

# 2023 INDEPENDENT ENVIRONMENTAL AUDIT

## Redirect Recycling Wetherill Park



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10 October 2023

## REPORT

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### Approval for issue

Ian Richardson



10 Oct 2023

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# INDEPENDENT AUDIT REPORT DECLARATION FORM

## Independent Audit Report Declaration Form

Project Name	Redirect Recycling Wetherill Park
Consent Number	SSD 7401
Description of Project	RPS was engaged to conduct an independent environmental audit (IEA) of Bettergrow Pty Ltd's Redirect Recycling Wetherill Park facility. The IEA is a requirement of conditions C13 and C14 of SSD 7401 and requires endorsement and approval from the NSW Department of Planning and Environment (DPE).
Project Address	24 Davis Road, Wetherill Park NSW 2164
Proponent	Bettergrow Pty Ltd
Title of Audit	Independent Environmental Audit 2023 – Redirect Recycling Wetherill Park
Date	10 October 2023

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 Department's Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).
- ii.
- iii. the findings of the Audit are reported truthfully, accurately and completely;
- iv. I have exercised due diligence and professional judgement in conducting the Audit;
- v. I have acted professionally, objectively and in an unbiased manner;
- vi. 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;
- vii. 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;
- viii. neither I nor my employer have provided consultancy services for the Audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- ix. 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	Ian Richardson
Signature	
Qualification	Bachelor of Environmental Science Exemplar Global Certified Lead Auditor – Environmental Management Systems (ISO 14001)

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### Independent Audit Report Declaration Form

Company RPS AAP Consulting Pty Ltd

Company Address RPS Newcastle – Unit 2A, 45 Fitzroy Street, Carrington NSW 2294

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## EXECUTIVE SUMMARY

RPS AAP Consulting Pty Ltd (RPS) was engaged by Redirect Recycling Pty Ltd (RR) to conduct an Independent Environmental Audit (IEA) of the Redirect Recycling Wetherill Park facility.

The audit was conducted in accordance with Conditions C13 and C14 of SSD7401, as issued by the Department of Planning and Environment (the Department) and RPS proposal dated 22 June 2023.

This is the first IEA conducted on the development, commissioned immediately prior to one year since commencement of operations. At the time of the site inspection and the end of the audit period, Bettergrow has only constructed and operated under 'Stage 1' of their development plans, including the processing of drill mud and hydro excavation materials.

The audit period to which this audit applies is inclusive of the period from commencement of operation on 23 August 2022 to the date of the site inspection 14 September 2023. This IEA is relevant only to Stage 1 of the Redirect Recycling Wetherill Park Facility. This report presents the findings of the audit.

The IEA was undertaken in general accordance with:

- The Department's Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).
- AS/NZS ISO 19011:2019 Guidelines for auditing management systems.
- RPS's proposal (dated 22 June 2023).

The RPS audit team was approved by the Department on 29 July 2023. A copy of the approval letter is located in **Appendix A**. The site inspection was conducted on Thursday 14 September 2023.

The IEA identified a total of 2 non-compliances against SSD-7401.

## GLOSSARY OF TERMS

Abbreviation	Description
Aboriginal object / Aboriginal place	Has the same meaning as the definition of the term in section 5 of the NP&W Act
Annual Review	The review required by condition C9 of Development Consent SSD 7401
Applicant / Bettergrow	Bettergrow Pty Ltd, or any person carrying out any development under this consent
Approved disturbance area	The area identified as such on the Development Layout
ARI	Average Recurrence Interval
BCA	Building Code of Australia
BC Act	Biodiversity Conservation Act 2016
BCS	Biodiversity, Conservation and Science Directorate within the Department
BCT	NSW Biodiversity Conservation Trust
Conditions of this consent	Conditions contained in SSD 7401
Construction	All physical works to enable mining operations to be carried out, including demolition and removal of buildings or works, and erection of buildings and other infrastructure permitted by this consent
Council	Fairfield City Council
CPI	Consumer Price Index
Day	The period from 7.00 am to 6.00 pm on Monday to Saturday, and 8.00 am to 6.00 pm on Sundays and Public Holidays
Decommissioning	The deconstruction or demolition and removal of works installed as part of the development
Demolition	The deconstruction and removal of buildings, sheds and other structures on the site NSW Department of Planning, Industry and Environment
Department	NSW Department of Planning and Environment
Development (Stage 1)	The construction and operation of a resource recovery facility to process up to 160,000 tonnes per year of waste comprising of: <ul style="list-style-type: none"> <li>• 60,000 tpa of hydro-excavation, drill muds and fluids;</li> </ul>
Development Layout	The plans in Appendix 2 of this consent
Crown Lands	Crown Lands Group within the Department
DPE Water	Water Group within the Department
EEC	Endangered ecological community, as defined under the BC Act
EIS	The Environmental Impact Statement titled 'Greenspot Resource Recovery Centre State Significant Development Preliminary Environmental Assessment', prepared by RPS, dated November 2015 (as modified), submitted with the application for consent for the development.
Environment	Includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation EPBC Act	Environmental Planning and Assessment Regulation 2000
EPL	Commonwealth Environment Protection and Biodiversity Conservation Act 1999 Environment Protection Licence under the POEO Act
Evening	The period from 6 pm to 10 pm
Feasible	Means what is possible and practical in the circumstances
Heavy vehicle	A vehicle that has a combined Gross Vehicle Mass or Aggregate Trailer Mass of more than 4.5 tonnes
Heritage NSW	Heritage NSW within Department of Premier and Cabinet

Abbreviation	Description
Heritage item	An Aboriginal object, an Aboriginal place, or a place, building, work, relic, moveable object, tree or precinct of heritage significance, that is listed under any of the following: <ul style="list-style-type: none"> <li>the State Heritage Register under the Heritage Act 1977;</li> <li>a state agency heritage and conservation register under section 170 of the Heritage Act 1977;</li> <li>a Local Environmental Plan under the EP&amp;A Act;</li> <li>the World Heritage List;</li> <li>the National Heritage List or Commonwealth Heritage List under the EPBC Act; or</li> <li>anything identified as a heritage item under the conditions of this consent</li> </ul>
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance
Land	Has the same meaning as the definition of the term in section 1.4 the EP&A Act, except for where the term is used in the noise and air quality conditions in PART B of this consent where it is defined to mean the whole of a lot, or contiguous lots owned by the same landowner, in a current plan registered at the Land Titles Office at the date of this consent
Material harm	Is harm to the environment that: <ul style="list-style-type: none"> <li>involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)</li> </ul> <p>This definition excludes "harm" that is authorised under either this consent or any other statutory approval</p>
Minimise	Implement all reasonable and feasible mitigation measures to reduce the impacts of the development
Minister	NSW Minister for Planning and Public Spaces, or delegate
Minor	Not very large, important or serious
Mitigation	Activities associated with reducing the impacts of the development
Negligible	Small and unimportant, such as to be not worth considering
Night	The period from 10 pm to 7 am on Monday to Saturday, and 10 pm to 8 am on Sundays and Public Holidays
Noise sensitive areas	Areas where operations are being carried out that have potential to lead to increased noise at privately-owned residences, such as elevated areas or areas near the boundary of the site
Non-compliance	An occurrence, set of circumstances or development that is a breach of this consent
NP&W Act	National Parks and Wildlife Act 1974
Over-dimensional	Over-mass, over-size or over-length vehicles
PA	Planning agreement within the meaning of the term in section 7.4 of the EP&A Act
Planning Secretary	Planning Secretary under the EP&A Act, or nominee
POEO Act	Protection of the Environment Operations Act 1997
Privately-owned land	Land that is not owned by a public agency or a mining, petroleum or extractive industry company (or its subsidiary or related party)
Public infrastructure	Linear and related infrastructure that provides services to the general public, such as roads, railways, water supply, drainage, sewerage, gas supply, electricity, telephone, telecommunications, etc.
Reasonable	Means applying judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements

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Abbreviation	Description
Registered Aboriginal Parties	As described in the National Parks and Wildlife Regulation 2009
Rehabilitation	The restoration of land disturbed by the development to a good condition, to ensure it is safe, stable and non-polluting
Residence	Existing or approved dwelling at the date of grant of this consent
RFS	NSW Rural Fire Service
Site	The land defined in Appendix 1
TfNSW	Transport for NSW

# 1 INTRODUCTION

RPS AAP Consulting Pty Ltd (RPS) was engaged by Redirect Recycling (RR) to conduct an Independent Environmental Audit (IEA) of the Redirect Recycling Wetherill Park facility, located at 24 Davis Road, Wetherill Park NSW.

The audit was conducted in accordance with Conditions C13 and C14 of SSD7401, as issued by the Department of Planning and Environment (the Department) and RPS' proposal dated 22 June 2023.

This is the first IEA conducted on the development, commissioned immediately prior to one year since commencement of operations.

The audit period to which this audit applies is inclusive of the period from commencement of operation on 23 August 2022 to the date of the site inspection 14 September 2023. This report presents the findings of the audit.

## 1.1 Background of the Project

Redirect Recycling Wetherill Park is a recycling and resource recovery facility owned and operated by Bettergrow Pty Ltd. The facility features a partially enclosed wash plant of approximately 8000 m<sup>2</sup>, focusing in converting drill mud, soils, street sweepings and stormwater into recycled aggregate for reuse in the construction industry.

The project underwent 18 months of construction by Crossmuller Pty Ltd and has been operational for approximately one year at the time of composing this report.

### 1.1.1 SSD 7401

'Bettergrow Resource Recovery Facility' was conditionally approved under Part 4 of the Environmental Planning and Assessment Act 1979 by the Minister for Planning on 22 December 2017 via the state significant development application 'SSD 7401'.

The Project has undergone 3 modifications to its development consent, detailed in **Table 1** below.

**Table 1: SSD 7401 and its Modifications**

Approval	Details of Approval	Date Granted
SSD 7401	Original development consent	22 December 2017
Modification 1	Increased Processing Capacity, Additional Wastes Streams and New Shedding	21 April 2021
Modification 2	Amendment to Stormwater Treatment Device	30 November 2021
Modification 3	Amendment to Weighbridges, Carparking and Stormwater	1 April 2022

### 1.1.2 Environment Protection Licence

Redirect Recycling Wetherill Park operates under Environmental Protection Licence (EPL) 21092. EPL 21092 was last updated June 2023 and has an anniversary date of 10 January. No monitoring results have yet been reported to the EPA due to time requirements not yet being met. Independent Environmental Audits are not required to audit EPLs under the Department's Independent Environmental Audit Guidelines, 2020.

## 1.2 Operations During the Audit Period

Redirect Recycling Wetherill Park has operated under 'Stage 1' of the development since 23 August 2022. At the time of the site inspection and the end of the audit period, Bettergrow has constructed and operated the Wetherill Park facility under 'Stage 1' of their development plans, including the processing of drill mud and hydro excavation materials. Although the processing of other materials such as food and garden organics

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has been approved under SSD 7401, the facilities required to undertake this type of processing have not yet been constructed. Therefore, the 'FGO' and 'FLD' buildings are irrelevant to this stage of the development and irrelevant to this Independent Environmental Audit. EPL 21092 allows the processing of up to 150,000 t of general solid waste and 100,000 t of liquid waste on site. **Table 2** details the waste types and quantities that have been processed at Redirect Recycling Wetherill Park under EPL 21092 during the audit period, according to weighbridge transaction records provided by Bettergrow.

**Table 2: Waste Processed at Redirect Recycling Wetherill Park**

Waste Type	EPA Waste Classification	Amount Processed (t)
Raw street sweepings	General solid	97
Drill water	Liquid	41430
Treated drill mud	General solid	34
Concrete slurry	General solid	81
Stormwater	Liquid	7
Washed sand	General solid	87
Soils	General solid	486
Excavated natural material	General solid	97
Virgin excavated natural material	General solid	0

### 1.3 Audit Team

The RPS 2023 IEA team was approved by the Department on 29 July 2023. The Department reviewed the nominations and information provided in accordance with the requirements of the development consent for SSD 7401 and the Department's Post-approval requirements for State Significant Developments Independent Audit Guideline 2020 and was satisfied that the RPS audit team was suitably qualified and experienced.

RPS was directed by the Department to undertake the audit in accordance with the IEA Guideline 2020 utilising the compliance indicators noted in the Department's Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).

The audit team members were approved with Ian Richardson as lead auditor and Dianne Munro as an alternative according to the approval in **Appendix A**. During the audit, the lead auditor was assisted by an audit assistant, who assisted with note taking, collating documentation and compiling the findings into the report for review. **Table 3** details the RPS audit team.

**Table 3: RPS 2023 IEA Team**

Personnel	Audit Team Role	Company
Ian Richardson	Lead Auditor	RPS AAP Consulting
Luke Wiggins	Assistant Auditor	RPS AAP Consulting

### 1.4 Audit Scope

RPS undertook the audit in accordance with:

- The Department's Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).
- AS/NZS ISO 19011:2019 Guidelines for auditing management systems.
- SSD 7401 Modification 3 Development Consent
- RPS's proposal (dated 22 June 2023).

### 1.4.1 SSD 7401

The requirement for the IEA is set out in Conditions C13 and C14 of SSD7401, as modified. The conditions require the following scope of works to be carried out:

**C13.** Within one year of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6 of the EP&A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:

(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;

(b) include consultation with the relevant agencies;

(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);

(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and

(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.

**Note:** *This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Planning Secretary.*

**C14.** Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Planning Secretary.

## 2 AUDIT METHODOLOGY

### 2.1 Task 1 Pre-audit Activities

#### 2.1.1 Pre-Audit Meeting and Documentation Requests

RPS undertook initial discussions with Bettergrow to organise the audit, including the provision of documentation through requests for information (RFI) and an agenda for the site visit and timing.

Review of documentation provided by Bettergrow ensued, along with preparation of the compliance assessment checklist for the development consent.

#### 2.1.2 Approval and Regulator Consultation

Following DPE approval of the RPS Audit Team, RPS consulted via email with relevant regulators with respect to the audit scope in accordance with the DPE Independent Audit Post Approval Requirements, 2020.

Relevant comments and requests from these regulators were included in the audit checklists and investigated as part of the audit as required. Requests from regulators and auditor's responses are contained in **Appendix B**.

### 2.2 Task 2 Site Inspection and Interviews

The Audit Team conducted the audit site visit on 14 September 2023. The following activities were undertaken:

- Opening meeting
- Document reviews
- Interviews with relevant personnel
- Site inspection
- Closing meeting

Opening and closing meetings were held to ensure open communication with Bettergrow and provide preliminary audit findings. The audit was conducted as per the previously discussed agenda.

In accordance with Condition C13 SSD 7401, Bettergrow is required to commission an IEA of Redirect Recycling Wetherill Park within 1 year of the commencement of operations and every 3 years thereafter. This audit satisfied the requirements of Condition C13, having been commissioned on 4 July 2023, within the first year from commencement of operation on 23 August 2022. The next audit will be required to be inclusive of the time period from 14 September 2023 to 14 September 2026.

#### 2.2.1 Opening Meeting

An opening meeting was held upon commencement of the audit at the site. The purpose of this meeting was to confirm the objectives of the audit, the scope of the audit, the resources required and methodology to be applied.

#### 2.2.2 Site inspection and interviews

The Lead Auditor and Auditor's Assistant undertook a site inspection, which involved physical validations and collection of a photographic record. The auditors' observations were used to supplement information gathered during the review of documents and records.

During the site inspection, interviews were conducted with Bettergrow staff to verify compliance with the consents and associated documents. The following staff were interviewed during site inspection:

- James Sutton – Environmental Manager

- Neale Hogarth – Operations Manager
- Kim Hogarth – Administration Officer

### 2.2.3 Close-out Meeting

At the completion of the audit site inspection, a brief close-out meeting was held with relevant Bettergrow personnel. The purpose of the close-out meeting was to provide and receive feedback on the audit process and present the summary of preliminary findings, recommendations, and any post-audit actions. It should be noted that additional findings based on detailed document reviews as part of the audit process were required following the completion of the site inspection. As such, the summary of preliminary findings detailed in the closeout meeting did not cover all findings associated with the audit.

