



## Noise Management Plan

ReDirect Recycling Pty Ltd  
Resource Recovery and Recycling Facility

25 Dunheved Circuit St Marys, NSW

**Date:** 10/08/2022

**Prepared by:** EMM Consulting

**Version:** Rev 1

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# 1 Introduction

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## 1.1 Project Approval

This Noise Management Plan (NMP) has been prepared by EMM Consulting Pty Ltd (EMM) on behalf of ReDirect Recycling Pty Ltd (ReDirect Recycling), for the operation of a Resource Recovery and Recycling Facility (the Facility) located at 25 Dunheved Circuit, St Marys, NSW (the Subject Site).

Consent for State Significant Development 10474 (SSD-10474) was granted by the NSW Department of Planning and Environment (DPE) on 30 September 2021. See Attachment 1 of the OEMP for Consolidated Conditions of Approval (COA) for SSD-10474.

Approval for SSD-10474 permitted the operation of a resource recovery facility to process up to 150,000 tonnes per year of waste comprising of:

- 110,000 tonnes per annum (tpa) of wood and timber waste.
- 30,000 tpa of plasterboard.
- 10,000 tpa of metal waste.

See **Section 4** for further information relating to the final facility design approved under SSD-10474.

## 1.2 Project Description

The main waste types and materials to be accepted at the site will include:

- Wood and timber waste;
- Plasterboard; and
- Metal waste.

The recovered resources will be transferred either directly to end use markets or to other facilities or processors for value adding to achieve maximum value for the beneficial use.

This OEMP covers facility operations conducted under SSD-10474. Processing of waste material will occur within the existing building, with the majority of the processed wood waste to be transferred by trucks to the Borg Manufacturing site in Oberon to be used in the manufacture of particleboard and MDF.

No additional buildings or structures are proposed from those currently on site, with the primary physical works relating to the installation of new plant and equipment within the existing building to facilitate the proposed expansion of operations.

Facilities covered under this OEMP include:

- Two in-ground 20m weighbridges (one for in-bound vehicles, one for out-bound vehicles);
- Concrete tilt panel and metal clad warehouse building with internal floor area of approximately 3,500m<sup>2</sup> and ridge height of 11.9m;
- Office and amenities building with a floor space of 152m<sup>2</sup> and a height of 4.6m;
- External areas sealed with concrete hardstand, including 10 car parking spaces; and
- Water tanks to capture rainwater from the warehouse building and a sprinkler pump room.

