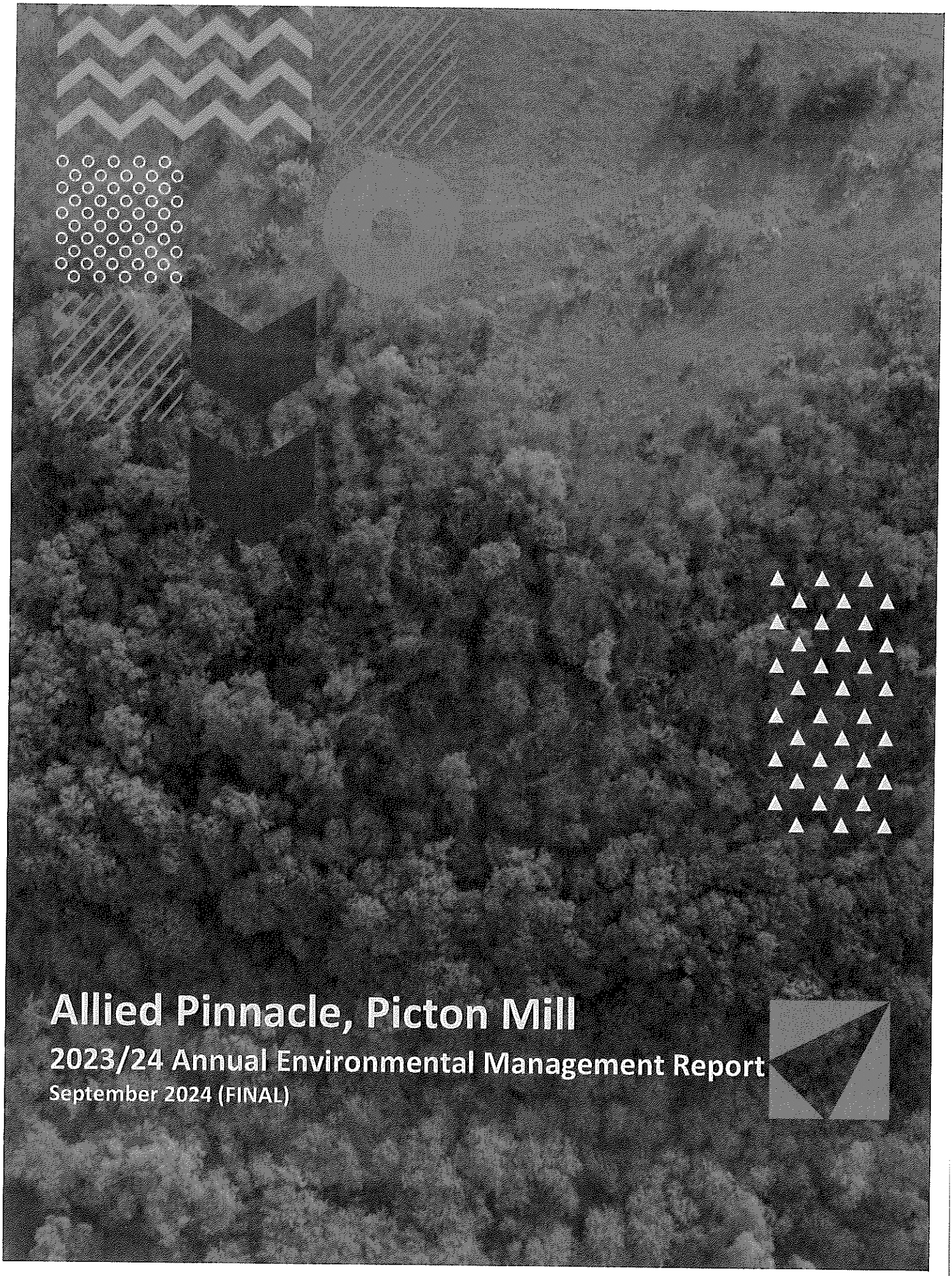

Allied Pinnacle, Picton Mill

2023/24 Annual Environmental Management Report

September 2024 (FINAL)

Contents

Appendices

Glossary

AEMR	Annual Environmental Management Report
Allied Pinnacle	Allied Pinnacle Pty Ltd
AWTS	Aerated Wastewater Treatment System
CHMP	Cultural Heritage Management Sub-Plan
DA	Development Application DA-318-12-2004-i as modified by Mod 51-5-2007 and DA 318-13-2007-Mod 3
DPHI	Department Planning Housing and infrastructure (formally Department Planning and Environment)
EIS	Environmental Impact Statement for Grain Milling Facility, Picton Road, Maldon (KBR, December 2004)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GHD	GHD Pty Ltd
HGV	Heavy goods vehicle
IEA	Independent Environmental Audit
LMP	Landscape Management Sub-Plan
NVMP	Noise and Vibration Management Sub-Plan
OEMP	Operational Environment Management Plan
OptimE	OptimE Pty Ltd
POEO	Protection of the Environment Operations Act 1997
SLR	SLR Consulting Australia Pty Ltd
WMMP	Water Monitoring and Management Sub-Plan
T	Tonnes
TfNSW	Transport for NSW (formally Roads and Maritime Services)
TMP	Traffic Management Sub-Plan
WAL	Water Access Licence

Title Page

Name of Operation	Flour and Maize Mill – Picton, NSW
Name of Operator	Allied Pinnacle Pty Ltd
Development Application	*DA-318-12-2004-i* as modified by Mod 51-5-2007 and DA 318-13-2007-Mod 3
Name of holder of development consent	Allied Pinnacle Pty Ltd
AEMR start date	1 April 2023
AEMR end date	31 March 2024

I, **Mark Hughes** certify that this Annual Environmental Management Report is a true and accurate record of the compliance status of **Flour and Maize Mill – Picton, NSW** for the period **1 April 2023 to 31 March 2024** and that I am authorised to make this statement on behalf of **Allied Pinnacle Pty Ltd**.

Note.

a) The Annual Review is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.

b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or $22,000, or both)

Name of authorised reporting officer	Mark Hughes
Title of authorised reporting officer	Acting Site Manager - Picton
Signature of authorised reporting officer	M. Hughes
Date	9/10/24

Statement of compliance

The Annual Review is required to incorporate a statement of compliance which includes summary tables that highlight the compliance status of the operation with its relevant approval conditions, as at the end of the reporting period.

Were all conditions of the relevant approvals complied with during the reporting period?	
Development conditions	No

The site monitors its compliance status against the Consent Conditions and records its assessment using a compliance tracking table. A copy of the 2023/24 Compliance Tracking Table is attached as **Appendix A**.

Site operations were found to be compliant with the Consent Conditions for the reporting period except for the conditions outlined below.

Conditions of consent - compliance exceptions for the reporting period

Condition	Compliance assessment
1.1 The development must be carried out in accordance with the DA.	Allied Pinnacle demonstrated a high level of compliance with the documentation outlined in this condition, although five non-compliances were recorded against the conditions of this consent as detailed in the table below.
2.3 Noise criteria	An operational noise monitoring survey on 6 October and 10 October 2023. concluded that the noise prediction/measurement found that: • LAeq(daytime), LAeq(evening), LAeq(15min) and LA1(1min) noise levels at all sensitive receivers comply with the noise criteria stipulated in EPL 12498 (equivalent to Table 1 of the Approval). • predicted LAeq(night-time) noise levels from site exceed the noise criteria at all residential receivers.
2.5 and 2.6 Noise assessment methodology	The noise assessment methodology applied for the operational noise monitoring survey was not consistent with these conditions. The assessment was consistent with section 7.1.1 of EPA's Noise Policy for Industry (2017) however details of the alternate noise assessment method had not been submitted to the Secretary prior to the assessment hence non-compliances have been awarded for these conditions.
5.5 Informing the Secretary of changes to the OEMP	The OEMP including the associated sub plans were reviewed within the three-year period. A copy of the updated OEMP and associated sub-plans were available on the Allied Pinnacle webpage. However, the Secretary was not notified of the revision to the OEMP and associated management plans within the reporting period hence a non-compliance was awarded for this condition.
5.8 Effluent quality	Faecal coliforms, or E.coli (thermotolerant coliforms) in the irrigation chamber was generally an order of magnitude over the target requirements.

1 Introduction

1.1 AEMR context

Allied Pinnacle Pty Ltd (Allied Pinnacle) is required, under its development application, to prepare an Annual Environmental Management Report (AEMR) for operations at the Flour and Maize Mill – Picton, NSW (the site).

Allied Pinnacle engaged OptimE Pty Ltd (OptimE) to prepare the AEMR. This AEMR covers the reporting period from 1 April 2023 to 31 March 2024.

1.2 Scope of the service

The service undertaken by OptimE, for the purpose of preparing this AEMR, included:

- Collation of information (interview, emails, records and reports) provided by Allied Pinnacle, applicable to the reporting period
- Interpreting information provided by Allied Pinnacle for the purpose of fair and transparent presentation into the AEMR
- AEMR responding to *Development Application DA-318-12-2004-i* as modified by Mod 51-5-2007 and DA 318-13-2007-Mod 3, Consent Condition 6.3

This AEMR does not constitute an audit report. The information provided by Allied Pinnacle was not independently verified by OptimE. An Independent Environmental Audit (IEA) of the site is undertaken every three years in accordance with Consent Condition 3.3, as a separate process. The last IEA was undertaken in August 2023.

1.3 Structure of this report

This AEMR has been prepared to address the requirements of Consent Condition 6.3, as outlined in Table 1.

Table 1 – AEMR conditions

Clause No.	Requirement	AEMR details & reference
6.3	The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to:	Refer to sections below
6.3 (a)	details of compliance with the conditions of this consent;	Section 3
6.3 (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;	Section 4

Clause No.	Requirement	AEMR details & reference
6.3 (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;	Section 5
6.3 (d)	results of all environmental monitoring required under this consent and other approvals, including interpretations and discussion by a suitably qualified person;	Section 6
6.3 (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.	Section 7
6.3 (cont)	The Applicant shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the development. The Director-General may require the Applicant to address certain matters in relation to the environmental performance of the development in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Applicant shall make copies of each AEMR available for public inspection on request.	This report

In addition to the requirements of Consent Condition 6.3, this AEMR also includes:

- Section 8 - Status of actions arising from the Department Planning and Environment (DPE) requests.
- Section 9 - Environmental Action Plan 2023/24.

1.4 Limitations

This report has been prepared by OptimE for Allied Pinnacle and may only be used and relied on by Allied Pinnacle for the purpose agreed between OptimE and Allied Pinnacle as set out in Section 1.1 of this report.

OptimE otherwise disclaims responsibility to any person other than Allied Pinnacle arising in connection with this report. OptimE also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by OptimE in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations in Section 1.2.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. OptimE has no responsibility or obligation to update this report to account for events or changes occurring after the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by OptimE and described in this report. OptimE disclaims liability arising from any of the assumptions being incorrect.

OptimE has prepared this report on the basis of information provided by Allied Pinnacle, which OptimE has not independently verified or checked beyond the agreed scope of work. OptimE does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2 Overview of operations

2.1 Operational activities

The Picton Mill is capable of processing up to 300,000 tonnes a year of wheat and maize, with a corresponding 300,000 tonnes a year output from the milling process (not including a small amount of moisture added to the product during the milling process).

The operations summarised in this section provide an overview of the processes occurring on site that have the most influence on the surrounding environment.

2.1.1 Flour and maize mill operations

Grain intake

The grain intake plant is one of the key elements of the milling operations, processing up to approximately 300,000 tonnes per year of grain. All grain is received through a combination of rail and road deliveries. Grain is received on site using the grain intake facility located under the rail siding, where an intake pit receives grain from either rail or road transport. The grain is transported to the bulk storage bins via an underground conduit directly connected to the elevator pit.

Grain bulk storage

Wheat is stored on site in wheat silos. The silos are connected to the main plant by chain conveyors. In addition to the main storage facility, the wheat cleaning plants also require separate storage bin capacity.

Grain cleaning process

Pre-cleaning of incoming grain involves screening (to remove metal and other impurities) and aspiration (drawing air through the grain to extract light impurities). Additionally, water is sprayed onto the grain and absorbed at a rate of up to 5% of dry grain weight (a process known as tempering) during the cleaning process. A second tempering is carried out for the cleaning process with an application of additional water at a rate of up to 3% of grain weight. Collected screenings (impurities) are graded and passed to a ground screenings bin in the screenings disposal plant.

Milling process

Both wheat and maize are processed by wheat and maize milling technology. Wheat based products such as fine low ash flours, baker's flours, biscuit flours, wheat semolinas, general-purpose flours, noodle flours and wholemeal flours are produced on the wheat mill. The maize milling plant is designed primarily for the production of maize products (flaking grits, semolinas, polenta and residual flour).

Finished product storage

The finished product is stored in concrete storage bins for flour storage, flour blending bins, mill mix storage bins, specialty product storage bins, and wholemeal storage bins.

Out-loading

Finished product is dispatched from the plant by:

- Packing into bags and onto pallets for loading onto flat-bed trucks (approximately 20-40% of finished products)

- Bulk loading into tankers for removal by truck (approximately 60-80% of finished products, including all by-products).

Bag packing

Bag packing is a fully automated flour packing system with an operational design capacity for 24 hours a day, seven days a week. Trucks reverse into the packaged product loading area and forklifts load product into the trucks.