## 2.3 Task 3 Draft IEA Report

During the site visit, and as required following the site visit, the audit team conducted a review of the key documentation provided. Each requirement within the audit compliance tables was reviewed and evidence was gathered to support an assessment of compliance. Although personal communication provides valuable insight to this process it cannot be relied upon as verification of compliance.

An assessment of environmental performance was undertaken, and issues identified were documented within the audit report.

A single consolidated report was prepared (this report), with separate audit tables appended to address each of the approval instruments.

## 2.4 Task 4 Finalise IEA Report

Following receipt of consolidated comments from Bettergrow, RPS updated and finalised the IEA Report and reissued for Bettergrow to submit to the Department via the Major Projects website.

## 2.5 Consultation

Condition C13 (b) of SSD 7401 requires the Independent Environmental Audit to include consultation with the relevant agencies. A summary of the consultation undertaken with relevant agencies is provided in **Table 4**.

**Table 4: Regulatory Consultation Summary**

Regulatory Agency	Date Requested	Response Received	Date Received
Department of Planning and Environment	20 July 2023	Y	20 July 2023 22 August 2023
NSW Environment Protection Agency	20 July 2023	N	NA
Fairfield City Council	20 July 2023	N	NA

A summary of comments received from the regulatory agencies as well as responses to regulator consultation is provided in **Appendix C**.

## 2.6 Site Inspection

Weather conditions were fine and clear with no rain events during or prior to the site inspection. Daytime temperatures ranged from around 7°C to 27°C over the day. Wind conditions were light during the inspection. No visible pollution was noted during the site inspection.

Photographs from the audit site inspection supporting audit findings are provided in **Appendix D**. Areas inspected during the audit included:

- The workshop floor area
- All screening machinery

- Wastewater filtration system
- Site office
- Control room
- Eastern access road
- Stormwater management system including sandfilter and ecoceptor
- Unused building closest to Davis Road
- Native woodland outside site fence
- Main driveway and carpark
- Future construction area for FLD and FGO buildings

## 2.7 Compliance Status

The compliance status was determined using the relevant descriptors in accordance with the Independent Audit Post Approval Requirements, 2020 provided in **Table 5** below.

**Table 5: Compliance Status Descriptors**

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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Previous audit descriptors of partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms must not be used in accordance with the above requirements.

As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in **Table 8**.

## 2.8 Evidence Validation

The audit team undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and site inspections. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site prior to the site inspection. The site inspections concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspections and interviews over the three days.

### 3 ENVIRONMENTAL MANAGEMENT

Condition C13 of SSD 7401 requires a review the adequacy of any approved strategy, plan or program relevant to the development consent. A detailed implementation review was conducted against each management plan condition in SSD 7401 and can be found in the Project Approval audit checklists in **Appendix B. Table 6** provides a summary of the adequacy of the relevant management plans and their implementation at Redirect Recycling Wetherill Park.

**Table 6: Environmental Management Summary**

Document	Audit findings
Operational Waste Management Plan (OWMP)	<p>Version: Rev 2 Effective: 29/06/2022 Prepared by: Space Urban Pty Ltd</p> <p>The OWMP was prepared by suitably qualified consultants Space Urban Pty Ltd to cover Stage 1 of the operations at Redirect Recycling Wetherill Park. The OWMP forms part of the overarching OEMP as required by Conditions B12 and C4 of SSD 7401. The OWMP was determined to be fully compliant with the relevant consent conditions.</p> <p>Upon site inspection, it was clear to auditors that the OWMP is being implemented effectively. Any waste on site was observed to be suitably stored and tracking sheets were observed, showing trucking of waste to qualified facilities.</p>
Air Quality and Odour Management Plan (AQOMP)	<p>Version: Rev 2 Effective: 19/04/2022 Prepared by: Advanced Environmental Dynamics Pty Ltd</p> <p>The AQOMP was prepared by suitably qualified consultants Advanced Environmental Dynamics Pty Ltd to cover Stage 1 of the operations at Redirect Recycling Wetherill Park. The AQOMP forms part of the overarching OEMP as required by Condition B24 and C4 of SSD 7401. The AQOMP was determined to be fully compliant with the relevant consent conditions.</p> <p>Upon site inspection, it was clear to auditors that the AQOMP is being implemented effectively. No visual emissions were observed and no odour was noted on site.</p>
Water Management Plan (WMP)	<p>Version: Rev 2 Effective: 05/04/2022 Prepared by: Senversa Pty Ltd</p> <p>The WMP was prepared by suitably qualified consultants Senversa Pty Ltd to cover Stage 1 of the operations at Redirect Recycling Wetherill Park. The WMP forms part of the overarching OEMP as required by Conditions B49 and C4 of SSD 7401. The WMP was determined to be fully compliant with the relevant consent conditions.</p> <p>Upon site inspection, it was clear to auditors that the WMP is being implemented effectively. The site's water management systems were observed to be functioning effectively.</p>
Operational Traffic Management Plan (OTMP)	<p>Version: Rev 5 Effective: 21/07/2022</p>

Prepared by: David Pavey Pty Ltd

The OTMP was prepared by suitably qualified consultants David Pavey Pty Ltd to cover Stage 1 of the operations at Redirect Recycling Wetherill Park.

The OTMP forms part of the overarching OEMP as required by Conditions B55 and C4 of SSD 7401.

The OTMP was determined to be fully compliant with the relevant consent conditions.

Upon site inspection, it was clear to auditors that the OTMP is being implemented effectively. Auditors observed multiple trucks manoeuvring throughout the site on the day. All truck movements were organised and safe.

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Construction Environmental Management Plan (CEMP)

Version: Rev 3

Effective: 15/08/2022

Prepared by: Borg Property Pty Ltd

The CEMP was prepared by suitably qualified consultants Borg Property Pty Ltd to cover Stage 1 of construction at Redirect Recycling Wetherill Park.

The CEMP was prepared according to conditions B14, B40, B52, B71, B72 and C1 of SSD 7401.

The CEMP was determined to be fully compliant with the relevant consent conditions. All required sub-plans were determined to be compliant.

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Operational Environmental Management Plan (OEMP)

Version: Rev 2

Effective: 18/07/2022

Prepared by: Space Urban Pty Ltd

The OEMP was prepared by suitably qualified consultants Space Urban Pty Ltd to cover Stage 1 of operations at Redirect Recycling Wetherill Park.

The OEMP contains a suite of attachments required by SSD 7401.

The OEMP was determined to be fully compliant with the relevant consent conditions.

Upon site inspection it was clear to auditors that OEMP is being implemented effectively as a whole. There are daily site inspections checking for compliance with the OEMP conducted by staff members.

---

Emergency Response Plan

Version: Rev 2

Effective: 18/07/2022

Prepared by: Bettergrow Pty Ltd

The Emergency Plan was prepared by Bettergrow Pty Ltd to cover Stage 1 of the operations at Redirect Recycling Wetherill Park.

The Emergency Response Plan forms part of the OEMP as required by conditions B51 and C4.

The Emergency Response Plan was deemed compliant with the relevant consent conditions.

Staff are made aware of the Emergency Response Plan through induction and toolbox talks. Auditors viewed signed staff attendance forms for relevant toolbox talks.

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Conceptual Decommissioning Management Plan (DMP)

Version: Rev 1

Effective: 20/04/2022

Prepared by: Space Urban Pty Ltd

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The DMP was prepared by suitably qualified consultants Space Urban Pty Ltd to cover Stage 1 of the development at Redirect Recycling Wetherill Park.

The DMP forms part of the overarching OEMP as required by Condition B80 of SSD 7401.

The DMP was determined to be fully compliant with the relevant consent conditions.

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Flood Emergency Response Plan (FERP)

Version: Rev D (4)

Effective: 27/07/2021

Prepared by: Northrop Consulting Engineers Pty Ltd

The Flood Emergency Response Plan was prepared by suitably qualified consultants Northrop Consulting Engineers Pty Ltd.

The Flood Emergency Response Plan is relevant to both construction and operation under condition B40 of SSD 7401.

The FERP was deemed compliant with the relevant consent conditions.

Staff are made aware of the FERP through induction and toolbox talks. Auditors observed signed staff attendance sheets for relevant toolbox talks.

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Building Material Schedule and Landscape Plan (BMSLP)

Version: Rev B

Effective: 15/07/2020

Prepared by: RPS Australia East Pty Ltd

The Building Material and Landscape Schedule Plan was prepared by suitably qualified consultants at RPS. The BMSLP was reviewed during the audit. Auditors confirmed the development was generally constructed in line with the BMSLP.

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Construction and Demolition Waste Management Plan (CDWMP)

Version: Rev 1

Effective: 22/07/2021

Prepared by: Borg Property Pty Ltd

The CDWMP was deemed to be generally comprehensive and effective.

However, condition B14 specifically requires the CDWMP to detail the quantities of each waste type generated during construction. The CDWMP failed to provide quantities of each waste stream.

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## 4 ENVIRONMENTAL PERFORMANCE

This section addresses the requirement of Condition C13 of SSD 7401 to assess the environmental performance of the project and recommend appropriate measures for improvement of any relevant assessments, plans or programs. RPS based the assessment of the environmental performance of the site on the following:

- **Section 3** provides an assessment of the effectiveness and adequacy of the environmental management plans and programs required under the approvals.
- **Section 5** provides a summary assessment of compliance with the conditions of SSD 7401. The details of this assessment are provided in the compliance checklists presented in **Appendix B**.
- **Section 4.1** provides a review of compliance management practices in place at the site.
- **Section 4.2** provides a review of incidents reported during the audit period.
- **Section 4.3** provides a review of complaints received during the audit period.
- **Section 4.4** provides a review of general environmental performance and ongoing environmental management.

### 4.1 Compliance Management

#### 4.1.1 Compliance Monitoring

Bettergrow implements a daily OEMP site inspection with a checklist that is completed by the staff member undertaking the inspection. This checklist provides timing requirements for inspections to ensure compliance with the OEMP and relevant consent conditions of SSD 7401.

The staff member undertaking the routine site inspection is the first point of call to remedy any identified non-compliance. If the staff member is unable or unauthorised to complete any task required to remedy compliance, the operations manager and/or environmental manager are contacted, who will then provide direction or attend to the issue. It was noted by James Sutton Environmental Manager, that no incident has occurred in the history of the development's operation that has required escalation from the staff member undertaking the daily inspection.

If an incident were to occur, it would be recorded in the publicly available OEMP register.

### 4.2 Incidents

Accidents, incidents and potential incidents are managed through the publicly available OEMP Register, a spreadsheet which contains information regarding rejected loads, incidents and complaints to the site. Bettergrow has reported no incidents within the audit period.

### 4.3 Complaints

Redirect Recycling Wetherill Park is under 24/7 operation. Complaints to the site are managed through the publicly available OEMP Register, a spreadsheet which contains information regarding rejected loads, incidents and complaints to the site.

Bettergrow has received zero complaints within the audit period.

### 4.4 General Environmental Performance

This section presents a review of the development's general environmental performance with respect to environmental commitments and predictions from the Environmental Impact Statement, as well as an overview of ongoing environmental management.

The timing of this audit, being just one year from commencement of operation at Redirect Recycling Wetherill Park, along with the staging of the development means there is a relative lack of monitoring data currently available.

### 4.4.1 Water Resource Management

Bettergrow provided historical pH and electrical conductivity monitoring for water discharged to sewer through Trade Waste Agreement with Sydney Water. Water monitoring results are generally consistent with an electrical conductivity range of 248 and a pH range of 0.3. Water management systems were observed to be well maintained and of a suitable capacity for operations.

### 4.4.2 Stormwater Management and Sediment Control

The site's stormwater management and sediment control systems were inspected during the site visit. All materials were stored undercover in appropriately bunded areas, removing the chance for rainwater to run through aggregate, drill mud or any other processing materials. An additional roll bund has been installed down grade of the bunded material storage areas. The stormwater drains were observed to be clear and free of debris. The sandfilter and ecoceptor were inspected and were determined to be functioning and well maintained (**Plate 18**).

### 4.4.3 Air Quality and Odour

Air quality and odour impacts are of minimal concern at the site. The wet nature of operations reduces the risk of dust emissions from waste processing. The partially enclosed nature of the shed minimises any dust or visible emissions escaping the shed should they be produced. The shed floor is swept as needed.

There are no odour concerns related to Stage 1 of the development. Waste streams with the potential to produce odour are not accepted at the site. Trained Bettergrow employees inspect every load before it is unloaded and then again once unloaded. If there is any odour, the load is rejected and recorded in the 'Rejected Load Register'. Food and garden organics which could potentially be odorous will not be processed until Stage 2 of the development. A recommendation is included in **Table 8** suggesting that the location of the meteorological station be reviewed prior to the commencement of Stage 2 of the development.

### 4.4.4 Noise

Noise was observed to be in line with the industrial setting of the development. The partially enclosed shed helps to minimise noise emission from machinery operating inside. Daily OEMP site inspections would alert management staff to any potential anomalous or offensive noise sources on site. There have been no complaints related to noise in the history of operations at the site.

### 4.4.5 Landscaping and Weed Management

The majority of the site's groundcover is concrete, with a small section of native woodland outside the front fence. The woodland was observed to be well maintained and free of weeds (**Plate 16**). It is recommended that Bettergrow continue to maintain the native woodland and ensure any weeds that may grow through the concreted areas are managed appropriately and removed.

## 4.5 Environmental Management and Opportunities for Improvement

Auditors noted several good environmental management practices occurring at Redirect Recycling Wetherill Park. Bettergrow's compliance management consists of daily site inspection checklists, inspection of incoming loads and staff training. Overall, Bettergrow's general environmental management is commended. Appropriate shed layout, bunding and storage of materials, regular cleaning of the shed floor and other environmental management processes contribute to effective minimisation of the development's environmental impacts. Any recommendations for improvement are contained in **Table 8**.

## 5 AUDIT FINDINGS

### 5.1 Identified Non-compliances and Recommendations

#### 5.1.1 SSD 7401

Non-compliances against SSD 7401 are summarised in **Table 7**. Detailed commentary and evidence against each condition is provided in the SSD 7401 Audit Checklist in **Appendix B**.

**Table 7: Non-compliances against SSD 7401**

Condition	Date	Requirement	Audit Finding	Recommendation
A27	2020	<p>Prior to the commencement of construction, the Applicant must:</p> <p>(a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(c) submit a copy of this report to the Planning Secretary and Council.</p>	<p>Auditors reviewed dilapidation reports prepared by Eclipse Consulting Engineers for the following properties:</p> <ul style="list-style-type: none"> <li>- 2 Arnott Place, Wetherill Park</li> <li>- 23 Davis Road, Wetherill Park</li> <li>- 25 Davis Road, Wetherill Park</li> <li>- 3 Arnott Place, Wetherill Park</li> <li>- 4 Arnott Place, Wetherill Park</li> <li>- 5 Arnott Place, Wetherill Park</li> <li>- 6 Arnott Place, Wetherill Park</li> <li>- 7 Arnott Place, Wetherill Park</li> <li>- 8 Arnott Place, Wetherill Park</li> </ul> <p>All dilapidation reports were deemed satisfactory in identifying the condition of relevant infrastructure in the vicinity of the site.</p> <p>No rearrangements of services were required.</p> <p>Evidence was observed for submission of reports to council, however, Bettergrow was not able to provide evidence of submission to DPE.</p>	<p>Ensure that copies of reports have been provided to DPE.</p>
B14	2021	<p>Prior to the commencement of construction, the Applicant must prepare a Construction and Demolition Waste Management Plan (CDWMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by Condition C1. The CDWMP must:</p> <p>(a) detail the quantities of each waste type generated during construction and the proposed</p>	<p>The CDWMP did not provide specific quantities of each waste type.</p>	<p>The CDWMP did not provide specific quantities of each waste type as stipulated by this condition. It is recommended that this be amended prior to future construction/demolition.</p>

reuse, recycling and disposal locations; and  
 (b) be implemented for the duration of construction works.