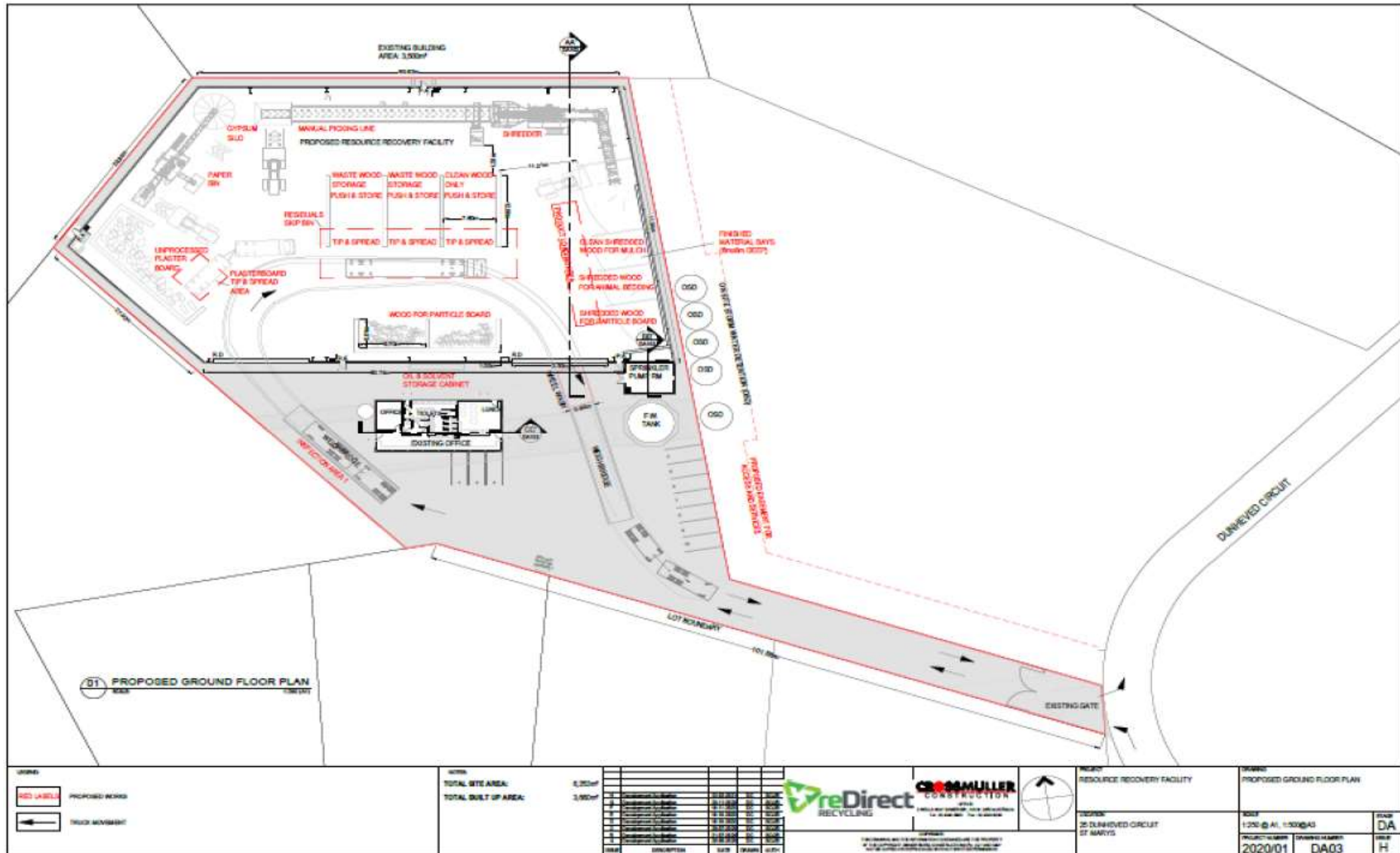


Figure 1: Extent of Facility Operating.

## 1.3 Site Location

The Facility is located at 25 Dunheved Circuit, St Marys, identified as Lot 143 in DP 1013185 in the Penrith Local Government Area (LGA). The Facility is located in the St Marys Industrial Estate, an industrial area zoned IN1 General Industrial and is surrounded by a mix of industrial premises. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the Protection of the Environment Operations Act 1997 (POEO Act).

The development is surrounded by existing manufacturing, processing, and heavy industry businesses, with the nearest residential dwellings located approximately 1.3 km east and 1.3 km west of the site in the suburbs of Ropes Crossing and Werrington County respectively.

## 1.4 Land Ownership

The subject site is currently owned by BM Property Investments Pty Limited, however in this instance the sole Applicant was reDirect Recycling. Owner's consent has been obtained for the lodgement of the approved Development Applications (DAs) and supporting documentation.

Operation of the Facility will be undertaken by reDirect Recycling.

## 2 Site Processing

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The key processes at the site are detailed below.

### 1. Weighing loads at the weighbridge and data recording

Vehicles enter via Dunheved Circuit. All vehicles transporting recyclable material to site will be required to stop at the in-bound weighbridge and be weighed. The weighbridge operator will inspect the loads for obvious contamination. Contaminated loads will be rejected and instructed to leave the site without unloading.

The weighbridge docket will contain the following information: Date; Gross, tare and net weights; Product description; Origin; Supplier (if necessary i.e. different from origin); Carrier; Truck registration; Drivers name and signature and other details as per the EPA's Benchmark Weighbridge Requirements (see OEMP Attachment 8 – Weighbridge Management Procedure). This information will be used to submit the monthly WARRP report.

Accepted vehicles are directed to the waste tipping area inside the warehouse.

### 2. Tipping and inspection of waste

The incoming loads of wood waste will be tipped onto the floor in designated areas in the centre of the warehouse (Tip and Spread Inspection 2 Area in **Figure 1**). The waste will be spread to 100mm thick and inspected for contaminants and other non-conforming materials. Plasterboard materials will be tipped into the designated area adjacent the western entrance to the shed (Tip and Spread Inspection 2 Area in **Figure 1**).

