



Independent Audit No.1

St Marys Resource Recovery Facility

SSD-10474

October 2024



Audit Details

Audit Report Name	Independent Audit No.1 – St Marys Resource Recovery Facility SSD-10474
Audit Report Reference	SMRRF_IEA-01
KPMG Internal Reference	455379
Date of Audit	2 October 2024
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Date:	23-Oct-2024	Date:	23-Oct-2024

Document Revision History

Revision	Date	Details
Draft.v1	21 October 2024	Draft Independent Audit Report for review
Final.v1	23 October 2024	Final Independent Audit Report

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Inherent Limitations

*This Report has been prepared at the request of ReDirect Recycling Pty Ltd (**ReDirect**), in the Scope Section of KPMG's engagement letter dated 19th August 2024.*

The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirety and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by ReDirect employees consulted as part of the process.

KPMG has indicated within this Report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the Report.

KPMG is under no obligation in any circumstance to update this Report, in either oral or written form, for events occurring after the Report has been issued in final form.

The findings in this Report have been formed on the above basis.

Third Party Reliance

This Report is solely for the purpose set out in the Audit Objectives and Scope Section and for ReDirect's information, and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This Report has been prepared at the request of ReDirect, in accordance with the terms of KPMG's engagement letter dated 19th August 2024. Other than our responsibility to ReDirect, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party. Any reliance placed is that party's sole responsibility.

Executive Summary

Background

KPMG has been engaged by ReDirect Recycling Pty Ltd (ReDirect) to undertake an Independent Environmental Audit (IEA) at the St Marys Resource Recovery Facility (SMRRF) project (the Project) located at 21-25 Dunheved Circuit, St Marys NSW 2760 (the Site). This IEA has been undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR) as required by the State Significant Development (SSD-10474) conditions of consent.

This is the first IEA to be undertaken at the Site, which was required to be commissioned within 12 months of the commencement of operations. The audit period is defined from the commencement of operational activities (19 November 2023) to the date of the audit (2 October 2024).

The Project was approved by the Minister of the Planning on 30 September 2021 and holds an SSD Consent (SSD-10474). The Project comprises a resource recovery and processing operation where wood waste is collected and shredded within an industrial building, prior to being transported offsite and used in the production of particle board. The SSD consent allows for the processing of up to 110,000 tonnes per annum of wood and timber waste, 30,000 tonnes of plasterboard, and 10,000 tonnes of metal waste. The Auditor understands that prior to the SSD consent, a smaller scale operation was undertaken on the site in accordance with a local Council Development Approval (DA140/2016).

Based on the evidence provided, the observations made and compliance findings of the audit, the Project is considered to have demonstrated good environmental performance during the audit period. Six (6) non-compliances have been identified during this Audit. However, three (3) had been self-reported and all are considered administrative in nature which have not been associated with any actual environmental impacts. There were no notifiable incidents, and no complaints received during the audit period.

Based on interviews and observations made during the audit, the ReDirect site operations and management teams are considered to have demonstrated a strong awareness of their environmental obligations, including OEMP requirements and the relevant SSD-10474 conditions of approval, with the following good practices being of note:

- The use of specific toolbox talks for each of the environmental management plans to raise awareness of specific mitigation measures, procedures, roles and responsibilities.
- The ReDirect Environmental Manager utilised a comprehensive compliance tracking register to document evidence against each of the SSD conditions of approval, which allowed for an efficient audit process with documentation readily available.
- The use of a daily site environmental checklist which requires site personnel to review environmental controls. The Auditor considers that a daily inspection frequency is good practice in avoiding environmental impacts.
- Dust suppression was well managed via use of a water mister within the main warehouse and a dedicated street sweeper for external areas.

Site Inspection

No issues were identified during the site inspection.

Audit Findings

Table E.1: Summary of Audit Findings

Reference	Requirement Details	Finding Details	Status*
Non-compliance SMRRF-01_NC-1	A2 Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent	Considering the non-compliances raised against CoA A7, A22, A23, B16 and C8, this triggers an additional non-compliance against CoA A2. Recommendation: Nil	Closed
Self-reported Non-compliance. SMRRF-01_NC-2	A7 Waste The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.	In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. The non-compliance was self-reported by ReDirect. Recommendation: ReDirect should review their internal planning processes to ensure that repeat non-compliances to not occur in future periods when their receiving facility reduces their intakes over holiday periods etc. Additional Information provided to Auditor post audit: <i>Since the non-compliance occurred, ReDirect has increased its fleet of prime movers and walking floor trailers from 16 to 24. This allows increased capacity to manage and process wood product during periods of increased demand.</i> <i>Additionally, ReDirect will provide notification to all customers notifying them of its shut down period and requesting notification of any large quantities intended to be received prior to the shut down period.</i>	Closed
Non-compliance SMRRF-01_NC-3	A22 Easements Within six months of the commencement of operation of the development, an easement, or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the	The registered plans for Lot 9 DP 31908 depict the newly created easement which provides shared access to 21 and 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise	Closed

Reference	Requirement Details	Finding Details	Status*
	prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.	Recommendation: Nil	
Non-compliance SMRRF-01_NC-4	A23 Easements Within six months of the commencement of operation of the development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.	Review of the plan of subdivision for of Lot 143 DP1307832 and Lot 9 DP31908 confirms that the boundary had been adjusted so that all on site detention tanks are located within the boundary of 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise. Recommendation: Nil	Closed
Self-reported Non-compliance. SMRRF-01_NC-5	B16 Stormwater Management System Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	Council was not consulted with prior to operations regarding the replacement rainwater tank required by CoA B16. Recommendation ReDirect should implement the actions outlined in the non-compliance notification letter, dated 27 August 2024.	Open
Self-reported Non-compliance. SMRRF-01_NC-6	C8 Non-Compliance Notification The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. ReDirect became aware of the non-compliance on 21 February 2024 and self-reported to DPHI on 3 April 2024. DPHI were not notified within 7-days of becoming aware that the non-compliance against CoA A7 had occurred. Recommendation: Ensure that DPHI are notified within 7 days of becoming aware of any future non-compliances (including those identified in this IEA report).	Closed

Reference	Requirement Details	Finding Details	Status*
Opportunity for Improvement SMRRC-01_OFI-1	B2 Operating Conditions The Applicant must ensure: (o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations.	<p>The mitigation measures outlined in The Transport Planning Partnership memorandum include the provision of staff induction training and implementation of a Driver Code of Conduct that is to be read and signed by internal and external truck drivers. ReDirect have developed a Driver Code of Conduct as part of the Operational Traffic Management Plan and provided details of staff training and 15 separate completed Driver Code of Conduct declarations for internal staff. Due to the extensive network of external truck drivers delivering product to the site, the Auditor was advised that it has not been feasible for ReDirect to obtain signed declarations from each external operator.</p> <p>Recommendation: Consider implementing a method of educating external operators of site-specific traffic management requirements such as a generic email to all registered providers including the Driver Code of Conduct for their acknowledgement.</p>	Open
Opportunity for Improvement SMRRC-01_OFI-2	C4 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN The Applicant must: b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	<p>ReDirect implement a daily environmental checklist which includes assessment of the effectiveness of several environmental mitigation measures required to be implemented under the OEMP and sub-plans. The Auditor considers that the daily checklist is a valuable tool for minimising environmental impact and maintaining compliance to the conditions of consent.</p> <p>Recommendation: There is an opportunity to review the daily checklist to ensure that it is providing value and capturing all key mitigation measures and reflects any changes or lessons learnt from the previous ~11 months of implementation. An example of an improvement is to add the truck wheel wash to the checklist.</p>	Open

* Status of the finding at the time of audit report finalisation

1 Introduction

1.1 Background

KPMG has been engaged by ReDirect Recycling Pty Ltd (ReDirect) to undertake an Independent Environmental Audit (IEA) at the St Marys Resource Recovery Facility (SMRRF) project (the Project) located at 21-25 Dunheved Circuit, St Marys NSW 2760 (the Site). This IEA has been undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR) as required by the State Significant Development (SSD-10474) conditions of consent.

This is the first IEA to be undertaken at the Site, which was required to be commissioned within 12 months of the commencement of operations. The audit period is defined from the commencement of operational activities (19 November 2023) to the date of the audit (2 October 2024).

This IEA sought to assess and provide findings on compliance with the Project's SSD Consent (SSD-10474) conditions of approval (refer to Section 1.2 for further details) and to assess the implementation and effectiveness of the Project's environmental management plans in accordance with the methodology outlined within the IAPAR.

Any references to 'audit', 'independent', 'review' and / or 'verification' in this report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance, or an audit opinion, have been expressed in this report.

The evidence used to test the compliance status with respect to each condition has been documented in Appendix A with a summary of audit findings and recommendations provided in Section 4.13.

1.2 Project Details

The Project was approved by the Minister of the Planning on 30 September 2021 and holds an SSD Consent (SSD-10474). The Project comprises a resource recovery and processing operation where wood waste is collected and shredded within an industrial building, prior to being transported offsite and used in the production of particle boards. The SSD consent allows for the processing of up to 110,000 tonnes per annum of wood and timber waste, 30,000 tonnes of plasterboard, and 10,000 tonnes of metal waste. The Auditor understands that prior to the SSD consent, a smaller scale operation was undertaken on the site in accordance with a local Council Development Approval (DA140/2016).

1.3 Audit Team

In accordance with condition C13 of SSD-10474 and the IAPAR, Independent Auditors must be suitably qualified, experienced and independent of the Project, and endorsed by the Planning Secretary prior to each IEA. Details of the KPMG audit team, as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Table 1.1: Audit Team Details

Name	Company Title	Audit Position	Certifications
Dylan Jones	KPMG Director	Lead Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C-464532 M. Environmental Engineering Management B. Environmental Science & Management Certified Environmental Practitioner (CEnvP)
Gary Selwyn	KPMG Partner	Alternate Lead Auditor and Technical Peer reviewer	Principal Environmental Auditor – Institute of Environmental Management & Assessment (IEMA) MSc. Environmental Science BSc (Hons). Biological Sciences
Michael Stojanoski	KPMG Associate Director	Audit Team Member	M.Sc Environmental Science, B.Sc Science (Geology) Exemplar Global Lead Auditor Certificate – ISO14001 and ISO19001
Jack Hanigan	KPMG Consultant	Audit Team Member / Assistant	B. Environmental Management, Earth Science BSc (Hons) Geology

Endorsement of the Audit Team was provided by DPHI on 19 August 2024 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

2 Audit Objectives and Scope

2.1 Audit Objectives

The objective of this audit was to satisfy SSD-10474 condition of approval C13 by undertaking an independent assessment of environmental performance and compliance against the Project's conditions of approval and environmental mitigation measures. Condition C13 states that *Audits must be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)*.

2.2 Audit Scope

The scope of the audit included undertaking an assessment of compliance against the project's conditions of approval of SSD-10474 Schedule 2, Parts A, B and C, including Advisory Notes and Appendices.

An overview of the audit scope undertaken by the KPMG audit team includes the following:

- Review the implementation of management plans, including:
 - Operational Environmental Management Plan (OEMP), Rev 1, dated 30 November 2022.
 - Operational Traffic Management Plan, Rev 3, dated 20 February 2023.
 - Waste Management Plan, Rev 4, dated 12 April 2023.
 - Surface Water Management Plan, Rev 1, dated 5 October 2022.
 - Air Quality and Odour Management Plan, Rev 1, dated 25 July 2022.
 - Operational Noise Management Plan, Rev 1, dated 10 August 2022.
 - Emergency Response Plan, Rev 3, dated May 2023.
- Site inspection conducted on 2 October 2024:
 - A high-level assessment of the effectiveness of environmental management plans.
 - Assess general environmental performance.
 - Review of records.
 - Assess the physical extent of the project compared to the approved boundary.
 - Interviews with site personnel.
- Conduct audit interviews at the ReDirect site office.

The audit scope did not include assessing compliance against the site's Environmental Protection Licence (EPL 21487), as this is not required by the IAPAR.

2.3 Audit Period

This is the first IEA undertaken on the Project and has been designed to cover all activities from commencement of operational activities to the date the IEA was conducted. The audit period is therefore defined as the period between **19 November 2023 to 2 October 2024**.

3 Audit Methodology

3.1 Endorsement of the Audit Team

The KPMG Audit team includes:

- Dylan Jones – Lead Auditor;
- Gary Selwyn - Alternate Lead Auditor;
- Michael Stojanoski – Audit Team Member; and,
- Jack Hanigan – Audit Team Member.

Endorsement of the Audit Team was provided by DPHI on 19 August 2024 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

3.2 Audit Process

The following sections describe the processes that comprised the IEA, with site inspection and personnel interview components completed on 21 August 2024, followed by additional document reviews and reporting. The IEA process was aligned with the principles of *ISO 19011:2018 Guidelines for Auditing Management Systems* and the IAPAR requirements.

3.2.1 Audit Preparation

Prior to commencement of the IEA, the Lead Auditor prepared an Audit Plan/Agenda and Request for Information documents, which were distributed to the ReDirect team in preparation for the IEA. Refer to Appendix E for the Audit Agenda. Upon receipt of documents from ReDirect and via review of documents available on the ReDirect project website, document assessment (refer to Section 3.2.6) commenced prior to the day of audit.

3.2.2 Consultation

Department of Planning, Housing and Infrastructure

In accordance with Section 3.2 of the IAPAR, consultation was undertaken with DPHI in advance of the IEA, to request feedback on the Project including any focus areas or other matters that the Auditor should be made aware of.

Further to an email request for feedback from KPMG to DPHI on 23 September 2024, DPHI responded via email on 24 September 2024, making a specific request to “look into the compliance with”:

- The waste limits of consent (conditions A6 and A7);
- Operational traffic conditions (B2);

- Operational management plans.

DPHI also requested that contact was made with Penrith City Council and the EPA.

KPMG Response:

- **Conditions A6 and A7** - During the audit KPMG sighted the most recent version of the Transaction Summary Report, covering the period from 19 September 2023 to 4 September 2024. The Transaction Summary Report revealed that a total of 42,553.76 tonnes of net wood waste had been received during the period, which is well within the 110,000-tonne annual limit. Furthermore, it was confirmed by ReDirect that no plasterboard or metal waste streams had been received on the site to date. However, there had been some metal materials encountered as a by-product of the timber waste stream, i.e. metal fixings and hardware, such as anticipated within the Environmental Impact Statement (EIS). The Auditor was satisfied that CoA A6 had been complied with.