Bulk loading

Bulk out-loading occurs using a rapid loading system where flour is deposited into tankers or waiting trucks. Approximately 80% of the production output for flour, semolina and wholemeal is in bulk. The bulk flour out-loading system can accommodate approximately 25 to 30 tanker loads a day.

By-product handling

The only by-product of the process is grain husks ('mill mix'), which requires storage before being loaded into open top transport trucks. From the storage bins, this by-product is transported in bulk to a pellet mill, to be turned into animal feed. Two storage and bulk out-loading silos allow rapid loading into open top trucks. The system meets a standard free of product spillage and dust emission, and the trucks are housed in a completely enclosed loading area.

Administration and General Maintenance facilities

Several ancillary areas within the plant have been constructed on the site, including a small onsite laboratory, control centre area, maintenance area and administrative/office area. The laboratory is used for testing the physical properties of the raw grains and the quality of the materials and finished products.

2.1.2 Transport operations

Operations involve the delivery of grain by rail, unless issues with the rail network result in the use of trucks for incoming grain as a contingency measure. Trains arrive at different times but only unload between the hours of 7 am and 7 pm. Typically one train arrives every two days.

Trucks are used to take the processed product from the site and operate 24 hours a day, 7 days a week depending on production flows. B-double trucks and semi-trailers transport the flour, which forms approximately 80% of the processed product. Trucks with trailers and bogies transport the mill mix, which is a by-product of the milling process and represents the other 20% of product produced by the mill. Truck movements, including deliveries, equate to approximately 30 vehicles per day making up to 60 trips in and out of the site.

2.1.3 Water management

The milling process at the Site consumes potable water to maintain suitable moisture content in the grain. The grain absorbs all of the water, therefore there is no liquid waste generated by this process.

Bio-swales and drainage lines have been constructed and maintained at the site to manage the surface water. Measures such as grading away from buildings and bunding assist in directing the movement of site captured surface water away from built areas. Captured surface water is directed to established offsite stormwater systems, whilst the presence of spill kits provide additional security should the prevention of contamination of product be required.

2.1.4 Wastewater management

Domestic wastewater is generated from the on site staff amenities. All domestic wastewater is treated on site as there is no municipal sewer connection. The wastewater is treated by means of a small package sewage treatment plant. The plant comprises of a septic tank, primary aeration tanks, and secondary aeration tanks that clarify and chlorinate the water. The sewage treatment plant is designed for a maximum daily flow of 3,000 L/day and serves as a low maintenance system that treats only domestic wastewater, preventing offensive odours in the process. The treated effluent is re-purposed through irrigation to land within the mill site.

The milling process is described as a *zero-waste process*. The process water added during the milling process is wholly consumed, and no liquid process waste streams are discharged from the mill to the stormwater drainage or to the domestic wastewater systems.

Wastewaters generated from the onsite laboratory are kept isolated from stormwater drainage and from domestic wastewater systems and are disposed off site in a controlled manner.

2.2 Applicable planning documents

Site operations are conducted generally in accordance with the following documents as nominated in the Consent Conditions:

- Development Application DA-318-12-2004-i as modified by Mod 51-5-2007 and DA 318-13-2007-Mod 3
- Environmental Impact Statement (EIS) for Grain Milling Facility, Picton Road, Maldon (KBR, December 2004)
- Mod 51-6-2007 (KBR, 30 May 2007)
- DA-318-12-Mod 2 (KBR, 17 October 2007)
- Visual Assessment: Additional Information Report (Garry Stanley, March 2004)
- Construction Noise Report (Heggies Australia, April 2005)
- Aboriginal Heritage Assessment, Final Report for the Proposed Allied Mills Flour Mill, Picton NSW (Austral Archaeology Pty Ltd, May 2005)
- Operational Noise Report (Heggies Australia, June 2005).
- Review of wastewater treatment and effluent application to land, Allied Mills Pty Ltd – Picton Mill, prepared by Landfax Laboratory (2016)

An Operational Environmental Management Plan (OEMP) has been developed to provide an environmental management framework during operation of the mill, including practices and procedures for all site operations, as required by the Consent Condition 5.3. At the time of drafting this report, the OEMP and supporting sub-plans were updated, as described below:

- Operational Environment Management Plan, V1 dated July 2023
- Appendix A - Noise and Vibration Management Sub-Plan, V1 dated July 2023
- Appendix B – Water Monitoring and Management Sub-Plan, V1 dated July 2023
- Appendix C - Traffic Management Sub-Plan, V1 dated July 2023
- Appendix D - Cultural Heritage Management Sub-Plan, V1 dated July 2023
- Appendix E - Landscape Management Sub-Plan, V1 dated July 2023

The Department was notified of the revision to the OEMP and associated plans prior to finalising this AEMR.

Licences, permits and approvals relevant to site operations and referenced in this AEMR are summarised in Table 2.

Table 2 - Site operational approvals

Title	Regulator	Details
DA-318-12-2004-I	Department of Planning, Industry and Environment	Site operations are approved subject to the Consent Conditions. The Consent Conditions are developed with reference to the planning approval documentation submitted supporting the original application.
Mod 51-5-2007	Department of Planning, Industry and Environment	Changing the design of the sewage treatment plant to an aerated tank system, which removes the need for the originally proposed settling tank and reed bed.
DA-318-12-Mod 2	Department of Planning, Industry and Environment	Changing the alignment of the proposed rail siding so that it meets the Main Southern Railway line on a curve, and refining the design of the rail crossover at the end of the siding.
DA-318-12-Mod 3	Department of Planning, Industry and Environment	Amendment to Consent Conditions in relation to the sewage treatment plant, the effluent balance tank and irrigation area.
EPL 12498	Environmental Protection Authority	The site requires an EPL under the *Protection of the Environment Operations Act 1997*, for undertaking the Scheduled Activity of Agricultural Processing. Scale: > 100,000 – 250,000 T processed.
WAL 26929	Department of Industry, Water	The site holds a Water Access Licence issued under the Water Management Act 2000, however site operations do not require water extraction as permitted by the Licence.

3 Compliance

3.1 Consent conditions

The site monitors its compliance status against the Consent Conditions and records its assessment using a compliance tracking table. A copy of the 2023/24 Compliance Tracking Table is attached as **Appendix A**.

Site operations were compliant with the Consent Conditions for the reporting period except for the conditions outlined in Table 3.

Table 3 - Conditions of consent - compliance exceptions for the reporting period

Condition	Compliance assessment
1.1 The development must be carried out in accordance with the DA.	Allied Pinnacle demonstrated a high level of compliance with the documentation outlined in this condition, although five non-compliances were recorded against the conditions of this consent as detailed in the table below.
2.3 Noise criteria	An operational noise monitoring survey on 6 October and 10 October 2023, concluded that the noise prediction/measurement found that: • LAeq(daytime), LAeq(evening), LAeq(15min) and LA1(1min) noise levels at all sensitive receivers comply with the noise criteria stipulated in EPL 12498 (equivalent to Table 1 of the Approval). • predicted LAeq(night-time) noise levels from site exceed the noise criteria at all residential receivers.
2.5 and 2.6 Noise assessment methodology	The noise assessment methodology applied for the operational noise monitoring survey was not consistent with these conditions. It was consistent with section 7.1.1 of EPA's Noise Policy for Industry (2017) however details of the alternate noise assessment method had not been submitted to the Secretary prior to the assessment hence a non-compliance has been awarded for this condition.
5.5 Informing the Secretary of changes to the OEMP	The OEMP including the associated sub plans were reviewed within the three-year period. A copy of the updated OEMP and associated sub-plans were available on the Allied Pinnacle webpage. However, the Secretary was not notified of the revision to the OEMP and associated management plans within the reporting period hence a non-compliance was awarded for this condition.
5.8 Effluent quality	Faecal coliforms, or E.coli (thermotolerant coliforms) in the irrigation chamber were generally an order of magnitude over the target requirements.

3.2 Environmental Protection Licence

The EPA has issued an Environmental Protection Licence (EPL 12498) to the site, under the Protection of the Environment Operations (POEO) Act 1997. The premises is licensed to undertake a scheduled activity for "Agricultural Processing" at a scale of >100,000 - 250,000T annual processing capacity.

The EPL does not impose any limit criteria, operational requirements, or monitoring requirements in addition to those set by the Consent Conditions. Allied Pinnacle submitted the following annual returns to the EPA, applicable to the reporting period:

- EPA Annual Return – 6/7/22 to 5/7/23 received by EPA on 22/08/23.
- EPA Annual Return – 6/7/23 to 5/7/24 received by EPA on 28/08/24.

No non-compliances or environmental incidents were recorded in the annual return and no penalty notices were issued for the reporting period.

There has been no correspondence "show cause" or penalty notices with the EPA during the reporting period.

4 Incidents and complaints

Allied Pinnacle maintain an incident reporting database known as "RAPID", to record incidents at all sites across Australia and New Zealand, including the Picton site.

The database is accessible by all Allied Pinnacle staff, and information can be readily entered and/or retrieved.

4.1 Incidents

An incident database (RAPID GLOBAL) is maintained across all of Allied Pinnacle operations, which includes recording complaints.

During the reporting period, two environmental incidents were recorded for the Picton site. These were related to:

- a localised flour spill (60kg)
- a localised hydraulic oil spill from a vehicle.

The spills were contained within the site. Neither event was reportable to DPHI or the EPA.

4.2 Complaints

Complaints received by Allied Pinnacle are recorded on "RAPID GLOBAL" and managed as an incident.

During the reporting period, no environmental complaints were recorded for the Picton site.

5 Impacts and performance predictions

5.1 EIS predictions

Table 4 provides a summary of the environmental impacts and performance from the EIS and a statement of whether these performance goals are being met.

Table 4 - EIS Impacts and performance predictions

Predictions and impacts	Actual performance
Noise	
The calculated operational noise emissions from the proposed mill will comply with the noise criteria at all of the residential assessment points under all-weather scenarios. The predicted noise levels associated with the loading and unloading activities indicate that the night-time sleep disturbance criteria will not be exceeded.	Not all noise criteria were complied with during the reporting period. Refer to Section 6.1 for further discussion. No noise complaints related to the operation of the facility were received for the site during the reporting period.
The most significant road traffic noise source (on public roads) associated with the proposed mill development will be approximately 33 additional trucks per day, accessing the site via Picton Road and the Hume Highway. The relatively small increase in the number of heavy vehicles and total traffic volume is not expected to result in any perceptible change in noise level as the change in noise level is expected to be less than 0.5 dBA.	No noise complaints related to road traffic noise were received for the site during the reporting period.
Operational vibration impacts are expected to be negligible.	There have been no recorded instances of unreasonable vibration impacts arising from site operations.
Soil and water quality	
Under developed site conditions, the reservoir will receive stormwater from an additional 20 ha catchment area, 3 ha of which will be hardstand area as a result of the development. The reservoir will potentially receive a greater pollutant load associated with the increased hardstand and total volume of inflow.	Site operational practices involve the regular sweeping and cleaning of hardstand surfaces, and the maintenance of plant and equipment, which reduces the likelihood of potential contaminants being present on hardstand areas.

Predictions and impacts	Actual performance
Traffic	
The total heavy goods vehicle (HGV) traffic generation from the site will be in the order of sixteen trips per day to and from the site.	This prediction has been superseded by a traffic study undertaken by GHD. Refer to Section 5.2 of this report.
The proposed flour mill will generate a total of 54 private car trips per day during the week.	The number of site staff is consistent with the predictions made in the EIS. Consequently, the number of daily private car trips are in the range of 50 to 60.
Air quality	
The proposed flour mill is expected to operate at the proposed location without causing any adverse effects on local air quality.	Air quality monitoring undertaken by Heggies Pty Ltd in 2009 found that through testing of all significant and accessible emission points, particulate matter concentrations were within the limits set-out in the Consent Conditions. Site operations have not substantially changed since the testing and consequently adverse impacts to air quality are not expected. There have been no reported incidents or complaints in relation to air quality.
On an annual basis, the additional load due to the flour mill would be difficult to discern above the existing background conditions.	Air quality monitoring undertaken by Heggies Pty Ltd in 2009 found that emissions at all locations were well within the emission limits, and at more than half of the monitoring locations results were below the detection limits.
Waste Predictions	
Waste generated during operation will be minor, and the milling process is a zero-waste process as all by-products (husks) are used in animal feed.	No solid waste generated from the milling process is disposed of to landfill or other offsite disposal facilities. All by-products are sold to stock feed companies and local farms as animal feed. No liquid process waste streams are discharged from the mill to the stormwater drainage or to the domestic wastewater systems.
Effluent quality will meet the 90 percentile targets set out in the EIS, and the system will achieve compliance with the NSW EPA's reuse guidelines and National Water Quality Management Strategy (NWQMS) Guidelines for Sewerage System Use of Reclaimed Water.	This prediction has been superseded by MOD3. Refer to Section 5.3 of this report.
Based on the estimated minimum uptake of nitrogen and phosphorous by pasture,	The soil monitoring data from previous years consistently indicates that the land application area

Predictions and impacts	Actual performance
there would be no excess nutrients on the site.	shows no signs of overloading. Refer to Section 6.3 of this report.
An irrigation area of over 1 hectare would be adequate to prevent nutrient imbalance and water release from the site.	This prediction has been superseded by MOD3. Refer to Section 5.3 of this report.

