014	3,775	73	61,000
2015	3,840	74	60,065
2016	6,578	127	58,912
2017	6,502	125	54,148
2018	6,803	131	54,562
2019	6,035	116	53,974
2020	5,166	99	53,195
2021	5,858	112	52,268
2022	4,401*	92	51,787
2023	3,632	76	50,791

*Note: The 2022 annual total truck movement value has been updated to correct an error that was identified in the 2022 AEMR.

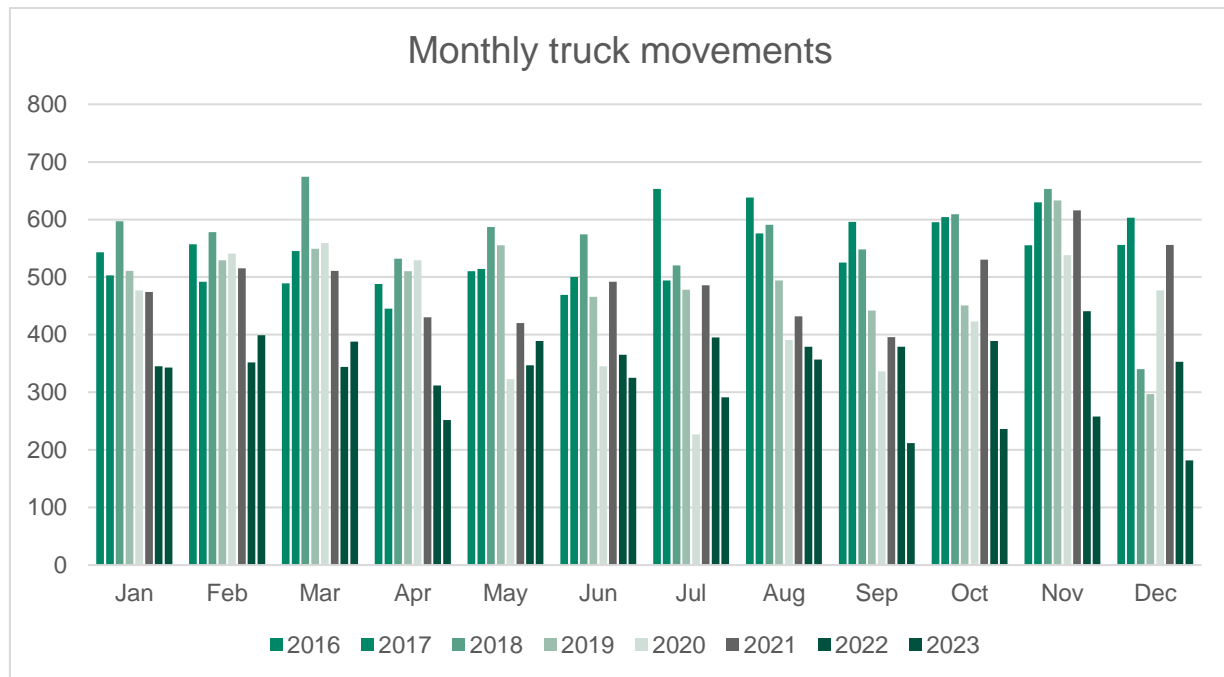


Figure 3 Comparison of historic monthly truck monitoring data

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

5.4 Waste

5.4.1 Monitoring Results

Allied Pinnacle continues to source recycling options for waste management wherever possible. All paper and putrescible waste are removed from the site for recycling or disposal. Waste streams include the following:

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

Monthly waste quantities generated for each waste stream during the current reporting period are provided in **Table 9**. The proportion of General Waste (non-putrescible) that was recycled or disposed of to landfill for the current reporting period is provided in **Table 10**. The average weekly quantities provided in the table are from the Waste Management Plan as provided in Version 02 of the Environment Management Plan dated 18 April 2023.

Table 9 Monthly waste quantities generated during the reporting period

Month	Waste Stream					
	General Waste (putrescible) (tonnes)	General Waste (non-putrescible) (tonnes)	Hazardous waste (litres)	Liquid waste (litres) ²	Special Waste	Restricted Waste
<i>Annual quantities from predictions in WMP¹</i>	364	390	104	2,600 ²	520	0
<i>Monthly quantities from predictions in WMP¹</i>	30	33	9	217	43	0
January 2023	21.48	22.93	0	0	0	0
February 2023	69.34	33.91	0	630	0	0
March 2023	122.98	36.61	0	130	0	0
April 2023	127.53	23.64	0	0	0	0
May 2023	80.84	33.21	0	0	0	0
June 2023	27.01	24.54	0	0	0	0
July 2023	39.08	20.09	0	0	0	0
August 2023	42.49	29.32	0	90	0	0
September 2023	42.18	24.41	5	0	0	0
October 2023	67.17	29.44	0	0	0	0
November 2023	104	37.81	0	270	0	0
December 2023	47.81	27.23	0	310	0	0
Total	791.91	343.14	5	1,430	0	0
Average monthly	65.99	28.59	0.41	119.16	0	0

¹ Waste Management Plan as provided in Version 02 of the Environment Management Plan provides indicative weekly quantities, from which these monthly and annual quantities have been calculated.