Regarding CoA A7, the Auditor notes that the 704-tonne limit for the storage of General Solid Waste (GSW) at any one time had been exceeded in December 2023 when 762.47 tonnes of waste was recorded at the site, which was attributed to its receiving facility being shut for the Christmas holidays. A self-reported non-compliance was raised and notified by ReDirect to DPHI in February 2024, which has been identified within this audit report, with a recommendation provided for ReDirect to review their internal planning processes to ensure that repeat non-compliances do not occur. ReDirect has since provided the following response to the Auditor:

"ReDirect have since increased its fleet of prime movers and walking floor trailers from 16 to 24 since the non-compliance occurred. This allows significant increased capacity to manage and process UWR [Urban Wood Residues] during periods of increased demand.

Additionally, ReDirect will provide notification to all customer notifying them of our shut down period and request notification of any large quantities intended to be received prior to the shut period."

The Auditor considers the CoA A7 non-compliance to be closed.

- **Condition B2** - This condition was assessed for compliance via site inspection observations. The Auditor did not observe any instance of non-compliance to the requirements listed under CoA B2. Generally, there were suitable car parking spaces, no instances of parking on public roads, vehicles appeared to be obeying with traffic requirements and all loading was occurring fully within the site. The mitigation measures required by CoA B2 (o) including installation of a convex mirror, installation of a stop sign and installation of hatching paint on the shared driveway were observed as being installed.

An opportunity for improvement (OFI) has been raised against CoA B2 (o) which requires the implementation of a driver code of conduct to be read and signed by all internal and external truck drivers. Given the advised difficulties in having each individual external truck driver sign a code of conduct, the Auditor has included a recommendation for ReDirect to consider implementing a method of educating external operators of site-specific traffic management requirements such as a

generic email to all registered providers including the Driver Code of Conduct for their acknowledgement.

- **Operational management plans** - the Auditor has assessed compliance to the Site's OEMP and supporting management plans respectively and did not identify any non-compliances. An OFI has been raised against CoA C4, with a recommendation to review and update of the environmental inspection checklist, with further details provided in Section 4.13 and Appendix A.

Penrith City Council

KPMG issued an email request for feedback on the environmental performance of the Site to Penrith City Council (Council) on 24 September 2024. Council responded on 25 September 2024 confirming that "Council has reviewed the information referred and has no comments to make that would warrant amendment to what has been prepared".

KPMG Response: N/A

NSW Environmental Protection Authority

KPMG issued an email request for feedback on the environmental performance of the Site to the NSW Environmental Protection Authority (EPA) on 24 September 2024. The EPA responded on 14 October 2024 with a letter documenting the recorded non-compliances against the Site's EPL #21487. Seven (7) non-compliances had been recoded against the EPL licence condition number L2.2 from 22 April 2021 to 21 April 2024 in relation to exceeding authorised amounts of waste permitted to be stored at any one time.

The EPA also noted that "from a review of aerial imagery from 2021 to 2024 that the Licensee is using the adjacent unlicensed site at 21 Dunheved Circuit St Marys to park trucks with uncovered wood loads. Condition O3.3 of the EPL requires trucks entering and leaving the premises to be covered at all times, except during loading and unloading" and "A drive by inspection by the EPA in 2022 also observed bundles of melamine within the shed at the unlicensed 21 Dunheved Circuit St Marys. It is unknown what activities are occurring at this site."

KPMG Response: It is noted that only one (1) of the recorded EPL non-compliances occurred with the audit period and that the previous six (6) occurred prior to the SSD when the Site was operating under the Council Development Approval. The identified non-compliance (CoA A7) was self-reported to DPHI (refer to the previous response provided in relation to DPHI consultation for further information on this non-compliance).

During the site inspection the Auditor observed a number of trucks parked in the adjacent property at 21 Dunheved Circuit, matching the observation made by the EPA. When queried about these trucks, ReDirect advised that the trucks were used to transport shredded wood product from the site to a manufacturing facility. The trucks did not contain wood products or any waste materials at the time of inspection and the Auditor did not identify any breaches against the SSD conditions of approval associated with these parked trucks. The Auditor did not assess compliance against the EPL conditions.

While not part of the Site or subject to the audit, the Auditor requested and was permitted to inspect the warehouse at 21 Dunheved Circuit. Inspection of the 21 Dunheved Circuit property did not identify stored wood materials. ReDirect advised the Auditor that 21 Dunheved Circuit is also owned by ReDirect's parent company Borg, which is used for vehicle and equipment storage.

Refer to Appendix C for consultation records.

3.2.3 Opening Meeting

An opening meeting was held on site on 2 October 2024 with representatives from the ReDirect site operations and management teams, as per the Audit Attendance Sheet (refer to Appendix F). During the opening meeting the Auditor outlined the objective and the process of the IEA. ReDirect provided the Auditor with a summary of current and historical site activities including an overview of the specific wood processing operations. Key matters such as any environmental incidents, non-compliances, environmental issues and risks and stakeholder interactions were discussed.

3.2.4 Site Inspection

A site inspection was undertaken on 2 September 2024 at the SMRRF with representatives from the ReDirect management and site operations teams. The site inspection was used to understand the nature of the operations and the extent to which environmental controls are implemented and managed across the site. The Auditor was provided full access to all areas requested for inspection. No issues were identified during the site inspection.

Refer to details of the inspection in Section 4.9 and photographs provided in Appendix D.

3.2.5 Interviews

Interviews were held with key personnel from the ReDirect site operations and management teams. These interviews were focused on the management of environmental aspects, and, where areas of concern may exist, what proposed means of risk control are undertaken and proposed to account for these concerns. Additionally, the interviews assisted the Auditor to understand the nature of the activities undertaken at the sites and to identify focus areas for the audit. Table 3.1 provides details of the personnel interviewed during the IEA.

Table 3.1: Personnel Interviewed

Name	Organisation	Position
James Sutton	ReDirect Recycling	Environmental Manager
Aaron Murphy	ReDirect Recycling	Site Manager

3.2.6 Document Assessment

Documentation relevant to the audit scope was collected and assessed by the audit team as evidence of compliance with a Condition of Approval (CoA). This included, but was not limited to, management plans, site induction forms and presentations, monitoring and sampling records, correspondence, emergency response plans, plant and equipment maintenance registers and pre-approval documentation such as the EIS. Refer to Appendix H for a full list of documents reviewed as part of the IEA.

3.2.7 Closing Meeting

A closing meeting was held on 2 October 2024 at 1:00pm at the SMRRF site. During the closing meeting the Lead Auditor presented the preliminary audit findings, including any identified potential non-compliances and opportunities for improvement. Where identified, additional documentary evidence was requested by the Audit team following the closing meeting to enable further assessment of compliance.

3.3 Compliance Evaluation

Considering the evidence gathered during audit execution, the IEA assessed and tested the compliance status of each CoA in the Audit Table, through application of the compliance descriptors detailed in *Table 2* of the IAPAR, as listed in *Table 3.2*.

Table 3.2: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Where appropriate, the Auditor also identified opportunities for improvement, details of which are provided in Appendix A and Section 4.13

4 Audit Findings

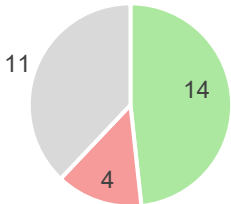
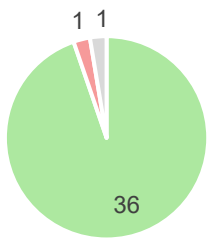
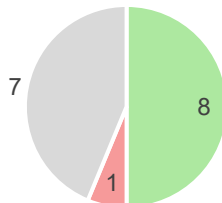
4.1 Approvals and Documents Audited

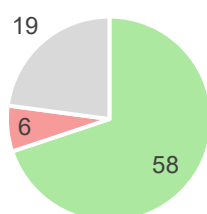
Refer to Appendix H for details of the primary documents assessed as part of the IEA.

4.2 Compliance Assessment Summary

A summary of the assessment of compliance is presented in *Table 4.1*. Findings against each Condition of Approval (CoA) subject to the IEA are presented in Appendix A, with details of the non-compliance findings identified during the IEA also provided in Section 4.13.

Table 4.1: Compliance assessment summary

Part (total number of conditions)	Summary	
Part A - Administrative Conditions + Advisory Notes (29)	<ul style="list-style-type: none"> Compliant - 14 Non-Compliant - 4 Not Triggered - 11 	
Part B - (38)	<ul style="list-style-type: none"> Compliant - 36 Non-Compliant - 1 Not Triggered - 1 	
Part C - (16)	<ul style="list-style-type: none"> Compliant - 8 Non-Compliant - 1 Not Triggered - 7 	

Part (total number of conditions)	Summary									
Total - (83)	<ul style="list-style-type: none">Compliant - 58Non-Compliant - 6Not Triggered - 19	 <table><caption>Condition Distribution</caption><thead><tr><th>Category</th><th>Count</th></tr></thead><tbody><tr><td>Compliant</td><td>58</td></tr><tr><td>Non-Compliant</td><td>6</td></tr><tr><td>Not Triggered</td><td>19</td></tr></tbody></table>	Category	Count	Compliant	58	Non-Compliant	6	Not Triggered	19
Category	Count									
Compliant	58									
Non-Compliant	6									
Not Triggered	19									

4.3 Notices, Orders, Penalty Notices and Prosecutions

Based on the documentation assessed by the audit team, no formal notices, orders, penalty notices or prosecutions associated with SSD-10474 were issued by DPHI or from other regulators (e.g., NSW EPA, Council etc.) during the audit period.

While not constituting a formal action under the Environmental Planning and Approval Act 1979 (EP&A Act), a 'record the breach' was issued from DPHI on 16 September 2024 in response to the self-reported non-compliance against CoA B16 (refer to Section 4.13 for details). The DPHI compliance policy describes these informal actions as:

"For very minor non-compliances that are administrative and do not go to the integrity of the planning system, or for other minor non-compliances that resulted in no or minimal impacts on the community or the environment, informal action may be appropriate. These non-compliances are generally voluntarily reported, rectified and have controls put in place to prevent any recurrence. The department records the decision as well as the rationale and advises the proponent of the outcome of its's investigation".

4.4 Incidents

There were no notifiable incidents, as defined by the development consent, during the audit period.

4.5 Complaints

A Complaints Register is maintained monthly and is available on the ReDirect project website. Sighting of the Complaints Register identified that no complaints were received, or recorded, during the audit period. In addition, ReDirect advised the Auditor that no complaints had been received during the audit period.

4.6 Non-compliances

The IEA identified six (6) non-compliances during the audit period, three (3) of which had been self-reported by ReDirect. Details of the non-compliances identified during the IEA are listed in Section 4.13.

4.7 Previous Audit Findings

This is the first independent audit undertaken on the Project, as such there are no previous audit findings to review.

4.8 Suitability of Environmental Management Plans

The SMRRF is managed in accordance with the OEMP, Rev 1, dated 30 November 2022, which is supported by the following management plans:

- Operational Traffic Management Plan, Rev 3, dated 20 February 2023.
- Waste Management Plan, Rev 4, dated 12 April 2023.
- Surface Water Management Plan, Rev 1, dated 5 October 2022.
- Air Quality and Odour Management Plan, Rev 1, dated 25 July 2022.
- Operational Noise Management Plan, Rev 1, dated 10 August 2022.
- Emergency Response Plan, Rev 3, dated May 2023.

The OEMP and associated management plans had been subject to DPHI review, with comments and requests for additional information provided. The DPHI approval letter, dated 3 August 2023 stated *"The Department has reviewed the OEMP, including the Operational Traffic, Waste, Surface Water, Air Quality, Operational Noise and Emergency Response Management Plans, and concludes they appropriately address the requirements of the relevant conditions. Accordingly, the following updated plans are approved"*.

The Auditor acknowledges that the Operational Traffic, Waste, Surface Water, Operational Noise and Emergency Response plans had been prepared by third party technical consultants.

When assessing the suitability of management plans, the Auditor undertook a high-level gap assessment of the OEMP against the Department of Planning, Industry and Environment, *Post Approval Guidance, Environmental Management Plan Guideline* requirements (April 2020). The high-level assessment found that the OEMP contained all the relevant requirements from the guideline including a comprehensive list of mitigation measures (controls) including responsibilities and frequencies for each control.

The Auditor tested implementation of the OEMP via review of documentation, interviews and via the site inspection, with no major issues raised or any non-compliances identified. However, the Auditor noted an opportunity for ReDirect to review the daily environmental checklist to ensure that it is

capturing all key mitigation measures and reflects any changes or lessons learnt from the previous 11 months of implementation. Refer to Section 4.13 for further details.

In general, the Auditor considers that the OEMP and associated management plans have been prepared to an appropriate standard and capture the requirements of the SSD-10474 CoA, the Environmental Impact Statement (EIS) and the Response to Submissions (RtS). The Auditor therefore considers that the management plans are suitable for the current phase of the Project.

4.9 Audit Site Inspection

A site inspection was undertaken on 2 October September 2024, starting at approximately 10am. At the time of the inspection weather conditions were wet and rainy with no observable wind. The objective of the site inspection was to review the effectiveness of the environmental mitigation measures implemented at the Site and to assess environmental performance generally.

The ReDirect Site Supervisor and Environmental Manager accompanied the Auditor during the site inspection and were interviewed during the process. All areas were made accessible to the Auditor upon request.

No issues were raised by the Auditor during the inspection, with the following observations made:

- Traffic control signage observed at the Site entrance including the mitigation measures required by CoA B2(o) – convex mirror, stop sign and installation of hatching paint on the shared driveway. (Photos 1 to 3).
- No mud tracking observed on public roads. (Photo 4).
- Trucks delivering wood waste to site were noted as having covered loads. (Photo 5).
- Wheel wash noted as being operational and utilises recirculated water. (Photo 6).
- Minor volumes of liquid chemicals were stored within dedicated bunds. (Photo 7)
- Spill kits were available at point-of-use and were free of litter. (Photo 8).
- A dedicated street sweeper was on Site. (Photo 9).
- A water mister was being utilised within the main warehouse as a dust mitigation measure. (Photo 12).
- Inspected plant and equipment was found to be free of visible leaks and spills, with daily pre-start checks being utilised. (Photos 13 and 14).
- No dust issues or offsite migration of contaminants was observed.
- All surfaces were sealed and stabilised.
- No odours observed.
- No significant noise or vibration impacts observed.
- All waste processing activities were observed as being undertaken within the main warehouse.

- No significant pooling of surface water was observed, with stormwater drainage appearing to function appropriately.

Refer to Appendix D for additional photographs taken during the site inspection.

4.10 Actual versus Predicted Environmental Impacts

The Auditor has undertaken a qualitative assessment of the predicted impacts associated with the Project, as described within the following documentation, against the actual impacts observed during the audit process:

- Environmental Impact Statement, Rev 3, dated 25 February 2021(EIS); and
- Response to Submissions Report, dated 27 July 2021 (RtS).