## 5.2 Summary of Audit Recommendations

**Table 8** outlines the general recommendations identified for issue during the audit. The recommendations detailed below are based around continuous improvement opportunities identified during the audit and do not all represent immediate non-compliance issues.

**Table 8: Summary of Recommendations**

Condition	Requirement	Audit Finding	Recommendation
A13	The Applicant shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.	Auditors reviewed Bettergrow’s Operational Waste Management Plan to assess recycling strategies. Bettergrow ensures all staff are comprehensively trained in the waste management plan before contributing to operations on site through inductions, environmental awareness training and daily toolbox talks. Waste separation and segregation are promoted on site to ensure reuse and recycling are priority waste management actions. This responsibility is assigned to operations Management under the OWMP.	Operational Waste Management Plan could be clearer regarding target of 97.5% recycling. Table 1 relates Condition A12 to Section 8 of the plan, where Section 6 (specifically Section 6.5 Reuse and Recycling) is more relevant. It is recommended that upon the next amendment of the OWMP, Table 1 is updated and specific mention of the recycling target is made in Section 6.5.
A27	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of this report to the Planning Secretary and Council.	Auditors reviewed dilapidation reports prepared by Eclipse Consulting Engineers for the following properties: - 2 Arnott Place, Wetherill Park - 23 Davis Road, Wetherill Park - 25 Davis Road, Wetherill Park - 3 Arnott Place, Wetherill Park - 4 Arnott Place, Wetherill Park - 5 Arnott Place, Wetherill Park - 6 Arnott Place, Wetherill Park - 7 Arnott Place, Wetherill Park - 8 Arnott Place, Wetherill Park All dilapidation reports were deemed satisfactory in identifying the condition of relevant infrastructure in the vicinity of the site. No rearrangements of services were required. Evidence was observed for submission of reports to council, however, Bettergrow was not able to provide evidence of submission to DPE.	Ensure that copies of reports have been provided to DPE.

## REPORT

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B14	Prior to the commencement of construction, the Applicant must prepare a Construction and Demolition Waste Management Plan (CDWMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by Condition C1. The CDWMP must: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and (b) be implemented for the duration of construction works.	The CDWMP did not provide specific quantities of each waste type.	The CDWMP did not provide specific quantities of each waste type as stipulated by this condition. It is recommended that this be amended prior to future construction/demolition.
B16	Prior to the commencement of any works on-site, the Applicant must install a suitable meteorological station on the site. That generally complies with the requirements in the EPA's Approved Methods for Sampling of Air Pollutants in New South Wales.	The applicant provided timestamped photographic evidence confirming the installation of a meteorological station on site prior to the commencement of construction and the current existence of the meteorological station on site. The current location of the meteorological station may potentially be impacted by the nearby woodland at the front of the site. At present, the risk of any air quality, and particularly odour, impacts are low given that only Stage 1 has been completed. Given the higher risk of air quality impacts associated with Stage 2 of the development it is recommended that the location of the meteorological station is reviewed prior to Stage 2.	It is recommended that the location of the meteorological station is reviewed prior to the commencement of Stage 2 of the development.

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## 6 LIMITATION OF IEA REPORT

In preparing this IEA report, RPS has assessed all activities appropriate and necessary to evaluate the environmental status of the site and operations undertaken within the audit period. RPS has addressed all technical matters which might reasonably be considered to be relevant to such an assessment conducted to standards which apply in NSW. Based on observations of the site, interviews with appropriate staff and a review of available documentation, it is RPS's opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, RPS can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues. The conclusions presented in this report are professional opinions based solely upon RPS's visual observations of the site and the immediate site vicinity, and review of available documentation, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

Opinions presented in this report apply to the site's conditions and features as they existed at the time of RPS' site inspection on 14 September 2023 and those areas accessible. They cannot apply to conditions and features which RPS is unaware of and has not had the opportunity to evaluate.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any circumstances constitute a breach of relevant legislation.



## Appendix A

### DPE Audit Team Approval

Mr Shaun Smith  
BETTERGROW RECYCLING PTY LTD  
ACN: 628 494 011  
2 WELLA WAY  
SOMERSBY New South Wales 2250

29/06/2023

Dear Shaun Smith

**Bettergrow RRF Wetherill Park - IEA Auditor Nomination (SSD-7401)**

I refer to your request (SSD-7401-PA-5) for the Planning Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit (**Audit**) for the Bettergrow RRF Wetherill Park (SSD-7401) (**Project**).

The Department of Planning and Environment (**department**) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Planning Secretary approves the appointment of RPS AAP Consulting Pty Ltd to prepare the Audit for the Project

In accordance with Condition C13 of SSD-7401 (**Consent**) and the Independent Audit Post Approval Requirements (2020), the Planning Secretary has agreed to the following audit team:

- Ian Richardson (Lead Auditor); and
- Dianne Munro (Alternate Lead 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 Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Gabriel Peters Shaw on 0288376395 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Department of Planning and Environment

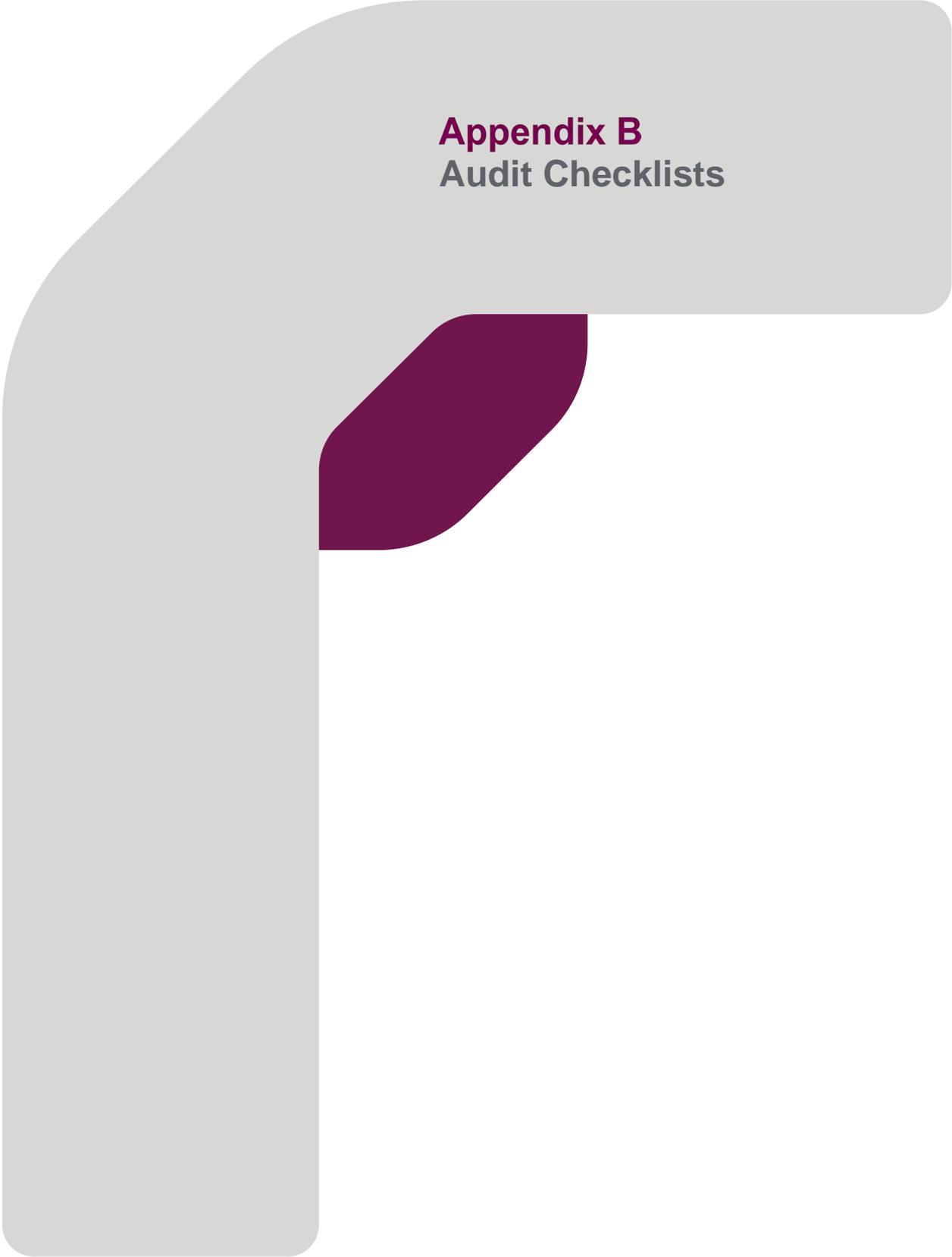


Yours sincerely

A handwritten signature in black ink, appearing to read "R. Sherry".

Rob Sherry  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary



## Appendix B Audit Checklists

# AUDIT CHECKLIST – CONSOLIDATED CONSENT SSD 7401

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**Table 1 Consolidated Consent SSD 7401**

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>SCHEDULE 2 - ADMINISTRATIVE CONDITIONS</b>					
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>					
DA01	A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all measures to prevent and/or minimise any harm to the environment that may result from the Development.	Auditors were satisfied after completing the audit that Bettergrow is implementing every measure within their means to ensure harm to the environment is prevented/minimised. This claim is evidenced throughout the checklist and audit report.	Compliant	
<b>TERMS OF CONSENT</b>					
DA02	A2	The Development may only be carried out in: (a) compliance with the conditions of this consent; (b) accordance with the directions of the Planning Secretary; (c) accordance with the EIS and RTS; (d) accordance with development layout plans and drawings in the EIS (see Appendix A); (e) accordance with the Management and Mitigation Measures (see Appendix B); and (f) accordance with Modification Assessments.	Auditors were satisfied that construction and operation of the Development has only been carried out in line with: (a) the conditions of SSD 7401 (b) the directions of the Planning Secretary (c) the EIS and RTS (d) development layout plans and drawings in the EIS (e) the Management and Mitigation Measures (f) the relevant Modification Assessments	Compliant	
DA03	A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.		Noted	
DA04	A4	The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department’s assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with	Bettergrow has had no specific requests or requirements from the Secretary, nor the DPE.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		the consent; and (c) the implementation of any actions or measures contained in these documents.			
<b>LIMITS ON CONSENT</b>					
DA05	A5	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 the date on which the consent would otherwise lapse under section 95 of the EP&A Act.		Noted	
DA06	A6	The Applicant must not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Bettergrow reports no waste has been processed on site outside the bounds of the EPL. Site inspection revealed no evidence of unapproved waste storage, use, treatment, processing, reprocessing, or disposal.	Compliant	
DA07	A7	The Applicant must not receive or process more than 350,000 tonnes per year of waste comprising of: (a) 100,000 tpa of hydro-excavation, drill muds and fluids, classed as liquid waste; (b) 150,000 tpa of general solid waste (non-putrescible); (c) 70,000 tpa of food and garden organics classed as general solid waste (putrescible); and (d) 30,000 tpa of packaged and bulk food and liquids, classed as general solid waste (putrescible) and liquid waste respectively.	Auditors sighted Bettergrow's Transaction Summary Reports by Product and weighbridge records beginning from commencement of operations. Review of the reports revealed Bettergrow is well below the approved limits for total waste processing per year. Further, Bettergrow's reports and weighbridge records confirmed processing well below the approved limits for liquid waste and general solid waste (non-putrescible). Putrescible waste streams such as food and garden organics are not being processed at this stage of the development. As shown below, the Transaction Summary Reports show a gross receipt quantity of 187,932.9 tonnes to date and a net receipt of 42398 tonnes, with liquid waste received to date at approximately 84,000 t and general solid waste at approximately 782 t.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations																																												
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DA08	A8	The Applicant must not store more than 40,000 tonnes per year of landscape material supplies at the site and no processing of landscape supplies is permitted.	Landscape materials supply facility not relevant to stage 1 operations. Bettergrow's Transaction Summary Reports by product confirmed no landscape supplies were processed within the audit period.	Compliant																																													
DA09	A9	The Applicant must not store general solid (putrescible) and liquid waste at the site for more than 48 hours from the time of receipt unless in the event of an emergency and approved by the Planning Secretary.	This condition is addressed as a mitigation measure in the Operational Waste Management Plan. It is Operations Management's responsibility to ensure no general solid (putrescible) or liquid waste is stored on site for longer than 48 hours unless approved by the Planning Secretary. The site is operated 24 hours a day, 7 days a week. Bettergrow representatives report majority of the waste received is processed immediately. Waste streams that cannot be processed immediately are stored in a 250,000 L concrete pit, where materials are processed during off peak times (night hours).	Compliant																																													
DA10	A10	The storage of compost on the site is not permitted.	This condition is addressed as an ongoing mitigation measure in the Operational Waste Management Plan.	Compliant																																													