5.2 Total heavy goods vehicles per day

The total heavy goods vehicle (HGV) traffic generation from the site has been increased from sixteen trips per day to and from the site (predicted by the EIS) to thirty trips per day to and from the site. Thirty traffic movements of HGV to and from the site has been adopted in the TMP following a study by GHD of the Allied Pinnacle intersection with Picton Road, and formal advice from TfNSW to DPE that the traffic movements were considered acceptable (letter dated 22 September 2016).

During the reporting period, the number of HGV traffic movements were consistent with the TMP. The total HGV traffic generation from the site, when averaged on a monthly basis, were 30 trips per day, or less, to and from the site. HGV movement data is provided in Section 6.5 of this report. See section 6.5

5.3 Wastewater management system

To compare the performance of the wastewater management system with the estimated performance in the EIS, Allied Pinnacle commissioned Landfax Laboratory to undertake a "Review of wastewater treatment and effluent application to land, Allied Mills Pty Ltd – Picton Mill" (2016 Review). The 2016 Review was used to support MOD3, which was approved by DPE.

The 2016 Review reported that:

- The EIS estimated an effluent quantity of 3,000 L/day however monitoring of the effluent discharged from the Aerated Wastewater Treatment System (AWTS) showed the average effluent quantity was 1,950 L/day.
- The AWTS was performing well within the EIS calculated load. The AWTS was producing an effluent that reflects the high inputs of human wastes and low domestic wastes; high in nitrogen and phosphorus, but low in total alkalinity.
- The available irrigation area (1,250 m^2) would assimilate the nitrogen and phosphorus as well as the hydraulic load.

The 2016 review recommended that the overall system should not be hampered by defined limits on effluent quality, except for those properties that directly relate to system function and public health.

The WMMP was subsequently updated to meet the requirements of MOD 3.

During the reporting period, performance monitoring of the AWTS and the irrigation area confirmed that the system was operating in accordance with the requirements of MOD 3 and the WMMP. AWTS and irrigation monitoring data is provided in Section 6.2 and 6.3 respectively, of this report.

6 Environmental monitoring results

6.1 Noise monitoring

Three-yearly monitoring

The Approval does not specify any noise monitoring requirements however noise monitoring data is required to assess compliance against Conditions 2.3, 2.5 and 2.6.

The Noise and Vibration Management Sub-Plan, V1 dated 20 July 2023 (NVMP), applicable during the reporting period, specified that noise monitoring will be undertaken every three (3) years.

An operational noise monitoring survey was conducted on 6 October and 10 October 2023. Unattended and attended noise surveys were conducted both onsite and at noise sensitive receivers.

The report concluded that the noise prediction/measurement found that:

- LAeq(daytime), LAeq(evening), LAeq(15min) and LA1(1min) noise levels at all sensitive receivers comply with the noise criteria stipulated in EPL 12498 (equivalent to Table 1 of the Approval).
- predicted LAeq(night-time) noise levels from site exceed the noise criteria at all residential receivers.

It is noted that the description of the noise recorded during the survey at sensitive receivers (Locations 1-6), at night, was as follows:

- Location 1: Plant Noise audible. Traffic noise levels were dominant. *The property has also been rezoned "Industrial" therefore residential noise criteria no longer applies.*
- Location 2: Plant Noise barely audible. Traffic noise levels and cicadas were dominant.
- Location 3: Plant Noise barely audible. Traffic noise levels and animals were dominant.
- Location 4. Plant Noise barely audible. Traffic noise levels and train were dominant.
- Location 5. Plant Noise barely audible. *Traffic noise levels and cicadas were dominant. The property has also been rezoned "Industrial" therefore residential noise criteria no longer applies.*
- Location 6. Plant Noise inaudible. Train noise was dominant.

At all residential receivers, the site was barely audible and dominant noises were associated with traffic on Picton/Menangle Roads, cicadas, animals, and trains. Therefore, whilst the LAeq (night-time) noise criteria was exceeded, the site may not be adversely affecting the amenity of the residential receivers.

ACTION 2023/24-01: Engage a suitably qualified acoustic specialist to review the operational noise monitoring survey findings and make an assessment as to whether the site had adversely impacted the amenity of the residential receivers at night. The assessment should inform whether further noise controls are required from the site or whether the LAeq(night-time) noise levels should be revised, taking into consideration background environmental noise.

Event triggered monitoring

The NVMP also specified noise monitoring to occur:

- Within 14 days of any change to the schedule of operations.
- Following adverse comment or complaint relating to noise from the operations.

Neither of these events were triggered during the reporting period.

6.2 Wastewater monitoring

Maintenance and monitoring requirements for the AWTS have been set by Consent Condition 5.8 as outlined below.

Quarterly maintenance and monitoring

Consent Condition 5.8 requires samples to be taken for analysis from within the AWTS irrigation chamber before commencing each service. These requirements have been incorporated into the Water Monitoring and Management Sub-Plan V1 dated July 2024 (WMMP).

During the reporting period, the monitoring events were undertaken on a quarterly basis, just prior to the servicing of the AWTS, and the results are presented in Table 5.

Table 5 - Quarterly monitoring from within the irrigation chamber

Parameter	Faecal Coliforms & E.coli (per/100ml)	Dissolved oxygen (mg O_2/L)	Free Chlorine (mg/L)	Results submitted to DPE
Sample Date/Target	**<100**	**>5**	**0.01 - 2.0**	**-**
23 May 2023	4000	5.34	0.43	Y
23 August 2023	140	5.26	0.21	Y
23 November 2023	1700	5.53	0.13	Y
24 February 2024	32000	10.3	0.03	Y

Monitoring and service records confirm that the AWTS was monitored quarterly in accordance with Consent Condition 5.8. The results of the monitoring indicated that faecal coliforms, or E.coli (thermotolerant coliforms) in the irrigation chamber was generally an order of magnitude over the target requirements.

ACTION 2023/24-02: Provide the laboratory test results to the AWTS maintenance contractor. Determine the cause of the high faecal coliforms and E.coli count, and implement corrective actions, to bring the faecal coliform and E.coli count to less than 100 colony forming units per 100 ml in the irrigation chamber.

Six-monthly monitoring

The WMMP specifies that twice annually (one summer and one winter), the facility shall collect samples from the irrigation chamber of the AWTS for analysis of the parameters in Table 6. These parameters are quantified without limit however, a comparison of annual results can be undertaken from one year to the next.

Two sampling events were undertaken during the reporting period. The results for this reporting period continue to be consistent with previous years.

Table 6 - Six-monthly monitoring from within the irrigation chamber

Parameter	Unit	Winter August 22	Summer Feb 23	Winter August 23	Summer Feb 24
Ammonia as N	*mg/L*	*21.3*	*10.1*	13.8	25.8
Nitrate as N	*mg/L*	*0.54*	*1.85*	0.76	0.22
Total Kjeldahl Nitrogen as N (TKN) / Total Nitrogen (TN)	*mg/L*	*25.0 21.7*	*18.9 21.3*	18.1	37.2
pH		*7.4*	*7.0*	7.0	7.3
Electrical conductivity	*(uS/cm)*	*670*	*474*	614	583
Reactive phosphorus (P)	*mg/L*	*7.59*	*6.30*	7.74	5.43
Total phosphorus (TP)	*mg/L*	*8.48*	*7.28*	7.94	5.76
Calcium	*mg/L*	*33*	*26*	21	22
Magnesium	*mg/L*	*8*	*7*	5	5
Sodium	*mg/L*	*37*	*30*	44	23
Potassium	*mg/L*	*28*	*23*	33	17
Calculate sodium adsorption ratio (SAR)		*1.5*	*1.35*	2.24	1.15

6.3 Effluent irrigation area monitoring

The WMMP, specifies the annual soil monitoring program for the irrigation area. The Plan specifies:

- Annually, explicit soil sampling is required at six designated areas within the irrigation area at targeted depths within the soil profile for targeted soil parameters
- The parameters are quantified without limit and annual results are to be maintained on a progressive spreadsheet where the changes from one year to the next can be evaluated.

Allied Pinnacle have engaged consultants to collect annual monitoring data since 2016. Appendix D of the CSTS Report[1], has been extracted and presented in **Appendix B**, containing the soil analysis results for the respective report. Annual testing and historical comparisons have confirmed the irrigation area is adequately tasked with returning the hydraulic and nutrient load to the environment without affecting the sustainability of the enterprise.

6.4 Solid waste and recycling monitoring

The milling process is described as a 'zero-waste process'.

No liquid process waste streams are discharged from the mill to the stormwater drainage or to the site's effluent management system.

No solid waste generated from the milling process is disposed to landfill or other offsite disposal facilities. All solid by-products from the milling process are sold to stock feed companies and local farms as animal feed.

The site also produces general solid waste from its operations including office and warehousing general refuse. The total tonnage of solid waste produced by the site for the reporting period is presented in Table 7.

Table 7 – Solid waste records

Month	Tonnes April 19 to March 20	Tonnes April 20 to March 21	Tonnes[2] April 21 to March 22	Tonnes[3] April 22 to March 23	Tonnes[4] April 23 to March 24
Apr 22	2.15	5.5	2.94	8.57	8.41
May 22	3.44	2.5	2.68	12.15	9.97
Jun 22	3.01	2.95	3.26	7.3	5.21
Jul 22	6.02	7.22	1.89	15.39	0.84
Aug 22	3.87	3.01	7.71	11.15	12.95
Sep 22	3.44	6.94	8.1	0.84	0.84
Oct 22	3.87	8.27	3.37	8.74	7.81
Nov 22	3.87	2.83	1.47	7.03	1.05
Dec 22	3.44	5.44	4.83	3.93	10.27
Jan 23	3.87	3.62	5.14	8.25	1.05
Feb 23	3.44	3.02	1.47	8.02	9.5
Mar 23	3.87	8.18	7.95	1.05	6.22

[1] *Source: CSTS Report, Annual Review of Effluent Irrigation, Picton Mill - 330 Picton Road, Maldon NSW 2580, May 2024*
[2] *Source: Data from Grima Recycling*
[3] *Source: Data from Grima Recycling (Paper) Waste flex (skip bin waste)*
[4] *Source: Data from Grima Recycling (Paper) Waste flex (skip bin waste)*

Total	44.29 T	59.6T	50.81T	92.4T	**74.12T**

Table 7 shows that solid waste generation fluctuates from year to year however the 2023/24 annual tonnage of general solid waste has reduced since the previous year.

6.5 Traffic monitoring

Heavy vehicle movements are recorded by the site using:

- the weigh bridge, grain only
- Netlogix, a third-party company, manages some logistics for Allied Pinnacle and maintains heavy vehicle movement records, that are received at the dock.

The total monthly average for heavy vehicles per day is presented in Table 8. The data confirms that the total HGV traffic generation from the site, when averaged on a monthly basis, was 30 trips per day, or less, to and from the site.

Table 8 – Heavy vehicle movement data[5]

Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly average	26	29	27	27	28	27	27	27	25	26	30	28

6.6 Environmental inspections

The OEMP specifies that environmental inspections using the combined implementation checklist (Appendix F of the OEMP) is undertaken quarterly and six monthly, as required by each sub-plan. The checklist includes observations to confirm conformance with mitigation measures associated with each of the sub-plans.

During the reporting period, quarterly environmental inspections were undertaken on 18/5/23, 20/6/23, 17/8/23, 14/11/24 and 13/2/24. The inspections confirmed that the site was implementing the mitigation measures associated with each of the sub-plans to a high degree as outlined in Table 9.

Table 9 - Quarterly environmental inspections

Sub-plan	Observations confirmed the following mitigation measures were implemented
Appendix A - Noise and Vibration Management Sub-Plan	• Operational mitigation measures including night works, bag packing works and site building facades • Maintenance of mechanical equipment • Bag packing works
Appendix B – Water Monitoring and Management Sub-Plan	• Maintenance of hardstand area and stormwater drains • Fuel and chemical storage • AWTS monitoring and servicing • Irrigation area maintenance and monitoring • Laboratory – storage and management of chemicals

[5] *Source: Weighbridge data and Netlogix Limited data processed by Allied Pinnacle*

Appendix C - Traffic Management Sub-Plan	• Routine traffic monitoring including speed, noise and load coverage
Appendix D - Cultural Heritage Management Sub-Plan	• Maintenance of cultural heritage zones and control of access
Appendix E - Landscape Management Sub-Plan	• Routine inspection of landscaped areas for noxious weeds, litter and pooled water, bushfire risk, and buffer zones.

7 Environmental Performance Goals

Table 10 provides a summary of the environmental performance goals from the OEMP and a statement of whether these performance goals were met during the reporting period.