Chapters 11 to 18 of the EIS contain an assessment of the predicted impacts of each environmental aspect requested for assessment via the Secretary's Environmental Assessment Request (SEARs). These assessments were used by the Auditor when comparing to actual impacts.

When assessing actual impacts the following factors were considered:

- The occurrence of environmental incidents.
- Compliance history against the conditions of consent and adherence to the approved management plan requirements.
- Results of environmental monitoring data compared to predicted levels.
- Number of and frequency of internal actions raised during site inspections.
- The nature and frequency of complaints.
- Regulatory notices and actions.
- The physical extent of the Project's operations compared to the approved boundaries.
- Consistency of designs with the EIS.
- Any planning approval modifications or consistency assessments.
- Appropriate implementation of environmental mitigation measures.

It is beyond the scope of this IEA to investigate each of the detailed studies and predictions undertaken as part of the EIS in order to make comparisons against actual measurements.

As such, a qualitative assessment has been undertaken as per Table 4.2.

Table 4.2: Assessment of Predicted vs Actual Impacts

Environmental Aspect	Predicted Impact	Actual Impact*
Air Quality	<p>An Air Quality Impact Assessment was undertaken during the EIS which concluded:</p> <p><i>"The results of the dispersion modelling indicate that dust and particulate matter concentrations due to the operation of the Proposal would comply with the established criteria at all sensitive receptors".</i></p>	<p>No dust or odour issues observed by the Auditor.</p> <p>No recorded dust or odour related complaints or incidents.</p> <p>Air quality mitigation measures (i.e., water mister) were observed during the inspection.</p> <p>No non-compliances associated with implementation of the Air Quality and Odour Management Plan were identified.</p>
Noise and Vibration	<p>A Noise and Vibration Impact Assessment was undertaken as part of the EIS, which concluded:</p> <p><i>"The noise impact associated with operational activities is predicted to comply with the noise criteria at all the considered residential receivers. Potential noise impacts from traffic on the surrounding road network, arising from additional truck movements associated with the operation of the recycling facility are predicted to not be noticeable as increases in noise level of 1dB was predicted".</i></p>	<p>The Auditor noted that fewer plant were being utilised on site compared to those modelled in the impact assessment and what while permitted to operate 24/7, there were no night time activities being undertaken.</p> <p>No noise related complaints had been received.</p> <p>No non-compliances associated with implementation of the Noise and Vibration Management Plan were identified.</p>
Cultural Heritage	<p>The Site was not considered to have any Aboriginal or Historic heritage value.</p>	<p>No heritage items identified. No excavation works undertaken as part of the SSD.</p>
Waste Management	<p>The Site was permitted to receive 110,000 tonnes of general solid waste per annum, triggering the requirement for an SSD.</p>	<p>No non-compliances associated with implementation of the approved Waste Management Plan were identified.</p> <p>Review of documentation confirmed that the Site receives less than the 110,00-tonne annual limit.</p>
Traffic	<p>The EIS stated that <i>"The traffic impacts due to the proposed operation of a timber waste recovery facility have been assessed to be minor".</i></p>	<p>The Auditor observed that traffic related mitigation measures had physically been installed at the site as per requirements.</p> <p>A driver code of conduct had been prepared.</p> <p>No instances of parking on public roadways or blocking of property access were observed.</p>
Water Use and Conservation	<p>Nil impacts predicted in relation to water use and supply. No mitigation measures were proposed in the EIS.</p>	<p>Nil actual impacts observed. However, the Auditor notes that the Site's rainwater tank is in the process of being investigated in consultation</p>

Environmental Aspect	Predicted Impact	Actual Impact*
		with Council regarding its suitability (Refer to CoA B16 in Appendix A).
Stormwater Management and Water Quality	The EIS stated that the main source of stormwater contamination will be oil fuel drops on the vehicle paths and dust carried from the warehouse. Mitigation measures included the installation of an 'Ocean Protect StormFilter' system to treat rainwater and installation of a truck wheel wash.	<p>The Auditor confirmed that the 'StormFilter' and wheel wash had been installed as required and that the preexisting Gross Pollutant Trap (GPT) was operational.</p> <p>A biannual stormwater monitoring plan had been implemented as per the Surface Water Management Plan.</p> <p>No offsite migration of sediments or contaminants was observed. Oil and fuel storage was within dedicated bunds.</p> <p>No actual water quality impacts identified.</p>
Other items	<p>There have been no planning approval modifications or consistency assessments undertaken for the Project since the SSD approval.</p> <p>The physical extent of the project was confirmed to be consistent to that described in the EIS.</p>	

* Actual impacts based on the factors listed above table 4.2.

Based on the assessment of the environmental impacts identified in the EIS, the Auditor considers that current environmental impacts would be considered less than or equal to those anticipated within the EIS.

4.11 Previous Compliance Reporting Recommendations

There have been no compliance reports (as required by CoA C11) undertaken at the site to date. The Auditor understands that the first compliance report is required to be completed by ReDirect in early 2025.

4.12 Key Strengths

Based on interviews and observations made during the audit, the ReDirect site operations and management teams are considered to have demonstrated a strong awareness of their environmental obligations, including OEMP requirements and relevant SSD-10474 conditions of approval, with the following good practices being of note:

- The use of specific toolbox talks for each of the environmental management plans to raise awareness of specific mitigation measures, procedures, roles and responsibilities.
- The ReDirect Environmental Manager utilised a comprehensive compliance tracking register to document evidence against each of the SSD conditions of approval, which allowed for an efficient audit process with documentation readily available.

- The use of a daily site environmental checklist which requires site personnel to review environmental controls. The Auditor considers that a daily inspection frequency is good practice in avoiding environmental impacts.
- Dust suppression was well managed via use of a water mister within the main warehouse and a dedicated street sweeper for external areas.

4.13 Audit Findings and Recommendations

Independent Audit findings were based on evidence collected during the audit process, which included:

- Relevant records, documents and reports (refer to Appendix A and Appendix H).
- Interviews of relevant site personnel (refer to Section 3.2.5 and Appendix A).
- Photographs (refer to Appendix D).
- Figures and plans (refer to Appendix A and Appendix H).
- Site inspections of relevant locations, activities and processes (refer to Section 4.9).

Based on the evidence provided, the observations made and compliance findings of the audit, the Project is considered to have demonstrated good environmental performance during the audit period. Six (6) non-compliances have been identified during this Audit. However, three (3) had been self-reported and all are considered administrative in nature which have not been associated with any actual environmental impacts. There were no notifiable incidents, and no complaints received during the audit period.

The Auditor thanks the ReDirect team for their cooperation during the IEA process.

A summary of Audit Findings is provided in *Table 4.3* below.

Table 4.3: Summary of Audit Findings

Reference	Requirement Details	Finding Details	Status*
Non-compliance SMRRF-01_NC-1	A2 Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent	Considering the non-compliances raised against CoA A7, A22, A23, B16 and C8, this triggers an additional non-compliance against CoA A2. Recommendation: Nil	Closed
Self-reported Non-compliance.	A7 Waste The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.	In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. The non-compliance was self-reported by ReDirect.	Closed

Reference	Requirement Details	Finding Details	Status*
SMRRF-01_NC-2		<p>Recommendation: ReDirect should review their internal planning processes to ensure that repeat non-compliances to not occur in future periods when their receiving facility reduces their intakes over holiday periods etc.</p> <p>Additional Information provided to Auditor post audit:</p> <p><i>Since the non-compliance occurred, ReDirect has increased its fleet of prime movers and walking floor trailers from 16 to 24. This allows increased capacity to manage and process wood product during periods of increased demand.</i></p> <p><i>Additionally, ReDirect will provide notification to all customers notifying them of its shut down period and requesting notification of any large quantities intended to be received prior to the shut down period.</i></p>	
Non-compliance SMRRF-01_NC-3	<p>A22 Easements</p> <p>Within six months of the commencement of operation of the development, an easement , or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.</p>	<p>The registered plans for Lot 9 DP 31908 depict the newly created easement which provides shared access to 21 and 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise</p> <p>Recommendation: Nil</p>	Closed
Non-compliance SMRRF-01_NC-4	<p>A23 Easements</p> <p>Within six months of the commencement of operation of the development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.</p>	<p>Review of the plan of subdivision for of Lot 143 DP1307832 and Lot 9 DP31908 confirms that the boundary had been adjusted so that all on site detention tanks are located within the boundary of 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise.</p> <p>Recommendation: Nil</p>	Closed

Reference	Requirement Details	Finding Details	Status*
Self-reported Non-compliance. SMRRF-01_NC-5	B16 Stormwater Management System Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	Council was not consulted with prior to operations regarding the replacement rainwater tank required by CoA B16. Recommendation ReDirect should implement the actions outlined in the non-compliance notification letter, dated 27 August 2024.	Open
Self-reported Non-compliance. SMRRF-01_NC-6	C8 Non-Compliance Notification The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. ReDirect became aware of the non-compliance on 21 February 2024 and self-reported to DPHI on 3 April 2024. DPHI were not notified within 7-days of becoming aware that the non-compliance against CoA A7 had occurred. Recommendation: Ensure that DPHI are notified within 7 days of becoming aware of any future non-compliances (including those identified in this IEA report).	Closed
Opportunity for Improvement SMRRC-01_OFI-1	B2 Operating Conditions The Applicant must ensure: (o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations.	The mitigation measures outlined in The Transport Planning Partnership memorandum include the provision of staff induction training and implementation of a Driver Code of Conduct that is to be read and signed by internal and external truck drivers. ReDirect have developed a Driver Code of Conduct as part of the Operational Traffic Management Plan and provided details of staff training and 15 separate completed Driver Code of Conduct declarations for internal staff. Due to the extensive network of external truck drivers delivering product to the site, the Auditor was advised that it has not been feasible for ReDirect to obtain signed declarations from each external operator. Recommendation: Consider implementing a method of educating external operators of site-specific traffic management requirements such as a generic email to all registered providers including the Driver Code of Conduct for their acknowledgement.	Open

Reference	Requirement Details	Finding Details	Status*
Opportunity for Improvement SMRRC-01_OFI-2	C4 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN The Applicant must: b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	ReDirect implement a daily environmental checklist which includes assessment of the effectiveness of several environmental mitigation measures required to be implemented under the OEMP and sub-plans. The Auditor considers that the daily checklist is a valuable tool for minimising environmental impact and maintaining compliance to the conditions of consent. Recommendation: There is an opportunity to review the daily checklist to ensure that it is providing value and capturing all key mitigation measures and reflects any changes or lessons learnt from the previous ~11 months of implementation. An example of an improvement is to add the truck wheel wash to the checklist.	Open

* Status of the finding at the time of audit report finalisation.



Appendix A – Audit Compliance Table

Appendix A – Audit Compliance Table

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Part A: Administrative Conditions					
1.01	A1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Based on the outcome of this audit, it is considered that all reasonable and feasible measures have been implemented to minimise material harm to the environment.		Compliant
1.02	A2	TERMS OF CONSENT The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS, Response to Submissions and Supplementary Information; (d) in accordance with the Development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in appendix 2..	(a) There were six (6) non-compliances to the conditions of consent identified during this audit, including a non-compliance with this condition. (b) There were no written directions received from DPHI. (c) The OEMP references the EIS and RtS and contains the mitigation measures outlined in Appendix 2. (d) The site inspection confirmed the site layout in Appendix 1. (e) Mitigation measures were referenced in the OEMP.	Non-compliance SMRRF-01_NC-1 Considering the non-compliance raised against CoA A7, A22, A23, B2, B16 and C8, this triggers an additional non-compliance against CoA A2 Recommendation: Nil	Non-Compliant
1.03	A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).			Not Triggered
1.04	A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	No inconsistencies, ambiguities or conflicts between any of the planning documents has been raised during the audit period.		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.05	A5	LIMITS OF CONSENT Lapsing This consent lapses five years after the date from which it operates unless the development has physically commenced on the land to which the consent applies before that date.	Operations commenced 19 November 2023.		Compliant
1.06	A6	Waste The Applicant must not receive or process more than 150,000 tonnes of general solid waste (non-putrescible) per year, comprising: <ul style="list-style-type: none"> (a) 110,000 tonnes per year of wood, plastic and waste; urban wood residues for composting (as defined in 'The compost order 2016'); (b) 30,000 tonnes per year of plasterboard; and (c) 10,000 tonnes per year of metal waste. 	Sighted: <ul style="list-style-type: none"> a) Transaction Summary Report 19/09/23 to 04/09/24 with 42553.76 tonnes of net wood waste observed b) No plasterboard has been received on site to date c) No metal waste stream is accepted on site, however some metal was observed as a byproduct of the timber waste stream 		Compliant
1.07	A7	The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.	Sighted: <ul style="list-style-type: none"> • Waste Contribution Monthly Report (WCMR) – St Marys, Reporting Period: July 2024, dated 26 August 2024. • Sighted way bridge export summary August 2024 using exported transactions of way bridge records 4449.56 tonnes of wood waste in. The July 2024 WCMR detailed a 'Closing Stock' of 550.67 tonnes (78.22% of the authorized amount". Sighted: <ul style="list-style-type: none"> • Letter from ReDirect to DPHI, dated 3 April 2023. Notification of non-compliance SSD-10474, conditions A7 and C8. Ref: SSD-10474-PA-14. The non-compliance notification letter detailed a breach of CoA A7 and C8, including the below:	Self-reported Non-compliance. SMRRF-01_NC-2 In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. The non-compliance was self-reported by ReDirect. Recommendation: ReDirect should review their internal planning processes to ensure that repeat non-compliances to not occur in future periods when their receiving facility reduces their	Non-Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>"On 21 February 2024, ReDirect submitted the December 2023 Waste Contribution Monthly Report (WCMR) in the NSW Environment Protection Authorities (NSW EPA) Waste and Resource Reporting Portal (WARRP). The closing stock reported in WARRP was 762.47 tonnes, exceeding the storage limit of 704 tonnes outlined by condition A7 of Development Consent SSD-10474. At the time of submission Redirect provided the following reason for the breach of its storage limit:</p> <p><i>"Due to the Christmas and New Year holiday period Redirect had reduced operating days to remove processed materials during December. Additionally, Redirect's affiliated company Borg Manufacturing also ceased production of particle board over a period of two weeks, therefore only limited loads were accepted during this period."</i></p> <p>In accordance with Condition C8 the Planning secretary should have been notified in writing via the Major Projects website within seven days."</p> <p>On 3 May 2024 DPHI emailed ReDirect regarding SSD-10474-PA-16 advising that "NSW Planning has determined that a Warning Letter in the case of this non-compliance".</p> <p>The Auditor has been advised that a Warning Letter was not issued by DPHI.</p>	<p>receiving intakes over holiday periods etc.</p> <p>Additional Information provided to Auditor post audit:</p> <p>ReDirect has since increased its fleet of prime movers and walking floor trailers from 16 to 24 since the non-compliance occurred. This allows significant increased capacity to manage and process UWR during periods of increased demand.</p> <p>Additionally, ReDirect will provide notification to all customers notifying them of its shut down period and requesting notification of any large quantities intended to be received prior to the shut period.</p>	
1.08	A8	<p>NOTIFICATION OF COMMENCEMENT</p> <p>The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary:</p> <ul style="list-style-type: none"> (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Letter from ReDirect to DPHI, dated 19 October 2023, Re: Notification of commencement of operations. Ref: SSD-10474-PA-15. <p>The letter stated that operations would commence on 19 November 2023.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.09	A9	If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.	Not applicable. No Staging proposed for the SSD.		Not triggered
1.10	A10	SURRENDER OF EXISTING CONSENTS OR APPROVALS Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the existing development consent DA140/2016 in accordance with the EP&A Regulation.	The development consent DA140/2016 is required to be surrendered by 19 November 2024. The Auditor understands that this is currently in progress.		Not triggered
1.11	A11	Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A10, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 6 of the EP&A Act. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.	Noted.		Compliant
1.12	A12	EVIDENCE OF CONSULTATION Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	The Auditor sighted the following evidence of consultation: <ul style="list-style-type: none"> • Fire and Rescue NSW (FRNSW) Letter, Re: Review of Fire Safety Study (FSS), dated 13 July 2023. Ref: FRN16/2631 BFS23/3772 8000029394. • Email correspondence with SafeWork NSW, dated 20 April 2023, Re. Review of Waste Management Plan. SafeWork NSW had comments regarding the Non-conforming Waste Procedure, however the email noted that all comments had been closed. • Fire and Rescue NSW (FRNSW) Letter, Re: Emergency Plan Submission, dated 1 August 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>2023. Ref: FRN16/2361 BFS23/2680 8000028330. FRNSW stated that they had reviewed the Emergency Plan and associated Emergency Services Information Package and noted that it has been prepared in accordance with CoA B37 of SSD-10474.</p> <ul style="list-style-type: none"> All consultation was noted to have been undertaken prior to submission of respective plans to DPHI for approval. The consultation appropriately documented the matters raised and addressed, when applicable. 		
1.13	A13	<p>STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS</p> <p>With the approval of the Planning Secretary, the Applicant may:</p> <ul style="list-style-type: none"> (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	Not applicable. No Staging proposed for the SSD.		Not triggered
1.14	A14	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Not triggered.		Not triggered
1.15	A15	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Not triggered.		Not triggered