### 3. Removal of contaminants and sorting of waste

For loads with only a small amount of contaminants, the contaminants will be picked out and placed in a “residuals” skip bin for disposal off-site. Loads with large amounts of contamination will be immediately re-loaded and removed from site by the delivering vehicle. If necessary, a quarantine area has been allocated against the western wall of the warehouse for storing non-conforming waste awaiting removal from site.

Material will be sorted, by hand and by machine, into material types.

### 4. Processing of conforming material

Limited processing will occur. Size reduction will be performed using the excavator or shredder to facilitate efficient transport of processed materials to off-site markets (refer to **Figure 1**).

### 5. Storage

Clean, sorted material will be transferred to a designated storage area. The storage area for outgoing product is marked in **Figure 1**, along the eastern wall of the warehouse. Bays will be signposted for easy identification.

### 6. Loading and transfer of material off-site

Products will be loaded from the storage bays into vehicles using a front-end loader. Loaded vehicles will exit the warehouse in the forward direction via the eastern door, then exit the site via the outbound weighbridge. Vehicles are weighed on the way out. Vehicles exit the site via Dunheved Circuit in the forward direction.

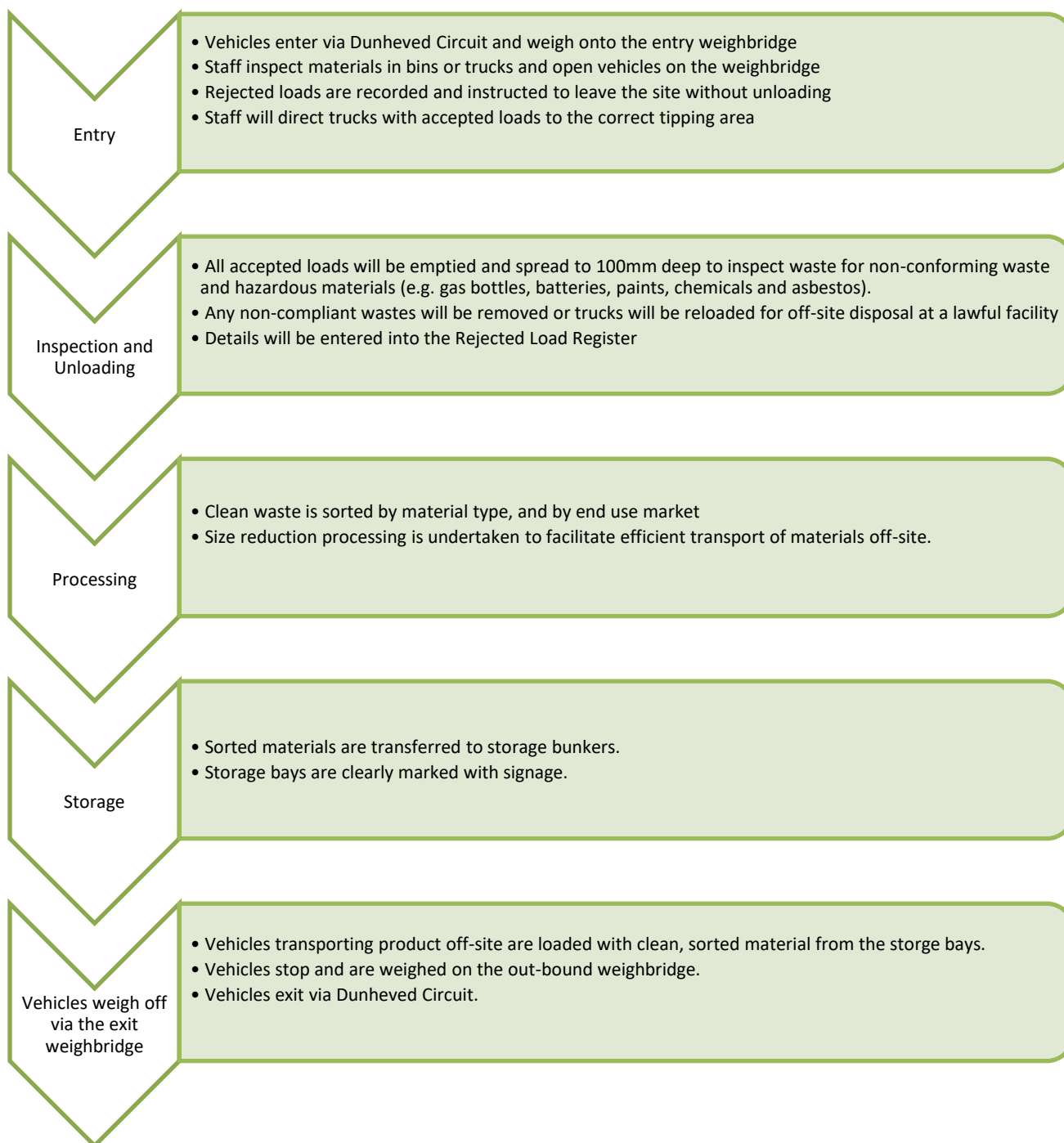


Figure 2.Process flow chart for the operation of the Recycling Facility.