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

Table 10 Proportion of general waste (non-putrescible) recycled or disposed of to landfill during the reporting period

Parameter	General Waste (non-putrescible)	
	Non-recyclable (disposed of to landfill)	Recycled
Total (tonnes)	160.08	183.06
Percentage of total	47	53
Average weekly (tonnes)	3.08	3.52

5.4.2 Identification of trends

A comparison of annual waste quantities for the current reporting period against historical results is provided in **Table 11**.

The quantity of General Waste (putrescible) generated at the site has increased from 686 tonnes in 2022 to 791.91 tonnes in 2023. The General Waste (putrescible) in 2023 is the second highest annual quantity to date and follows the highest (965.57 tonnes) in 2020.

As shown in **Table 9**, the higher waste volume is primarily due to waste recorded in March (122.97 tonnes) and April (127.53 tonnes), which accounts for 31.6% of the total annual volume of putrescible waste. All months (except for January and June) produced an exceedance in monthly predicted waste amount, with the 2023 average monthly amount being 65.99 tonnes, which is 35.99 tonnes higher than the monthly average predicted in the WMP. Increases are generally associated with clear out of expired stock.

A total of 5 litres of Hazardous Waste was generated on site in the reporting period. All 5 litres of Hazardous waste were generated in September. This was associated with waste from the test kitchen laboratory. In the previous reporting period, 11,500 litres of Hazardous Waste were produced due to a clean out of the grease traps on 07 July and 11 July 2022. Hazardous waste production on site would likely continue to be associated with events of this nature.

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

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

The amount of non-putrescible General Waste to landfill increased in the 2023 reporting period from 153.35 tonnes in 2022 to 160.08 tonnes. The total amount of non-putrescible General Waste, at 343.14 tonnes, is within the amount predicted by the WMP, 390 tonnes (an average of 6.6 tonnes per week).

Of the General Waste (non-putrescible) generated on site during the reporting period, approximately 47% was disposed of to landfill, and 53% was recycled. This is a minor decrease to the previous year (2022) during which 56% of non-putrescible waste was recycled.

The quantity of Liquid Waste generated at the site decreased significantly in the reporting period, with 1,430 litres being produced, compared to 5,180 litres in 2022. The WMP predicts a weekly average of 50 litres of liquid waste, a total of 2,600 litres per annum. The liquid waste generated was 1,170 litres below the WMP prediction. This is the second lowest annual quantity of liquid waste, behind 2015 (165 litres).

Liquid Waste volumes have varied during operation with no apparent trend. Higher volumes are generally associated with specific events and isolated incidents, rather than routine operations. Liquid waste generated at the site has exceeded predictions every year with the exception of 2015, 2016 and this year (2023). Exceedances in 2013, 2014, 2017, 2019, 2020, 2021 and 2022 were the result of isolated incidents, the outcomes of which are addressed in the respective AEMR periods.

Table 11 Comparison of historical waste monitoring data

Year	Waste Stream					
	General Waste (putrescible) (tonnes)	General Waste (non-putrescible) (tonnes)	Hazardous waste (litres)	Liquid waste (litres)	Special Waste	Restricted Waste
<i>Annual quantities from predictions in WMP¹</i>	364	390	104	2,600 ²	520	0
2013	144	258	111	5,241	0	0
2014	146	265	70	2,625	0	0
2015	170	277	50	165	0	0

Year	Waste Stream					
	General Waste (putrescible) (tonnes)	General Waste (non-putrescible) (tonnes)	Hazardous waste (litres)	Liquid waste (litres)	Special Waste	Restricted Waste
2016	285	287	20	1,680	360	0
2017	377	349	0	5,880	0	0
2018	147	280	0	4,710	0	0
2019	307	286	0	6,560	0	0
2020	965	284	0	2,660	0	0
2021	666	291	132	4,510	0	0
2022	686	351	11,500	5,180	0	0
2023	791.91	343.14	5	1,430	0	0

¹ Waste Management Plan as provided in Revision V02 of the Environment Management Plan provides indicative weekly quantities, from which these annual quantities have been calculated.

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

6.0 Non-Compliance, Incidents and Complaints

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

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

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

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

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

6.1 Non-compliances

No non-compliances were recorded during the 2023 reporting period.

Table 12 Summary of non-compliances for the site

Details of Non-Compliance	Audit Finding
No general non-compliances during the current reporting period.	