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1.16	A16	PROTECTION OF PUBLIC INFRASTRUCTURE Before the commencement of construction of the development, the Applicant must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	No disruption of services caused by the development. No consultation requirements triggered under this condition.		Not triggered
1.17	A17	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. 	No damage to public infrastructure has been caused by the development.		Not triggered
1.18	A18	DEMOLITION All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).	No demolition works occurred as part of the development.		Not triggered
1.19	A19	STRUCTURAL ADEQUACY All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: <ul style="list-style-type: none"> • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	No building or structural works occurred as part of the SSD.		Not triggered
1.20	A20	COMPLIANCE The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	The Auditor sighted the following evidence: <ul style="list-style-type: none"> • Toolbox Talk, dated 31 October 2023 – Subject: Asbestos Awareness Training. • Toolbox Talk, dated 22 November 2023 – Subject: Work Health and Safety and Environment Induction. 		Compliant

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			<ul style="list-style-type: none"> Toolbox Talk, dated 22 November 2023 – Subject: OEMP – Waste Management Plan. Toolbox Talk, dated 22 November 2023 – Subject: Pollution Incident Response Management Plan. Work Health and Safety Site Induction – St Marys, version 1, dated 15 May 2022. Environmental Requirements and Awareness Site Induction St Marys, version 1.2, dated 5 February 2023. <p>The Environmental Requirements site induction slides presented an overview of the OEMP objectives and requirements including the various sub-plans, mitigation measures, roles and responsibilities, details of pollution and incident response procedures, management of complaints, an overview of nearby sensitive receivers and the environmental policy. Site personnel were presented the induction on 22 November 2023, evidenced by the provided Toolbox Talk.</p>		
1.21	A21	OPERATION OF PLANT AND EQUIPMENT All plant and equipment used on site, or to monitor the performance of the development, must be: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<p>a) Sighted:</p> <ul style="list-style-type: none"> Plant Workorder Spreadsheet. The worksheet provided evidence that the various plant used on site were being continuously maintained. During the site inspection all plant and equipment was observed as being maintained in good working condition. <p>The maintenance register is used to track when plant is due for service and when faults are identified.</p> <p>b) Sighted:</p> <ul style="list-style-type: none"> Safe Operating procedure for Excavator 		Compliant

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			<p>dated 18/08/24 signed by site personnel</p> <ul style="list-style-type: none"> Front End Loader Safe operating procedure dated 18/08/24 signed by site personnel Sighted daily Prestart checklist for 01/10/24 for plant number 9109 Komatsu excavator Sighted repair history spreadsheet for 9109 Komatsu excavator for 17/09/24 		
1.22	A22	<p>EASEMENTS</p> <p>Within six months of the commencement of operation of the development, an easement , or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Letter from ReDirect to DPHI, dated 28 March 2024, Re: 25 Dunheved Circuit, St Marys – Development Consent No SSD-10474. DPHI Approval Letter, dated 9 April 2024, Re: St Marys Resource Recovery Facility – Alternative arrangement for easement required by Condition A22. Ref: SSD-10474-PA-17. Plan of Subdivision of Lot 143 DP1307832 and Lot 9 DP31908, registered on 19 August 2024.Persuant to 88B of the Conveyancing Act 1919. <p>The letter from ReDirect to DPHI outlined the request to amend the requirement of CoA A22, where an easement under S88B of the Conveyancing Act 1919 may be registered in lieu of the easement or public covenant under sections 88A and 88E. The letter detailed that the tenants at 25 Dunheved and 21 Dunhevd Circuit would have equal access to the easement and that costs for repair and maintenance would be equally shared.</p> <p>The DPHI approval letter (PA-17) stated that “the Department has carefully reviewed the document and agrees that the alternative arrangement fulfils the intent of Condition A22 in SSD-10474.”</p>	<p>Non-compliance SMRRF-01_NC-3</p> <p>The registered plans for Lot 9 DP 31908 depict the newly created easement which provides shared access to 21 and 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor ‘VMS Survey’ on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise.</p> <p>Recommendation: Nil</p>	Non-Compliant

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1.23	A23	Within six months of the commencement of operation of the development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.	<p>Sighted:</p> <ul style="list-style-type: none"> Plan of Subdivision of Lot 143 DP1307832 and Lot 9 DP31908, registered on 19 August 2024. Pursuant to 88B of the Conveyancing Act 1919. Land Registry Services record form dated 19 August 2024 with the registration of Lot 143 DP1307832 and Lot 9 DP31908 subdivision <p>The provided plans confirm that four (4) detention tanks are located within the boundary of Lot 9.</p>	<p>Non-compliance SMRRF-01_NC-4</p> <p>The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise.</p> <p>Recommendation: Nil</p>	Non-Compliant
1.24	A24	<p>UTILITIES AND SERVICES</p> <p>Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.</p>	No utilities constructed as part of the development.		Not triggered
1.25	A25	Before the commencement of operation, the Applicant must lodge a Feasibility study with Sydney Water for the development which accurately details water and wastewater demands, prepared by a Water Servicing Coordinator. Approval from Sydney Water is also required if it is proposed to discharge trade wastewater to Sydney Water's sewerage system.	<p>Approval from Sydney Water received as per Section 73.</p> <p>No discharge to trade waste is occurring.</p> <p>Sighted:</p>		Compliant

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			<ul style="list-style-type: none"> Music Link report prepared by Eclipse Consulting dated 23/05/22 Rose Atkins Rimmer Sydney Water application form confirming use of a certified water services coordinator Email correspondence between ReDirect and Rose Atkins Rimmer detailing the water usage planning for the development which was used as a feasibility study for the purpose of the application. 		
1.26	A26	Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i> .	<p>Sighted:</p> <ul style="list-style-type: none"> Sydney Water Compliance Certificate for 25 Dunheved Circuit, St Marys Ref: Case No. 207410. Prepared under Division 9 Section 73 of the Sydney Water Act 1994. Dated 11 October 2023. <p>The compliance certificate was received prior to the commencement of operations</p>		Compliant
1.27	A27	<p>APPLICABILITY OF GUIDELINES</p> <p>References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.</p>	Noted.		Compliant
1.28	A28	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted.		Compliant
1.29	AN1	<p>ADVISORY NOTES</p> <p>All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Environmental Protection Licence (EPL) #21487. Notification of Variation to Licence No. 21487, dated 4 October 2023. 		Compliant

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			<ul style="list-style-type: none"> Annual EPL Returns for 2021, 2022 and 2023. <p>The EPL is required due to the undertaking of scheduled activities under the Protection of the Environment and operations Act 1997 (POEO) Act, being 'Resource Recovery' and 'Waste Storage'. The EPL was varied in October 2023 in order to align some of the EPL requirements with the SSD requirements. The annual returns provide evidence that the EPL is being maintained.</p>		
Part B: Specific Environmental Conditions					
2.01	B1	TRAFFIC AND ACCESS Parking The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	The Auditor observed: <ul style="list-style-type: none"> adequate parking with 10 car parking spaces for permanent staff (only 5 permanent staff onsite) no ReDirect vehicles parking on public streets. 		Compliant
2.02	B2	Operating Conditions The Applicant must ensure: <ul style="list-style-type: none"> (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of <i>AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004)</i> and <i>AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002)</i>; (b) all car spaces are to be line marked and dedicated for the parking of vehicles only and not be used for storage of materials; (c) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (d) the site is not to be serviced or accessed by any vehicle greater than 19m 	Sighted: <ul style="list-style-type: none"> The Transport Planning Partnerships (TPPP) memorandum, dated 3 September 2021. Traffic management plan. Driver code of conduct. <p>The Auditor verified compliance with parts a) to o) during the site inspection which found adequate traffic control measures had been implemented as per the requirements of this condition and the Transport Management Plan.</p> <p>No instances of non-compliances were identified however it was found that the Driver Code of Conduct had not been signed by external truck drivers which was a recommendation of The</p>	Opportunity for Improvement SMRRF-01_OFI-1 ReDirect have developed a Driver Code of Conduct as part of the Operational Traffic Management Plan and provided details of staff training and fifteen (15) separate completed Driver Code of Conduct declarations for internal staff. Due to	Compliant

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		<p>in length;</p> <p>(e) all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway;</p> <p>(f) the development does not result in any vehicles queuing on the public road network;</p> <p>(g) heavy vehicles and bins associated with the development are not parked on local roads, footpaths, reserves, parks or vacant land in the vicinity of the site;</p> <p>(h) all vehicles associated with the development are prohibited from parking along Dunheved Circuit, Links Road and the surrounding road network;</p> <p>(i) signage, which is clearly visible from the public road, is placed within the development site to indicate entry and exit at the driveway access on Dunheved Circuit;</p> <p>(j) all vehicles are wholly contained on site before being required to stop;</p> <p>(k) all vehicles are to enter and exit the site in a forward direction;</p> <p>(l) all loading and unloading of materials is carried out on-site;</p> <p>(m) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network;</p> <p>(n) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and</p> <p>(o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations.</p>	Transport Planning Partnership memorandum referenced under CoA B2 (o).	<p>the extensive network of external truck drivers delivering product to the site, the Auditor was advised that it has not been feasible for ReDirect to obtain signed declarations from each external operator.</p> <p>Recommendation: Consider implementing a method of educating external operators of site-specific traffic management requirements such as a generic email to all registered providers including the Driver Code of Conduct for their acknowledgement.</p>	
2.03	B3	<p>Operational Traffic Management Plan</p> <p>Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C2 and must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s), in consultation with Council;</p> <p>(b) detail the numbers and frequency of vehicle movements, including light and heavy vehicles, size of heavy vehicles, routes and peak movements and internal pedestrian routes;</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Operational Traffic Management Plan, ReDirect Recovery Facility, 25 Dunheved Circuit, St Marys, Rev 3, dated 12 September 2022. (a) Prepared by Pavey Consulting Services an approved Department Planning and Environment Consultant for Preparation of Traffic Management Plans 		Compliant

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		<p>(c) detail the measures to be implemented to ensure road safety and network efficiency throughout operation, including:</p> <ul style="list-style-type: none"> (i) ensuring no queuing or parking of heavy vehicles occurs in Dunheved Circuit, the adjacent reserve, footpaths or the surrounding road network. (ii) redirecting incoming trucks to other facilities to prevent traffic build up and queuing in Dunheved Circuit; and (iii) ensuring there is no conflict of vehicles entering and exiting the site at the driveway entrance, including the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information; <p>(d) detail measures to minimise noise from development related traffic, including procedures for receiving and addressing complaints from the community about development related traffic and noise;</p> <p>(e) include a Driver Code of Conduct and induction training that includes procedures for:</p> <ul style="list-style-type: none"> (i) ensuring drivers implement safe driving practices and adhere to designated routes including prioritising the use of arterial roads and avoiding residential streets; (ii) minimising road traffic noise, particularly during night-time operations; (iii) ensuring drivers adhere to site-specific speed limits. <p>(f) include a program to monitor the effectiveness of these measures;</p> <p>(g) include procedures for ensuring all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway;</p> <p>(h) restrict access to vehicles that are over 19.0 metres long;</p> <p>(i) include a Traffic Control Plan (TCP) detailing the onsite measures to be implemented to control the manoeuvring of vehicles in designated areas, and the installation of signage,</p> <p>(j) recommend and implement additional traffic management measures where necessary, that have been developed in consultation with Council and to the satisfaction of the Planning Secretary, to maintain road safety</p>	<p>(b) Detailed in Section 8.0 of Operational Traffic Management Plan</p> <p>(c)</p> <ul style="list-style-type: none"> (i) Detailed in Section 8.0 of Operational Traffic Management Plan (ii) Detailed in Section 8.0 of Operational Traffic Management Plan (iii) Detailed in Section 8.0 of Operational Traffic Management Plan <p>(d) Detailed in Section 8.0 of Operational Traffic Management Plan</p> <p>(e)</p> <ul style="list-style-type: none"> (i) Detailed in Section 9.0 of Operational Traffic Management Plan (ii) Detailed in Section 8.0 of Operational Traffic Management Plan (iii) Detailed in Section 9.0 of Operational Traffic Management Plan <p>(f) Detailed in Section 10.0 of Operational Traffic Management Plan</p> <p>(g) Detailed in Section 8.0 of Operational Traffic Management Plan</p> <p>(h) Detailed in Section 8.0 of Operational Traffic Management Plan</p> <p>(i) Detailed in Section 8.0 of Operational Traffic Management Plan</p> <p>(j) Detailed in appendix C of Operational Traffic Management Plan</p> <p>(k) Detailed in Section 8.0 of Operational</p>		