# 3 Scope & Objectives

## 3.1 NMP Scope

This NMP has been prepared to address Schedule 2, Condition B29 of SSD-10474, whereby:

*Prior to the commencement of the development, the Applicant must prepare an Operational Noise Management Plan (ONMP) for the development to the satisfaction of the Planning Secretary. The ONMP must form part of the OEMP required by Condition C2 and be prepared in accordance with Condition C1. The ONMP must:*

- a) *be prepared by a suitably qualified and experienced noise expert;*
- b) *describe the measures to be implemented to manage noise generating activities during operation; and*
- c) *include a complaints management system that would be implemented for the duration of the development.*

In addition, this NMP has been prepared to satisfy Management Plan requirements under Schedule 2, Condition C1, which states:

*Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:*

- a) *details of:*
  - a) *the relevant statutory requirements (including any relevant approval, licence or lease conditions);*
  - b) *any relevant limits or performance measures and criteria; and*
  - c) *the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;*
- b) *a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;*
- c) *a program to monitor and report on the:*
  - a) *impacts and environmental performance of the development; and*
  - b) *effectiveness of the management measures set out pursuant to paragraph (c) above;*
- d) *a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;*
- e) *a program to investigate and implement ways to improve the environmental performance of the development over time;*
- f) *a protocol for managing and reporting any:*
  - a) *incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);*
  - b) *complaint;*
  - c) *failure to comply with statutory requirements; and*
- g) *a protocol for periodic review of the plan.*

Additional SSD-10474 COA referenced under this NMP are provided in **Section 3.2**.

## 3.2 SSD-10474 Conditions of Approval

**Table 1** below lists conditions under the SSD-10474 Consolidated COA that are addressed under this Facility Operational NMP.

**Table 1 Conditions relevant to this NMP under the SSD -10474 Consolidated COA**

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN NMP										
SSD-10474	B27	<p>The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.</p> <table border="1" data-bbox="497 1809 1235 2002"> <caption>Table 2 Noise Limits dB(A)</caption> <thead> <tr> <th>Location</th> <th>Day Liang (6 mins)</th> <th>Evening Liang (6 mins)</th> <th>Night Liang (6 mins)</th> <th>Night Liang</th> </tr> </thead> <tbody> <tr> <td>All residential receivers</td> <td>49</td> <td>43</td> <td>38</td> <td>52</td> </tr> </tbody> </table> <p><small>Note: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.</small></p>	Location	Day Liang (6 mins)	Evening Liang (6 mins)	Night Liang (6 mins)	Night Liang	All residential receivers	49	43	38	52	8.2.1
Location	Day Liang (6 mins)	Evening Liang (6 mins)	Night Liang (6 mins)	Night Liang									
All residential receivers	49	43	38	52									

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN NMP
SSD-10474	B28	Prior to the commencement of operation of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must implement the Code of Conduct for the life of the development.	6
SSD-10474	B29	<p>Prior to the commencement of the development, the Applicant must prepare an Operational Noise Management Plan (ONMP) for the development to the satisfaction of the Planning Secretary. The ONMP must form part of the OEMP required by Condition C2 and be prepared in accordance with Condition C1. The ONMP must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced noise expert;</li> <li>(b) describe the measures to be implemented to manage noise generating activities during operation; and</li> <li>(c) include a complaints management system that would be implemented for the duration of the development</li> </ul>	This NMP
SSD-10474	C1	<p><i>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</i></p> <ul style="list-style-type: none"> <li>a) <i>details of:</i> <ul style="list-style-type: none"> <li>i) <i>the relevant statutory requirements (including any relevant approval, licence or lease conditions);</i></li> <li>ii) <i>any relevant limits or performance measures and criteria; and</i></li> <li>iii) <i>the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;</i></li> </ul> </li> <li>b) <i>a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</i></li> <li>c) <i>a program to monitor and report on the:</i> <ul style="list-style-type: none"> <li>i) <i>impacts and environmental performance of the development; and</i></li> <li>ii) <i>effectiveness of the management measures set out pursuant to paragraph (c) above;</i></li> </ul> </li> <li>d) <i>a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</i></li> <li>e) <i>a program to investigate and implement ways to improve the environmental performance of the development over time;</i></li> <li>f) <i>a protocol for managing and reporting any:</i> <ul style="list-style-type: none"> <li>i) <i>incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</i></li> <li>ii) <i>complaint;</i></li> <li>iii) <i>failure to comply with statutory requirements; and</i></li> </ul> </li> <li>g) <i>a protocol for periodic review of the plan.</i></li> </ul>	Whole of this NMP