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			Bettergrow's Transaction Summary Report by product showed no receipt of compost on site. No compost was observed on site during site inspection.		
DA11	A11	Stockpiles of waste within the FGO and FLD buildings must not exceed 4 m in height measured from the finished floor level.	FGO and FLD buildings are not part of stage 1 operations. To be assessed in future.	Not triggered	
DA12	A12	Stockpiles of product stored at the landscaping material supplies facility must not exceed 4 m in height measured from the finished ground level.	Landscaping materials supply facility is not part of stage 1 operations. To be assessed in future.	Not triggered	
DA13	A13	The Applicant shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.	<p>Auditors reviewed Bettergrow's Operational Waste Management Plan to assess recycling strategies.</p> <p>Bettergrow ensures all staff are comprehensively trained in the waste management plan before contributing to operations on site through inductions, environmental awareness training and daily toolbox talks.</p> <p>Waste separation and segregation are promoted on site to ensure reuse and recycling are priority waste management actions.</p> <p>This responsibility is assigned to operations Management under the OWMP.</p>	Compliant	Operational Waste Management Plan could be clearer regarding target of 97.5% recycling. Table 1 relates Condition A12 to Section 8 of the plan, where Section 6 (specifically Section 6.5 Reuse and Recycling) is more relevant. It is recommended that upon the next amendment of the OWMP, Table 1 is updated and specific mention of the recycling target is made in Section 6.5.
DA14	A14	The Applicant must not receive, per week, more than: (a) 1,750 tonnes of general solid waste (putrescible) within the FGO building; and (b) 700 tonnes of general solid waste (putrescible) and liquid waste within the FLD building.	FGO building and FLD building are not part of Stage 1 operations. To be assessed in future.	Not triggered	
<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>					
DA15	A15	With the approval of the Planning Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(b) combine any strategy, plan or program required by this consent.			
DA16	A16	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage 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. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.	Bettergrow's staged implementation of management plans alongside operations is satisfactory to this condition. For example, the Air Quality and Odour Management Plan (AQOMP) is being updated in stages. The current AQOMP is applicable only to stage 1 operations onsite, made clear in the introduction of the plan. Bettergrow has committed to updating plans once Stage 2 operations commence.	Compliant	
<b>REQUEST FOR INFORMATION</b>					
DA17	A17	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or the EPA.	Bettergrow provided weighbridge records from the commencement of operation upon auditor's request. No requests to produce weighbridge records from the Planning Secretary or EPA have been made.	Compliant	
DA18	A18	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	Auditors sighted 9 waste classification records/certificates provided upon request by Bettergrow. Auditors also sighted waste orders for aggregate, fines and sand since commencement of operations. No requests to produce waste classification records have been made by the EPA, nor the Planning Secretary.	Compliant	
<b>EVIDENCE OF CONSULTATION</b>					
DA19	A19	Where consultation with any public authority is required by the conditions of this consent, the Applicant must: (a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the PCA for approval; (b) submit evidence of such consultation as part of the relevant documentation required by the conditions of this consent;	Auditors sighted consultation between Bettergrow and: - Sydney Water Regarding the Trade Waste Agreement and Compliance Certificate - Fairfield City Council	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(c) describe how matters raised by the public authority have been addressed and identify matters that have not been resolved; and (d) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant.	<p>Regarding the Traffic Impact Assessment, a vehicular crossing inspection, driveway widening requirements, the Flood Management Plan</p> <ul style="list-style-type: none"> <li>- NSW EPA</li> </ul> <p>Regarding the Air Quality and Odour Management Plan</p> <p>The consultation letters confirmed submission of consultation prior to submitting the required documentation.</p> <p>This is further evidenced by the DPE approval letter regarding the OEMP dated 24 August 2022, which confirms the OEMP and all sub-plans were prepared in consultation with DPE and Council.</p>		
<b>STATUTORY REQUIREMENTS</b>					
DA20	A20	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	Redirect Recycling has ensured that all relevant licences have been obtained to date. Relevant, up to date licences /permits/approvals include Environmental Protection Licence, Trade Waste Agreement and Construction Certificates.	Compliant	
<b>DEMOLITION</b>					
DA21	A21	The Applicant must ensure that all demolition associated with the Development is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011.	Bettergrow carried out demolition works on site under DA493.1/2015. The demolition works involved the removal of a car port, 4 small buildings including first aid amenities, metal storeroom, laboratory and storeroom and two offices. Auditors reviewed the Demolition Environmental Management Plan dated 14 August 2020, as well as the stamped DA demolition plan, Bettergrow's notice of intention to commence work, the hazmat clearance report and the relevant dilapidation report to the project.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>STRUCTURAL ADEQUACY AND CERTIFICATION</b>					
DA22	A22	<p>The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the EIS and relevant requirements of the BCA.</p> <p>Note: Under Part 4A of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the Development.</p>	<p>Auditors sighted Construction Certificates dated 21 October 2020 for demolition, earthworks and site preparation, 25 May 2021 for structure and rood wall cladding of large shed and 26 May 2022 for the remainder of works including Fire Engineering approval.</p> <p>Auditors also viewed the Occupation Certificate dated 26 September 2022 for construction and operation of the resource recovery facility, along with confirmation of submission of the Occupation Certificate through the Planning Portal on 28 July 2022.</p>	Compliant	
DA23	A23	<p>Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council, unless otherwise agreed between the Applicant and Council.</p>	<p>No agreement was made between Bettergrow and Fairfield City Council regarding utility adjustments. No utility adjustments were required for the development.</p>	Not triggered	
<b>UTILITIES AND SERVICES</b>					
DA24	A24	<p>Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.</p>	<p>No utility works were required or undertaken.</p>	Not triggered	
DA25	A25	<p>Prior to the commencement of construction, Approved Plans must be submitted to the Sydney Water via their online service to determine if the development will have any impacts on Sydney Water assets.</p>	<p>Auditors sighted Sydney Water Approved Plans dated 28/04/2021.</p>	Compliant	
DA26	A26	<p>Prior to the commencement of operations, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.</p>	<p>Auditors sighted relevant compliance certificate from Sydney Water dated April 12, 2021, prior to operations commencement on 23 August 2022.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>					
DA27	A27	<p>Prior to the commencement of construction, the Applicant must:</p> <p>(a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(c) submit a copy of this report to the Planning Secretary and Council.</p>	<p>Auditors reviewed dilapidation reports prepared by Eclipse Consulting Engineers for the following properties:</p> <ul style="list-style-type: none"> <li>- 2 Arnott Place, Wetherill Park</li> <li>- 23 Davis Road, Wetherill Park</li> <li>- 25 Davis Road, Wetherill Park</li> <li>- 3 Arnott Place, Wetherill Park</li> <li>- 4 Arnott Place, Wetherill Park</li> <li>- 5 Arnott Place, Wetherill Park</li> <li>- 6 Arnott Place, Wetherill Park</li> <li>- 7 Arnott Place, Wetherill Park</li> <li>- 8 Arnott Place, Wetherill Park</li> </ul> <p>All dilapidation reports were deemed satisfactory in identifying the condition of relevant infrastructure in the vicinity of the site.</p> <p>No rearrangements of services were required.</p> <p>Evidence was observed for submission of reports to council, however, Bettergrow was not able to provide evidence of submission to DPE.</p>	Non-compliant	Submit the reports to DPE as soon as possible.
DA28	A28	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and</p> <p>(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.</p>	<p>No damage to any local public infrastructure has been reported.</p> <p>No damage to public infrastructure was observed upon site inspection.</p>	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>OPERATION OF PLANT AND EQUIPMENT</b>					
DA29	A29	<p>The Applicant must ensure that all plant and equipment used for the Development is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>Auditors sighted daily maintenance sheets formulated through consent conditions and OEMP. The site is checked daily against consent conditions to ensure compliance and that the site is well maintained. The sheets have time requirements next to tasks and completed sheets are recorded daily.</p> <p>All maintenance for the wash plant is controlled via inbuilt computer system and managed via digital displays in the control room. Auditors viewed screenshots showing maintenance alerts on the system. Auditors viewed service records for the loader and forklift used on site, demonstrating regular maintenance.</p> <p>The daily equipment condition checklist and daily plant checklist were also reviewed. The checklists were deemed comprehensive and effective at ensuring all plant and equipment is properly maintained.</p> <p>Auditors sighted digital centrifuge maintenance schedule on the system, the on-site folders with Manuals for equipment and a work order from August 2023 showing recent maintenance performed on the loader.</p> <p>Auditors also viewed SOP training records, demonstrating efforts to ensure all staff are operating plant and equipment in a safe and efficient manner.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>COMPLIANCE</b>					
DA30	A30	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	<p>Auditors sighted training records confirming attendance of staff at toolbox talks on the following topics:</p> <ul style="list-style-type: none"> <li>- Fire extinguishers</li> <li>- Isolation and lockout tag out</li> <li>- Pollution PIRMP</li> <li>- Spill kit training/firefighting equipment</li> <li>- Spill kit locations</li> <li>- WHS site inductions</li> <li>- WHSMS procedure</li> <li>- WP, OEMP and WMP</li> </ul> <p>Bettergrow showed auditors the site induction slideshow during site inspection. Auditors noted the induction was comprehensive addressing any potential concerns about safety and environmental management.</p>	Compliant	
<b>DEVELOPMENT CONTRIBUTIONS</b>					
DA31	A31	<p>Prior to the issue of a Construction Certificate for any part of the Development, the Applicant must pay \$158,862.74 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011. Following Councils approval, the Applicant may stage the payment of the 94A contributions in accordance with the construction stages.</p> <p>Note: The contribution and the amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, producer Price index – Building Construction (NSW South Wales).</p>	<p>Auditors sighted Fairfield City Council's Development Contributions Quotation for the development, which provided a total of \$168,223.34.</p> <p>Remittance Advice and a receipt from Fairfield City Council dated 13 October 2023 were also shown to auditors, which confirmed payment of the total amount.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>SCHEDULE 2 PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT</b>					
<b>WASTE MANAGEMENT</b>					
DA32	B1	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Redirect's waste disposal, according to the Operational Waste Management Plan only directs waste to adequately licenced facilities under Section 6.2 and Section 6.8. Waste facilities addressed in the plan include SUEZ, Veolia, Boral and Cleanaway.  Auditors sighted receipts for waste disposal dated 15 May 2023 provided by Sydney Recycling Park and corresponding outgoing weighbridge records.	Compliant	
DA33	B2	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL.	Auditors reviewed the EPL alongside weighbridge records and Transaction Summary Reports by Product since the commencement of operations. No waste generated outside the site was noted to have been processed at the site outside the bounds of the EPL.	Compliant	
DA34	B3	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	The amount of waste received and exported on site daily is recorded in the Exported Transactions spreadsheet. The spreadsheet shows records of all waste received on site from 23 August 2022.	Compliant	
DA35	B4	The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of the EPA.	Auditors sighted all waste classification records from 26 September 2022 to 6 July 2023. Historical monitoring data from water to be discharged to sewer was also provided in the form of spreadsheets. The spreadsheets show sampling results from pH and electrical conductivity testing from the commencement of operation to current.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>Receipt, storage and handling of waste</b>					
DA36	B5	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	Auditors inspected waste receipt records prior to site inspection. No observations of waste processing outside the terms of the EPL were made upon inspection of waste records or site inspection. This is also enforced through Redirect's Operational Waste Management Plan Section 5.1 Waste materials to be received.	Compliant	
DA37	B6	The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept the waste.	<p>Bettergrow employed Sydney Environmental to perform the first Waste Classification Assessment Report dated 26 September 2022.</p> <p>Auditors reviewed every consequential Waste Classification Report provided to date including:</p> <ul style="list-style-type: none"> <li>- Waste Classification Report Stockpiled Soil materials by Rapid Geo dated 26 September 2022</li> <li>- Waste Classification Report by Cardno dated 26 September 2022</li> <li>- Waste Analysis &amp; Classification Report by ADE Consulting Group dated 13 October 2022</li> <li>- Waste Classification Report by Rapid Geo dated 23 February 2023</li> <li>- Waste Classification Report by Rapid Geo dated 24 March 2023</li> <li>- Waste Classification Certificate by CHEC dated May 2023</li> <li>- Waste Classification Report by Rapi Geo dated 15 June 2023</li> <li>- Excavated Natural Material Report by Alliance dated 6 July 2023</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			Auditors observed waste disposal receipts and corresponding weighbridge records dated 15 May 2023.		
DA38	B7	<p>The Applicant shall:</p> <p>(a) implement auditable procedures to:</p> <p>(i) ensure the site does not accept wastes that are prohibited; and</p> <p>(ii) screen incoming waste loads.</p> <p>(b) ensure that:</p> <p>(i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site;</p> <p>(ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation;</p> <p>(iii) details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Planning Secretary when requested; and</p> <p>(iv) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste.</p>	<p>Bettergrow's Operational Waste Management Plan provides auditable waste management procedures throughout Section 6.</p> <p>Section 6.3 Inspection of Waste &amp; Non-Conforming Waste Procedure ensures that the site does not accept any wastes that are prohibited. The site layout ensures all incoming loads are screened under the OWMP.</p> <p>Weighbridge transaction records and the daily exported transactions spreadsheet were sighted which show recording of appropriate documentation at waste acceptance as required under Clause 27 of the PoEO Regulation.</p> <p>Training records demonstrating staff attendance of toolbox talks regarding the WP, OEMP and OWMP were also shown to auditors.</p> <p>Neither the EPA nor the Planning Secretary has requested waste tracking records be produced.</p>	Compliant	
DA39	B8	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	Bettergrow reports no materials have been required to be classified for offsite disposal. Only organics (pre-classified as GSW) are sent off-site.	Compliant	
DA40	B9	<p>All waste must be:</p> <p>(a) stored wholly within the designated waste storage areas; and</p> <p>(b) loaded and unloaded within the designated loading and unloading areas.</p>	According to the Operational Waste Management Plan, liquid waste must be stored in appropriately banded containers and all other wastes (bar wastewater) are	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			to be stored in appropriate covered receptacles in appropriate locations on site. Site inspection confirmed all waste was appropriately stored in designated areas and loaded and unloaded in appropriate designated areas.		
DA41	B10	All loading and unloading of general solid waste (putrescible) and liquid waste must be carried out completely within the FGO and FLD buildings.		Not triggered	
<b>Waste Monitoring Program</b>					
DA42	B11	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the Development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos.	The Waste Monitoring Program is detailed in Section 6 of the Operational Waste Management Plan. The WMP was prepared by Space Urban Pty Ltd prior to the commencement of operation but has since been updated to Rev 2 on 29/06/2022. Auditors reviewed the WMP and concluded it contains satisfactory provisions for monitoring quantity, type and source of waste received on site and quantity, type and quality of the site's output. Section 6.2 of the OWMP details information to be collected for documentation of waste prior to acceptance at site. Section 8 contains provisions for staff training.	Compliant	
<b>Waste Management Plan</b>					
DA43	B12	Prior to the commencement of operation, 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 required by Condition C4 and be prepared in accordance with Condition C7. The Plan must: (a) detail the type and quantity of waste to be received during operation of the Development;	The auditors reviewed the Operational Waste Management Plan, found on Redirect Recycling's public facing website, prior to site inspection. Section 5.1 details the types and amounts of waste to be received and processed during the development's operation. Diversion of waste products is adequately covered in Section 7. The Vineyard Waste Resource	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(b) include procedures for diversion of waste to other facilities during unexpected machinery breakdown; and (c) details the requirements for non-conforming waste handling and removal.	Recovery Facility is the first point of contact in unexpected machinery breakdown requiring waste diversion. Section 6.3 details the procedure for dealing with non-conforming waste when identified. In summary, non-conforming waste will not be accepted at the site. If identified during initial inspection, the vehicle will be instructed to leave the premises. If identified after the load has been tipped, it will be reloaded and the vehicle will be instructed to leave. The procedure has further detail regarding contaminated loads containing certain materials.		
DA44	B13	The Applicant must: (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; and (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.	Auditors sighted DPE approval letter relating to OEMP including WMP dated 24 August 2022, prior to commencement of operations. Site inspection confirmed proper implementation of the most recent version of the OWMP.	Compliant	
<b>Construction Waste Management</b>					
DA45	B14	Prior to the commencement of construction, the Applicant must prepare a Construction and Demolition Waste Management Plan (CDWMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by Condition C1. The CDWMP must: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and (b) be implemented for the duration of construction works.	Auditors reviewed the Construction and Demolition Waste Management Plan dated 22 July 2021. Section 4.1 of the CDWMP identifies the relevant waste streams while Table 3 identifies the proposed reuse, recycling and disposal locations. Bettergrow reports the CDWMP was implemented for the duration of construction works. It is noted that the CDWMP did not provide specific quantities of each waste type as stipulated by this condition.	Non-compliant	The CDWMP did not provide specific quantities of each waste type as stipulated by this condition. It is recommended that this be amended prior to future construction/demolition.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA46	B15	The Applicant must: (a) retain disposal records for all waste disposed of under the CDWMP for 4 years and provide these to the EPA as requested; (b) not commence construction until the CDWMP is approved by the Planning Secretary; and (c) implement the most recent version of the CDWMP approved by the Planning Secretary.	Auditors viewed waste disposal docket for all waste disposed of under the CDWMP from November 2020 through August 2022. It is noted the four year required time period has not yet lapsed. Auditors also sighted DPE approval of the updated CEMP containing the CDWMP dated 24 August 2022. Bettergrow reports the CDWMP was implemented throughout the entirety of construction/demolition activities.	Compliant	
<b>ODOUR AND AIR QUALITY</b>					
<b>Meteorological Station</b>					
DA47	B16	Prior to the commencement of any works on-site, the Applicant must install a suitable meteorological station on the site. That generally complies with the requirements in the EPA's Approved Methods for Sampling of Air Pollutants in New South Wales.	The applicant provided timestamped photographic evidence confirming the installation of a meteorological station on site prior to the commencement of construction and the current existence of the meteorological station on site. The current location of the meteorological station may potentially be impacted by the nearby woodland at the front of the site. At present, the risk of any air quality, and particularly odour, impacts are low given that only Stage 1 has been completed. Given the higher risk of air quality impacts associated with Stage 2 of the development it is recommended that the location of the meteorological station is reviewed prior to Stage 2.	Compliant	It is recommended that the location of the meteorological station is reviewed prior to the commencement of Stage 2 of the development.
<b>Dust Management</b>					
DA48	B17	All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.	The Air Quality and Odour Management Plan provides clear and specific measures to ensure all reasonable steps are taken to minimise dust generation throughout the	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>lifetime of the development. It is the responsibility of the Safety, Health and Environment Officer to review the AQOMP on a monthly basis and ensure all mitigation measures are effectively minimising dust levels. Mitigation measures provided in Table 7 of the AQOMP also have required actions to implement if any certain measure is not effectively minimising dust. For example, sweeping and moistening of paved areas as needed can be increased in frequency to twice per day.</p> <p>During the construction stage, the CEMP air quality mitigation measures were employed. If, despite all mitigation measures being appropriately implemented, visible dust emissions were observed leaving the site, all works were to cease and further controls were to be employed. If further controls did not manage to contain dust, work would cease until more favourable conditions ensued.</p> <p>'Section 4.2 Air Quality' of the OEMP suggests that the moist nature of the materials being processed, combined with the partially enclosed nature of the workspace minimises dust generation during operations. Upon site inspection, no dust was seen escaping the site.</p>		
DA49	B18	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>(a) all vehicles on site do not exceed a speed of 20 kilometres per hour;</li> <li>(b) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(c) all trucks entering or leaving the site with loads have their loads covered;</li> </ul>	<p>The Traffic section of Table 9 Summary of Mitigation Measures in the CEMP provides traffic impact mitigation measures including the requirement for an appropriate Traffic Control Plan to be implemented throughout construction. During site inspection it was made clear that the site speed limit is 10km/h, enforced through appropriate</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>(d) trucks associated with the Development do not track dirt onto the public road network; and</p> <p>(e) public roads used by these trucks are kept clean.</p>	<p>signage and the design of the pathway through the site.</p> <p>The Construction Environmental Management Plan provides mitigation measures in Table 9 to control air quality.</p> <p>The CEMP stipulated that all work sites, general work areas and stockpiles will be closely monitored for dust generation and watered down (with clean water) or covered (tarpaulins) in the event of dry and/or windy conditions.</p> <p>The CEMP provided a specific measure to ensure all loads of excavated material, soil, fill and other erodible matter that are transported to or from the work site will be kept covered at all times during transportation and will remain covered until they are unloaded either for use at the work site, reuse or disposal at an EPA licensed waste disposal facility. Additionally, the Drivers Code of Conduct requires all trucks entering and exiting the premises to have their loads effectively covered at all times</p> <p>Driveways and haulage paths were regularly swept during construction under the CEMP and trucks were made to leave the site with loads as full as safely possible to reduce number of trips, preventing tracking of excess dirt onto public roads and keeping public roads clean.</p> <p>During site inspection, workers were observed sweeping the shed floor and a truck was observed uncovering and recovering its load prior to leaving the site. The site was observed to be in a very clean and tidy state.</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA50	B19	Prior to the commencement of operations, the Applicant must: (a) ensure the interior of the FGO and FLD building is designed to facilitate wash down and leachate capture; and (b) seal all trafficable areas.	FGO and FLD building are not relevant to Stage 1 of the development.	Not triggered	
DA51	B20	During operations, the Applicant must ensure that: (a) all vehicles on site do not exceed a speed of 20 kilometres per hour; (b) regular watering is conducted within the landscaping material supplies area to ensure dust impacts are minimised; and (c) air quality and odour impacts of the Development are minimised during adverse meteorological conditions.	The Operational Traffic Management Plan provides measures to ensure vehicle and road safety is prioritised. Section 4.0 Ways to Control Traffic Risks contains provisions such as clear signposting and speed humps. Section 7.0 Traffic Management Plan provides which measures Bettergrow takes to control vehicle speed onsite. The section states the site speed limit is 15kmph, which will be enforced. Vehicle speed is controlled through gates, track design and clear signposting.  The landscape material supplies area is not relevant to Stage 1 of the development. A meteorological monitoring station was installed prior to construction to ensure appropriate mitigation measures, as per the AQOMP, are employed in adverse meteorological conditions. The meteorological station has been removed due to irrelevance of air quality issues to stage 1 of the development but will be reinstated prior to stage 2.	Compliant	
DA52	B20A	The Applicant must ensure the design and construction of the partially enclosed shed (shown in Drawing Number DA100, Issue A in Appendix A) does not preclude the ability for roller doors to be retrofitted.	Site inspection confirmed the shed is physically capable of supporting roller doors as per Drawing number DA100, should they need to be installed.	Compliant	
<b>Odour</b>					
DA53	B21	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as	Redirect Recycling has never had a complaint or incident regarding offensive odour as defined under the POEO Act. This	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		defined in the POEO Act).	was confirmed through review of the Community Complaints Register. This lack of complaints speaks for successful implementation of the AQOMP. Auditors did not observe any offensive odours during site inspection.		
<b>Air Quality and Odour Mitigation</b>					
DA54	B22	<p>The Applicant must:</p> <p>(a) operate the Development so that air and odour emissions are minimised during all meteorological conditions</p> <p>(b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development, including but not limited to an odour management system comprising of:</p> <p>(i) a system which ensures the FGO and FLD buildings would be held under negative pressure and fitted with automatically closing heavy vehicle roller doors;</p> <p>(ii) installation of an air extraction device(s) which directs the air to eight carbon filters with a 99.9% odour elimination efficiency rate;</p> <p>(iii) installation of a volatile organic compounds (VOC) breakthrough detection alarm in the FGO building which must be triggered once the carbon filters reach 90% saturation;</p> <p>(iv) ducting the air from the FLD building to the FGO building to ensure the air is treated via the eight carbon filters;</p> <p>(v) biological inoculums to deodorise plant and equipment areas; and</p> <p>(vi) the installation of misting sprays above the truck entry/exit in the FGO and FLD building to suppress odour emissions</p> <p>(vii) conduct weekly cleaning of any tipping areas within the FGO or FLD building where interior walls have been contaminated with putrescible waste;</p> <p>(c) regularly maintain on-site surfaces to prevent dust re-entrainment from vehicle movements and other</p>	<p>Air and odour emissions are negligible during stage 1 operations due to the nature of waste that is processed. Drill mud/aggregate does not typically produce an odour. This condition will become more relevant once the FGO and FLD buildings are commissioned during stage 2. It was noted during site inspection that Bettergrow is diligent with sweeping the workshop floor and hosing the loader after use, preventing negative air quality impacts from operation. All waste to be processed on site is sprayed/washed before machine screening.</p> <p>Air quality and odour management is prescribed by the AQOMP.</p> <ul style="list-style-type: none"> <li>- FGO and FLD buildings not relevant to Stage 1 of the development</li> <li>- Surfaces are swept and moistened as needed to control dust under the AQOMP</li> <li>- Section 4.4 of the OEMP does not require odour impact mitigation under the AQOMP due to the negligible odour generation from activities to be conducted under Stage 1 of operation.</li> <li>- There have been no air quality nor odour complaints in the lifetime of the development</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>equipment use;</p> <p>(d) in accordance with the OEMP ensure the regular wash down of the FGO and FLD buildings to ensure a build-up of waste and odour does not occur;</p> <p>(e) ensure regular maintenance of the odour management system; and</p> <p>(f) record and respond to any air quality or odour complaints within 48 hours.</p>			
DA55	B23	Prior to acceptance of any waste at the FGO or FLD building, the odour management system identified in Condition B22(b) must be installed and operational.	FGO and FLD building irrelevant to Stage 1 of the development.	Not triggered	
<b>Air Quality and Odour Management Plan</b>					
DA56	B24	<p>Prior to commencement of operation, the Applicant must prepare an Air Quality and Odour Management Plan (AQOMP) to the satisfaction of the Planning Secretary. The AQOMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The AQOMP must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</p> <p>(b) describe the measures that would be implemented on site to ensure all reasonable and feasible measures are employed to minimise air quality and odour emissions, including details of the odour management system and all other operational air quality mitigation measures;</p> <p>(c) detail on a site plan the location of any air quality and odour management infrastructure;</p> <p>(d) include an ongoing odour monitoring program with details of location, frequency and duration of monitoring activities;</p> <p>(e) detail the contingency measures to be deployed to minimise air quality and odour impacts with well defined triggers for their deployment; and</p> <p>(f) include a system for monitoring and responding to any odour complaints.</p>	<p>a. Redirect commissioned Darlene Huff from Advanced Environmental Dynamics to prepare an AQOMP, which was approved under the OEMP by the DPE 24 August 2022, noting appropriate consultation with the EPA was undertaken.</p> <p>b. Management measures to control air quality and odour emissions are detailed in Table 7. The specific actions provided appear to be adequate upon review.</p> <p>c. The Prospect Monitoring Station is shown on a site plan in Figure 4.</p> <p>d. Table 7 provides directions and responsibilities for ongoing monitoring of dust and odour.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<ul style="list-style-type: none"> <li>e. Specific timing and triggers for management measures are detailed in table 7.</li> <li>f. Complaints protocol is outlined in the last row of Table 7.</li> </ul>		
DA57	B25	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the AQOMP required by Condition B24 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the AQOMP approved by the Planning Secretary for the duration of the Development.</li> </ul>	<p>Auditors sighted DPE approval letter approving the OEMP (containing the AQOMP) dated 24 August 2022, prior to commencement of operations. Auditors also sighted the most recent version of the AQOMP dated 19 April 2022. Auditors were satisfied following site inspection that the AQOMP is being implemented effectively. No air quality complaints have been received by Bettergrow and no visible emissions were observed leaving the site by auditors.</p>	Compliant	
<b>Odour Audit</b>					
DA58	B26	<p>The Applicant must carry out an Odour Audit of the Development no later than six months after the commencement of operation of the FGO and FLD buildings. The audit must:</p> <ul style="list-style-type: none"> <li>(a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Planning Secretary;</li> <li>(b) be carried out in accordance with the methodologies set out in the relevant EPA guidelines;</li> <li>(c) identify all significant odour sources at the site;</li> <li>(d) monitor odour and audit the Development whilst the FGO and FLD buildings are in full operation;</li> <li>(e) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints;</li> </ul>	<p>FGO and FLD buildings not relevant to Stage 1 of the development.</p>	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>(f) validate the Development in consultation with the EPA against the odour predictions in the EIS and provide a comparison between the monitoring results and the relevant EPA guidelines;</p> <p>(g) review the design and management practices of the Development against the industry best practice for odour emissions; and</p> <p>(h) include an action plan that identifies, prioritises and provides timeframes for the implementation of any additional odour emission mitigation measures that may be necessary to reduce odour emissions to ensure the relevant odour criteria is met.</p> <p>Note: The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</p>			
DA59	B27	Within six months of commissioning of the Odour Audit required by Condition B26, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the Planning Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.	Time period for completion has not yet been triggered.	Not triggered	
DA60	B28	The Applicant must comply with any reasonable requirement(s) of the Planning Secretary arising from the Odour Audit.	Time period for completion has not yet been triggered.	Not triggered	
<b>SOILS, WATER QUALITY AND HYDROLOGY</b>					
<b>Wastewater and Leachate</b>					
DA61	B29	Any leachate generated on the site must be captured and re-used on-site or disposed of at a licenced facility, and no leachate is permitted to enter the stormwater system.	All waste and product stockpiles are stored undercover inside the shed negating the potential to generate leachate through exposure to rainwater.	Compliant	
DA62	B30	The Applicant must ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water or tankered offsite for appropriate disposal at licenced facilities or further processing	Redirect's Water Management Plan sets out the procedure for dealing with wastewater in Section 4.2.2. Process waters are collected from the centrifuge and directed to a process water storage	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>tank and subsequently two clean water storage tanks, all of which are located within the shed. From here, the process waters are re-used in the process until there is an excess in the system at which point the process water is released to sewer under the TWA or trucked offsite if it does not meet TWA requirements.</p> <p>Sampling data for TWA discharges from commencement of operation until August 2023 was observed by auditors.</p>		
DA63	B31	The Applicant must install an alarm system which sounds and flashes once the amount of wastewater within the wastewater tanks reaches 80% of the total capacity.	The alarm system is controlled by the computer in the control room. The alarm for the wastewater tank is set to occur at 80% capacity, although Bettergrow staff note this has not occurred with current water processing rates. If an alarm sounds the computer alerts staff as to exactly what is setting off the alarm, which valves are open, which pumps are running, etc. The entire site is alerted when an alarm goes off.	Compliant	
DA64	B32	Wastewater from the hydro-excavation, drill mud and fluids processing facility is not permitted to enter the stormwater management system.	Redirect's Water Management Plan details the process for dealing with wastewater. All wastewater is stored in appropriate tanks and discharged to sewer if it meets TWA requirements. If not, it is tankered offsite to a licenced facility. Auditors observed the stormwater management system on site. The system appeared to be functioning appropriately.	Compliant	
DA65	B33	Prior to commencement of operation of the hydro-excavation, drill mud and fluid processing facility, the Applicant must ensure: (a) the wastewater management system is operational; and (b) the wastewater tanks associated with the hydro-excavation, drill mud and fluid processing facility are banded in accordance with:	Auditors sighted the wastewater management system on site, confirming operational status.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(i) all relevant Australian Standards; and (ii) NSW EPA's Spill Management Bunding guidelines.	Auditors sighted engineering certification of the wastewater management system by Jordan McCooe of CDE on 28 March 2022.		
<b>Liquid Food Waste</b>					
DA66	B34	Prior to the commencement of operations of the FLD building, the Applicant must: (a) ensure the base of the FLD tip pit is located at or above 44.5 m AHD (0.5 m above the groundwater table); (b) line the FLD building tip pit with an impermeable barrier to prevent leachate from entering groundwater; (c) install an alarm within the two 27 kL liquid food waste tanks which sounds and flashes once 75% of the total capacity is reached; and (d) ensure the liquid food waste tanks are bunded in accordance with all relevant Australian Standards and NSW EPA's Spill Management Bunding guidelines.	FLD building not relevant to Stage 1 of the development.	Not triggered	
DA67	B35	Any liquid food waste generated within the FLD building must be contained within the two 27 kL tanks within the FLD building.	FLD building not relevant to Stage 1 of the development.	Not triggered	
<b>Groundwater</b>					
DA68	B36	Every 12 months from commencement of the FLD operations, the Applicant must conduct groundwater monitoring and demonstrate that leachate from the FLD facility tip pit is not entering groundwater. The groundwater monitoring must be conducted by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary.	FLD building not relevant to Stage 1 of the development.	Not triggered	
DA69	B37	Within two months of the groundwater monitoring being conducted, the Applicant must submit a Groundwater Report to the Planning Secretary which: (a) includes a plan showing the location of the groundwater monitoring well which was sampled in accordance with Condition B36;	Time period for completion has not yet been triggered.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(b) details the baseline data, groundwater levels and monitoring results against the relevant criteria; (c) considers whether leachate from the FLD tip pit has entered groundwater; and (d) if necessary, details the mitigation and contingency measures which would be implemented to prevent the FLD tip pit from leaking.			
DA70	B38	Should it be determined that leachate has entered groundwater, the Applicant is not permitted to store waste within the FLD tip pit until the leak has been rectified.	Time period for completion of groundwater monitoring has not yet been triggered.	Not triggered	
<b>Discharge Limits</b>					
DA71	B39	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.	The Stormwater Management Plan and Water Management Plan ensure compliance with section 120 of the POEO Act. Section 4.3.5 of the Water Management Plan provides Trigger Levels and Action Responses to prevent pollution of waters. Section 5.4 addresses specific Assessment Criteria against baseline and background conditions of groundwater. Clean surface water is stored in a 5000L rainwater tank for reuse around site. Rainwater above the capacity of the tank is diverted around the operational areas and treated via sand filter before continuing through the stormwater management system. Water passing through the sand filter is then treated by an SPEL Ecoceptor 6000 series before discharge to Fairfield City Council's stormwater management system. This water treatment prevents contaminated water from entering the stormwater system by removing suspended solids and nutrients via sand filter and removing pollutants, sediments and light liquids via the Ecoceptor. To prevent fire	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>water contamination, there is a fire hose reel system within bunded Materials Handling area, containing fire water to site and stormwater drain inlet screens are regularly inspected and cleaned as necessary according to the Pollution Incident Response Management Plan.</p> <p>No pollution of waters was observed during site inspection.</p>		
<b>Flood Management</b>					
DA72	B40	<p>Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan (FERP) for the Development in consultation with Council and to the satisfaction of the Planning Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C1 and C4 and must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) include details of:</p> <p>(i) the flood emergency responses for both construction and operation phases of the Development;</p> <p>(ii) predicted flood levels;</p> <p>(iii) flood warning time and flood notification;</p> <p>(iv) assembly points and evacuation routes;</p> <p>(v) evacuation and refuge protocols; and</p> <p>(vi) awareness training for employees and contractors.</p>	<p>a. The Flood Emergency Response Plan was prepared by a number of suitably qualified engineers at Northrop Consulting and formed part of the CEMP and OEMP. Auditors sighted DPE approval of the CEMP and OEMP confirming the secretary's satisfaction with the plan and consultation with the relevant agencies including Council.</p> <p>b.</p> <p>i. It is clearly defined which responsive actions are to be taken during construction and which are to be taken during operation throughout the entire report.</p> <p>ii. Predicted flood levels are defined in Section 3 Flood Behaviour.</p> <p>iii. The report is clear that three hours warning time is expected. Information regarding flood warnings and notification types for</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>different severity levels can be found in Section 4.1 Warning Types.</p> <p>iv. Assembly points and evacuation route details can be found in Section 6 of the report. This section contains site plans and diagrams, along with descriptions for assembly and evacuation during both construction and operation.</p> <p>v. Section 10.1 details the Evacuation response procedure. Responsibilities, triggers and actions are clearly laid out.</p> <p>vi. Staff training provisions are contained in Section 9.2. Site inductions, training courses and toolbox talks are recommended methods of training. It is also recommended that records of training completed are kept.</p>		
DA73	B41	The Applicant must: (a) not commence construction until the FERP required by Condition B40 is approved by the Planning Secretary; and (b) implement the most recent version of the FERP approved by the Planning Secretary for the duration of the Development.	Auditors viewed DPE approval letter of Stage 1 CEMP containing the FERP dated 24 August 2022. Upon site inspection auditors were satisfied that Bettergrow is well positioned to implement the FERP in the event of a flood emergency.	Compliant	
DA74	B42	All floor levels must be no lower than the 1% Annual Exceedance Probability flood plus 0.5 m of freeboard.	Floor levels have been determined as per recommendations from the Flood Emergency Response Plan. The floor level of the shed is approximately 39.45m AHD,	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>about 1.45m above the Probably Maximum Flood level of 38m.</p> <p>All floor levels were also above the PMF during construction, with the temporary office outside the flood extent.</p>		
<b>Stormwater Management System</b>					
DA75	B43	<p>The Applicant must design, install and operate a stormwater management system for the Development. The system must:</p> <p>(a) be designed by a suitably qualified and experienced person(s);</p> <p>(b) be generally in accordance with the conceptual design in the EIS (as amended in Modification Assessments) and applicable Australian Standards;</p> <p>(c) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004);</p> <p>(d) divert existing clean surface water around operational areas of the site; and</p> <p>(e) prevent firewater and contaminated water from entering the stormwater system.;</p>	<p>a. The Stormwater Management Plan, prepared by Eclipse Consulting Engineers, contains the engineering plans and details regarding the Stormwater Management System.</p> <p>b. The stormwater management system has been updated in Mod 3 and Mod 2, to relocate rainwater storage and to replace the sediment and bioretention basins. Auditors sighted the stormwater management system during site inspection, confirming its alignment with the design in the EIS as modified.</p> <p>c. During desktop investigation of design, the stormwater management system appeared to be in general accordance with Australian Rainfall and Runoff, as well as Managing Urban Stormwater: Soils and Construction – Volume 1. This was confirmed during site inspection.</p> <p>d. Clean surface water is stored in a 5000L rainwater tank for reuse around site. Rainwater above the capacity of the tank is diverted around the operational areas and treated via sand</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>filter before continuing through the stormwater management system.</p> <p>e. Water passing through the sand filter is then treated by an SPEL Ecoceptor 6000 series before discharge to Fairfield City Council's stormwater management system. This water treatment prevents contaminated water from entering the stormwater system by removing suspended solids and nutrients via sandfilter and removing pollutants, sediments and light liquids via the Ecoceptor. To prevent fire water contamination, there is a fire hose reel system within bunded Materials Handling area, containing fire water to site and stormwater drain inlet screens are regularly inspected and cleaned as necessary according to the Pollution Incident Response Management Plan.</p>		
DA76	B44	<p>Prior to the issue of a Construction Certificate, a certificate must be submitted to the PCA certifying that:</p> <p>(a) satisfactory arrangements have been made for the disposal of stormwater;</p> <p>(b) the proposed development and alterations to the natural surface contours will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties; and</p> <p>(c) the piped drainage system has been designed to Council's Stormwater Drainage Policy.</p>	<p>Compliance Certificate – Design Civil/stormwater, produced by Eclipse Consulting Engineers , dated 1 April 2022 was sighted by auditors confirming compliance with Conditions:</p> <ul style="list-style-type: none"> <li>- B43</li> <li>- B44</li> <li>- B46</li> <li>- B51</li> </ul> <p>The certificate certified sediment and erosion control, stormwater drainage, external pavement, parking and access.</p> <p>The certification is in line with relevant Australian Standards, along with The Blue</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			Book and the Fairfield City Wide DCP 2013.		
DA77	B45	Prior to the issue of the Final Occupation Certificate, Works-As-Executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved must be submitted to the PCA.	<p>Identification Survey and Floor Level Certification signed by Registered Surveyor Jonathon Burke dated 6 July 2022 was sighted by auditors.</p> <p>The Compliance Certificate dated 15 June 2022, certified sediment and erosion control, stormwater drainage, external pavement, parking and access.</p> <p>Signed design drawings dated 9 June 2022, along with a Site Inspection Report dated 10 June 2022, prepared by Eclipse Consulting Engineers, confirming construction as approved, was sighted by auditors.</p>	Compliant	
DA78	B46	The Applicant must ensure the stormwater generated from the development is directed to the onsite in-ground concrete pit and/or Ecoceptor prior to being released to Council's street kerb and gutter.	The stormwater management system was observed during site inspection. The system appeared to be adequately designed to direct water to the pit containing the sand filter and the not the Ecoceptor. This is in line with the stormwater management system proposed in the EIS as modified and the Stormwater Management Plan and Civil Engineering Drawings completed by Eclipse Consulting Engineers.	Compliant	
DA79	B47	Within 6 months of the operation of the landscaping materials supplies facility, the Applicant must demonstrate to the Planning Secretary that the following stormwater reduction targets for the site are being met:	Landscaping materials supplies facility not relevant to Stage 1 of the development.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations										
<p><b>Table 1: Stormwater Reduction Targets</b></p> <table border="1"> <thead> <tr> <th>Stormwater Pollutant</th> <th>Industrial Developments</th> </tr> </thead> <tbody> <tr> <td>Gross pollutants</td> <td>90%</td> </tr> <tr> <td>Total suspended solids (TSS)</td> <td>80%</td> </tr> <tr> <td>Total phosphorus (TP)</td> <td>55%</td> </tr> <tr> <td>Total nitrogen (TN)</td> <td>40%</td> </tr> </tbody> </table>						Stormwater Pollutant	Industrial Developments	Gross pollutants	90%	Total suspended solids (TSS)	80%	Total phosphorus (TP)	55%	Total nitrogen (TN)	40%
Stormwater Pollutant	Industrial Developments														
Gross pollutants	90%														
Total suspended solids (TSS)	80%														
Total phosphorus (TP)	55%														
Total nitrogen (TN)	40%														
DA80	B48	If the Targets in Table 1 are not met, the Applicant must install additional mitigation measures to meet the targets in Table 1.	As above.	Not triggered											
<p><b>Water Management Plan</b></p>															
DA81	B49	<p>Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The Water Management Plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) detail water use, disposal and management on-site;</p> <p>(c) detail the water licence requirements for the development i.e trade waste;</p> <p>(d) detail how leachate, stormwater and wastewater would be managed, including how any changes approved by modification applications have been addressed;</p> <p>(e) detail any trigger levels to ensure overflow of wastewater and leachate at the site does not occur;</p> <p>(f) contain a Surface Water Management Plan, including:</p> <p>(i) a program to monitor:</p> <p>a. surface water flows and quality;</p> <p>b. surface water storage and use; and</p> <p>(ii) sediment and erosion controls;</p> <p>(iii) surface water impact assessment criteria, including trigger levels for investigating and potential</p>	<p>a. The Water Management Plan dated 5 April 2022 was prepared in accordance with Condition C7, prior to the commencement of operations by suitably qualified staff members of Senversa Pty Ltd, forming part of the OEMP.</p> <p>b. Section 2.4.4 details Water Losses and Usage. Water usage on site is broken down into the five different water systems present.</p> <p>c. At the time of preparing the Water Management Plan, there was no Trade Waste Agreement established with Sydney Water. Section 2.4.4 details the requirements around water licencing and the TWA to be established. TWA has since been established with Sydney Water.</p> <p>d. Section 4.2 describes the management of surface water including leachate,</p>	Compliant											