Table 10 – Environmental performance goals

Performance target	Statement of performance
Noise	
Achievement of zero non-compliance with the noise limit criteria as outlined in the Noise and Vibration Management Sub-Plan.	An operational noise monitoring survey was conducted on 6 October and 10 October 2023. Unattended and attended noise surveys were conducted both onsite and at noise sensitive receivers. The report concluded that the noise prediction/measurement found that: • LAeq(daytime), LAeq(evening), LAeq(15min) and LA1(1min) noise levels at all sensitive receivers comply with the noise criteria stipulated in EPL 12498 (equivalent to Table 1 of the Approval). • predicted LAeq(night-time) noise levels from site exceed the noise criteria at all residential receivers. Refer to Section 6.1 for further discussion regard non-compliance with noise limit criteria.
Adopt best management practices and best available technology for economically achievable principles to reduce noise emissions.	Site infrastructure has been designed to reduce noise emissions, and operational protocols support the reduction of noise emissions.
Adherence to noise mitigation measures including the adaptation where necessary of engineering measures on trucks, the implementation of operating techniques such as limited compression braking and speed limit restrictions.	The Traffic Management Plan (TMP) provides noise mitigation measures related to vehicles including site speed limits (<10km/h), restrictions on the use of compression braking, and restrictions on vehicle idling. There have been no recorded incidents or complaints related to noise generated by traffic on site.
Maintain accurate truck movement data to establish patterns and timeframes that can assist in controlling noise impacts.	Vehicle movements to and from the site are recorded via the weigh bridge and a third-party logistics service provider. Refer to Section 6.5 of this report.
Landscape management	
Minimal impact to visual amenity.	All landscaping works required under the Consent Conditions have been completed. Quarterly environmental inspections confirm monitoring and maintenance of landscaped areas. Refer to section 6.6 of this report.

Performance target	Statement of performance
Water Quality	
Ensure that process water added during the milling process is wholly consumed and no liquid process waste streams are discharged from the mill during operations.	The milling process and associated infrastructure continues to operate as intended, with no liquid process waste streams discharged during operations. Refer to Section 6.4 of this report.
Retain the maximum daily flow of 3,000L / day to ensure the effective operation of the treatment plant.	The WMMP specifies that twice annually (one summer and one winter), the facility shall collect samples from the irrigation chamber of the AWTS for analysis of the parameters in Table 6. These parameters are quantified without limit however, a comparison of annual results can be undertaken from one year to the next. Two sampling events were undertaken during the reporting period. The results for this reporting period continue to be consistent with previous years. Refer to Section 6.2 of this report.
Respond to pollution incidents (such as the release of wastewater into undesignated areas) and implement control measures within 24 hours of identification of breach.	A Pollution Incident Response Management Plan (PIRMP) is in place that outlines the pollution response procedures including reporting and notification timeframes. To date, there have been no reportable pollution incidents associated with site operations.
Cultural Heritage	
Allied Pinnacle and sub-contractor compliance with Cultural Heritage Management Sub-Plan and regulatory requirements. Comply with heritage requirements of relevant stakeholders.	Heritage requirements of relevant stakeholders have been incorporated into the CHMP. The CHMP had been effectively implemented as confirmed by the quarterly environmental inspections. Refer to Section 6.6 of this report.
Traffic	
Allied Mills and sub-contractor compliance with Traffic Sub-Plan and regulatory requirements.	All Allied Pinnacle staff and regular contractors undergo an induction for transport drivers that includes site traffic rules. Quarterly environmental inspections confirm routine monitoring of sub-contractors compliance with the site's traffic rules. Refer to Section 6.6 of this report. There have been no incidents related to non-compliances with the TMP.

8 Status of DPE instructions

8.1 Independent environmental audit (2023 IEA)

Recommendations raised by the 2023 IEA and actions taken by Allied Pinnacle are present in Table 11 below:

Table 11 – Progress on 2023 IEA Recommendations

Corrective Action	Action
2023 IEA/01 Prepare modification to the DA conditions to have the noise monitoring locations, noise limits etc reassessed. Zonings have changed.	**Finding**: This modification will be sought to the DA when other modifications to the Project are proposed. **Status: Ongoing**
2023 IEA/02 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.	**Finding:** Allied Pinnacle advised it provided all assessment criteria to SLR, the noise consultant, however the noise consultant did not address all criteria. **Status:** ***OPEN*** *– to be addressed prior to engaging the next triennial noise assessment.*
2023 IEA/03 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.	**Finding:** The IEA recommendations were received after the July 2023 OEMP review. These amendments will be undertaken during the next OEMP review. **Status:** ***OPEN*** *- to be addressed at the next OEMP review.*
2023 IEA/04 September each year review the company's website to ensure latest documents are available. Noting that AEMR normally prepared in July/ August each year.	**Finding:** The information on the company website was updated. **Status: CLOSED**
2023 IEA/05 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.	**Finding:** The IEA recommendations were received after the July 2023 OEMP review. These amendments will be undertaken during the next OEMP review. **Status:** ***OPEN*** *- to be addressed at the next OEMP review.*
2023 IEA/06 All conditions of consent are included in Appendix A.	**Finding:** All conditions of consent have been included in this AEMR, including those conditions that have been closed out in previous years. **Status: CLOSED**

Improvement opportunities	
2023 IEA/07 Update Section 4 OEMP to include NSW WHSE Manager and the National and NSW WHSE managers roles for the site. **2023 IEA/08** Update Appendix A to Appendix E in the OEMP. **2023 IEA/09** 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. **2023 IEA/10** 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 **2023 IEA/11** Update Appendix A – NVMP – Section 12.3 – second paragraph needs to amend wording to be consistent with first paragraph in this Section. **2023 IEA/12** Update Appendix B – WMMP – Section 20, refers to Appendix A	**Finding:** The IEA recommendations were received after the July 2023 OEMP review. These amendments will be undertaken during the next OEMP review. **Status:** ***OPEN*** *- to be addressed at the next OEMP review.*

8.2 Annual Environmental Management Report (2022/23)

The 2022/23 AEMR established an action plan. Allied Pinnacle has not received any instruction from DPE to implement the 2022/23 AEMR Action Plan however the status of progress against the plan is presented in Table 12.

Table 12 – Progress on the 2022/23 action plan

Corrective Action	Action
Action 2021/22 - 2	Amend the NVMP to reference section 7.1.1 of EPA's Noise Policy for Industry (2017), as an alternate to the methodology outlined in Condition 2.5 and Condition 2.6 of the consent. Seek approval from DPE for the amendment. **Finding:** No action taken during this reporting period ***Status: OPEN***
Action 2021/22 - 3	Update the Water Monitoring and Management sub-plan to remove natural phosphorus sorption capacity, from the list of parameters to be tested as there is more than a century's adsorption capacity even with leaving all grass clippings in place. Seek approval for the update from DPE. **Finding:** Allied Pinnacle have elected to continue to monitor natural phosphorus sorption capacity therefore no change is required to the OEMP.

Status: CLOSED

Action 2022/23 – 1	The 2023 Tri-annual Noise Monitoring report should clearly identify the inconsistency between the zoning status of neighbouring properties on the statutory instruments (CoA and EPL) and the actual zoning status of neighbouring properties; and provide guidance on how to interpret the noise results in consideration of the inconsistency. **Finding:** The 2023 Tri-annual Noise Monitoring report identified the inconsistency between the zoning status of neighbouring properties. ***Status: CLOSED***
Action 2022/23 – 2	Notify the Secretary of update to the OEMP and supporting subplans as required by Condition 5.5. **Finding:** The secretary was notified of the amendments to the OEMP and associated plans on 20/9/24. ***Status: CLOSED***
Action 2022/23 – 3	Submit any outstanding AWTS service records to the Secretary as required by Condition 5.8. **Finding:** AWTS service records were submitted to the Secretary. Project Portal receipts were sighted. ***Status: CLOSED***
Action 2022/23 – 4	Engage a suitably qualified technical specialist to undertake the annual soil monitoring program for the irrigation area in accordance with the DEC Guideline as required by Condition 5.9. **Finding:** Allied Pinnacle engaged Compaction and Soil Testing Services Pty Ltd (CSTS) to undertake the annual soil monitoring program for the irrigation area. ***Status: CLOSED***
Action 2022/23 – 5	Update the documents on the Allied Pinnacle web page. In particular, the most recent versions of the IEA and the AEMR. **Finding:** The most recent AEMR and IEA were on the webpage. The webpage was up to date. ***Status: CLOSED***

9 Environmental Action Plan (2023/24)

Table 13 lists the environmental actions arising from the 2023/24 AEMR. Actions with the prefix of 2021/22 or 2022/23 have been carried forward from the previous AEMRs.

The first column of the table provides a "Report Reference" which can be used by the reader for context to each action proposed.

Table 13 – 2023/24 Environmental action plan

Report Reference	Action	Environmental Action
Appendix A Conditions 2.5 and 2.6	ACTION 2021/22-2	Amend the NVMP to reference section 7.1.1 of EPA's Noise Policy for Industry (2017), as an alternate to the methodology outlined in Condition 2.5 and Condition 2.6 of the consent. Seek approval from DPE for the amendment.
Appendix A Condition 2.3	ACTION 2023/24-01	Engage a suitably qualified acoustic specialist to review the operational noise monitoring survey findings and make an assessment as to whether the site had adversely impacted the amenity of the residential receivers at night. The assessment should inform whether further noise controls are required from the site or whether the LAeq (night-time) noise levels should be revised, taking into consideration background environmental noise.
Appendix A Condition 5.8	ACTION 2023/24-02	Provide the laboratory test results to the AWTS maintenance contractor. Determine the cause of the high faecal coliforms and E.coli count, and implement corrective actions, to bring the faecal coliform and E.coli count to less than 100 colony forming units per 100 ml in the irrigation chamber.

Appendix A – Development Application DA-318-12-2004-i: Compliance tracking table 2023/24

Appendix A Development Application DA-318-12-2004-i MOD 3 Compliance Tracking Table 2023/24

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
General - Scope Of Development					
1.1	The Applicant must carry out the development in accordance with: a) Development Application DA-318-12-2004-i, lodged with the Department of Infrastructure, Planning and Natural Resources on 23 December 2004; b) the Environmental Impact Statement, EIS For Grain Milling Facility, Picton Road, Maldon, prepared by Kellogg Brown and Root Pty Ltd, dated 22 December 2004; 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; d) additional information relating to construction noise prepared by Heggies Australia and dated 28 April 2005; e) Aboriginal Heritage Assessment, Final Report for the Proposed Allied mills Flour Mill, Picton NSW, prepared by Austral Archaeology Pty Ltd, dated May 2005, and submitted to the Department 2 June 2005; f) additional information relating to operational noise prepared by Heggies Australia and dated 10 June 2005; g) MOD 1; h) MOD 2; i) MOD 3; and j) the conditions of this consent.	Non-compliant	Ongoing	Allied Pinnacle demonstrated a high level of compliance with the documentation outlined in this condition, although five non-compliances were recorded against the conditions of this consent as detailed in the table below.	See below.
1.2	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.	Compliant	Ongoing	The Traffic Management Plan, Rev4 dated 15/4/20 states that there will be 30 traffic movements of total heavy good vehicles traffic generation from the site, which is inconsistent with the EIS (which predicted 16 movements). However as the TMP (15/4/20) is the most recent document. The plan prevails according to Condition 1.2 (as modified by MOD3).	Environmental Impact Statement, EIS For Grain Milling Facility, Picton Road, Maldon, prepared by KBR, dated 22 December 2004. The Traffic Management Plan, Rev4 dated 15/4/20. MOD 3
General - Statutory Requirements					
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.	Compliant	Ongoing	Operations are subject to the conditions of EPL12498, as the site conducts a Scheduled Activity as defined in the Protection of the Environment Operations Act 1997 (agricultural produce industries). A valid licence was maintained during the reporting period. The site also holds a current Water Licence which expires on 9 February 2025.	EPL12498 Water Licence approval number 10CA117028
Dispute Resolution					
1.4	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.	Not triggered	Ongoing	No disputes have arisen between Allied Pinnacle and regulatory bodies.	N/A
General - Compliance					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
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.	Not triggered	Ongoing	Allied Pinnacle confirms that the Secretary did not require an update report on compliance with all, or any part, of the conditions of this consent, during the reporting period.	N/A
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.	Not triggered	Ongoing	Allied Pinnacle confirms that no request have been made by the Secretary during the reporting period.	N/A
Provision and Protection of Public Infrastructure					
Structural adequacy of Early Works					
Environmental Performance - Noise Impacts					

<table>
<tr><th>Condition Number</th><th>Condition</th><th>Compliance Level</th><th>Status</th><th>2023/24 Findings</th><th>Reference Documentation</th></tr>
<tr>
<td>2.3</td>
<td>The Applicant shall design, construct, operate and maintain the development to ensure that the noise contributions from the development do not exceed the maximum allowable noise contribution limits specified in Table 1, at those locations and during those periods indicated. The maximum allowable noise contributions apply under meteorological conditions of:
a) wind speed up to 3 m/s at 10 metres above ground level; or
b) temperature inversion conditions of up to 3C/100 m and wind speed up to 2 m/s at 10 metres above ground level.

Table 1 - Maximum Allowable Noise Contribution
<table>
<tr><th rowspan="2">Location</th><th colspan="2">Day
7:00am to 6:00pm Mondays to Saturdays
8:00am to 6:00pm Sundays and public holidays</th><th colspan="2">Evening
6:00pm to 10:00pm on any day</th><th colspan="3">Night
10:00pm to 7:00am Mondays to Saturdays
10:00pm to 8.00am Sundays and public holidays</th></tr>
<tr><th>$L_{Aeq(day)}$</th><th>$L_{Aeq(15\ minute)}$</th><th>$L_{Aeq(evening)}$</th><th>$L_{Aeq(15\ minute)}$</th><th>$L_{Aeq(night)}$</th><th>$L_{Aeq(15\ minute)}$</th><th>$L_{A1(1\ minute)}$</th></tr>
<tr><td>1</td><td>-</td><td>44</td><td>41</td><td>44</td><td>36</td><td>43</td><td>53</td></tr>
<tr><td>2</td><td>-</td><td>40</td><td>-</td><td>40</td><td>31</td><td>37</td><td>47</td></tr>
<tr><td>3</td><td>43</td><td>43</td><td>39</td><td>43</td><td>32</td><td>43</td><td>61</td></tr>
<tr><td>4</td><td>42</td><td>42</td><td>38</td><td>42</td><td>26</td><td>42</td><td>64</td></tr>
<tr><td>5</td><td>45</td><td>45</td><td>37</td><td>45</td><td>28</td><td>42</td><td>52</td></tr>
<tr><td>6</td><td>-</td><td>35</td><td>-</td><td>35</td><td>27</td><td>35</td><td>49</td></tr>
</table>
</td>
<td>Non-compliant</td>
<td>Ongoing</td>
<td>An operational noise monitoring survey was conducted by SLR consulting. Unattended and attended noise surveys were conducted both onsite and at noise sensitive receivers on 6 October and 10 October 2023.