### 3.3 NMP Objectives

The key objective of this ONMP is to ensure no noise annoyance or sleep disturbance for any residential receptor near the Facility. It should be noted this should be achieved by compliance with regulatory limits, that is, noise at those levels are usually acceptable for 'the reasonable person'.

## 3.4 Environmental Protection Licence (EPL 21487)

The Facility is currently managed subject to the provisions of an Environmental Protection Licence (EPL 21487), administered under Section 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) and issued as per Section 48 of the POEO Act for the following scheduled activities:

- Resource recovery.
- Waste storage.

EPL 21487 was issued on 22 April 2021 for the following fee-based activities:

- Recovery of general waste.
- Waste storage – other types of waste.

This NMP (and overarching OEMP) have been prepared with reference to management and reporting requirements under EPL 21487.

## 4 Development description

### 4.1 Facility Description

Consent for SSD-10474 was initially granted by NSW DPE on 30 September 2021.

**Table 2** provides a summary of key components of the Facility as approved under SSD-10474.

**Table 2: Summary of SSD-10474**

ELEMENT	SSD-10474
Use	Waste or resource management facility, specifically a resource recovery facility.
Processing Capacity	Total of up to 150,000 tonnes per annum (tpa) made up of: <ul style="list-style-type: none"> <li>[a] 110,000 tpa of wood and timber waste.</li> <li>[b] 30,000 tpa of plasterboard waste.</li> <li>[c] 10,000 tpa of metal waste.</li> </ul>
Site Area	Site and development footprint measures approximately 6,253 square metres (m <sup>2</sup> ).
Hours of Operation	24 hours / day during operation.
Receival / Dispatch Area	Inbound and outbound weighbridge (20 m), main administration office including staff amenities and car parking.
Processing Plant and Equipment and existing site buildings	Enclosed shed containing processing plant and equipment, including truck unloading area. Shed area, 3,455 m <sup>2</sup> . Industrial woodchipper/shredder/grinder. Manual picking station. Turbo separator. Loaders and excavators.
Water storage and treatment	<ul style="list-style-type: none"> <li>• Stormwater is collected in four (4) 50kL hydraulically linked on-site detention (OSD) tanks.</li> <li>• Warehouse roof space and all hardstand areas all drain into a Ecosol GPT 4200 gross pollutant trap prior to draining onto receiving environments.</li> <li>• Ecosol GPT 4200 gross pollutant trap will be located adjacent to the inbound roller door on the western boundary of the site</li> <li>• Above ground wheel wash will be installed in the outbound lane of the driveway to remove dust and sediment from heavy vehicles leaving the site.</li> </ul>
Received wastes	<ul style="list-style-type: none"> <li>• Urban and natural wood wastes (MDF off-cuts, raw wood offcuts, clean pallets, LOSP pine, engineered wood products, particleboard).</li> <li>• Separated timber/wood waste from waste facilities.</li> <li>• Plasterboard (pre-sorted) from construction sites and waste facilities.</li> <li>• Steel components removed from the processing of pallets</li> <li>• Clay/Sands/Stone/Gravels/Aggregates (VENM).</li> </ul>
Finished products	Finished Products include: <ul style="list-style-type: none"> <li>• Shredded wood for resource recovery.</li> <li>• Processed plasterboard.</li> <li>• Recovered ferrous and non-ferrous metals.</li> </ul>
Traffic Generation	Up to 126 movements per day.
Workforce	Up to 10 construction jobs over three months period. Up to 10 operational jobs.