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2.04	B4	<p>and network efficiency throughout operation; and</p> <p>(k) include a Workplace Travel Plan detailing measures to promote public transport usage and describing pedestrian and bicycle linkages and end of trip facilities available on site.</p> <p>The Applicant must:</p> <p>(a) not commence operation until the Operational Traffic Management Plan required by Condition B3 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the Operational Traffic Management Plan approved by the Planning Secretary for the duration of operation.</p>	<p>Traffic Management Plan</p> <p>a) Sighted: DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p> <p>The Project commenced operations on 19 November 2023.</p> <p>b) Sighted evidence of implementation:</p> <ul style="list-style-type: none"> Daily environmental checklist from 23/09/24 which includes a condition for traffic measures Completed Driver Code of Conducts Observed physical implementation of traffic mitigation measures on site, 		Compliant
2.05	B5	<p>WASTE MANAGEMENT</p> <p>Waste Monitoring Program</p> <p>From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>(b) include suitable provision to monitor the:</p> <p>(i) quantity, type and source of waste received on site; and</p> <p>(ii) quantity, type and quality of the waste outputs produced on site; and</p> <p>(c) ensure that:</p> <p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Waste Management Plan version 4, dated 12 April 2023 <ul style="list-style-type: none"> (a) Prepared by consultant; Jackson Environmental and Planning Pty Ltd (b) <ul style="list-style-type: none"> (i) Tracking software issued for compliance and the waste received is pre classified as exclusively wood waste (ii) Tracking software issued for compliance and the waste received is pre classified as exclusively wood waste (c) 		Compliant

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		<p>acceptance at the site; and</p> <p>(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>	<p>(i) Sighted way bridge tracking software from Weigh More solutions from 02/10/24 receivals</p> <p>Sighted Weighbridge Verification Form dated 11 of July 2024</p> <p>(ii) Sighted SafeWork correspondence for asbestos procedures</p> <p>Sighted Asbestos training toolbox talk dated 31 October 2023</p>		
2.06	B6	<p>Waste Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with Condition C22. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with SafeWork NSW; (b) detail the type and quantity of waste to be generated during operation of the development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Environment Protection Authority, 2014); (d) describe the management of any non-conforming waste received at the site, consistent with the 'Standards for managing construction waste in NSW' (EPA, 2019); (e) describe the processes and procedures for managing asbestos received at the site; (f) detail the materials to be reused or recycled, either on or off site; and (g) include the Management and Mitigation Measures included in Appendix 2. 	<ul style="list-style-type: none"> • Sighted: Waste Management Plan Rev 4, dated 12 April 2023 (a) Email correspondence with SafeWork NSW, dated 20 April 2023, Re. Review of Waste Management Plan. SafeWork NSW had comments regarding the Non-conforming Waste Procedure, however the email noted that all comments had been closed. (b) Detailed in Section 3.2.1 of the Waste Management Plan (c) Detailed in Section 3.2.3 of the Waste Management Plan (d) Detailed in Appendix A of the Waste Management Plan (e) Detailed in Appendix A of the Waste Management Plan (f) Detailed in Section 1 of the Waste Management Plan (g) Detailed in Section 6 of the Waste Management Plan 		Compliant

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2.07	B7	The Applicant must: <ul style="list-style-type: none"> (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary. 	Sighted: <ul style="list-style-type: none"> (a) DPHI Letter: Approval of the St Mary Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3. (b) Sighted: <ul style="list-style-type: none"> • Toolbox Talk – dated 22 November 2023, Subject: St Marys OEMP – Waste Management Plan. • Implementation of mitigation measures observed during site inspection. 		Compliant
2.08	B8	Statutory Requirements All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	All waste material removed from site is pre classified in accordance with NSW Waste Classification Guidelines.		Compliant
2.09	B9	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	All waste material removed from site is pre classified in accordance with NSW Waste Classification Guidelines.		Compliant
2.10	B10	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	No waste classification data obtained as all waste is pre-classified.		Not triggered
2.11	B11	Waste Reveal, Loading, Unloading and Storage The Applicant must only receive waste on site that is authorised for receipt by an EPL.	Only receiving pre classified waste. Sighted way bridge transaction report 19/11/23 to 05/09/24 with all urban wood residue as per the EPL conditions		Compliant
2.12	B12	All waste must be stored wholly within the designated waste storage areas.	Site observations found no waste stored outside the main warehouse.		Compliant
2.13	B13	All waste must be loaded and unloaded within the designated loading and unloading areas.	Site observations identified waste being unloaded within the main warehouse		Compliant
2.14	B14	SOILS, WATER QUALITY AND HYDROLOGY	The site has installed a remedial stormwater drainage system including four Onsite Detention		Compliant

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		Discharge Limits The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Tanks (OSDs), an Ecosol Gross Pollutant Trap (GPT) and Stormfilter cartridges to remove finer particulates and oil and grease. There has been one (1) monitoring event which did not identify surface water impacts representative of a pollution event. Sighted: <ul style="list-style-type: none"> Email correspondence between ReDirect and the consultant Land Risk Environmental, dated 18 July 2024, detailing the surface water biannual monitoring results 		
2.15	B15	Stormwater Management System Prior to the commencement of operation of the development, the Applicant must design, install and operate a stormwater management system for the development. The system must: <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s); (b) be in accordance with the Stormwater Management Plan Report (ref. 10113-002-smp) prepared by Eclipse Consulting Engineers Pty Ltd, dated 13 May 2021, and the Remedial Stormwater Drainage Plan (Drg No. C04-A) prepared by Consulting Engineers Pty Ltd, dated 23 February 2021. (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines. 	Sighted: <ul style="list-style-type: none"> Stormwater Management Plan Report, 21-25 Dunheved Circuit, St Marys NSW, Rev 2, dated 23 February 2021. Letter from Eclipse Consulting Engineers to Penrith City Council, dated 5 September 2024. Ref: 10113-003-I. Remedial Stormwater Drainage Plan, Drawing C04-A, Prepared by Eclipse Engineers, dated 23 February 2021. (a) The stormwater management system was designed by Eclipse Consulting Engineers, who are considered to be suitably qualified and experienced. (b) Prepared by Eclipse Engineers in accordance with Australian Standards and guidelines. (c) Prepared by Eclipse Engineers in accordance with Australian Standards and guidelines. 		Compliant
2.16	B16	Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the	Sighted: <ul style="list-style-type: none"> (a) Letter from ReDirect to DPHI, dated 27 August 2024. Notification of non-compliance SSD-10474, condition B16. Ref: SSD-10474-PA-19. 	Self-reported Non-compliance. SMRRF-01_NC-5 Council was not consulted with prior to	Non-Compliant

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		Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	<p>(b) Email from DPHI to ReDirect, dated 16 September 2024. Re: Communication regarding non-compliance notification – rain water tank SSD-10474-PA-19.</p> <p>(c) Letter from Eclipse Consulting Engineers to Penrith City Council, dated 5 September 2024. Ref: 10113-003-I.</p> <p>(d) Stormwater Management Plan Report, 25 Dunheved Circuit, St Marys NSW, Rev 4, dated 5 September 2024.</p> <p>The non-compliance notification letter from ReDirect detailed a breach of CoA B16, including the below:</p> <p>“On 21 August 2024, Redirect became aware of non-compliance with Condition B16 during Independent Environmental Audit preparation, the condition has not been met to “the satisfaction of council”. Previous assessment and modelling undertaken by Eclipse Consulting Engineering Pty Ltd (Eclipse) prior to operation had indicated that the development had met the requirements of Council. However, no assessment was requested from Council following preparation of the Eclipse report.”</p> <p>DPHI responded on 16 September 2024 stating that a ‘record the breach’ has been recorded, without any further enforcement action proposed.</p> <p>The letter from Eclipse to Council dated 5 September 2024 included a revised Stormwater Management Plan which was stated by Eclipse “indicates that the existing rainwater tank is compliant with Council’s rainwater reuse targets.”</p>	<p>operations regarding the replacement rainwater tank required by CoA B16.</p> <p>Recommendation: ReDirect should implement the actions outlined in the non-compliance notification letter, dated 27 August 2024. Including:</p> <p>(a) Request Council to undertake assessment of modelling and MusicLink report provided by Eclipse - CLOSED</p> <p>(b) Request for Eclipse to provide additional assessment and updated report.</p> <p>(c) Seek council endorsement for updated modelling and selection of any new rainwater tank (should it be required).</p> <p>(d) Install new and/or additional rainwater tank (should it be required).</p>	

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.17	B17	<p>Surface Water Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare a Surface Water Management Plan (SWMP) to the satisfaction of the Planning Secretary. The SWMP must be prepared by a suitably qualified and experienced person(s), form part of the OEMP required by Condition C22, and must include:</p> <ul style="list-style-type: none"> (a) a program to monitor surface water flows, quality, storage and use; (b) a maintenance schedule for all stormwater devices and treatment measures; (c) detail the management of wastewater streams on the site, including leachate; (d) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and (e) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Surface Water Management Plan, 21-25 Dunheved Circuit, St Marys NSW, Rev 1, dated 5 October 2022. <ul style="list-style-type: none"> (a) Detailed in Section 4 of the Surface Water Management Plan (b) Detailed in Section 4 of the Surface Water Management Plan (c) Detailed in Section 2 and 4 of the Surface Water Management Plan (d) Detailed in Section 5 of the Surface Water Management Plan (e) Detailed in Section 4,5 and 7 of the Surface Water Management Plan 		Compliant
2.18	B18	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the Surface Water Management Plan required by condition B17 is approved by the Planning Secretary; and (b) implement the most recent version of the Surface Water Management Plan approved by the Planning Secretary for the duration of the development. 	<ul style="list-style-type: none"> (a) Sighted: DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3. The site commenced operations on 19 November 2023. (b) The most recent version of the approved Surface Water Management Plan is being implemented as evidenced by <ul style="list-style-type: none"> • Toolbox talk dated 22 November 2023 with details of water management • Biannual surface water monitoring • Evidence of mitigation measures observed during site inspection 		Compliant
2.19	B19	AIR QUALITY	Sighted:		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Dust Minimisation The Applicant must take all reasonable steps to prevent and minimise dust generated during all works authorised by this consent.	<ul style="list-style-type: none"> Operational Environmental Management Plan – St Marys INSPECTION CHECKLIST, dated 3 June 2024. Section 3 of the checklist includes dust mitigation measures which were required to be implemented daily. Auditor to also include dust control measures from site inspection observations. Site inspection found no observation of dust on the site		
2.20	B20	During operation, the Applicant must ensure: <ul style="list-style-type: none"> (a) all loading, unloading, materials handling, sorting, sampling, processing and storage operations are undertaken within a fully enclosed building; (b) (no waste, waste derived products and/or finished products, are stored outside of the building at any time; (c) the roller doors of the processing building are kept closed at all times, except when vehicles are entering or exiting the building; (d) a wheel wash at the vehicle egress point is operational and used at all times by trucks exiting the site; (e) all trucks entering and exiting the premises have their loads covered; (f) the following areas are sealed with concrete or asphalt: <ul style="list-style-type: none"> i. roads and carparking areas; ii. operating, storage, unloading and loading areas; and iii. any unused external surfaces; (g) the site maintained in a manner that prevents and minimises the emission of air pollutants, including dust; (h) no material, including sediment, is tracked off site; (i) vehicles and plant are switched off when not in use, fitted with pollution reduction devices where reasonably practicable and maintained in accordance with manufacturer's specifications; and (j) a dust suppression system is operational and used at all times when processing materials that create dust. 	The Auditor verified the implantation of air quality control measures during the site inspection, with the following observed: <ul style="list-style-type: none"> Use of water misters within warehouse All surfaces sealed Trucks had loads covered All activities (including tipping and storage) occurring within the warehouse Dedicated street sweeper present on site No evidence of mud tracking or sediments leaving site A wheel wash was installed and was operational. 		Compliant
2.21	B21	Air Quality Discharges	Evidence of equipment maintenance logs.		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	The EPL does not contain air quality / discharge criteria. Sighted maintenance register and Plant Workorder Spreadsheet. The worksheet provided evidence that the various plant used on site were being continuously maintained. The maintenance register is used to track when plant is due for service and when faults are identified.		
2.22	B22	<p>Air Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C22. The AQMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) detail and rank all emissions from all sources of the development, including particulate emissions; (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; (d) identify the control measures that that will be implemented for each emission source; and (e) nominate the following for each of the proposed controls: <ul style="list-style-type: none"> i. key performance indicator; ii. monitoring method; iii. location, frequency and duration of monitoring; iv. record keeping; v. complaints register; vi. response procedures; and vii. compliance monitoring. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Air Quality and Odour Management Plan, Rev 1, dated 22 July 2022. <ul style="list-style-type: none"> (a) Prepared by consultant Todoroski Air Sciences (b) Detailed in section 7.1 of the Air Quality Management Plan (c) Detailed in section 8.1 of the Air Quality Management Plan (d) Detailed in section 7 of the Air Quality Management Plan (e) <ul style="list-style-type: none"> (i) Detailed in section 7.2 of the Air Quality Management Plan (ii) Detailed in section 7.2 of the Air Quality Management Plan (iii) Detailed in section 7.2 of the Air Quality Management Plan (iv) Detailed in section 7.2 of the Air Quality Management Plan (v) Detailed in section 7.2 of the Air Quality Management Plan 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>(vi) Management Plan Detailed in section 7.2 of the Air Quality Management Plan</p> <p>(vii) Management Plan Detailed in section 7.2 of the Air Quality Management Plan</p>		
2.23	B23	<p>The Applicant must:</p> <p>(a) not commence operation under this consent until the AQMP required by condition B22 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development.</p>	<p>(a) Sighted: DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p> <p>The site commenced operations on 19 November 2023.</p> <p>(b) Implementation of the most recent version of the AQMP was implemented and verified by the Auditor during the site inspection.</p>		Compliant
2.24	B24	<p>Odour Management</p> <p>The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).</p>	<p>No organic material is imported to site which would give rise to offensive odour, nor does the use of plant and machinery result in a noticeable odour. During the site inspection the Auditor did not observe odour which would be considered as 'offensive odour' as per the POEO Act.</p>		Compliant
2.25	B25	<p>Noise</p> <p>Hours of Work</p> <p>The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.</p> <p>Table 1 Hours of Work</p>	<p>The Site is permitted to operate 24/7, however the Auditor is advised that no night time operations occur.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status											
		<table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="2">Construction / Fit Out</td><td>Monday – Friday</td><td>7 am to 6 pm</td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td>Operation</td><td>Monday - Sunday</td><td>24 hours</td></tr></table>	Activity	Day	Time	Construction / Fit Out	Monday – Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Operation	Monday - Sunday	24 hours			
Activity	Day	Time														
Construction / Fit Out	Monday – Friday	7 am to 6 pm														
	Saturday	8 am to 1 pm														
Operation	Monday - Sunday	24 hours														
2.26	B26	<p>Works outside of the hours identified in condition B25 may be undertaken in the following circumstances:</p> <ul style="list-style-type: none">(a) works that are inaudible at the nearest sensitive receivers;(b) works agreed to in writing by the Planning Secretary;(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or(d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	<p>The Site is permitted to operate 24/7, however the Auditor is advised that no night time operations occur.</p>		Compliant											
2.27	B27	<p>Operational Noise Limits</p> <p>The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.</p> <p>Table 2 Noise Limits (dB(A))</p> <table><tr><th>Location</th><th>Day L_{Aeq}(15 minute)</th><th>Evening L_{Aeq}(15 minute)</th><th>Night L_{Aeq}(15 minute)</th><th>Night L_AMax</th></tr><tr><td>All residential receivers</td><td>49</td><td>43</td><td>38</td><td>52</td></tr></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 L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _A Max	All residential receivers	49	43	38	52	<p>Sighted:</p> <ul style="list-style-type: none">St Marys Noise Assessment, Report No. 20216, Rev A, dated February 2021. <p>The modelled noise impact assessment assumed that the site would be operating 24hrs/day, with no variations in operations from day to night. The model also assumed that one (1) telehandler, one (1) front end loader and one (1) shredder were being utilised indoors for 100% of the period, all noise sources were operating simultaneously and that two (2) trucks in a 15 min period would enter, tip material and leave the site. The front-end loader and telehandler presented the greatest sound power level (105 dBA).</p> <p>Based on the above assumptions, predicted noise levels at all identified sensitive receivers were found to comply with relevant criteria for day, evening and night periods.</p> <p>The Auditor notes that the site does not operate in the night period and during the site inspection</p>		Compliant	
Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _A Max												
All residential receivers	49	43	38	52												