The report acknowledges that Location 1 and 5 are now zoned industrial. The report concluded that the noise prediction/measurement found that:
- LAeq(daytime), LAeq(evening), LAeq(15min) and LA1(1min) noise levels at all sensitive receivers comply with the noise criteria stipulated in EPL 12498 (equivalent to Table 1 of the Approval).
- predicted LAeq(night-time) noise levels from site exceed the noise criteria at all residential receivers (hence a non-compliance was awarded for this condition).

The report also documented that at all residential receivers, the site was barely audible and dominant noises were associated with traffic on Picton/Menangle Roads, cicadas, animals, and trains. Therefore whilst the LAeq(night-time) noise criteria was exceeded, the site may not be adversely affecting the amenity of the residential receivers.</td>
<td>Compliance Survey
Operational Noise Monitoring
Allied Pinnacle Picton
SLR Project No.: 610.31209.00000
20 November 2023
Revision: v1.0</td>
</tr>
<tr>
<td>2.4</td>
<td>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) LAeq(night). At a minimum, the Applicant shall implement the following measures:
a) during the night-time all truck movement shall be in the forward direction only;
b) during the night-time all forklift movements will be limited to being within the confines of the warehouse building;
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
d) additional attenuation to the exhaust fans detailed in the document listed under condition 1.1f).
If the Applicant undertakes a noise impact assessment, in accordance with the EPA's Industrial Noise Policy, 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.</td>
<td>Compliant</td>
<td>Ongoing</td>
<td>The night time measures are documented in Table 8 of the NVMP. The quarterly inspections records confirm the operational controls are implemented.</td>
<td>Appendix A - Noise and Vibration Management Sub-Plan, V1 dated 20/07/23

Quarterly inspection records (20/6/23, 17/8/23/23, 14/11/24 and 13/2/24).</td>
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<tr>
<td>2.5</td>
<td>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 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.</td>
<td>Non-compliant</td>
<td>Ongoing</td>
<td>Measurements were conducted at closest accessible point of residential boundary as follows:

Location 2: Roughly 60m at northern side of the dwelling.
Location 3: Roughly 80m at southern side of the dwelling.
Location 4: Roughly 30m at southern side of the dwelling.
Location 5: Roughly 140m at northern side of the dwelling.
Location 6: Roughly 200m at eastern side of the dwelling.

The noise assessment methodology applied for the operational noise monitoring survey was not consistent with this condition. It was consistent with section 7.1.1 of EPA's Noise Policy for Industry (2017) however details of the alternate noise assessment method had not been submitted to the Secretary prior to the assessment (hence a non-compliance has been awarded for this condition).</td>
<td>Compliance Survey
Operational Noise Monitoring
Allied Pinnacle Picton
SLR Project No.: 610.31209.00000
20 November 2023
Revision: v1.0</td>
</tr>
</table>

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
2.6	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 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-compliant	Ongoing	Measurements were conducted at closest accessible point of residential boundary as follows: Location 2: Roughly 60m at northern side of the dwelling. Location 3: Roughly 80m at southern side of the dwelling. Location 4: Roughly 30m at southern side of the dwelling. Location 5: Roughly 140m at northern side of the dwelling. Location 6: Roughly 200m at eastern side of the dwelling. The noise assessment methodology applied for the operational noise monitoring survey was not consistent with this condition. It was consistent with section 7.1.1 of EPA's Noise Policy for Industry (2017) however details of the alternate noise assessment method had not been submitted to the Secretary prior to the assessment (hence a non-compliance has been awarded for this condition).	Compliance Survey Operational Noise Monitoring Allied Pinnacle Picton SLR Project No.: 610.31209.00000 20 November 2023 Revision: v1.0
Environmental Performance - Visual Impacts					
Environmental Performance - Soil and Water Quality Impacts					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
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).	Compliant	Ongoing	No material has been placed on land except as has been approved by this Approval. (effluent irrigation).	
2.13	Section 120 of the Protection of the Environment Operations Act 1997 must be complied with in the carrying out of the development, except as expressly provided by a licence under that Act for the development.	Compliant	Ongoing	EPL12498 does not include any licensed water discharges. The site does not discharge water under normal operating conditions attributable to the operations. Allied Pinnacle confirmed: - There has been no recorded instances of unauthorised discharges to water or pollution of waters. - There has been no recorded complaints of water discharges from the site - There has been no regulatory actions for water discharged from the site. - There has been no runoff from the irrigation area into waterways.	EPL12498 EPA Annual Return – 06/07/2022 to 07/04/2023. EPA Annual Return – 06/07/2023 to 07/04/2024. Incidents and complaints register

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
Environmental Performance - Heritage Impacts					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
2.29	Prior to the commencement of any construction works at the site, the Applicant shall 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); 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 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 affect the root zone of the tree. The Applicant shall manage the Heritage Conservation Zones in accordance with the management measures specified in the approved Cultural Heritage Management Plan.	Compliant	Ongoing	During this reporting period, Allied Pinnacle continued to monitor maintenance requirements for the heritage conservation zones. Allied Pinnacle confirmed that: • Secured Heritage Conservation Zone 1 is fenced. • The area surrounding surrounding the scarred tree (Zone 2) is fenced. • Fallen tree branch located in the Zone 2, has not been removed, as per Aboriginal stakeholder requirements. A cultural burn of the site was completed on 14-15 July 2024.	Photos sighted. Wori Wooilywa tax invoice 240705
AWTS Maintenance and Monitoring Requirements					
Environmental Performance - Traffic Impacts					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
2.40	No advertising signs or structures would be allowed within Picton Road road reserve.	Compliant	Ongoing	No advertising signs or structures are present within Picton Road Road reserve.	
Environmental Performance - Hazards and Risk Impacts					
Environmental Performance - Air Quality Impacts					
2.43	The Applicant shall design, construct, operate and maintain the development in a manner that minimises dust emissions from the site.	Compliant	Ongoing	Allied Pinnacle confirmed: - There has been no recorded complaints of dust emissions from the site - There has been no regulatory actions for dust emissions from the site.	
2.44	The raw material storage bunkers shall be maintained in a condition that effectively eliminates wind generated dust emissions.	Compliant	Ongoing	Allied Pinnacle confirmed: - There has been no recorded complaints of dust discharges from the site - There has been no regulatory actions for dust emissions from the site.	
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.	Compliant	Ongoing	Allied Pinnacle confirmed: - There has been no recorded complaints of dust discharges from the site - There has been no regulatory actions for dust emissions from the site.	
Environmental Performance - Mine Subsidence Impacts					
Environmental Performance - Waste Generation and Management					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
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 Protection of the Environment Operations Act 1997. This condition only applies to wastes for which a licence under the Protection of the Environment Operations Act 1997 is required.	Compliant	Ongoing	EPL12498 does not allow the storage, treatment, processing, reprocessing, or disposal of waste on the site. Waste is not stored, treated, processed, reprocessed, or disposed of on site.	
Environmental Monitoring and Auditing - Noise Monitoring					
Environmental Monitoring and Auditing - Air Quality Verification					
Environmental Monitoring and Auditing - Auditing					
3.3	Twelve months after the commencement of operation of the development, and every three years thereafter or as otherwise agreed or required by the 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 Environmental Audit Report shall be submitted for the approval of the Secretary within one month of the completion of the Audit. The Audit shall: a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing; b) assess compliance with the requirements of this consent, and other licences and approvals that apply to the development; 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 d) review the effectiveness of the environmental management of the development, including any environmental impact mitigation works. 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.	Not triggered	Ongoing	The three-yearly independent audit (IEA) which covers the period 23 October 2019 to October 2022 was undertaken in June 2023. A non-compliance was recorded in the previous AEMR as the IEA was not undertaken by Allied Pinnacle in a timely manner. An IEA was not due in this audit period so a "Not triggered" has been awarded.	Allied Pinnacle IEA Picton SLR reference No: 61019097-R02-v1.0.docx, August 2023

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
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 Applicants internet site, should one exist.	Compliant	Ongoing	Allied Pinnacle has not received any requests for documents to be made publicly available. Not withstanding, the following documents were publicly available via its web-site: - Picton Emergency Response Plan V02 - Picton Pollution Incident Response Management Plan - Consolidated Consent - DA - OEMP V1 dated 20/07/23 - NVMP V1 dated 20/07/23 - WMMP V1 dated 20/07/23 - TMP V1 dated 20/07/23 - CHMP V1 dated 20/07/23 - LMP V1 dated 20/07/23 - Combined Checklist V1 dated 20/07/23 - Total care Vegetation Management Plan June 06 - EPA Licence update 2018 - IEA Final Report - Allied Pinnacle Picton, March 2020 - 2022/23 AEMR Final	https://alliedpinnacle.com/whs/picton/
Community Information, Consultation and Involvement - Complaints Procedure					
4.3	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: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the EPA and the Secretary upon request.	Compliant	Ongoing	An incident and complaints database (RAPID GLOBAL) is maintained across all of Allied Pinnacle operations, which includes recording complaints. The requirements of this condition are recordable in the database. No complaints were recorded during the reporting period.	RAPID Incidents register
Environmental Management - CEMP					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
			Environmental Management - OEMP		
5.3	The Applicant shall prepare and implement an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the development. The Plan shall include, but not necessarily be limited to: 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. b) a description of the roles and responsibilities for all relevant employees involved in the operation of the development; c) overall environmental policies and principles to be applied to the operation of the development; 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; e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this consent; and f) the Management Plans listed under condition 5.4 of this consent. 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.	Compliant	Ongoing	Quarterly inspection and maintenance records confirm that the site is monitoring and implementing maintenance programs as per the plans. Please refer to Condition 5.4 for specific observations in relation to each sub-plan.	Water and soil monitoring records refer to Conditions 5.6, 5.7 and 5.8. Cultural Heritage Management Plan refer to Condition 2.29 Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).
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 implement the following Management Plans:	See below	Ongoing	See below for specific observations in relation to each sub-plan.	