#### 4.1.1 Operating hours

**Table 3** provides the approved operational hours.

**Table 3 Operational Hours as approved under SSD-10474-Mod-2.**

OPERATION	RECEIVAL	DISPATCH	PROCESSING
Receival, processing and loading of trucks	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours

Despite the Facility largely being permitted to operate 24 hours a day, seven (7) days a week, Condition B26 allows for construction works listed below to occur outside the hours specified in **Table 3**:

- Works that are inaudible at the nearest sensitive receivers;
- works agreed to in writing by the Secretary;
- for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or where it is required in an emergency to avoid the loss of lives, property and /or prevent environmental harm.

## 4.2 Key contact details

**Table 4** lists the key contacts for the Facility.

**Table 4 Resource Recovery and Recycling Facility Contact Details.**

LOCATION / PERSONNEL	CONTACT DETAILS
St Marys Resource Recovery and Recycling Facility	1300 001 306
Customer Inquiries	Wella Way Head Office 02 4340 9800
Complaints and Feedbacks	Wella Way Head Office 02 4340 9800

**Table 5** lists the contact details for the regulatory authorities that have an interest in the operations of the Facility.

**Table 5 Regulatory Authority Contact List.**

REGULATORY AUTHORITY	CONTACT DETAILS
Department of Planning and Environment (DPE) Head Office - Parramatta	Ph: 1300 420 596 (Planning) Ph: (02) 9338 6600 (Industry) Ph: 1300 361 967 (Environment, Energy and Science) info@planning.nsw.gov.au
Environment Protection Authority (EPA) Environment Line	131 555 or 02 9995 5555 info@epa.nsw.gov.au
Penrith City Council	(02) 4732 7777 council@penrith.city
SafeWork NSW Incident notification	13 10 50
Fire and Rescue NSW	St Marys Fire Station (permanently staffed): 02 9623 3897 Ropes Crossing Fire Station (retained staff): 02 9628 0661
NSW Police and / or NSW Ambulance Service	000

## 5 Legislative and Statutory Framework.

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### 5.1 Legislation

Legislation relevant to noise management includes:

- *Protection of the Environment Operations Act 1997 (POEO Act);*
- *Protection of the Environment Operations (General) Regulation 2009;*

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in the OEMP.

### 5.2 Guidelines and Standards

The main guidelines, specifications and policy documents relevant to this NMP include:

- Noise Policy for Industry (NPfI) 2017
- AS1055 2018 Description and measurement of environmental noise

## 6 Inductions and Training

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reDirect Recycling management will ensure that all employees and contractors involved with the operations of the Facility are suitably inducted and trained prior to commencing any work on site. Training in relation to environmental responsibilities relevant to this NMP will take place initially through a site induction and then on an on-going basis through “toolbox talks” (or similar) as detailed in section 3.6 of the OEMP.

Heavy vehicle drivers hauling to and from the site have to comply agree to and comply with a driver code of conduct. That document includes measures to minimise noise annoyance from truck movements.

## 7 Mitigation Measures

In addition to procedural items stated in the preceding Sections of this NMP, mitigation measures stated under **Table 6** below will be applied for the duration of operation for the Facility.

**Table 6: Noise management and mitigation measures to be applied to the Facility**

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
Noise from processing waste materials	All processing and handling will occur inside the warehouse	Site Manager	At all times
	Warehouse roller doors will be kept shut as much as possible	Site Manager	Whenever possible
Noise from vehicles	Engines and plant to be switched off when not in use	All staff	As required
	Vehicles and plant to be fitted with pollution reduction devices where practicable	Site Manager	At all times
	Vehicles and plant to be maintained in accordance with manufacturers specifications	Site Manager	At all times
	Vehicles restricted to designated routes	Drivers	At all times
	On-site speed limits enforced	Site Manager	At all times



## 8 Incidents and Complaints

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### 8.1 Incident Management

The management of environmental incidents, including potential pollution incidents, will be undertaken as outlined under Section 6.2 of the Facility OEMP.

Incident reporting will occur as outlined under Section 6.2.2 of the Facility OEMP. In accordance with Condition C7 and Appendix 3 of SSD-10474, **within 7 days of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment**, a report shall be supplied to DPE outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Secretary no later than 30 days after the incident or potential incident.