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			no additional plant were identified which would present a sound power level greater than a telehandler or front-end loader. Therefore, the Auditor is confident that actual noise impacts were less than what was predicted and therefore complies with the nominated criteria. Sighted daily checklist 01/10/24 which includes noise code of conducts.		
2.28	B28	Road Traffic Noise 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.	Sighted: <ul style="list-style-type: none"> Operational Traffic Management Plan, ReDirect Recovery Facility, 25 Dunheved Circuit, St Marys, Rev 3, dated 12 September 2022. Completed Driver Code of Conduct Declarations (15 declarations in total) Section 9 of the Operational Traffic Management Plan (OTMP) includes a Driver Code of Conduct. The OTMP was prepared prior to the operation of the development.		Compliant
2.29	B29	Operational Noise Management Plan 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: <ul style="list-style-type: none"> (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. 	Sighted: <ul style="list-style-type: none"> (e) Operational Noise Management Plan, revision 1, dated 10 August 2022. <ul style="list-style-type: none"> (a) Prepared by consultant EMM Consulting (b) Detailed in Section 7 of the Noise Management Plan (c) Detailed in Section 8.2 of the Noise Management Plan 		Compliant
2.30	B30	The Applicant must:	(a) Sighted: DPHI Letter: Approval of the		Comp

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>(a) not commence construction until the ONMP required by condition B25 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the ONMP approved by the Planning Secretary for the duration of construction.</p>	<p>St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p> <p>The site commenced operations on 19 November 2023.</p> <p>(b) Implementation of the most recent version of the ONVMP was implemented and verified by the Auditor during the site inspection.</p>		
2.31	B31	<p>HAZARDS AND RISK</p> <p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.</p>	<p>Site inspection observations found that dangerous goods were stored in accordance with Australian Standards and NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual'</p>		Compliant
2.32	B32	<p>Dangerous Goods</p> <p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.</p>	<p>Site Visit inspection observations found that dangerous goods were stored in accordance with the Australian Dangerous Goods Code, and in accordance with all relevant Australian Standards</p>		Compliant
2.33	B33	<p>Bunding</p> <p>The Applicant must store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i> (Department of Environment and Climate Change, 2007).</p>	<p>Minor volume of liquid chemicals were stored within banded areas</p>		Compliant
2.34	B34	<p>FIRE SAFETY</p> <p>Prior to the commencement of operation of the development, the Applicant is to engage a fire safety engineer or other suitably qualified consultant to prepare the final fire safety design of the development, including firewater containment, in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of the National Construction Code.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Fire Engineering Report, Waste Sorting Facility, 25 Dunheved Circuit, St Marys, Rev B, dated October 2016 Submission of Fire Engineering Report to DPHI, dated 26 October 2023, Ref: SSD-10474-PA-14. 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<ul style="list-style-type: none"> DPHI approval of Fire Engineering Report, dated 17 October 2023. Ref: SSD-10474-PA-14. <p>The DPHI approval letter stated that "I note that pursuant to the requirements of Condition B34, the final fire safety design in the Fire Engineering Report has been prepared by a fire safety engineer to address Clauses E1.10 and E2.3 of the National Construction Code, and that the Applicant has consulted with Fire and Rescue NSW."</p>		
2.35	B35	The premises must have appropriate fire services to be able to respond to a fire event at the facility in accordance with FRNSW 'Fire Safety in Waste Facilities' guidelines.	<p>Sighted:</p> <ul style="list-style-type: none"> Fire Engineering Report, Waste Sorting Facility, 25 Dunheved Circuit, St Marys, Rev B, dated October 2016 Wood waste and plasterboard recycling facility, 25 Dunheved Circuit, St Marys, Fire Safety Study, Rev 4, dated 10 July 2023 <p>The FSS was prepared in consultation with FRNSW who advised that the FSS "has been prepared to the satisfaction of FRNSW and will meet the operational requirements of FRNSW".</p>		Compliant
2.36	B36	<p>Prior to commencement of operation of the development, the Applicant must prepare a Fire Safety Study (FSS) for the development to the satisfaction of the Planning Secretary. The FSS must:</p> <ul style="list-style-type: none"> (a) cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994); (b) be developed in consultation with and approved by FRNSW; (c) consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence. 	<p>Sighted:</p> <ul style="list-style-type: none"> Wood waste and plasterboard recycling facility, 25 Dunheved Circuit, St Marys, Fire Safety Study, Rev 4, dated 10 July 2023 Fire and Rescue NSW (FRNSW) Letter, Re: Review of Fire Safety Study (FSS), dated 13 July 2023. Ref: FRN16/2631 BFS23/3772 8000029394. <p>(a) FRNSW stated that "FRNSW note the FSS was to be developed to the satisfaction of FRNSW and in accordance with the Hazardous</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>Industry Planning Advisory Paper (HIPAP) No. 2. FRNSW find that the FSS for Redirect Recycling St Marys - 21-25 Dunheved Circuit St Marys (Version 4.0 date 10 July 2023) has been prepared to the satisfaction of FRNSW and will meet the operational requirements of FRNSW."</p> <p>(b) Sighted letter of correspondence between NSW Fire and Rescue and reDirect dated 1 August 2023</p> <p>(c) Detailed in Fire and Rescue NSW (FRNSW) Letter, Re: Review of Fire Safety Study (FSS), dated 13 July 2023.</p>		
2.37	B37	<p>Prior to the commencement of operation of the development, the Applicant must prepare a comprehensive Emergency Response Plan (ERP) for the site in consultation with FRNSW to the satisfaction of the Planning Secretary. The ERP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified consultant; (b) specifically address foreseeable on-site and off-site fire events and other emergency incidents; (c) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards); and (d) detail other risk control measures that could be implemented in a fire emergency caused by any unique hazards specific to the site. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Emergency Plan – St Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023 • Emergency Services Information Package, Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023. • Fire and Rescue NSW (FRNSW) Letter, Re: Emergency Plan Submission, dated 1 August 2023. Ref: FRN16/2361 BFS23/2680 8000028330. • DPHI Letter: Approval of the St Mary Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3. <p>FRNSW stated that they had reviewed the Emergency Plan and associated Emergency Services Information Package and noted that it has been prepared in accordance with CoA B37 of SSD-10474.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>The Emergency Plan was approved by DPHI on 3 August 2023 as part of the suit of operation plans.</p> <ul style="list-style-type: none"> (a) Prepared by Lethlean Fire and Environment Pty Ltd (b) Detailed in section 6 of the emergency plan (c) Detailed in section 6 of the emergency plan (d) Detailed in section 6 of the emergency plan 		
2.38	B38	<p>Visual Amenity Lighting</p> <p>The Applicant must ensure the lighting associated with the development:</p> <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019); and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Electrical Design Statement, 25 Dunheved Circuit, St Marys NSW, dated 9 June 2024 (a) The electrical design statement certified that the electrical elements at the project had been designed in accordance with AS4282:1997 (b) The electrical design statement certified details that electrical elements are mounted in a manner which does not create nuisance to surrounding properties. 		Compliant
Part C: Environmental Management, Reporting and Auditing					
3.01	C1	<p>Environmental Management Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) Details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant 	<p>Sighted:</p> <ul style="list-style-type: none"> • OEMP, reDirect Recycling Facility, 25 Dunheved Circuit, St Marys NSW, dated 30/11/2022 <p>The OEMP were found to include the information required by this condition.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) 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;</p> <p>(b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(c) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</p> <p>(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;</p> <p>(e) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(f) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(g) a protocol for periodic review of the plan.</p> <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>(a)</p> <p>(i) Detailed in Section 1.2 of the OEMP</p> <p>(ii) Detailed in Section 4.3 of the OEMP</p> <p>(iii) Detailed in Section 5 of the OEMP</p> <p>(b) Detailed in section 5 of the OEMP in table 15</p> <p>(c)</p> <p>(i) Detailed in section 5 of the OEMP in table 15</p> <p>(ii) Detailed in section 7.4 of the OEMP in table 18</p> <p>(d) Detailed in section 5 of the OEMP</p> <p>(e) Detailed in section 5 of the OEMP</p> <p>(f)</p> <p>(i) Detailed in section 7 of the OEMP</p> <p>(ii) Detailed in section 7 of the OEMP</p> <p>(iii) Detailed in section 7 of the OEMP</p> <p>(g) Detailed in section 7.12 of the OEMP</p>		
3.02	C2	<p>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> OEMP ReDirect Recycling Facility, 25 Dunheved Circuit, St Marys NSW, Rev 1, dated 10 November 2023 SSD-10474. DPHI Letter to ReDirect 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3.03	C3	<p>As part of the OEMP required under Condition C2 of this consent, the Applicant must include the following:</p> <ul style="list-style-type: none"> (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and (c) include the following environmental management plans: <ul style="list-style-type: none"> (i) Operational Traffic (see Condition B3); (ii) Waste (see Condition B6); (iii) Surface Water (see Condition B17); (iv) Air Quality (see Condition B22); (v) Operational Noise (see Condition B29); and (vi) Emergency Response Plan (see Condition B37) 	<p>Recycling Re. approval of OEMP, dated 3 August 2023.</p> <p>The OEMP was observed to contain the following information:</p> <ul style="list-style-type: none"> (a) Roles, responsibilities, authority and accountabilities of personnel involved are detailed in table 21 of section 9.3 of the OEMP and section 3.1 of the OEMP (b) <ul style="list-style-type: none"> (i) Detailed section 9.3 of the OEMP (ii) Detailed section 9.3 of the OEMP (iii) Detailed section 8.2 of the OEMP (iv) Detailed in the Emergency Response Plan (c) <ul style="list-style-type: none"> (i) Sighted Operational Traffic Management Plan (B3) (ii) Sighted Waste Management Plan (B6) (iii) Sighted Surface Water Management Plan (B17) (iv) Sighted Air Quality and Odour management plan 		Compliant
3.04	C4	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time). 	<ul style="list-style-type: none"> • Sighted: DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3. • The site commenced operations on 19 November 2023. • Evidence of implementation of OEMP 	<p>Opportunity for Improvement SMRRF-01_OFI-2</p> <p>ReDirect implement a daily environmental checklist which includes assessment of the effectiveness of several</p>	Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>demonstrated by review of:</p> <ul style="list-style-type: none"> Sighted WHS site induction Toolbox Talk dated 22 November 2023 Sighted Asbestos training toolbox talk dated 31 October 2023 Sighted daily checklist 01/10/24 Site inspection observations – during the site inspection the auditor observed that site mitigation measures were adequately implemented 	<p>environmental mitigation measures required to be implemented under the OEMP and sub-plans. The Auditor considers that the daily checklist is a valuable tool for minimising environmental impact and maintaining compliance to the conditions of consent.</p> <p>Recommendation: There is an opportunity to review the daily checklist to ensure that it is providing value and capturing all key mitigation measures and reflects any changes or lessons learnt from the previous ~11 months of implementation. An example of an improvement is to add the truck wheel wash to the checklist.</p>	
3.05	C5	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) the submission of a Compliance Report under condition [C11]; (b) the submission of an incident report under condition [C7]; (c) the submission of an Independent Audit under condition [C13]; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, 	<ul style="list-style-type: none"> a) There have been no compliance reports completed at the site. The first compliance report will be due by 19 May 2025. b) No reportable incidents have occurred. c) This is the first Independent Audit for the site. d) No modifications to conditions for consent. 		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3.06	C6	<p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.</p> <p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>	e) No formal direction from DPHI to update review management plans.		Not triggered
3.07	C7	<p>REPORTING AND AUDITING</p> <p>Incident Notification, Reporting and Response</p> <p>The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.</p>	The have been no notifiable incidents at the site.		Not triggered
3.08	C8	<p>Non-Compliance Notification</p> <p>The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Letter from ReDirect to DPHI, dated 3 April 2023. Notification of non-compliance SSD-10474, conditions A7 and C8. Ref: SSD-10474-PA-14. Letter from ReDirect to DPHI, dated 27 August 2024. Notification of non-compliance SSD-10474, condition B16. Ref: SSD-10474-PA-19. <p>There were three (3) self-reported non-compliances during the audit period. The first non-compliance (CoA A7) was identified on 21 February 2023 and reported to DPHI 3 April 2024,</p>	<p>Self-reported Non-compliance.</p> <p>SMRRF-01_NC-6</p> <p>DPHI were not notified within 7-days of becoming aware that the non-compliance against CoA A7 had occurred.</p> <p>Recommendation:</p> <p>Ensure that DPHI are notified within 7 days of becoming aware of any future non-compliances</p>	Non-Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			which exceeded the 7-day requirement and triggered a non-compliance against CoA C8. There was a non-compliance against CoA B16 which was identified on 21 August 2024 and notified to DPHI on 27 August 2024, meeting the 7-day requirement. Refer to the respective CoA in this table for further details on the non-compliances.	(including those identified in this IEA report).	
3.09	C9	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Sighted: <ul style="list-style-type: none"> Letter from ReDirect to DPHI, dated 3 April 2023. Notification of non-compliance SSD-10474, conditions A7 and C8. Ref: SSD-10474-PA-14. Letter from ReDirect to DPHI, dated 27 August 2024. Notification of non-compliance SSD-10474, condition B16. Ref: SSD-10474-PA-19. The non-compliance notifications were confirmed to contain the information required by CoA C9.		Compliant
3.10	C10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	The self-reported non-compliances did not relate to the incidents.		Not triggered
3.11	C11	<p>Compliance Reporting</p> <p>Within six months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also:</p> <ul style="list-style-type: none"> (a) identify any trends in the monitoring data over the life of the development; (b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant 	First annual compliance report is to be completed in early 2025.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the development.			
3.12	C12	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.			Not triggered
3.13	C13	Independent Audit Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must: (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and (c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).	This is the first IEA commissioned for the SSD project, This audit was commissioned in August 2024 which is within one year of commencement of operation (November 2023). a) This Audit has been prepared in accordance with the IAPAR. b) the Lead Auditor and Audit Team have been endorsed by the Planning Secretary. Ref: SSD-10474-PA-10 Letter from DPHI to ReDirect endorsing Dylan Jones, Gary Selwyn, Mike Stojanoski and Jack Hanigan, dated 19 August 2024. c) It is understood that this report will be submitted by ReDirect to DPHI within 3 months of commissioning the audit.		Compliant
3.14	C14	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C13 of this consent; (b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and	The Auditor understand that ReDirect will action CoA C14 requirements upon receipt of the final Audit Report.		No triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3.15	C15	<p>notify the Planning Secretary in writing at least 7 days before this is done.</p> <p>Monitoring and Environmental Audits</p> <p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p> <p>Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</p>	Sighted email correspondence between ReDirect and the consultant Land Risk Environmental, dated 18 July 2024, detailing the surface water biannual monitoring report		Compliant
3.16	C16	<p>ACCESS TO INFORMATION</p> <p>At least 48 hours before the commencement of construction of the development and for the life of the development, the Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; 	<p>Sighted: Website URL: Environmental - ReDirect.</p> <p>(a) The following documents were found to be accessible on the website:</p> <ul style="list-style-type: none"> (i) the EIS, amendment report and Rts. (ii) SSD-10474 (iii) All management plans were listed (iv) No enviro monitoring required. Compliance report not yet available (v) No environmental performance monitoring reports required to date. (vi) No staging report applicable. (vii) Phone number and email address provided. (viii) A monthly complaints register is maintained on the website. (ix) No compliance reports have been 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (ix) the Compliance Report of the development; (x) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; (xi) any other matter required by the Planning Secretary; and <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<ul style="list-style-type: none"> undertaken on the project to date. (x) This is the first IEA report, which is intended to be published on the website. (xi) No other matters required. (b) All information was considered to be up to date. 		