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>adverse surface water impacts; and</p> <p>(iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.</p> <p>(g) contain a Groundwater Management Plan, including:</p> <p>(i) baseline data on groundwater levels and quality;</p> <p>(ii) a program to monitor groundwater levels and quality;</p> <p>(iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and</p> <p>(iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.</p>	<p>stormwater and wastewater. At this stage of the development, leachate is not expected to be impactful, due to the storage of material and waste stockpiles undercover in the shed, where they are not exposed to rainwater. Stormwater is managed through a comprehensive stormwater management system, featuring diversion through downpipes, a 5000L rainwater tank, a pit with sand filter and an ecoceptor. Wastewater processes are detailed in Section 4.2.2.</p> <p>e. Trigger levels are identified in Section 4.3.5.</p> <p>f. The Surface Water Management Plan makes up Section 4 of the report.</p> <p>i. Monitoring of surface water flows and quality is covered in Section 4.3.</p> <p>ii. Monitoring of surface water storage and use is also covered in Section 4.3</p> <p>iii. Trigger levels are contained in Section 4.3.5.</p> <p>iv. Section 4.3.5 also provides actions for investigation and mitigation of exceedances.</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<ul style="list-style-type: none"> <li>g. The Groundwater Management Plan is contained in Section 5.</li> <li>i. Baseline conditions across the 13 groundwater monitoring wells are presented in Section 5.2.</li> <li>ii. The groundwater monitoring program can be found in Section 5.3. This provides directions, frequencies and responsibilities for effective monitoring.</li> <li>iii. Assessment criteria and trigger levels are found in Sections 5.4 and 5.5.</li> <li>iv. Action responses are included in Table 5.4.</li> </ul>		
DA82	B50	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the Water Management Plan required by Condition B49 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the Water Management Plan approved by the Planning Secretary for the duration of the Development.</li> </ul>	Auditors sighted DPE approval of OEMP: containing Water Management Plan dated 24 August 2022. Upon site inspection, auditors were satisfied Bettergrow is properly implementing the Water Management Plan.	Compliant	
<b>Chemical Spills and Fire Water Containment</b>					
DA83	B51	<p>To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of operations, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) prepare an Emergency Response Plan as part of the OEMP as required by Condition C4 which details</li> </ul>	<ul style="list-style-type: none"> <li>a. The Emergency Response Plan outlines responsibilities during a chemical spill in Section 4.5 and in a fire situation in Section 4.1.</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>the responsibilities and procedures should a chemical spill or fire occur on the site;</p> <p>(b) ensure the stormwater isolation valve functionality has a fail-safe function on power failure which automatically closes the valve. The stormwater isolation valve must remain in the closed position until a manual over-ride function is initiated upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste;</p> <p>and</p> <p>(c) ensure the location of the stormwater isolation valve and any associated controls are clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan.</p>	<p>b. Auditors sighted Compliance Certificate prepared by Eclipse Consulting Engineers, dated 15 June 2022, certified sediment and erosion control, stormwater drainage, external pavement, parking and access, along with compliance with this condition.</p> <p>c. The stormwater isolation valve is present and clearly identifiable in the site plan included in the Emergency Response Plan.</p>		
<b>Erosion and Sediment Control</b>					
DA84	B52	<p>Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.</p>	<p>Erosion and sediment control measures for construction and operation are detailed in the Stormwater Management Plan Section 5.3. Auditors sighted Compliance Certificate prepared by Eclipse Consulting Engineers, dated 15 June 2022, certified sediment and erosion control in line with The Blue Book: Management Urban Stormwater 2004 – Soils and Construction 4th Edition.</p>	Compliant	
<b>TRAFFIC AND ACCESS</b>					
<b>Parking</b>					
DA85	B53	<p>Prior to the commencement of any operations, the Applicant must provide a total of 31 car parking spaces (including two disabled car spaces), all car parking must be constructed in accordance with the latest version of AS 2890.</p>	<p>Section 2.6 of the CEMP outlines parking will be constructed, in line with the approved staging of the development. 12 carparking spaces have been provided for Stage 1 and the remaining 19 car parking spaces will be provided as part of Stage 2.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			This is consistent with the approved plans for SSD7401-MOD3.		
<b>Operating Conditions</b>					
DA86	B54	<p>The Applicant must ensure:</p> <p>(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 AS 2890.1 and AS 2890.2;</p> <p>(b) the western entry/exit must be widened to meet RMS heavy vehicle access requirements and be submitted to Council for approval;</p> <p>(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;</p> <p>(d) the Development does not result in any vehicles queuing on the public road network in particular Davis Road;</p> <p>(e) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site;</p> <p>(f) all vehicles are wholly contained on site before being required to stop;</p> <p>(g) 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>(h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;</p> <p>(i) the eastern driveway is reserved for service and emergency access only;</p> <p>(j) the various operating areas must be clearly marked and signage erected to direct heavy vehicles to the relevant operating areas; and</p>	<p>a. Auditors observed roads, driveways and parking during site inspection, confirming compliance with Australian Standards. This is reinforced in the Operational Traffic Management Plan which found all driveways and internal parking areas to be compliant with Australian Standards.</p> <p>b. Auditors sighted consultation with Fairfield City Council confirming the western entry/exit comes off a Council Road and has to conform to Council standards (dated 21 July 2022). Auditors reviewed Fairfield City Council's 'Vehicular Crossings – General Conditions' along with the Construction Certificate for Stage 1.</p> <p>c. Auditors observed swept path to be adequate and satisfactory to the Austroads guidelines during site inspection. The swept path analysis completed by Pavey Consulting Services as part of the Operational Traffic Management Plan determined heavy vehicles servicing the site are capable of manoeuvring within the site in a safe and efficient manner without any unreasonable encroachment on internal passenger vehicle parking areas or structures.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(k) pedestrian paths on-site must be clearly marked at all times.	<ul style="list-style-type: none"> <li data-bbox="1037 316 1503 373">d. No vehicle queuing was observed during site inspection.</li> <li data-bbox="1037 411 1503 576">e. There is adequate parking for heavy vehicles and bins provided on site to avoid parking on local roads and footpaths. Associated vehicles and bins were observed to be within the site's boundaries.</li> <li data-bbox="1037 614 1503 699">f. There is adequate space on site to contain vehicles wholly on site before stopping.</li> <li data-bbox="1037 737 1503 874">g. Redirect's Driver Code of Conduct requires all loaded trucks arriving at and departing from the site to have an effective cover over their load for the entirety of their journeys.</li> <li data-bbox="1037 912 1503 997">h. There were no obstacles observed anywhere in the driveway nor in any of the paths of traffic on site.</li> <li data-bbox="1037 1035 1503 1145">i. The eastern driveway was not used during site inspection. Access to the shed was blocked off to ensure trucks would not use the eastern driveway.</li> <li data-bbox="1037 1184 1503 1241">j. Clearly marked signage was observed during site inspection (see Plate 13)</li> <li data-bbox="1037 1279 1503 1299">k. There are no pedestrian paths on site.</li> </ul>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
<b>Operational Traffic Management Plan</b>					
DA87	B55	<p>Prior to the commencement of operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C7. The OTMP must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council;</p> <p>(c) detail the measures that are to be implemented to ensure road safety and network efficiency is maintained including restricting queuing or parking of vehicles on Davis Road and re-directing heavy vehicles during peak times so that queuing is appropriately managed;</p> <p>(d) detail heavy vehicle routes, driveway widening, access and parking arrangements;</p> <p>(e) include a Driver Code of Conduct to:</p> <p>(i) minimise the impacts on the local and regional road network;</p> <p>(ii) minimise conflicts with other road users;</p> <p>(iii) minimise road traffic noise;</p> <p>(iv) ensure truck drivers use specified routes; and</p> <p>(v) include a program to monitor the effectiveness of these measures.</p> <p>(f) include a Traffic Control Plan (TCP) detailing:</p> <p>(i) the location of signage to direct heavy vehicles to the relevant operating areas;</p> <p>(ii) the on-site measures to be implemented to control the movement of trucks in, out and onsite, such as 'left turn only' signs and a traffic controller; and</p> <p>(iii) provisions for requiring a dedicated traffic controller to stop exiting trucks to allow an entering truck to manoeuvre into the site unhindered.</p>	<p>a. The Operational Traffic Management Plan was prepared by David Pavey, the director of Pavey Consulting Services.</p> <p>b. Appendix D demonstrates Council consultation during the preparation of the Operational Traffic Management Plan.</p> <p>c. Management measures are presented in Section 4 Ways to Control Traffic Risks. The measures provided were found to be appropriate to maintain network efficiency and road safety.</p> <p>d. Heavy vehicle routes, access arrangements, driveway improvements and parking arrangements are detailed in Section 7.</p> <p>e. The Driver Code of Conduct makes up Appendix C to the report. The Code of Conduct was found to contain satisfactory provisions to minimise impacts on roads, minimise conflicts with road users, minimise road traffic noise and ensure specified routes for truck drivers are taken. Compliance monitoring for the Driver Code of Conduct is covered in Section 9 of the Operational Traffic Management Plan.</p> <p>f. The Traffic Control Plan is contained in Appendix B. The locations of signage are clearly identified, along with traffic</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations																											
			control measures such as traffic signals and give way signs. Dedicated traffic controllers are considered in the plan with trucks being instructed to wait for approval to exit the dispatch area.																													
DA88	B56	The Applicant must: (a) not commence operation until the OTMP required by Condition B55 is approved by the Planning Secretary; And (b) ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development.	Auditors sighted DPE's approval letter referring to the OEMP Stage 1 containing the OTMP dated 24 August 2022. Upon site inspection auditors agreed the OTMP is being satisfactorily implemented. There have been no traffic related incidents recorded since the commencement of operation.	Compliant																												
<b>NOISE</b>																																
<b>Hours of Work</b>																																
DA89	B57	The Applicant must comply with the hours detailed in Table 2 and Table 3: <i>Table 2: Hours of Demolition and Construction</i>	There were 0 noise complaints during the construction period, in which works were carried out within the specified hours. Redirect has consent for 24/7 operation.	Compliant																												
		<table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Demolition and construction</td> <td>Monday to Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</td> </tr> <tr> <td>Sunday</td> <td>No works permitted</td> </tr> </tbody> </table> <i>Table 3: Hours of Operation</i> <table border="1"> <thead> <tr> <th>Operation</th> <th>Receival</th> <th>Dispatch</th> <th>Processing</th> </tr> </thead> <tbody> <tr> <td>Hydro-Excavation, Drill Mud and Fluids Processing Facility</td> <td>Monday to Sunday, 24 hours</td> <td>Monday to Sunday, 24 hours</td> <td rowspan="3">Monday to Sunday, 24 hours</td> </tr> <tr> <td>FGO Facility</td> <td>Monday to Sunday, 24 hours</td> <td>Monday to Sunday, 24 hours</td> </tr> <tr> <td>FLD Facility</td> <td>Monday to Sunday, 24 hours</td> <td>Monday to Sunday, 24 hours</td> </tr> <tr> <td>Landscaping Material Supplies Facility</td> <td>Monday to Sunday, 24 hours</td> <td>Monday to Sunday, 24 hours</td> <td>Not Applicable</td> </tr> </tbody> </table>	Activity	Day	Time	Demolition and construction	Monday to Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday	No works permitted	Operation	Receival	Dispatch	Processing	Hydro-Excavation, Drill Mud and Fluids Processing Facility	Monday to Sunday, 24 hours	Monday to Sunday, 24 hours	Monday to Sunday, 24 hours	FGO Facility	Monday to Sunday, 24 hours	Monday to Sunday, 24 hours	FLD Facility	Monday to Sunday, 24 hours	Monday to Sunday, 24 hours	Landscaping Material Supplies Facility	Monday to Sunday, 24 hours	Monday to Sunday, 24 hours	Not Applicable		
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DA90	B58	Works outside of the hours identified in Condition B57 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary;	Redirect Recycling Wetherill Park has received zero noise complaints, suggesting no audible work was conducted outside of the hours specified in Condition B57.	Compliant																												