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
5.4 (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: 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; 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; 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; 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; v. identification of activities that will be carried out in relation to the development and the associated noise sources; vi. proposed on-going community consultation measures; vii. development of reactive and pro-active strategies for dealing promptly with any noise complaints; viii. noise monitoring and reporting procedures.	Compliant	Ongoing	Allied Pinnacle quarterly observations confirmed the implementation of the following mitigation measures: - Operational mitigation measures including night works, bag packing works and site building facades - Maintenance of mechanical equipment - Bag packing works	Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).
5.4 (b)	A Water Monitoring and Management Plan 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: 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; 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; 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; iv. characterisation of wastewater qualities and quantities for reuse on-site and specification of wastewater reuse areas on site maps for the development; v. details of irrigation management practices to ensure there is no off-site impact through the use of treated effluent for irrigation; 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 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.	Compliant	Ongoing	Allied Pinnacle quarterly observations confirmed the implementation of the following mitigation measures: - Maintenance of hardstand area and stormwater drains - Fuel and chemical storage - AWTS - Irrigation area maintenance - Laboratory – storage and management of chemicals Refer to Conditions 5.6 to 5.9 for compliance assessment related to MOD 3.	Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).
5.4 (c)	A Traffic Management Strategy 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: i. driver training to ensure that noisy practices such as the use of compression engine brakes are avoided or minimised; ii. best exhaust emission and noise practice in the selection and maintenance of vehicle fleets; iii. speed limits to be observed along routes to and from, and within the site; iv. movement scheduling where practicable to minimise noise impacts during sensitive time of the day; v. behavioural requirements and load coverage specifications for drivers; 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 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.	Compliant	Ongoing	Allied Pinnacle quarterly observations confirmed the implementation of the following mitigation measures: - Routine traffic monitoring including speed, noise and load coverage	Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
5.4 (d)	A Cultural Heritage Management Plan 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.	Compliant	Ongoing	Allied Pinnacle quarterly observations confirmed the implementation of the following mitigation measures: - Maintenance of cultural heritage zones and control of access	Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).
5.4 (e)	A Landscape Management Plan to outline measures to ensure appropriate development and maintenance of landscaping on the site. The Plan shall include, but not necessarily be limited to: i. details of all landscaping to be undertaken on the site with specific reference to screening landscaping and the timing of landscaping works; ii. maximisation of flora species endemic to the locality in landscaping the site; iii. results of consultation with Council and the EPA to determine appropriate species for landscaping on the site; and iv. a program to ensure that all landscaped areas on the site are maintained in a tidy, healthy and weed free state.	Compliant	Ongoing	Allied Pinnacle quarterly observations confirmed the implementation of the following mitigation measures: - Routine inspection of landscaped areas for noxious weeds, litter and pooled water, bushfire risk, and buffer zones.	Quarterly inspection records (20/6/23, 17/8/23, 14/11/24 and 13/2/24).
5.5	Every three years after the commencement of operation of the development the Applicant shall undertake a formal review of the OEMP required under condition 5.3 of this consent. The review shall ensure that the OEMP is up-to-date and all changes to procedures and practices prior to the review are fully incorporated into the OEMP. The Applicant shall notify the 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.	Non-compliant	Ongoing	The OEMP including the associated sub plans were reviewed within the three year period as follows: - OEMP V1 dated 20/07/23 -NVMP V1 dated 20/07/23 -WMMP V1 dated 20/07/23 -TMP V1 dated 20/07/23 -CHMP V1 dated 20/07/23 -LMP V1 dated 20/07/23 -Combined Checklist V1 dated 20/07/23 A copy of the updated OEMP and associated sub-plans were available on the Allied Pinnacle web-page. The Department <u>was not notified</u> of the revision to the OEMP and associated management plans within the reporting period (hence a non compliance was awarded for this condition). It is noted however that the Department <u>was notified</u> of the revision to the OEMP and associated management plans on 20 September 2024 hence no further action is required.	OEMP V1 dated 20/07/23 NVMP V1 dated 20/07/23 WMMP V1 dated 20/07/23 TMP V1 dated 20/07/23 CHMP V1 dated 20/07/23 LMP V1 dated 20/07/23 Combined Checklist V1 dated 20/07/23 Allied Pinnacle letter to DPHI dated 20/9/24, Project Portal receipt 20/9/24
Dispute Resolution					
5.6	When applying effluent to land, the Applicant must ensure: a) there is no surface water runoff beyond the irrigation area as identified in Figure 1 at Appendix A of this consent; b) spray does not drift beyond the boundary of the site; and c) the quantities of nutrients, salt, hydraulic load and organic material are effectively absorbed through plant or crop production or within the soil as outlined in MOD 3, and confirmed through annual soil monitoring (refer to condition 5.9).	Compliant	Ongoing	Quarterly monitoring confirmed: - no evidence of surface water runoff beyond the irrigation area - spray does not drift beyond the boundary of the site - the stormwater diversion bank is maintained between the road and the irrigation area - There are no depressions capable of ponding water - grass is kept to below 100mm in length (except for on 18/5/23 due to excessive rain and inability to access to irrigation area without causing damage). Annual testing and historical comparisons has confirmed the irrigation area is adequately tasked with returning the hydraulic and nutrient load to the environment without affecting the sustainability of the enterprise.	Quarterly inspection records (18/5/23, 20/6/23, 17/8/23, 14/11/24 and 13/2/24). CSTS Report, Annual Review of Effluent Irrigation, Picton Mill - 330 Picton Road, Maldon NSW 258, May 2024
5.7	Within two months of the approval of MOD 3, the Applicant must ensure the irrigation area identified in Appendix A of this consent is managed and maintained as follows: 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; 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; c) the irrigation area must be regularly mowed to a length of 100 mm; and d) pasture or fodder crops must only be harvested when dry.	Compliant	Ongoing	The criteria in this condition has been incorporated in the WMMP and implemented on site as confirmed via the quarterly inspections.	OEMP Appendix B WMMP V1 dated 20/07/23 Quarterly inspection records (18/5/23, 20/6/23, 17/8/23, 14/11/24 and 13/2/24).
AWTS Maintenance and Monitoring Requirements					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
5.8	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: a) faecal coliforms, or E.coli (thermotolerant coliforms) must be less than 100 colony forming units per 100 ml in the irrigation chamber; b) dissolved oxygen in the irrigation chamber is more than 5 mg O2/L at 20 degrees Celsius; and c) free available chlorine in the irrigation chamber is between 0.01 and 2.0 mg/L.	Non-compliant	Ongoing	**Quarterly analytical results** Allied Pinnacle water results were submitted to DPE via the major projects portal dated May 2023, August 2023, November 2023, February 2024. The data determined that effluent quality was not always within the nominated parameters : a) faecal coliforms, or E.coli (thermotolerant coliforms)in the irrigation chamber was generally an order of magnitude over the target requirements (hence a non-compliance has been awarded with this condition) b) dissolved oxygen in the irrigation chamber was generally with the target requirement c) free available chlorine in the irrigation chamber was generally with the target requirement. **AWTS serviced quarterly records** AWTS serviced quarterly records were submitted to DPE via the major projects portal dated May 2022, August 2022, November 2022, February 2023, May 2023, August 2023, November 2023, February 2024. AEMR Action 2022/23 – 3 has been closed.	Project portal receipts May 2022, August 2022, November 2022, February 2023, May 2023, August 2023, November 2023, February 2024.
5.9	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: a) an annual soil monitoring program for the irrigation area in accordance with the DEC Guideline; and b) the management and monitoring requirements detailed in conditions 5.6 to 5.8 inclusive.	Compliant	Ongoing	The previous AEMRs confirmed that the WMMP (Jan 18) was amended to include MOD 3 requirements including annual soil monitoring program and management and monitoring requirements. These requirements were based on the Landfax report "Review of wastewater treatment and effluent application to land, Allied Mills Pty Ltd – Picton Mill" (2016 Review). Regarding implementation of Condition 5.9 (a). Allied Pinnacle engaged Compaction and Soil Testing Services Pty Ltd (CSTS). Soil monitoring was undertaken on 13/2/24. Regarding implementation of Condition 5.9 (b), please refer to Conditions 5.6 to 5.8 above.	OEMP Appendix B WMMP V1 dated 20/07/23 CSTS Report, Annual Review of Effluent Irrigation, Picton Mill - 330 Picton Road, Maldon NSW 258, May 2024
Environmental Reporting - Annual Performance Reporting					

Condition Number	Condition	Compliance Level	Status	2023/24 Findings	Reference Documentation
6.3	The Applicant shall, throughout the life of the development, prepare and submit for the approval of the Secretary, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the development against the Operation Environmental Management Plan (refer to condition 5.3 of this consent), the conditions of this consent and other licences and approvals relating to the development. The AEMR shall include, but not necessarily be limited to: a) details of compliance with the conditions of this consent; b) a copy of the Complaints Register (refer to condition 4.3 of this consent) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were address and resolved; c) identification of any circumstances in which the environmental impacts and performance of the development during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition 1.1 of this consent, with details of additional mitigation measures applied to the development to address recurrence of these circumstances ; d) results of all environmental monitoring required under this consent and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the development have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident. 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.	Compliant	Ongoing	During this reporting period, the 2021-22 AEMR covering the period 1 April 2021 to 30 March 2022 was prepared in accordance with this condition. No requests were made to address matters in relation to the environmental performance of the development in response to review of the Annual Environmental Report.	2022/232 Annual Environmental Monitoring Report (OptimE, September 2023).

Appendix B – Irrigation area soil monitoring - 2023 results and comparative data

(Extract from: CSTS Report, Annual Review of Effluent Irrigation, Picton Mill - 330 Picton Road, Maldon NSW 2580, May 2024, Appendix C and D)

C.S.T.S.
Compaction & Soil Testing Services Pty Ltd
1/78 Owen Street, GLENDENNING NSW 2761 • ABN 44 106 976 738
Phone: 02 9675 7522 Fax: 02 9675 7544
Email: office@csts.net.au Web: www.csts.net.au

Appendix C:
Lab Results

C.S.T.S.
Compaction & Soil Testing Services Pty Ltd
1/78 Owen Street, GLENDENNING NSW 2761 • ABN 44 106 976 738
Phone: 02 9675 7522 Fax: 02 9675 7544
Email: office@csts.net.au Web: www.csts.net.au

2023 Results

Location	Exc Al+ H	Ca		K		Mg		Na		Base Sat.	ESP	ECEC	Ca/Mg
	cmol+/ kg	mg/kg	cmol+/ kg	mg/kg	cmol+/ kg	mg/kg	cmol+/ kg	mg/kg	cmol+/ kg	%	%	cmol+/ kg	Ratio
Surface - 1	0	2400	11.78	190	0.48	330	2.75	52	0.23	100	1.5	15.2	4.3
Subsurface - 1	0	2300	11.64	91	0.23	670	5.47	150	0.67	100	3.7	18	2.1
Surface - 2	0	4000	19.72	380	0.97	500	4.1	84	0.37	100	1.5	25.2	4.8
Subsurface - 2	0	2400	11.86	150	0.39	560	4.61	140	0.61	100	3.5	17.5	2.6
Surface - 3	0	3100	15.35	450	1.16	380	3.15	54	0.24	100	1.2	19.9	4.9
Subsurface - 3	0	2400	12.16	150	0.38	460	3.77	130	0.56	100	3.3	16.9	3.2
Surface - 4	0	3800	18.94	540	1.37	500	4.14	77	0.34	100	1.4	24.8	4.6
Subsurface - 4	0	2500	12.71	200	0.5	610	5.02	120	0.53	100	2.8	18.8	2.5
Surface - 5	0	3400	16.93	510	1.31	530	4.35	34	0.15	100	0.7	22.7	3.9
Subsurface - 5	0	2300	11.52	58	0.15	570	4.65	170	0.76	100	4.4	17.1	2.5
Surface - 6	0	2600	12.87	270	0.7	410	3.41	82	0.36	100	2.1	17.3	3.8
Subsurface - 6	0	2100	10.64	130	0.33	510	4.18	150	0.64	100	4.1	15.7	2.5
Surface Mean	**0**	**3216.7**	**15.9**	**390.0**	**1.0**	**441.7**	**3.7**	**63.8**	**0.3**	**100.0**	**1.4**	**20.9**	**4.4**
Subsurface Mean	**0**	**2333.3**	**11.8**	**129.8**	**0.3**	**563.3**	**4.6**	**143.3**	**0.6**	**100.0**	**3.6**	**17.3**	**2.6**
Total Mean	**0**	**2775.0**	**13.8**	**259.9**	**0.7**	**502.5**	**4.1**	**103.6**	**0.5**	**100.0**	**2.5**	**19.1**	**3.5**

Location	pHw	pHCa	EC	OC	Bray-P	KCL 40 S	NO3-N	Cl-	Emerson Class
			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	SAR5 1ds/cm
Surface - 1	8.24	7.01	0.07	2.6	10.2	6.26	5.4	41.9	Class 5
Subsurface - 1	8.1	6.85	0.09	1.4	7.8	3.65	0.24	153	Class 4
Surface - 2	7.66	6.79	0.16	5.2	152.4	28.3	18	49.4	Class 5
Subsurface - 2	7.75	6.76	0.11	1.9	13.7	21.3	3	102	Class 4
Surface - 3	7.41	6.63	0.16	4.8	245.8	7.89	31	29.9	Class 5
Subsurface - 3	7.51	6.62	0.11	1.5	14	16.3	3.9	93.1	Class 4
Surface - 4	7.25	6.57	0.17	6.4	155.5	10.1	41	30.5	Class 5
Subsurface - 4	7.42	6.58	0.1	1.8	17.9	9.2	2.2	196	Class 4
Surface - 5	7.3	6.55	0.1	4.5	25.3	3.43	21	26.1	Class 5
Subsurface - 5	7.48	6.59	0.11	0.9	6.3	9.42	0.25	163	Class 4
Surface - 6	7.4	6.58	0.11	4.1	11.1	15.2	12	56.2	Class 4
Subsurface - 6	7.51	6.58	0.11	1.7	7.5	9.85	<0.05	17.6	Class 5
Surface Mean	**7.54**	**6.69**	**0.13**	**4.6**	**100.1**	**11.9**	**21.4**	**39.0**	-
Subsurface Mean	**7.63**	**6.66**	**0.11**	**1.5**	**11.2**	**11.6**	**1.9**	**120.8**	-
Total Mean	**7.59**	**6.68**	**0.12**	**3.1**	**55.6**	**11.7**	**12.5**	**79.9**	-

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Appendix D:
Comparative Data

Location	Exc.Al+H		Ca		K		Mg		Na		Base Sat.	ESP	CEC	Ca/Mg
Location	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	%	%	cmole+/kg	ratio
Picton-2016 - 1 surface	0.0	1501	7.5	304	0.78	305	2.5	18	0.08	100	0.7	10.9	3.0
Picton-2017 - 1 surface	0.3	2602	13	227	0.58	350	2.9	79	0.34	98.1	2.0	17.1	4.5
Picton-2018 - 1 surface	0.1	2247	11.2	174	0.45	293	2.4	96	0.42	99.5	2.9	14.6	4.6
Picton-2019 - 1 surface	0.0	2372	11.8	267	0.68	315	2.6	65	0.28	100	1.8	15.4	4.5
Picton-2020 - 1 surface	0.0	2312	11.5	370	0.95	332	2.7	92	0.40	100	2.6	15.6	4.3
Picton-2021 - 1 surface	0.0	2732	13.6	192	0.49	329	2.7	86	0.37	100	2.2	17.2	5.0
Picton-2023 - 1 surface	0.0	2400	11.96	190	0.48	330	2.75	52	0.23	100	1.6	15.2	4.3
Change	stable	stable	stable	stable	lower	stable	stable	stable	stable	stable	stable	stable	stable	