### 8.2 Complaint Management

A community complaints handling process has been developed to ensure all environmental complaints regarding the operation of the Facility are promptly and effectively received, handled, and addressed.

reDirect Recycling is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of a complaint. All employees and contractors who receive a complaint, either verbal or written, are to immediately notify Site Management.

Community complaints relating to the Facility can be received via:

- reDirect Recycling company or site office;
- reDirect Recycling Complaints and Feedback number – 02 4340 9800 (BORG Group Head Office).
- reDirect Recycling Internet enquiry - TBC and/or; and
- Through a government agency (i.e. Council or EPA).

#### 8.2.1 Complaint Handling Procedure

Upon becoming aware of a complaint, reDirect Recycling Site Management are to follow the below process.

##### **Receive**

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

While this should instigate investigative action, a formal written complaint should be requested. Where the initial contact reaches an employee or contractor who is not a representative of Site Management, the call should be directed to Site Management. If unavailable, the complainant's details should be taken with a view to responding once Site Management is in a position to discuss the matter.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note should be made on the form and complainant advised of same. The date and time of the complaint will also be recorded along with the method the complaint was made.

##### **Assistance**

Where assistance is required handling the situation, reDirect Recycling Management should be contacted. Where the complaint is reported via a government agency (i.e. Council or the EPA), reDirect Recycling's Operations Manager must be notified immediately (even if outside of normal business hours).

##### **Investigate**

A field investigation should be initiated in an attempt to establish complaint legitimacy and the problem cause. reDirect Recycling's Management should be consulted to identify any abnormality or incident that may have resulted in the complaint. Details may include heavy vehicle activity, equipment and machinery activities, etc.

If the complaint is due to an environmental incident, the management strategy outlined in Section 6 should be followed, and if the incident has caused or threatens to cause material harm to the environment each of the relevant regulatory agencies must be immediately notified.

##### **Action**

Once the complaint legitimacy and cause have been established, every possible effort must be made to undertake appropriate remedial action(s) to fix the complaint cause and mitigate any further impact. A noise measurement at the

complainant location will be made after remedial actions have been completed to confirm compliance with Condition B27 of SSD-10474.

#### **Inform**

The investigative work and remedial action should be reported back to the complainant and, if necessary, the relevant regulatory agencies.

#### **Record**

Every complaint received is to be recorded within the complaints register located in reDirect Recycling's electronic record system. If the system is unavailable, then the complaint is to be recorded on reDirect Recycling's Incident Non-Conformance Report Form. The complaints register will be updated on a monthly basis and made publicly available on reDirect Recycling's website.

In accordance Condition M2.2 of EPL 21487, the following details will be recorded at a minimum:

- The date and time of the complaint.
- The method by which the complaint was made.
- Any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect.
- The nature of the complaint.
- The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant.
- If no action was taken by the licensee, the reasons why no action was taken.

The complaints register will record the action taken by reDirect Recycling in relation to the complaint or if no action taken the reason why no action was taken.

Complaint records will be kept for at least 4 years after the complaint was made. The records must be produced to any authorised officer of the EPA who asks to see them.

#### **Preventative Action**

Once the complaint has been suitably handled, appropriate preventative measures will be identified and implemented to negate the possibility of re-occurrence.

#### **Dispute Resolution**

In the event that a dispute arises between reDirect Recycling and Council or a public authority, in relation to an applicable requirement of the COA or relevant matter relating to the site, either party may refer the matter to the DPE (Secretary of) for resolution. The Secretary's determination of any such dispute must be final and binding on the parties.

In the case of a dispute between reDirect Recycling and a community member/complainant, either party may refer the matter to the relevant regulatory authority for consideration, advice and/or negotiation. If the matter escalates, a third-party mediator may be required.

## 9 Review

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### 8.1 Review

This NMP will be reviewed and updated accordingly when required. It is noted that updated plans will require approval from the Planning Secretary prior to use. Section 11 of the OEMP lists the triggers for updating the NMP.

## 10 Conclusion

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This NMP has been prepared by EMM Consulting on behalf of ReDirect Recycling, for operation of the Resource Recovery and Recycling Facility, located at 25 Dunheved Circuit St Marys, NSW.

This NMP has been prepared in accordance with the SSD-10474 COA to address noise management and reporting requirements for operation of the Facility.

This NMP may require updates to remain consistent with site operations and supporting management plans. This will be undertaken in accordance with Section 11 of the OEMP where a