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations										
		(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 and /or prevent environmental harm.													
<b>Construction Noise Limits</b>															
DA91	B59	The Development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009). All noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the EIS.	The Resource Recovery & Recycling Centre, Wetherill Park NSW Noise and Vibration Impact Assessment (Global Acoustics, 2017) confirmed construction noise would not exceed the relevant criteria at the closest industrial or residential receivers. As no construction noise impacts were predicted, no mitigation measures were proposed.	Compliant											
<b>Operational Noise Limits</b>															
DA92	B60	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 4. <b>Table 4: Noise Limits dB(A)</b> <table border="1" data-bbox="324 957 1019 1029"> <thead> <tr> <th>Location</th> <th>Day LAeq(15 minute)</th> <th>Evening LAeq(15 minute)</th> <th>Night LAeq(15 minute)</th> <th>Night LA(1 minute)</th> </tr> </thead> <tbody> <tr> <td>All residential receivers</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p><i>Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</i></p>	Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA(1 minute)	All residential receivers	35	35	35	45	The Resource Recovery & Recycling Centre, Wetherill Park NSW Noise and Vibration Impact Assessment (Global Acoustics, 2017) confirmed operational noise would not exceed the relevant criteria at the closest industrial or residential receivers. Background research, unattended noise monitoring and attended noise monitoring at nearest receivers was completed and noise impacts were modelled using DataKustik CadnaA software. The nearest residential receivers were identified to be over 1500m away, with multiple industrial noise producers along the propagation path. No complaints have been submitted within the time period of the operational phase.	Compliant	
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA(1 minute)											
All residential receivers	35	35	35	45											