Appendix B – Planning Secretary Audit Team Endorsement

Appendix B – Planning Secretary Audit Team Endorsement

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-10474-PA-18

James Sutton
Environmental Manager
Borg Manufacturing Pty Limited
Darkinjung Country
2 Wella Way,
Somersby NSW 2250
19/08/2024

Sent via the Major Projects Portal only

Subject: St Marys Resource Recovery Facility - Independent Auditor Nomination Request

Dear Mr Sutton

Reference is made to your post-approval matter, SSD-10474-PA-18, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the St Marys Resource Recovery Facility (Borg) (Project), submitted as required by Schedule 2, Condition C13 of SSD-10474 as modified (Consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 13 August 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition C13(b) of the Consent and the NSW Planning's *Independent Audit Post Approval Requirements (2020) (IAPAR)*, as nominee of the Planning Secretary, I endorse the following independent audit team from KPMG:

- Mr Dylan Jones – Lead Auditor
- Mr Gary Selwyn – Alternate Lead Auditor
- Mr Michael Stojanoski – Auditor

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the IAPAR. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au

1

Department of Planning, Housing and Infrastructure



Should you wish to discuss the matter further, please contact Astrid Christensen, (Compliance Officer) on 9274 6170 or email compliance@planning.nsw.gov.au

Yours sincerely



Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix C – Consultation Records

Appendix C – Consultation Records

From: [Astrid Christensen](#)
To: [Jones, Dylan](#)
Cc: [Julia Pope](#); [Gehriol Peters Shaw](#); [Henigan, Jack](#)
Subject: [EXTERNAL] RE: St Marys Resource Recovery Facility SSD-10474 - Independent Auditor Approval
Date: Tuesday, 24 September 2024 8:18:08 AM
Attachments: [image006.png](#)

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hi Dylan,

Thank you for the opportunity to provide input into the scope of the audit.

Can you please also contact the local council and the EPA?

While I acknowledge the following are included within the scope, can you please look into the compliance with:

- The waste limits of consent (conditions A6 and A7)
- Operational condition (B2)
- Operational management plans

Please do not hesitate to contact me if you need any more information.

Kind regards,

Astrid Christensen
Compliance Officer
Compliance - Metro
Department of Planning, Housing and Infrastructure

P (02) 9274 6170 | E Astrid.Christensen@planning.nsw.gov.au |
4PSQ, 12 Darcy Street, Parramatta, NSW, 2150
www.dphi.nsw.gov.au



The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Subject: RE: St Marys Resource Recovery Facility SSD-10474 - Independent Auditor Approval

Dear Astrid,

I am writing to advise that KPMG is scheduled to undertake the first Independent Environmental Audit of the St Marys Resource Recovery Facility, as required by Condition of Consent C13 of SSD-10474. I note that the Department approved the KPMG audit team on 19 August 2024 as per the below email.

The audit is planned for the 2 October 2024 and will review compliance with SSD-10474 Schedule 2: Parts A, B, C and appendices, as applicable.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements 2020, Section 3.2*, KPMG seeks your input into the scope of the audit and advice on any particular areas where you would like KPMG to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of the audit.

Regards,

Dylan Jones

Director

ESG Advisory & Assurance

Climate Change & Sustainability

KPMG

International Towers Sydney 3

300 Barangaroo Avenue,

Sydney NSW 2000 Australia

Mob +61 421 026 746

djones17@kpmg.com.au

kpmg.com.au





Our reference: P-77483-P2y5
Contact: Gavin Cherry
Telephone: (02) 4732 8125

25 September 2024

KPMG
International Towers Sydney 3
300 Barangaroo Avenue,
Sydney, NSW, 2000

Attn: Dylan Jones
Email: djones17@kpmg.com.au

Dear Mr Jones

**Council Response to Planning Enquiry Regarding Compliance with
Condition No. C13 – Independent Environmental Audit for SSD-10474 at
Redirect Recycling Facility at 25 Dunheved Circuit, St Marys NSW, 2760**

I refer to your email of 23 September 2024 which is understood to respond
to conditioned requirements in an SSD determination issued by the State
Government.

A copy of the consent condition is provided below:

Independent Audit

- C13. Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:
- (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)
 - (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary, and
 - (c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).

Condition C13 has been imposed by the NSW Government via an SSD determination. As a result the State Government is the consent authority and is responsible for managing condition compliance. It is also noted that Condition C13 makes no reference to Council as an authority to be consulted or engaged in addressing Condition C13 compliance. Notwithstanding it is understood from the email received, that the consent authority has directed you to engage with Council for feedback. As a result of this direction, Council has reviewed the information referred and has no comments to make that would warrant amendment of what has been prepared. Please continue liaise directly with the consent authority to ensure they are ultimately satisfied that the condition

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NSW 2751 Australia
T 4732 7777
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penrith.nsw.gov.au

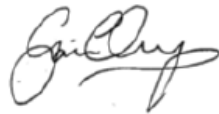




requirement has been or will be met, as any outcomes stemming from the audit will be a matter for the consent authority to consider and address.

Should you wish to discuss this matter further, please do not hesitate to contact me on (02) 4732 8125.

Yours sincerely,



Gavin Cherry
Development Assessment Coordinator



DOC24/805798-1

1 October 2024

Dylan Jones
Director, ESG Advisory & Assurance
KPMG Australia
International Towers Sydney 3
300 Barangaroo Avenue
SYDNEY NSW 2000

Email: djones17@kpmg.com.au

Dear Mr. Jones,

**Consultation for Independent Environmental Audit of Redirect Recycling Pty Ltd,
St Marys Resource Recovery Facility, EPL 21487, SSD-10474
25 Dunheved Circuit, St Marys, NSW, 2760 NSW 2036**

Thank you for your email, dated 29 September 2024, regarding consultation with the Environment Protection Authority (EPA) on the independent environmental audit of Redirect Recycling Pty Ltd (Licensee). The EPA understands that KPMG have been approved as the auditor to undertake audits in accordance with Condition C13 of SSD-10474 (Consent).

A review of EPA records shows that the Licensee holds Environment Protection Licence No. 21487 (Licence) to undertake recovery of general waste and waste storage at 25 Dunheved Circuit, St Marys (Premises). Since the Licence was issued on 22 April 2021, several non-compliances with the Licence have been noted, and are summarised in the table below.

Redirect Recycling EPL 21487 non compliances

Annual Return reporting period	Number of Incidents	Condition number	Summary of particulars
22/04/2021 to 21/04/2022	3	L2.2	The authorised amount of waste permitted on the premises exceeded 500 tonnes at any one time
	1	L2.3	The total quantity of waste received at the premises exceeds 18,000 tonnes in the 12 months period from the Licence Anniversary date.
22/04/2022 to 21/04/2023	1	L2.2	The authorised amount of waste permitted on the premises exceeded 500 tonnes at any one time.
	1	L2.3	The total quantity of waste received at the premises exceeds 18,000 tonnes in the 12 months period from the Licence Anniversary date.
22/04/2023 to 21/04/2024	1	L2.2	The closing stock for the December 2023 Waste Contribution reported in EPA's Waste and Resource Reporting Portal was 762.47 tonnes, exceeding the storage limit of 704 tonnes.

The licensee has historically had issues with exceeding their authorised amount of waste permitted on the Premises for several consecutive reporting periods, however, the authorised amount was increased on 4 October 2023 to allow 700 tonnes at any one time.

Additionally, the EPA notes from a review of aerial imagery from 2021 to 2024 that the Licensee is using the adjacent unlicensed site at 21 Dunheved Circuit St Marys to park trucks with uncovered wood loads. Condition O3.3 of the EPL requires trucks entering and leaving the premises to be covered at all times, except during loading and unloading. A drive by inspection by the EPA in

Phone: 131 555 TTY: 133 677, then ask for 131 155 Locked Bag 5022 PARRAMATTA NSW 2124 688 Parramatta Square 10 Darcy Street PARRAMATTA NSW 2150
Phone: 02 9995 5555 (from outside NSW) Info@epa.nsw.gov.au www.epa.nsw.gov.au ABN 43 652 285 758

2022 also observed bundles of melamine within the shed at the unlicensed 21 Dunheved Circuit St Marys. It is unknown what activities are occurring at this site.

The Environment Protection licences and regulatory histories of the sites can be viewed on the EPA's Public Register <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers/about-nrmpo>.

If you have any questions in relation to this matter, please contact Natalie Tan on (02) 9585 6619 or at natalie.tan@epa.nsw.gov.au.

Yours sincerely,



DAMON BOLTON
A/Unit Head Regulatory Operations
Environment Protection Authority



Appendix D – Site Inspection Photographs

Appendix D – Site Inspection Photographs

Observations from the site inspection are provided in the following table. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

Site Inspection Details	
Site Location:	25 Dunheved Circuit, St Marys NSW
Inspection Date / Time Period:	2 October 2024 / 9.15m – 12pm
Weather Conditions:	Wet and overcast, no wind observed
The Auditee:	ReDirect Recycling Pty Ltd



Photo 1 Main site entrance, including UHF and traffic control signs.



Photo 2 Main entrance, showing traffic control signs and painted hatching on pavement as required by CoA B2.



Photo 3 Dunheved Circuit, opposite main site entrance, showing convex mirror as traffic as required by CoA B2.



Photo 4 Dunheved Circuit, showing no sediment or mud tracking leaving site.



Photo 5 Truck delivering wood waste to site, noted as having the load covered.



Photo 6 | Truck wheel was noted as being operational and utilising recirculated water.



Photo 7 | Minor volumes of liquid chemicals stored in dedicated bunds.



Photo 8 Spill kit available at point of use. Noted as being free of litter.



Photo 9 Dedicated street sweeper on site.



Photo 10

Inside the main warehouse, showing incoming wood waste on the left and the shredder in the background.



Photo 11

Shredded timber product which is loaded into trucks and taken offsite.



Photo 12 A water mister being utilised as a dust mitigation measure.



Photo 12 Excavator used for wood processing, no oil leaks or spills observed.

BORG DAILY PLANT CHECKLIST NO: 27493

Site: St Marys Date: 1 / 10 / 24
Plant Number: 9109 Plant Description: exc Hour Meter Reading: _____

Operators are required to check the following items before commencing work. These records form the basis of a plant maintenance procedure and will be subject to random inspections.