6.2 Incidents

No incidents were recorded during the 2023 reporting period.

Table 13 Summary of incidents for the site

Date	Details	Action Taken
No incidents were recorded during the current reporting period.		

6.3 Complaints

No complaints were recorded for the site during the current reporting period, as shown in Table 14.

Table 14 Summary of historical complaints received for the site

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

7.0 Recommendations and Action Plan

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

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

8.0 Conclusion

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

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

Waste quantities have slightly increased in the reporting period for General Waste (putrescible) and were still above predicted levels in the WMP. All other waste streams quantities were below the annual quantity predictions in the WMP. It is noted that putrescible waste is sold as stock feed, reducing the site's waste contribution to landfill.

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

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

9.0 References

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

Allied Pinnacle (2023) *Kingsgrove KV – Environmental Management Plan including PRIMP*, Revision V02, Effective Date 18 April 2023, Allied Pinnacle Pty Ltd.

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

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

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

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

Pacific Equity Partners (2017), PEP's Pinnacle acquires Allied Mills from GrainCorp and Cargill. Available on the Internet at: https://www.pep.com.au/media/20153-pep_s_pinnacle_acquires_allied_mills_media_release.pdf

Planager (2022) 2022 Hazard Audit Report, Allied Pinnacle, Kingsgrove NSW, Planager Pty Ltd.

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

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

Appendix A

Recommendations and Action Plan

Appendix A Recommendations and Action Plan

Table A1 Recommendations and Action Plan for 2023 AEMR

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
Environmental Management Plan				
Consent condition 3.7	The Applicant must review and update the Environmental Management Plan regularly, or as directed by Director-General.	The EMP (version V02) was updated on 18 April 2023.	R. Ferris	April 2023
2023 Environmental Audit				
Consent condition 7.3	An IEA should be undertaken by an independent external audit team or auditor in accordance with the requirements outlined in Condition 7.3 of the Development Consent. Allied Mills will outline the requirements for the audit with the external auditor commissioned to complete this work in line with guidelines in the EMP.	The IEA was submitted to DPE on 26-Oct-2023	R. Ferris	October 2023
Table 9 IEA, Consent condition 7.1	Twelve months after commissioning the food processing plant, and annually thereafter for the duration of the development, the Applicant must submit an Annual Environmental Management Report to the Director-General and the Council. Recommend AEMR has a section on submission to Council and Director General. Allied Pinnacle has a third party that prepares the AEMR, therefore they should be reviewing this requirement on a yearly basis.	The introduction of the AEMR has been updated to include that the AEMR has been prepared for submission to the Director General and Council.	AECOM	March 2024
Table 9 IEA, Consent condition 7.4	Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the Applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Director General. Recommend Allied Pinnacle review their system and ensure they have processes in place to track and record when reports/documents are submitted to regulatory authorities and their associated responses. The auditor noted that DPIE now	Allied Pinnacle has adopted a practice whereby submission confirmation emails are kept on file. The audit report is to be submitted by the site manager or NSW WHSE.	R. Ferris	May 2024

Reference	Recommendation	Action Required / Undertaken	Person Responsible	Timing
	require everything to be submitted via a portal instead of emails and it is difficult to ascertain when documents are lodged.			
Table 9 IEA, Consent condition 8.4	<p>Within one month of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the Applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Director General.</p> <p>Recommended that Allied Pinnacle approach DPIE and seek change to this condition. One month does not appear to be sufficient time to commission and conduct the audit. Two months would be more appropriate based on how long the last audit took and in line with the IEA submission timeframe.</p>	Allied Pinnacle resolved resourcing issues. Currently, all required documentation is collected on the regular basis and within the reporting time.	R. Ferris	September 2023
2022 Hazard Audit				
Consent condition 8.3	An IHA should be undertaken by an independent external audit team or auditor in accordance with the requirements outlined in Condition 8.3 of the Development Consent. Allied Mills will outline the requirements for the audit with the external auditor commissioned to complete this work in line with guidelines in the EMP.	The IHA was submitted to DPE on 17-Oct-2023	R. Ferris	October 2023
Table E1 IHA, Action 1	Set up schedule and procedure to ensure Safety Data Sheets (SDS) are reviewed periodically (and updated as required	A check of SDS is scheduled to occur every six months.	R. Ferris	May 2024
Table E1 IHA, Action 4	Explain (or detail) in the Environment Management Plan where the PIRMP information is detailed (it seems to currently be included in Section 7 and some other information included elsewhere) and ensure all required details are provided	Pollution incident response procedures are included in Section 7 of the Environmental Management Plan (V02, dated 18 April 2023). The next review of the Environmental Management Plan is due in April 2024.	R. Ferris	September 2023