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA93	B61	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) implement best practice, including all noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;</li> <li>(b) minimise the noise impacts of the development during adverse meteorological conditions;</li> <li>(c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant and equipment is not being used operationally until fully repaired; and</li> <li>(d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</li> </ul>	<ul style="list-style-type: none"> <li>a. Processing operations are contained in a partially enclosed shed, with concrete push walls and rapid acting roller shutter doors, which assist in mitigation of operational noise. Further to this, the development is suitably located within one of the largest industrial estates in the southern hemisphere, producing no noise that could be considered out of character for this location.</li> <li>b. Meteorological conditions were considered in the development of the Noise and Vibration Impact Assessment (NVIA). The NVIA modelling was approached conservatively, using worst case scenario meteorological conditions. The NIA determined no adverse noise impacts would occur because of the development, even in worst case meteorological conditions.</li> <li>c. Auditors viewed service records for the loader and forklift used on site, demonstrating regular maintenance. The daily equipment condition checklist and daily plant checklist were also reviewed. The checklists were deemed comprehensive and effective at ensuring all plant and equipment is properly maintained.</li> <li>d. As no noise impacts have been predicted to occur in worst case noise modelling scenarios and no complaints have been received, Redirect have not</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			had to relocate, modify or stop operations to date. If a complaint is received, Redirect are committed to rectifying any issues by investigating and modifying operations as needed.		
<b>Construction and Operational Noise Management</b>					
DA94	B62	The Applicant must ensure that all its vehicles are fitted with broadband reversing alarms only.	Auditors sighted certification of compliance with this condition signed by Neale Hogarth Operations Manager dated 27 May 2022.	Compliant	
<b>VIBRATION</b>					
<b>Vibration Criteria</b>					
DA95	B63	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings Effects on Structures; and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006).	The NVIA predicted no vibration impacts at residential receivers due to separation distances of greater than 1500m. Operations on site were observed to be in accordance with the relevant guidelines.	Compliant	
<b>Vibration Validation</b>					
DA96	B64	During the commissioning of the hydro-excavation, drill mud and fluids processing equipment the Applicant must conduct vibration testing on vibration generating equipment. The vibration testing must be conducted by a suitably qualified and experienced person(s). Should exceedances occur, the Applicant must implement the following mitigation measures: (a) equipment causing the vibration should be isolated on resilient mounts from any connective structures; (b) inertia blocks should be considered to add system mass to reduce vibration; and (c) balance weights to correct rotation of poorly balanced parts.	Auditors reviewed the operational Vibration Testing Report dated 29 August 2022, composed by EMM. Attended vibration measurements were conducted at two site boundary locations, representative of the nearest premises with the potential to be affected by site vibration. During the attended measurements, all site fixed plant and machinery was operating to capture a potential worst-case operational scenario.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			Measured vibration levels at both boundary and near-field locations were less than both the guideline values for structural damage and the preferred values for human exposure.		
DA97	B65	Evidence of the vibration testing and outcomes must be submitted to the Planning Secretary and the EPA within two months of conducting the testing.	Auditors sighted a screenshot showing Bettergrow's submission of the Operational Vibration Testing Report to the DPE 7 September 2022.	Compliant	
<b>HAZARDS AND RISK</b>					
DA98	B66	The Applicant must store all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.	Auditors sighted certification of compliance with this condition signed by Neale Hogarth Operations Manager, dated 27 May 2022. The letter stated "All chemicals, fuels and oils at the development are stored in accordance with all relevant Australian Standards and the NSW EPA's 'Storing and Handling of Liquid: Environmental Protection – Participants Handbook'.  Auditors were satisfied upon site inspection that all chemical, fuel and oil storage was in line with the relevant standards.	Compliant	
<b>Dangerous Goods</b>					
DA99	B67	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Auditors sighted certification of compliance with other conditions of SSD 7401, signed by Neale Hogarth Operations Manager, dated 27 May 2022. The letter was relevant to the storage of dangerous goods on site, stating "Dangerous good stored onsite include a 2000 L diesel tank that is stored in a mobile self-bunded tank with a volume equal to or greater than 110% of the	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<p>maximum storage volume. The dangerous goods are stored in accordance with relevant Australian Standards and the Environment Protection Manual for Authorised Officers: Bunding and Spill Management. Technical bulletin (EPA, 1997.)</p> <p>Auditors did not observe any storage of dangerous goods outside the bounds of the Department of Planning's Hazardous and Offensive Development Application Guidelines on site.</p>		
DA100	B68	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997).</p> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<p>Auditors sighted certification of compliance with this condition signed by Neale Hogarth Operations Manager, dated 27 May 2022. The letter stated "Dangerous good stored onsite include a 2000 L diesel tank that is stored in a mobile self-bunded tank with a volume equal to or greater than 110% of the maximum storage volume. The dangerous goods are stored in accordance with relevant Australian Standards and the Environment Protection Manual for Authorised Officers: Bunding and Spill Management. Technical bulletin (EPA, 1997)."</p> <p>Auditors were satisfied upon site inspection that storage of dangerous goods was in line with the relevant guidelines and consent conditions.</p>	Compliant	
<b>LITTER AND PEST CONTROL</b>					
<b>Pests, Vermin and Noxious Weed Management</b>					
DA101	B69	The Applicant must:	The Drivers Code of Conduct requires all trucks entering and exiting the premises to have their loads effectively covered at all	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(a) ensure all waste loads are covered unless fully contained with building(s); and (b) maintain the site in a clean and tidy state at all times.	times. All trucks entering and exiting the site were observed to have covered loads during the site inspection (see Plate 10). The site was observed by auditors to be in a relatively clean and tidy state.		
DA102	B70	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area. Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993	The OEMP states “the risk of vermin and pest infestation is considered low” due to factors such as the site layout, the indoor nature of operations, the minimal time waste will remain on site, the proximity to waterways and vegetation and the nature of the surrounding industrial activities. Monthly site inspections are undertaken by the Site Manager/Environmental Manager under the OEMP, as well as general daily OEMP site inspections, which would identify any potential pest/vermin/noxious weeds that need to be controlled.	Compliant	
<b>CONTAMINATION</b>					
DA103	B71	Prior to the commencement of construction, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. The protocol must form part of the CEMP required by Condition C1 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	Appendix K of the CEMP contains the Unexpected Finds Protocol, which was approved by the DPE 24 August 2022. The original CEMP with original Unexpected Finds Protocol was approved 12 April 2019, confirmed by sighting of DPE approval letter.	Compliant	
<b>VISUAL AMENITY</b>					
<b>Building Materials and Landscaping</b>					
DA104	B72	Prior to the commencement of construction, the Applicant must prepare a Building Material Schedule and Landscape Plan for the Development to the satisfaction of the Planning Secretary. The Schedule and Plan must: (a) be prepared in consultation with Council;	Auditors sighted the landscape documentation including a landscape Plan and Building Material Schedule dated 15 July 2020, along with the related Installation Certificate dated 2 August 2022. Auditors also sighted the	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>(b) be consistent with the Fairfield City Council Development Control Plan 2013;</p> <p>(c) include a schedule of the building materials and colours to be used on the facades; and</p> <p>(d) include details on landscaping including species and number of plants to be planted and the watering regime.</p> <p>Only native species are to be used for landscaping purposes, and species must be selected which benefit the Cumberland Plain Woodland species present on the site.</p>	<p>Builder/Head Contractor Compliance Statement dated 4 August 2022.</p> <p>It is noted in the DPE approval letter that the CEMP was prepared in consultation with the EPA and Council and provided all information required by the conditions of approval.</p> <p>There are no planted species on site. It was observed that the pre-existing native vegetation between the site and the road has been well maintained.</p>		
DA105	B73	<p>The Applicant must:</p> <p>(a) not commence construction until the Building Material Schedule and Landscape Plan required by Condition B72 is approved by the Planning Secretary; and</p> <p>(b) ensure the Building Material Schedule and Landscape Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development.</p>	<p>Auditors sighted DPE approval of the updated CEMP containing the Approved landscape Plans as Attachment 11 dated 24 August 2022, prior to commencement of construction.</p> <p>It is noted in the DPE approval letter that the CEMP was prepared in consultation with the EPA and Council and provided all information required by the conditions of approval.</p> <p>Auditors were satisfied with the implementation of the Building Material Schedule and Landscape plan.</p>	Compliant	
<b>External Walls and Cladding Flammability</b>					
DA106	B74	<p>The external walls of the building including attachments must comply with the relevant requirements of the National Construction Code (NCC). Prior to the issue of a Construction Certificate and Occupation Certificate the Certifying Authority must:</p> <p>(a) be satisfied that suitable evidence is provided to demonstrate that the products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the relevant requirements of the NCC; and</p>	<p>Auditors sighted Construction Certificates dated 21 October 2020 for demolition, earthworks and site preparation, 25 May 2021 for structure and rood wall cladding of large shed and 26 May 2022 for the remainder of works including Fire Engineering approval.</p> <p>Auditors also viewed the Occupation Certificate dated 26 September 2022 for construction and operation of the resource recovery facility.</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(b) ensure that the documentation relied upon in the approval processes include an appropriate level of detail to demonstrate compliance with the NCC as proposed and as built.			
DA107	B75	A copy of the documentation required under Condition B74(b) must be provided to the Planning Secretary within 7 days of being accepted by the Certifying	Auditors sighted confirmation of submission of the Construction Certificates and Occupation Certificate through the Planning Portal on 28 July 2022.	Compliant	
<b>Lighting</b>					
DA108	B76	The Applicant must ensure the lighting associated with the Development: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; 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.	Auditors sighted the lighting certification certificate provided by Crossmuller Electrical, dated 25 May 2022. The certification, signed by Timothy Roper, warrants compliance with AS 4282 and this condition.  Auditors observed appropriate placement and direction of lighting during site inspection.	Compliant	
<b>Signage</b>					
DA109	B77	All signage and fencing must be erected in accordance with the Development plans included in the EIS/RTS. Note: This condition does not apply to temporary construction and safety related signage and fencing.	Fencing and signage was sighted during site inspection by the auditors, confirming compliance with the EIS/RTS as modified.	Compliant	
<b>Heritage</b>					
DA110	B78	The Applicant must cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume	The updated CEMP provides the Unexpected Finds protocol for the site in Appendix K, pursuant to this condition.  No unexpected finds have been made on site.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the National Parks and Wildlife Act 1974.			
<b>SECURITY</b>					
DA111	B79	The Applicant shall: (a) maintain the perimeter fence and security gates on the site; and (b) ensure that the security gates on site are locked whenever the site is unattended.	<p>a. The perimeter fence and security gates were sighted by auditors during site inspection and were noted to be in good, well-maintained condition.</p> <p>b. The site is operational 24/7.</p>	Compliant	
<b>DECOMMISSIONING</b>					
DA112	B80	Prior to the commencement of operations, the Applicant must prepare a Conceptual Decommissioning Management Plan (DMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C7. The DMP must: (a) include a schedule for the decommissioning of the Development; (b) detail how the following would be achieved: (i) ensure the site is left in a safe, stable and non-polluting manner; (ii) removal of all waste from the site; (iii) restoration of the site to the existing land use in accordance with State Environmental Planning Policy No 55 – Remediation of Land; and (iv) ensure public safety is maintained. (c) include procedures for notification of the surrounding landowners;	<p>The Conceptual Decommissioning Management Plan, which forms part of the OEMP, was reviewed by auditors during the audit. The CDMP:</p> <ul style="list-style-type: none"> <li>- Provides a decommissioning schedule in Section 7.</li> <li>- Ensures the site is left in a safe, stable and non-polluting manner if implemented in its entirety.</li> <li>- Provides for removal of all waste from site in Section 7.9</li> <li>- Provides for restoration of the site to the existing land use in Section 7.12</li> <li>- Ensures public safety is maintained via directions in Section 7.11</li> <li>- Contains procedures for notification of landholders in Section 5.</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(d) include procedures for safe removal of any machinery and structures; (e) include measures to mitigate any environmental impacts associated with the removal of the development; (f) include details of monitoring that would be undertaken during the decommissioning of the development; and (g) be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> <li>- Provides for safe removal of machinery and infrastructure in Section 7.8.4.</li> <li>- Provides comprehensive mitigation measures in Section 11.</li> <li>- Provides monitoring details in Section 12.</li> <li>- Details document review compliant to this condition in Section 13.</li> </ul>		