Site Location	pHwr	pHCa	EC	OC	Bray-P	KCl 40-S	NO3-N	Cl-	Emerson Class	Psorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 1 surface	6.90	6.20	0.123	7.4	4.8	12.0	4.6	28	water stable, swell Class 7	2160
Picton-2017 - 1 surface	6.98	6.31	0.083	3.1	4.1	7.1	11.0	20	water stable, no swell Class 8	1599
Picton-2018 - 1 surface	7.05	6.25	0.091	2.3	4.0	3.3	5.3	55	water stable, swell Class 7	1200
Picton-2019 - 1 surface	6.97	6.02	0.091	2.3	5.8	7.8	4.1	43	water stable, swell Class 7	1300
Picton-2020 - 1 surface	6.87	5.79	0.121	3.0	5.2	15.2	7.6	43	water stable, swell Class 7	1650
Picton-2021 - 1 surface	7.12	6.38	0.101	2.2	4.3	11.0	9.4	37	water stable, swell Class 7	960
Picton-2023 - 1 surface	5.24	7.01	0.07	2.6	10.2	6.26	5.4	41.9	Class 5	n/a
Change	higher	higher	lower	lower	higher	stable	stable	stable		

Location	Exc.Al+H		Ca		K		Mg		Na		Base Sat.	ESP	CEC	Ca/Mg
Location	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	%	%	cmole+/kg	ratio
Picton-2016 - 1 subsoil	0.1	972	4.8	82	0.21	523	4.3	8	0.04	99.2	0.4	9.5	1.1
Picton-2017 - 1 subsoil	0.2	2121	10.6	63	0.16	516	4.3	149	0.65	99.0	4.1	15.8	2.5
Picton-2018 - 1 subsoil	0.0	1810	9	58	0.15	585	4.8	197	0.86	100	5.8	14.9	1.9
Picton-2019 - 1 subsoil	0.0	1697	8.5	58	0.15	381	3.1	135	0.59	100	4.8	12.3	2.7
Picton-2020 - 1 subsoil	0.0	1409	7	42	0.11	315	2.6	131	0.57	100	5.5	10.3	2.7
Picton-2021 - 1 subsoil	0.0	1749	8.7	56	0.14	285	2.3	126	0.54	100	4.6	11.8	3.7
Picton-2023 - 1 subsoil	0.0	2300	11.64	91	0.23	670	5.47	150	0.67	100	3.7	18	2.1
Change	stable	higher	higher	higher	higher	higher	higher	stable	stable	stable	stable	higher	stable	

Site Location	pHwr	pHCa	EC	OC	Bray-P	KCl 40-S	NO3-N	Cl-	Emerson Class	Psorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 1 subsoil	7.66	6.81	0.121	1.7	0.1	21.9	0.4	51	*3/6, slake 1	20500
Picton-2017 - 1 subsoil	7.80	6.70	0.093	0.8	0.1	5.7	0.7	25	*3/6, slake 1	16400
Picton-2018 - 1 subsoil	7.75	6.71	0.073	1.1	0.1	5.8	0.4	35	*3/6, slake 1	16400
Picton-2019 - 1 subsoil	7.70	6.34	0.072	0.7	0.7	4.5	0.0	57	*3/6, slake 2	15100
Picton-2020 - 1 subsoil	7.60	5.92	0.077	0.7	0.5	7.7	0.3	36	*3/6, slake 2	11800
Picton-2021 - 1 subsoil	7.84	6.81	0.067	0.66	0.6	5.5	0.7	32	*3/6, slake 1	11200
Picton-2023 - 1 subsoil	8.1	6.85	0.09	1.4	7.8	3.65	0.24	153	Class 4	n/a
Change	higher	stable	stable	higher	higher	stable	stable	higher		

Location	Exc.Al+H		Ca		K		Mg		Na		Base Sat.	ESP	CEC	Ca/Mg
Location	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	%	%	cmole+/kg	ratio
Picton-2016 - 2 surface	0.1	2486	12.4	321	0.82	294	2.4	83	0.36	99.5	2.2	16.1	5.1
Picton-2017 - 2 surface	0.2	2826	14.1	229	0.59	386	3.2	123	0.53	99.1	2.9	18.6	4.4
Picton-2018 - 2 surface	0.2	2466	12.3	285	0.73	352	2.9	131	0.57	99.0	3.4	16.7	4.2
Picton-2019 - 2 surface	0.0	2858	14.3	272	0.70	373	3.1	130	0.57	100	3.1	18.6	4.6
Picton-2020 - 2 surface	0.0	1937	9.7	410	1.05	328	2.7	97	0.42	100	3.1	13.8	3.5
Picton-2021 - 2 surface	0.0	2793	13.9	360	0.92	385	3.2	104	0.45	100	2.4	18.5	4.4
Picton-2023 - 2 surface	0.0	4000	19.72	380	0.97	500	4.1	94	0.37	100	1.5	25.2	4.8
Change	stable	higher	higher	higher	higher	higher	higher	lower	lower	stable	lower	higher	stable	

Site Location	pHwr	pHCa	EC	OC	Bray-P	KCl 40-S	NO3-N	Cl-	Emerson Class	Psorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 2 surface	6.90	6.09	0.121	7.9	5.3	23.0	3.8	27	water stable, swell Class 7	2970
Picton-2017 - 2 surface	6.95	6.41	0.106	3.8	7.1	9.0	14.8	27	*3/6, slake 1	1560
Picton-2018 - 2 surface	6.93	6.51	0.147	2.5	3.5	10.5	18.4	114	water stable, no swell Class 8	1200
Picton-2019 - 2 surface	6.90	6.30	0.19	4.3	23.1	30.4	23.5	108	water stable, swell Class 7	1400
Picton-2020 - 2 surface	7.08	6.02	0.134	4.2	33.7	27.6	8.4	41	water stable, swell Class 7	780
Picton-2021 - 2 surface	7.24	6.58	0.129	3.06	71.2	16.1	14.9	61	water stable, swell Class 7	1470
Picton-2023 - 2 surface	7.66	6.79	0.16	5.2	152.4	28.3	18	49.4	Class 5	n/a
Change	higher	higher	stable	stable	higher	higher	stable	stable		

Location	Exc.Al+H		Ca		K		Mg		Na		Base Sat.	ESP	CEC	Ca/Mg
Location	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	cmole+/kg	mg/kg	%	%	cmole+/kg	ratio
Picton-2016 - 2 subsoil	0.1	1529	7.6	57	0.15	642	5.3	258	1.12	99.4	7.0	14.3	1.4
Picton-2017 - 2 subsoil	0.2	1906	9.5	78	0.20	604	5.0	170	0.74	99.0	4.8	15.6	1.9
Picton-2018 - 2 subsoil	0.8	1177	5.9	46	0.12	810	6.7	242	1.05	94.5	7.3	14.5	0.9
Picton-2019 - 2 subsoil	0.0	2078	10.4	83	0.21	716	5.9	213	0.93	100	5.3	17.4	1.7
Picton-2020 - 2 subsoil	0.0	1904	9.5	104	0.27	571	4.7	190	0.83	100	5.4	15.3	2.0
Picton-2021 - 2 subsoil	0.0	2273	11.3	96	0.24	691	5.7	232	1.01	100	5.5	18.3	2.0
Picton-2023 - 2 subsoil	0.0	2400	11.86	150	0.39	560	4.61	140	0.61	100	3.5	17.5	2.6
Change	stable	higher	higher	higher	higher	lower	lower	0.0	lower	stable	lower	higher	higher	

Site Location	pHwr	pHCa	EC	OC	Bray-P	KCl 40-S	NO3-N	Cl-	Emerson Class	Psorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 2 subsoil	7.66	6.70	0.142	1.9	0.1	25.0	0.1	75	*3/6, slake 1	11000
Picton-2017 - 2 subsoil	7.46	6.48	0.063	0.8	0.1	8.8	0.7	41	*3/6, slake 1	11300
Picton-2018 - 2 subsoil	5.90	5.02	0.116	0.8	0.1	33.8	1.7	59	*3/6, slake 2	11300
Picton-2019 - 2 subsoil	7.55	6.41	0.083	1.0	0.9	9.3	0.0	65	*3/6, slake 2	15600
Picton-2020 - 2 subsoil	7.10	6.07	0.13	1.4	2.6	36.1	0.5	77	*3/6, slake 1	11600
Picton-2021 - 2 subsoil	7.36	6.52	0.124	0.7	2.1	25.4	0.5	99	*3/6, slake 1	15100
Picton-2023 - 2 subsoil	7.75	6.76	0.11	1.9	13.7	21.3	3	102	Class 4	n/a
Change	stable	stable	stable	higher	higher	stable	higher	higher		

Location	Exc.Al+H		Ca		K		Mg		Na		Base Sat.	ESP	ECEC	Ca/Mg
Location	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	mg/kg	%	%	cmol+/kg	Ratio
Picton-2016 - 3 surface	0.1	2103	10.5	418	1.07	276	2.3	18	0.08	99.4	0.6	14.0	4.6
Picton-2017 - 3 surface	0.2	2542	12.7	265	0.68	275	2.3	93	0.40	98.5	2.5	16.3	5.5
Picton-2018 - 3 surface	0.0	2268	11.3	334	0.85	270	2.2	117	0.51	100	3.4	14.9	5.0
Picton-2019 - 3 surface	0.0	3011	15.0	841	2.15	476	3.9	191	0.83	100	3.8	21.9	3.8
Picton-2020 - 3 surface	0.0	2424	12.1	299	0.76	318	2.6	99	0.43	100	2.7	15.9	4.6
Picton-2021 - 3 surface	0.0	2853	14.2	254	0.65	284	2.3	116	0.50	100	2.8	17.7	6.0
Picton-2023 - 3 surface	0.0	3100	15.55	450	1.16	380	3.15	64	0.24	100	1.2	19.9	4.9
Change	stable	higher	higher	stable	stable	stable	stable	lower	stable	stable	lower	higher	stable

Location	pHw	pHCa	EC	OC	Bray-P	KCL 40 - S	NO3-N	Cl-	Emerson Class	Fsorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 3 surface	7.07	6.09	0.085	5.7	12.3	11.3	6.8	15	water stable, swell Class 7	840
Picton-2017 - 3 surface	6.52	5.96	0.096	3.7	5.5	13.3	8.8	27	water stable, swell Class 7	1590
Picton-2018 - 3 surface	6.65	5.91	0.144	2.5	4.3	12.1	17.8	109	water stable, no swell Class 8	1200
Picton-2019 - 3 surface	6.81	6.36	0.490	4.0	17.5	52.1	105.1	472	water stable, swell Class 7	1300
Picton-2020 - 3 surface	7.11	6.22	0.175	4.8	37.6	35.6	1.0	65	water stable, swell Class 7	1500
Picton-2021 - 3 surface	6.84	6.14	0.144	3.3	61.1	34.8	11.1	75	water stable, swell Class 7	1530
Picton-2023 - 3 surface	7.41	6.63	0.16	4.8	245.8	7.89	31	29.9	Class 5	n/a
Change	higher	higher	stable	stable	higher	lower	stable	stable		

Picton-2016 - 3 subsoil	0.1	1231	6.1	63	0.16	862	7.1	291	1.26	99.5	8.6	14.7	0.9
Picton-2017 - 3 subsoil	0.1	2181	10.9	91	0.23	445	3.7	185	0.81	99.5	5.1	15.7	2.9
Picton-2018 - 3 subsoil	0.0	1642	8.2	46	0.12	685	5.6	282	1.23	101	8.1	15.1	1.4
Picton-2019 - 3 subsoil	0.0	2034	10.2	83	0.21	509	4.2	197	0.86	100	5.6	15.4	2.4
Picton-2020 - 3 subsoil	0.0	1949	9.7	94	0.24	429	3.5	196	0.85	100	6.0	14.4	2.7
Picton-2021 - 3 subsoil	0.0	2218	11.1	113	0.29	462	3.8	237	1.03	100	6.4	16.2	2.9
Picton-2023 - 3 subsoil	0.0	2400	12.16	150	0.38	460	3.77	130	0.56	100	3.2	16.9	3.2
Change	stable	higher	higher	higher	higher	stable	stable	lower	lower	stable	lower	higher	higher

Picton-2016 - 3 subsoil	7.02	5.80	0.091	1.1	0.1	17.4	0.6	39	*3/6, slake 2	10000
Picton-2017 - 3 subsoil	7.72	6.65	0.087	0.5	0.1	16.5	0.7	50	*3/6, slake 1	10200
Picton-2018 - 3 subsoil	7.72	6.47	0.115	0.6	0.1	21.2	0.8	90	*3/6, slake 1	10200
Picton-2019 - 3 subsoil	7.75	6.69	0.128	0.6	1.0	20.4	0.0	100	*3/6, slake 2	11300
Picton-2020 - 3 subsoil	7.42	6.28	0.150	0.8	4.8	35.5	0.3	87	*3/6, slake 1	11100
Picton-2021 - 3 subsoil	7.62	6.70	0.127	0.5	3.6	28.7	0.4	75	*3/6, slake 1	10100
Picton-2023 - 3 subsoil	7.51	6.62	0.11	1.5	14	16.3	3.9	93.1	Class 4	n/a
Change	stable	stable	stable	higher	higher	lower	higher	stable		