BEFORE COMMENCING OPERATIONS CHECK	Good	Defect	N/A
Cabin – Access/Egress, seating, seat belts, loose objects, controls	✓	✗	
Visibility – windscreens wipers, washers, mirrors	✓		
Electrical Systems – Lights, amber beacon, horn, travel/reversing alarm	✓		
Hydraulics – rams, hoses, leaks, wear	✓		
Brakes – emergency and service	✓		
Neutral start	✓		
Compulsory signs, reflective tape, reflectors	✓		
Fire extinguisher	✓		
Wheels, tyres, tracks – wear/tension or pressure	✓		
Damage to – panels, guards – cracks to chassis, frame, body	✓		
Hitch pin (safety pin) wear	✓		
Articulated joint linkage	✓		
Fluid levels – transmission oil, engine oil (with engine running)	✓		
Air cleaner elements	✓		
UHF radio is operational	✓		
Pins and linkages daily, grease linkages daily	✓		
Foot brake, Hand brake	✓		
Steering mechanism	✓		
Horn	✓		
Gauges, indicators and controls	✓		
Wear levels on buckets/attachments	✓		
Seat belts (if fitted)	✓		

Details of faults or defects and actions taken: _____

Faults reported to: _____ Position: _____ Date: 1 / 1

Is the fault a safety hazard? YES / NO _____

Does the machine need immediate repair? YES / NO _____

If yes to either, park the machine up, contact the Borg Construction Supervisor. Machine should not be used until fault is repaired.

Comments: _____

Operators Name: Michael Signature: Michael Date: 1 / 1

Supervisors name: _____ Signature: _____ Date: _____

Original copy to be returned to the site office daily. Reader Code: 26753

Photo 13 Daily plant checklist.



Photo 14 Parks trucked offsite at 21 Dunheved Circuit in preparation to deliver shredded wood product to an offsite processing facility.



Appendix E – Audit Agenda

Appendix E – Audit Agenda

Independent Environmental Audit – St Marys Resource Recovery Facility	
Project	St Mary Resource Recovery Facility
Planning Approval	SSD - 10474
Proponent	ReDirect Recycling Pty Ltd
Location of Audit	25 Dunheved Circuit, St Marys NSW
Date of Audit	2 October 2024
Audit Team	Dylan Jones (Lead Auditor) Jack Hanigan (Auditor Assistant)
Site Contact	James Sutton, Environmental Manager
Audit Criteria	Conditions of consent SSD-10474 Schedule 2: Parts A, B, C and appendices in accordance with Independent Audit Post Approval Requirements 2020
Audit Period	19 November 2023 (commencement of operation) to 2 October 2024
Audit Objectives	Assess compliance with SSD-10474 conditions of approval.

Agenda		
Item	Time	Location
Opening Meeting <ul style="list-style-type: none"> Introduce the auditor and auditee team members. Confirm audit scope, audit period, objectives and outline the methodology and resources required. 	9:30 AM - 9:45 AM	St Marys Resource Recovery Facility
Site Inspection <ul style="list-style-type: none"> Auditee to provide an overview of site processes and facilitate site access. Auditor to sight current site activities and assess the implementation of mitigation measures and effectiveness of management plan requirements. Identify environmental aspects, impacts, controls and onsite documentation. 	9:45 AM - 10:45 AM	
Site Inspection Debrief / Coffee Break /	10:45 AM - 11:00 AM	N/A
Review Compliance to Consent Conditions		
<ul style="list-style-type: none"> PART A – Administrative Conditions 	11:00 AM – 11:45 PM	St Marys Resource Recovery Facility
<ul style="list-style-type: none"> PART B – Specific Environmental Conditions 	11:45 AM – 12:30 PM	
Lunch Break	12:30 PM – 1:00 PM	

<ul style="list-style-type: none"> PART C – Environmental Management, Reporting and Auditing 	1:00 PM – 2:00 PM	
Auditor Consolidation / Internal Meeting	2:00 PM – 2:15 PM	
Closing Meeting <ul style="list-style-type: none"> Discuss preliminary outcomes of the audit including details of any non-compliances and opportunities for improvement. Confirm next steps including additional requests for information and timelines 	2:15 PM – 2:30 PM	

Responsibilities		
Roles	Name	Responsibilities
Lead Auditor	Dylan Jones	<ul style="list-style-type: none"> Schedule audit, prepare audit materials and manage resources Provide Audit Agenda to ReDirect Recycling, including confirmation on a scope and timeframes Attend the site visits Lead interviews with key personnel Lead the Opening and Closing Meetings Prepare the Independent Audit Report
Auditor Assistant	Jack Hanigan	<ul style="list-style-type: none"> Support the lead auditor by preparing audit materials such as Audit Plan, schedules, interview questions and report drafting. Attend the site visits, document site and interview observations. Support preparation of the Independent Audit Report
Audit Specialists	N/A	N/A
Auditee	James Sutton	<ul style="list-style-type: none"> Liaise with ReDirect Recycling personnel to attend site inspection and audit interviews, as required Provide WH&S supervision to KPMG staff while on site Provide meeting rooms for audit interviews Respond to request for information prior to, during and following the day of the audit, as required.

Notes

- The audit will cover both the construction and operational requirements in accordance with Conditions of Consent SSD-10474 Schedule 2, Part A, B and C.
- The audit will cover a sampling of records relevant to the scope. KPMG auditors will apply their professional judgment based on the information made available during the audit.
- KPMG will conduct the audit in accordance with the Independent Auditing Post Approval Requirements (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.
- KPMG will issue a Request for Information (RFI) document separately to this agenda. To enable an efficient audit, it is requested that information is provided prior to the audit.



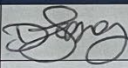
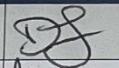

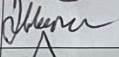

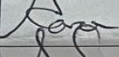


Appendix F – Audit Attendance Sheet

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Audit Attendance Sheet

Project	St Marys Resource Recovery Facility	Audit Ref.	SMRRF-IEA-01
Auditee	ReDirect Recycling	Lead Auditor	Dylan Jones
Location	25 Dunheved Circuit, St Marys NSW		
Opening Meeting Date / Time	2/10/24	9:29am	
Closing Meeting Date / Time	2/10/24	1:00pm	

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
Dylan Jones	KPMG	Lead Auditor		
Jack Hanigan	KPMG	Auditor assistant		
Aaron Murphy	Redirect	Site Manager		
James Sutton	Redirect	Environmental Manager		



Appendix G – Independent Audit Declarations

Appendix G – Independent Audit Declarations

Independent Audit Report Declaration Form	
Project Name	St Marys Resource Recovery & Recycling Facility
Consent Number	SSD-10474
Description of Project	Operation of a resource recovery facility with a capacity to process up to 150,000 tonnes per annum of wood and timber, plasterboard and metal waste and installation of additional waste processing equipment.
Project Address	25 Dunheved Circuit, St Marys NSW 2760
Proponent	ReDirect Recycling Pty Ltd
Title of Audit	Independent Audit No.1
Date	23-Oct-2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii the findings of the audit are reported truthfully, accurately and completely;
- iii I have exercised due diligence and professional judgement in conducting the audit;
- iv I have acted professionally, objectively and in an unbiased manner;
- v I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to DPE prior to the audit; and
- viii I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection

with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor	Dylan Jones
Signature	<i>Dylan Jones</i>
Qualification	Lead Auditor B. Env. Sci. & Mgt., M. Env. Eng. Mgt. Exemplar Global Lead Auditor Environmental Management Systems
Company	KPMG

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- vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
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- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Gary Selwyn
Signature	<i>Gary Selwyn</i>
Qualification	Alternate Lead Auditor BSc (Hons), MSc Institute of Environmental Management and Assessment (IEMA) Registered Principal Environmental Auditor
Company	KPMG

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- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Michael Stojanoski
Signature	<i>Michael Stojanoski</i>
Qualification	Audit Team Member M.Sc Environmental Science, B.Sc Science (Geology) Exemplar Global Lead Auditor Certificate – ISO14001 and ISO19001
Company	KPMG

Independent Audit Report Declaration Form	
Project Name	St Marys Resource Recovery & Recycling Facility
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- v I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
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audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

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Name of Auditor	Jack Hanigan
Signature	<i>Jack Hanigan</i>
Qualification	Audit Team Member B. Env. Mgmt. EarthSci, BSc. (Hons) Geol.
Company	KPMG



Appendix H – Documents Reviewed

Appendix H – Documents Reviewed

The primary documents assessed prior to and after the site visit are as follows:

- Environmental Impact Statement, Rev 3, dated 25 February 2021
- Fire and Rescue NSW (FRNSW) Letter, Re: Review of Fire Safety Study (FSS), dated 13 July 2023. Ref: FRN16/2631 BFS23/3772 8000029394.
- DPHI Letter: Approval of the St Mary Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.
- Operational Environmental Management Plan, Rev 1, dated 10 November 2023
- Toolbox Talk, dated 31 October 2023 - Subject: Asbestos Awareness Training.
- Toolbox Talk, dated 22 November 2023 – Subject: Work Health and Safety and Environment Induction.
- Toolbox Talk, dated 22 November 2023 – Subject: OEMP – Waste Management Plan.
- Toolbox Talk, dated 22 November 2023 – Subject: Pollution Incident Response Management Plan
- Work Health and Safety Site Induction – St Marys, version 1, dated 15 May 2022.
- Surface Water Management Plan, 21-25 Dunheved Circuit, St Marys NSW, Rev 1, dated 5 October 2022.
- Environmental Requirements and Awareness Site Induction St Marys, version 1.2, dated 5 February 2023.
- Plant Workorder Spreadsheet
- Operational Noise Management Plan, revision 1, dated 10 August 2022.
- Air Quality and Odour Management Plan, Rev 1, dated 22 July 2022.
- Waste Contribution Monthly Report – St Marys, Reporting Period: July 2024, dated 26 August 2024.
- Plan of Subdivision of Lot 143 DP1307832 and Lot 9 DP31908, registered on 19 August 2024. Pursuant to 88B of the Conveyancing Act 1919.
- Sydney Water Compliance Certificate for 25 Dunheved Circuit, St Marys Ref: Case No. 207410. Prepared under Division 9 Section 73 of the Sydney Water Act 1994. Dated 11 October 2023
- Environmental Protection Licence (EPL) #21487
- Notification of Variation to Licence No. 21487, dated 4 October 2023.
- Annual EPL Returns for 2021, 2022 and 2023.
- Letter from ReDirect to DPHI, dated 27 August 2024. Notification of non-compliance SSD-10474, condition B16. Ref: SSD-10474-PA-19
- Email from DPHI to ReDirect, dated 16 September 2024. Re: Communication regarding non-compliance notification – rainwater tank SSD-10474-PA-19.

- Letter from Eclipse Consulting Engineers to Penrith City Council; dated 5 September 2024. Ref: 10113-003-I
- Stormwater Management Plan Report, 21-25 Dunheved Circuit, St Marys NSW, Rev 2, dated 23 February 2021
- Stormwater Management Plan Report, 25 Dunheved Circuit, St Marys NSW, Rev 4, dated 5 September 2024.
- Emergency Response Plan, Rev 3, dated May 2023
- Remedial Stormwater Drainage Plan, Drawing C04-A, Prepared by Eclipse Engineers, dated 23 February 2021.
- Operational Environmental Management Plan – St Marys INSPECTION CHECKLIST, dated 3 June 2024.
- St Marys Noise Assessment, Report No. 20216, Rev A, dated February 2021.
- Operational Traffic Management Plan, ReDirect Recovery Facility, 25 Dunheved Circuit, St Marys, Rev 3, dated 12 September 2022.
- Completed Driver Code of Conduct Declarations (15 declarations in total)
- Fire Engineering Report, Waste Sorting facility, 25 Dunheved Circuit, St Marys, Rev B, dated October 2026
- Submission of Fire Engineering Report to DPHI, dated 26 October 2023, Ref: SSD-10474-PA-14.
- DPHI approval of Fire Engineering Report, dated 17 October 2023. Ref: SSD-10474-PA-14.
- Wood waste and plasterboard recycling facility, 25 Dunheved Circuit, St Marys, Fire Safety Study, Rev 4, dated 10 July 2023
- Electrical Design Statement, 25 Dunheved Circuit, St Marys NSW, dated 9 June 2024
- Email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023
- Repair history spreadsheet for 9109 Komatsu excavator dated 17 September 2024
- Weighbridge Verification Form dated 11 of July 2024
- SafeWork correspondence for asbestos procedures
- Waste Management Plan version 4, dated 12 April 2023
- Letter of correspondence between NSW Fire and Rescue and reDirect dated 1 August 2023
- Transaction Summary Report 19/09/23 to 04/09/24
- Waste Contribution Monthly Report (WCMR) – St Marys, Reporting Period: July 2024, dated 26 August 2024.
- Way bridge export summary August 2024

- Letter from ReDirect to DPHI, dated 3 April 2023. Notification of non-compliance SSD-10474, conditions A7 and C8. Ref: SSD-10474-PA-14
- Email on 3 May 2024 from DPHI to ReDirect regarding SSD-10474-PA-16
- Letter from ReDirect to DPHI, dated 19 October 2023, Re: Notification of commencement of operations. Ref: SSD-10474-PA-15.
- Email correspondence with SafeWork NSW, dated 20 April 2023, Re. Review of Waste Management Plan.
- Safe Operating procedure for Excavator dated 18/08/24 signed by site personnel
- Front End Loader Safe operating procedure dated 18/08/24 signed by site personnel
- Daily Prestart checklist for 01/10/24 for plant number 9109 Komatsu excavator
- Repair history spreadsheet for 9109 Komatsu excavator for 17/09/24
- ReDirect's data Station platform for Employee competency details
- Letter from ReDirect to DPHI, dated 28 March 2024, Re: 25 Dunheved Circuit, St Marys – Development Consent No SSD-10474.
- DPHI Approval Letter, dated 9 April 2024, Re: St Marys Resource Recovery Facility – Alternative arrangement for easement required by Condition A22. Ref: SSD-10474-PA-17.
- Land Registry Services record form dated 19 August 2024 with the registration of Lot 143 DP1307832 and Lot 9 DP31908 subdivision
- Music Link report prepared by eclipse consulting dated 23/05/22 as a form of the feasibility study
- Rose Atkins Rimmer application form as certified water services coordinator
- Email correspondence between Rose Atkins Rimmer detailing the water usage planning for the development
- Transport Planning Partnerships (TPPP) memorandum, dated 3 September 2021
- Daily environmental checklist, dated 23/09/24
- Way bridge tracking software from Weigh More solutions from 02/10/24 receivals
- Way bridge transaction report 19/11/23 to 05/09/24
- Daily checklist, dated 01/10/24 Emergency Plan – St Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023
- Emergency Services Information Package, Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023
- SSD-10474-PA-10 Letter from DPHI to ReDirect endorsing Dylan Jones, Gary Selwyn, Mike Stojanoski and Jack Hanigan, dated 19 August 2024
- Surface water biannual monitoring report dated 17 July 2024
- Email correspondence between ReDirect and the consultant Land Risk Environmental, dated 18 July 2024, detailing the surface water biannual monitoring results.