Picton-2016 - 4 surface	0.1	2079	10.4	289	0.74	294	2.4	27	0.12	99.4	0.9	13.7	4.2
Picton-2017 - 4 surface	0.2	2334	11.7	260	0.66	291	2.4	64	0.28	98.9	1.8	15.1	4.8
Picton-2018 - 4 surface	0.2	2042	10.2	272	0.70	295	2.4	100	0.43	98.8	3.1	13.9	4.1
Picton-2019 - 4 surface	0.0	2516	12.6	469	1.2	362	3.0	49	0.21	100	1.3	17.0	4.2
Picton-2020 - 4 surface	0.0	2067	10.3	467	1.19	363	3.0	90	0.39	100	2.6	14.9	3.4
Picton-2021 - 4 surface	0.0	2534	12.6	278	0.71	308	2.5	104	0.45	100	2.8	16.3	4.9
Picton-2023 - 4 surface	0.0	3800	18.94	640	1.57	500	4.14	77	0.34	100	1.4	24.8	4.6
Change	stable	higher	higher	higher	higher	higher	higher	stable	stable	stable	stable	higher	stable

Picton-2016 - 4 surface	6.72	5.94	0.086	5.5	2.2	6.4	22.0	9	*3/6, slake 1	2700
Picton-2017 - 4 surface	6.80	6.31	0.070	2.6	5.4	7.5	7.3	20	*3/6, slake 1	4500
Picton-2018 - 4 surface	6.60	6.10	0.117	2.7	3.7	10.7	15.0	76	water stable, swell Class 7	1100
Picton-2019 - 4 surface	6.50	5.97	0.157	4.0	22.0	22	1.9	40	water stable, swell Class 7	1000
Picton-2020 - 4 surface	7.03	6.25	0.116	4.7	34.0	16.5	2.4	41	water stable, swell Class 7	780
Picton-2021 - 4 surface	6.94	6.22	0.114	2.0	21.6	16.1	8.2	45	water stable, swell Class 7	2280
Picton-2023 - 4 surface	7.25	6.57	0.17	6.4	155.5	10.1	41	30.5	Class 5	n/a
Change	higher	higher	higher	higher	higher	stable	higher	stable		

Picton-2016 - 4 subsoil	0.1	1512	7.5	53	0.13	627	5.2	132	0.58	99.4	4.3	13.5	1.4
Picton-2017 - 4 subsoil	0.2	1884	9.4	55	0.14	503	4.1	133	0.58	98.9	3.0	14.4	2.2
Picton-2018 - 4 subsoil	0.2	1554	7.8	47	0.12	669	5.5	248	1.08	98.9	7.4	14.6	1.4
Picton-2019 - 4 subsoil	0.0	1641	8.2	61	0.16	615	5.1	198	0.86	100	6.0	14.3	1.6
Picton-2020 - 4 subsoil	0.0	1929	9.6	83	0.21	570	4.7	159	0.69	100	4.5	15.2	2.0
Picton-2021 - 4 subsoil	0.0	2139	10.7	146	0.37	556	4.6	145	0.63	100	3.9	16.3	2.3
Picton-2023 - 4 subsoil	0.0	2500	12.71	200	0.5	610	5.02	120	0.53	100	2.8	18.5	2.5
Change	stable	higher	higher	higher	higher	stable	stable	lower	lower	stable	lower	higher	higher

Picton-2016 - 4 subsoil	7.62	6.40	0.052	0.8	0.1	4.8	0.1	22	*3/6, slake 2	11200
Picton-2017 - 4 subsoil	7.70	6.57	0.046	0.4	0.1	5.2	0.4	17	*3/6, slake 1	7800
Picton-2018 - 4 subsoil	7.62	6.43	0.083	0.7	0.1	7.3	0.9	77	*3/6, slake 1	7800
Picton-2019 - 4 subsoil	7.69	6.50	0.075	0.6	1.1	4.2	0.0	80	*3/6, slake 1	10300
Picton-2020 - 4 subsoil	7.47	6.34	0.098	1.0	2.9	17.8	0.0	57	*3/6, slake 1	10300
Picton-2021 - 4 subsoil	7.62	6.62	0.071	0.5	2.0	9.9	0.5	41	*3/6, slake 1	9800
Picton-2023 - 4 subsoil	7.42	6.55	0.1	1.6	17.9	9.2	2.2	196	Class 4	n/a
Change	lower	higher	higher	higher	higher	stable	higher	higher		

Location	Exc. Al+H		Ca		K		Mg		Na		Base Sat.	ESP	ECEC	Ca/Mg
Location	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	mg/kg	cmol+/kg	%	%	cmol+/kg	Ratio	
Picton-2016 - 5 surface	0.1	2030	10.1	469	1.20	306	2.5	41	0.18	99.4	1.3	14.1	4	
Picton-2017 - 5 surface	0.2	3006	15.0	332	0.85	446	3.7	101	0.44	98.8	2.2	20.2	4	
Picton-2018 - 5 surface	0.2	2233	11.1	310	0.79	346	2.8	81	0.35	99.0	2.3	15.3	3.9	
Picton-2019 - 5 surface	0.0	2454	12.3	389	0.99	398	3.3	57	0.25	100	2.5	16.8	3.7	
Picton-2020 - 5 surface	0.0	2212	11.0	577	1.48	403	3.3	137	0.60	100	3.6	16.4	3.3	
Picton-2021 - 5 surface	0.0	2923	14.6	297	0.76	385	3.2	114	0.49	100	2.6	19.0	4.6	
Picton 2023 - 5 Surface	0.0	3400	16.93	510	1.31	530	4.35	34	0.15	100	0.7	22.7	3.9	
Change	stable	higher	higher	higher	higher	higher	higher	lower	lower	stable	lower	higher	stable	

Location	pHw	pHCa	EC	OC	Bray-P	KCL 40 - 4	NO3-N	Cl-	Emerson Class	Psorption
Sample			dS/m	%	mg/kg	mg/kg	mg/kg	mg/kg	in SARS, EC1dS/m	
Picton-2016 - 5 surface	7.12	6.24	0.101	0.4	7.4	9.9	3.9	13	*3/6, slake 1	2700
Picton-2017 - 5 surface	6.95	6.45	0.135	4.9	12.0	12.0	17.7	43	water stable, swell Class 7	2600
Picton-2018 - 5 surface	6.75	6.17	0.101	2.7	3.9	4.1	16.3	42	water stable, swell Class 7	600
Picton-2019 - 5 surface	6.88	6.30	0.110	3.2	11.2	14.5	6.3	58	water stable, swell Class 7	1100
Picton-2020 - 5 surface	7.17	6.33	0.167	5.1	29.1	42.9	6.5	55	water stable, swell Class 7	1470
Picton-2021 - 5 surface	7.24	6.61	0.128	2.9	42.8	21.0	9.7	55	water stable, swell Class 7	1530
Picton 2023 - 5 Surface	7.3	6.56	0.1	4.6	25.3	3.43	21	26.1	Class 5	n/a
Change	higher	higher	stable	stable	stable	lower	higher	lower		

Picton-2016 - 5 subsoil	0.1	1720	8.6	64	0.16	617	5.1	240	1.04	99.5	7.0	14.9	1.7
Picton-2017 - 5 subsoil	0.2	2400	12.0	77	0.2	392	3.2	155	0.67	99.0	4.2	16.2	3.7
Picton-2018 - 5 subsoil	0.1	1631	8.1	41	0.11	727	6.0	249	1.08	99.5	7.0	15.4	1.3
Picton-2019 - 5 subsoil	0.0	1793	9.0	73	0.19	639	5.3	212	0.92	100	6.0	15.3	1.7
Picton-2020 - 5 subsoil	0.0	1937	9.1	79	0.20	424	3.5	137	0.59	100	4.3	14.0	2.7
Picton-2021 - 5 subsoil	0.0	2269	11.8	96	0.25	495	4.1	150	0.65	100	4.0	16.3	2.7
Picton 2023 - 5 subsoil	0.0	2300	11.52	58	0.15	570	4.65	170	0.76	100	4.4	17.1	2.6
Change	stable	higher	higher	stable	stable	stable	stable	stable	stable	stable	stable	higher	stable

Picton-2016 - 5 subsoil	7.63	6.62	0.126	0.0	0.1	6.3	0.1	93	*3/6, slake 1	10300
Picton-2017 - 5 subsoil	7.78	6.70	0.061	1.0	0.1	6.9	0.9	25	*3/6, slake 1	9500
Picton-2018 - 5 subsoil	7.47	6.54	0.126	0.6	0.1	4.2	0.0	178	*3/6, slake 1	9500
Picton-2019 - 5 subsoil	7.57	6.56	0.100	0.6	0.7	8.1	0.0	127	*3/6, slake 2	10900
Picton-2020 - 5 subsoil	7.51	6.39	0.104	0.7	2.0	25.3	0.0	46	*3/6, slake 1	10800
Picton-2021 - 5 subsoil	7.97	6.82	0.078	0.4	6.5	11.4	0.6	49	*3/6, slake 1	
Picton 2023 - 5 subsoil	7.48	6.59	0.11	0.9	6.3	9.42	0.25	163	Class 4	n/a
Change	lower	stable	stable	higher	higher	stable	stable	higher		

Picton-2016 - 6 surface	0.1	2638	13.2	328	0.84	355	2.9	82	0.36	99.5	2.0	17.4	4.5
Picton-2017 - 6 surface	0.2	2846	14.2	310	0.79	390	3.2	105	0.46	99.1	2.4	18.8	4.4
Picton-2018 - 6 surface	0.2	2482	12.4	281	0.72	332	2.7	118	0.52	99.5	3.1	16.4	4.5
Picton-2019 - 6 surface	0.0	2150	10.7	204	0.52	307	2.5	114	0.5	100	3.5	14.3	4.2
Picton-2020 - 6 surface	0.0	2265	11.3	622	1.59	415	3.4	158	0.69	100	4.0	17.0	3.3
Picton-2021 - 6 surface	0.0	3226	16.1	406	1.04	422	3.5	123	0.54	100	2.5	21.1	4.6
Picton 2023 - 6 surface	0.0	2600	12.97	270	0.7	410	3.41	82	0.36	100	2.1	17.3	3.8
Change	stable	stable	stable	stable	stable	stable	higher	lower	lower	stable	lower	stable	lower

Picton-2016 - 6 surface	7.05	6.35	0.155	1.1	10.4	24.7	5.2	44	water stable, swell Class 7	5300
Picton-2017 - 6 surface	7.00	6.47	0.114	3.5	4.8	10.8	15.2	37	water stable, swell Class 7	4700
Picton-2018 - 6 surface	6.91	6.35	0.095	2.8	9.5	15.4	2.5	53	water stable, swell Class 7	1100
Picton-2019 - 6 surface	7.37	6.60	0.104	1.7	5.2	7.9	9.9	54	water stable, swell Class 7	1400
Picton-2020 - 6 surface	7.14	6.38	0.165	4.7	23.8	26.3	9.5	69	water stable, swell Class 7	1650
Picton-2021 - 6 surface	7.18	6.49	0.144	3.8	65.3	20.7	15.7	62	water stable, swell Class 7	1410
Picton 2023 - 6 surface	7.4	6.58	0.11	4.1	11.1	19.2	12	58.2	Class 4	n/a
Change	higher	higher	stable	stable	stable	stable	stable	stable		

Picton-2016 - 6 subsoil	0.1	1056	5.3	62	0.16	813	6.7	303	1.32	99.4	9.7	13.5	0.8
Picton-2017 - 6 subsoil	0.1	1951	9.7	103	0.26	433	3.6	125	0.54	99.4	3.8	14.2	2.7
Picton-2018 - 6 subsoil	0.0	1590	7.9	52	0.13	847	7.0	249	1.08	100	6.7	16.1	1.1
Picton-2019 - 6 subsoil	0.0	1745	8.7	82	0.21	646	5.3	187	0.82	100	5.4	15.0	1.6
Picton-2020 - 6 subsoil	0.0	1928	9.6	200	0.51	481	4.0	162	0.71	100	4.8	14.8	2.4
Picton-2021 - 6 subsoil	0.0	1829	9.1	109	0.28	494	4.1	174	0.76	100	5.3	14.2	2.2
Picton 2023 - 6 subsoil	0.0	2100	10.64	130	0.33	910	7.28	150	0.66	100	4.1	15.7	2.5
Change	stable	stable	stable	stable	stable	stable	stable	stable	stable	stable	stable	stable	stable

Picton-2016 - 6 subsoil	6.47	5.56	0.149	0.0	0.1	40.0	0.0	60	*3/6, slake 1	11100
Picton-2017 - 6 subsoil	7.66	6.62	0.055	0.6	0.1	5.8	1.1	35	*3/6, slake 1	9900
Picton-2018 - 6 subsoil	7.52	6.43	0.079	0.5	0.1	7.8	0.0	75	*3/6, slake 1	9900
Picton-2019 - 6 subsoil	7.71	6.64	0.076	0.7	1.2	8.0	0.0	69	*3/6, slake 1	10200
Picton-2020 - 6 subsoil	7.52	6.44	0.102	1.1	1.7	14.6	0.0	71	*3/6, slake 1	11000
Picton-2021 - 6 subsoil	7.70	6.73	0.089	0.5	2.4	18.5	0.6	59	*3/6, slake 2	8100
Picton 2023 - 6 subsoil	7.51	6.58	0.11	1.7	7.5	9.85	<0.05	17.6	Class 5	n/a
Change	stable	stable	stable	stable	higher	stable	stable	stable		

OptimE Pty Ltd

Allied Pinnacle, Picton Mill

2023/24 Annual Environmental Management Report

Document Control

Revision	Date	Author	Reviewer	Approved
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