## SCHEDULE 2 PART C: ENVIRONMENTAL MANAGEMENT PLAN

### CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

DA113	C1	<p>The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must:</p> <p>(a) be approved by the Planning Secretary prior to the commencement of construction;</p> <p>(b) outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>(c) explain the controls that would be implemented to minimise dust emissions during construction of the Development;</p> <p>(d) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;</p> <p>(e) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;</p> <p>(f) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and</p> <p>(g) include the management plans required under Condition C2 of this consent.</p>	<p>The updated CEMP dated 24 August 2022 was reviewed by auditors during the audit. The original CEMP was approved 12 April 2019.</p> <p>All environmental management practices are outlined in Section 3 Environmental Management.</p> <p>Section 6.7 Mitigation Measures describes all the measures taken during construction to minimise dust emissions.</p> <p>Section 1.1.2 provides a clear description of the development along with the staged approach that is being taken.</p> <p>Section 7 details Monitoring and corrective actions.</p> <p>Roles and responsibilities of employees are addressed in Section 3.1.</p> <p>The relevant management plans are addressed in Section 6 and appendicised.</p>	Compliant	
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Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA114	C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: (a) Construction and Demolition Waste Management Plan (Condition B14); (b) Flood Emergency Response Plan (see Condition B40); (c) Erosion and Sediment Control Plan (see Condition B52); (d) Unexpected Finds Protocol (see Condition B71); and (e) Building Material Schedule and Landscape Plan (see Condition B72).	The required management plans can be found in the following locations: CDWMP – Appendix H FERP – Appendix I ESCP – Appendix J UFP – Appendix K Building Material Schedule – Appendix L Landscape Plan – Appendix M	Compliant	
DA115	C3	The Applicant must carry out the construction of the Development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	Auditors viewed Construction Certificates relying on the approved CEMP and subplans of the CEMP. Construction certificates were issued by 'BM+G' 21 October 2020, 25 May 2021 and 26 May 2022.	Compliant	
<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b>					
DA116	C4	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must: (a) be approved by the Planning Secretary prior to the commencement of operations; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the Development; (d) identify the statutory approvals that apply to the Development; (e) provide a legible site plan which shows all the various operations on the site; (f) detail the FGO and FLD cleaning and maintenance regime; (g) include the details of the groundwater monitoring as required by Condition B36; (h) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (i) describe the procedures that would be implemented to:	<ul style="list-style-type: none"> <li>a. The OEMP was approved by the DPE 24 August 2022.</li> <li>b. The OEMP was prepared by the suitably qualified team at Space Urban Pty Ltd.</li> <li>c. The environmental management framework for the development is described in extensive detail throughout Section 3 of the report.</li> <li>d. The relevant statutory approvals are outlined in Section 1.1.1, including SSD 7401 MOD1, MOD2 and MOD3.</li> <li>e. The OEMP was designed to detail all operations on site and includes multiple</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance; and</p> <p>(v) respond to emergencies.</p> <p>(j) include the following environmental management plans:</p> <p>(i) Waste Management Plan (Condition B12);</p> <p>(ii) Air Quality and Odour Management Plan (see Condition B24);</p> <p>(iii) Water Management Plan (see Condition B49);</p> <p>(iv) Emergency Response Plan that addresses flooding, chemical spills and fire water containment (see Condition B51 and B40);</p> <p>(v) Operational Traffic Management Plan (see Condition B55); and</p> <p>(vi) Conceptual Decommissioning Management Plan (see Condition B80).</p>	<p>figures showing operations on site, such as Figure 1: Extent of Facility Operating under Stage 1.</p> <p>f. The FGO and FLD operations are not relevant to Stage 1 (the current stage) of the development. It is recommended that the OEMP is updated before the development progresses to a stage with plans to utilise the FGO and FLD buildings.</p> <p>g. The time period for groundwater monitoring has not yet been triggered.</p> <p>h. The roles and responsibilities of all staff and subcontractors are detailed in Section 3.1 of the report.</p> <p>i. Procedures for communication are found in Section 9. Procedures for handling complaints are found in Section 9.3, including dispute resolution. Management of non-compliances is detailed in Section 8.2. The OEMP contains an Emergency Response Plan, with emergency contacts listed in Table 16.</p> <p>j. The Waste Management Plan, Air Quality and Odour Management Plan, Water Management Plan, Emergency Response Plan, Operational Traffic Management Plan and Conceptual Decommissioning Management Plan are appended to the report and</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			determined to be satisfactory by auditors.		
DA117	C5	The Applicant must 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), unless otherwise agreed by the Planning Secretary.	<p>The Conditions Compliance Report assists Bettergrow in ensuring operations are compliant with SSD 7401 and the OEMP. The OEMP also has provisions for monitoring and reporting, along with regular monthly site inspections.</p> <p>Bettergrow employs a daily OEMP checklist, undertaken by one staff member each morning. The checklist was sighted by auditors and has time requirements beside conditions that need to be checked.</p> <p>Auditors were satisfied upon site inspection that operations are currently in line with the OEMP.</p>	Compliant	
<b>Conditions Compliance Report</b>					
DA118	C6	The Applicant must submit a Conditions Compliance Report to the Planning Secretary with any Environmental Management Plans, to track compliance with the conditions of this approval during the construction and operation of the Development. The Conditions Compliance Report must include procedures for rectifying any non-compliance identified.	The Conditions Compliance Report was submitted to the DPE 26 April 2022 and is attached to the OEMP as Attachment 10.	Compliant	
<b>MANAGEMENT PLAN REQUIREMENTS</b>					
DA119	C7	The Applicant must ensure that the environmental management plans required under Condition C1 and Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data (b) a description of:	<p>Auditors performed a review of all relevant environmental management plans prior to site inspection.</p> <p>a. Detailed baseline data can be found management plans where it is</p>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		<p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures/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>(c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the Development; and</p> <p>(ii) effectiveness of any management measures (see (c) above).</p> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the Development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incidents;</p> <p>(ii) complaints;</p> <p>(iii) non-compliances with statutory requirements; and</p> <p>(iv) exceedances of the impact assessment criteria and/or performance criteria.</p> <p>(h) a protocol for periodic review of the plan.</p>	<p>obtainable and relevant. For example, Section 3.2 Existing Air Quality, in the Air Quality and Odour Management Plan presents baseline data obtained from a desktop investigation regarding particulate matter and total suspended particles at the nearest monitoring station.</p> <p>b. Auditors also found:</p> <p>i. Satisfactory descriptions of relevant statutory requirements. For example, Section 4 of the Operational Waste Management Plan lists all relevant legislation, guidelines and standards and refers to explanations found in the OEMP.</p> <p>ii. Relevant limits and criteria. For example, Section 3.1 of the Air Quality and Odour Management Plan sets out the relevant Impact Assessment Criteria and project goals for air quality relating to dust deposition, particulate matter and total suspended particles.</p> <p>iii. Performance indicators and relevant actions to be taken if required, such as those found in Table 7 of the Air Quality and Odour Management Plan.</p> <p>c. Detailed descriptions of and instructions to implement management</p>		

Ref No.	Cond Audit Finding & Recommendations No.	Comments & Evidence	Audit Findings	Recommendations
		<p>measures to ensure compliance with relevant conditions and criteria, such as those found in Section 9 of the operational Waste Management Plan.</p>		
		<p>d. Monitoring and reporting programs based around impacts, environmental performance and management measures were found to be present in the relevant environmental management plans. Example includes Section 11 Monitoring and Reporting in the Operational Waste Management Plan.</p>		
		<p>e. Contingency plans were found where relevant. For example, the detailed Air Quality Management Plan found in Section 4 of the Air Quality and Odour Management Plan.</p>		
		<p>f. The procedures for dealing with incidents, complaints, non-compliances and exceedances can all be found within the overarching Operational Environmental Management Plan.</p>		
		<p>g. Redirect has committed to implementing a yearly environmental management review, which will assess the environmental performance of the development. Annual monitoring will include an assessment of the operational compliance and feasibility of controls listed under the OEMP and all associated sub-plans. The intent will be to identify possible opportunities for</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			improvement in site management as well as identifying management controls that are not practical for implementation for the Facility. This process will identify any inadequacies or requirements for update of environmental management plans.		
<b>Revision of Strategies, Plans and Programs</b>					
DA120	C8	<p>Within three months of:</p> <p>(a) approval of a modification;</p> <p>(b) approval of an annual review under Condition C9;</p> <p>(c) submission of an incident report under Condition C10; and</p> <p>(d) completion of an audit under Condition C14.</p> <p>the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</p>	Condition not triggered. No annual reviews, modifications, incident reports or audits under condition C14 have been completed. All management plans will be reviewed following completion of the current audit under condition C14.	Not triggered	
<b>ANNUAL REVIEW</b>					
DA121	C9	<p>Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Planning Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria;</p>	Redirect has committed to an annual environmental management review under this condition. Annual monitoring will include an assessment of the operational compliance and feasibility of controls listed under the OEMP and all associated sub-plans. The intent will be to identify possible opportunities for improvement in site management as well as identifying management controls that are not practical for implementation for the Facility. This process will identify any inadequacies or requirements for update of environmental management plans. The time period for	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS. (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.	completion of environmental performance review has not yet been triggered.		
<b>REPORTING</b>					
<b>Incident Reporting</b>					
DA122	C10	Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report shall be supplied to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Planning Secretary no later than 14 days after the incident or potential incident.	The Accidents, Incidents and potential Incidents register for Redirect Recycling Wetherill Park contains no history of incidents or potential incidents on site. There have been no incidents since the commencement of the development. This was confirmed via communications with James Sutton Environmental Manager during the audit opening meeting.	Not triggered	
DA123	C11	The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent Hazard Auditor and the Department.	The applicant maintains an accidents, incidents and potential incidents register which is available for download via Redirect Recycling's website.	Compliant	
<b>Regular Reporting</b>					
DA124	C12	The Applicant must provide regular reporting on the environmental performance of the Development on its	Redirect has committed to an annual environmental performance/management	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	review. Due to the timespan of the development's operation being less than one year at the commissioning of this audit, environmental reporting has not yet been finalised or uploaded to the website.		
DA125	C13	<p>Within one year of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6 of the EP&amp;A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:</p> <ul style="list-style-type: none"> <li>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</li> <li>(b) include consultation with the relevant agencies;</li> <li>(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);</li> <li>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</li> <li>(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.</li> </ul> <p>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Planning Secretary.</p>	<p>This independent environmental audit has been commissioned to satisfy this condition.</p> <ul style="list-style-type: none"> <li>a. The audit team were approved as experts by the DPE on 29 June 2023 (see approval letter attached to audit report).</li> <li>b. Consultation letters were sent out to the DPE, the EPA and Fairfield City Council by the audit team prior to site inspection for consideration of agency input.</li> <li>c. This audit checklist and the accompanying report contains all details assessed by the approved auditors regarding environmental performance and compliance.</li> <li>d. Management plans have been thoroughly reviewed by the approved auditors. Details of the reviews are contained in the associated audit report.</li> <li>e. Recommended actions for improvement are contained in the audit report.</li> </ul>	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA126	C14	Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Planning Secretary.	The audit report along with any required accompanying information will be submitted to the DPE within three months of the commissioning of the independent environmental audit.	Compliant	

#### ACCESS TO INFORMATION

DA127	C15	<p>The Applicant must:</p> <p>(a) make copies of the following publicly available on its website:</p> <p>(i) the documents referred to in Condition A2;</p> <p>(ii) all current statutory approvals for the Development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(iv) 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> <p>(v) a complaint register updated on a monthly basis;</p> <p>(vi) the annual reviews of the Development;</p> <p>(vii) any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit;</p> <p>(viii) any other matter required by the Planning Secretary; and</p> <p>(ix) keep this information up to date, to the satisfaction of the Planning Secretary.</p>	<p>a. Auditors found:</p> <p>i. The documents listed in condition A2 (consolidated consent conditions, EIS, RTS, development plans, proposed mitigation measures and modification assessments) are available through Redirect Recycling's public facing website.</p> <p>ii. Relevant statutory approvals, including consolidated consent for SSD 7401 Mod 3 on the public website.</p> <p>iii. All plans, strategies and programs relevant to Stage 1 of the development required by this consent, including:</p> <ul style="list-style-type: none"> <li>• Approved landscape Plans</li> <li>• Conceptual Decommissioning Management Plan</li> </ul>	Compliant	Ensure summaries of monitoring results are uploaded to the website after monitoring is undertaken.
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Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<ul style="list-style-type: none"> <li>• Conditions Compliance Report</li> <li>• Pollution Incident Response Management Plan</li> <li>• Operational Environmental Management Plan</li> <li>• Consolidated Consent</li> <li>• Air Quality and Odour Management Plan Update</li> <li>• Stormwater Management Plan</li> <li>• Operational Waste Management Plan</li> <li>• Consent to discharge industrial trade wastewater</li> <li>• Flood Emergency Response Plan</li> <li>• Water Management Plan</li> <li>• Emergency Plan</li> <li>• Operational Traffic Management Plan</li> </ul> <p>iv. Timelines for completion of monitoring programs have not yet been reached.</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			<ul style="list-style-type: none"> <li>v. The complaints register in the excel spreadsheet titled 'Wetherill Park – OEMP Registers'</li> <li>vi. Annual reviews not yet undertaken.</li> <li>vii. This Independent Environmental Audit will be uploaded to the website upon completion.</li> <li>viii. No other matters have been required to be uploaded by the DPE.</li> <li>ix. The information reviewed was up to date at the time of inspection.</li> </ul>		

S = Schedule  
C = Condition



## Appendix C Stakeholder Consultation

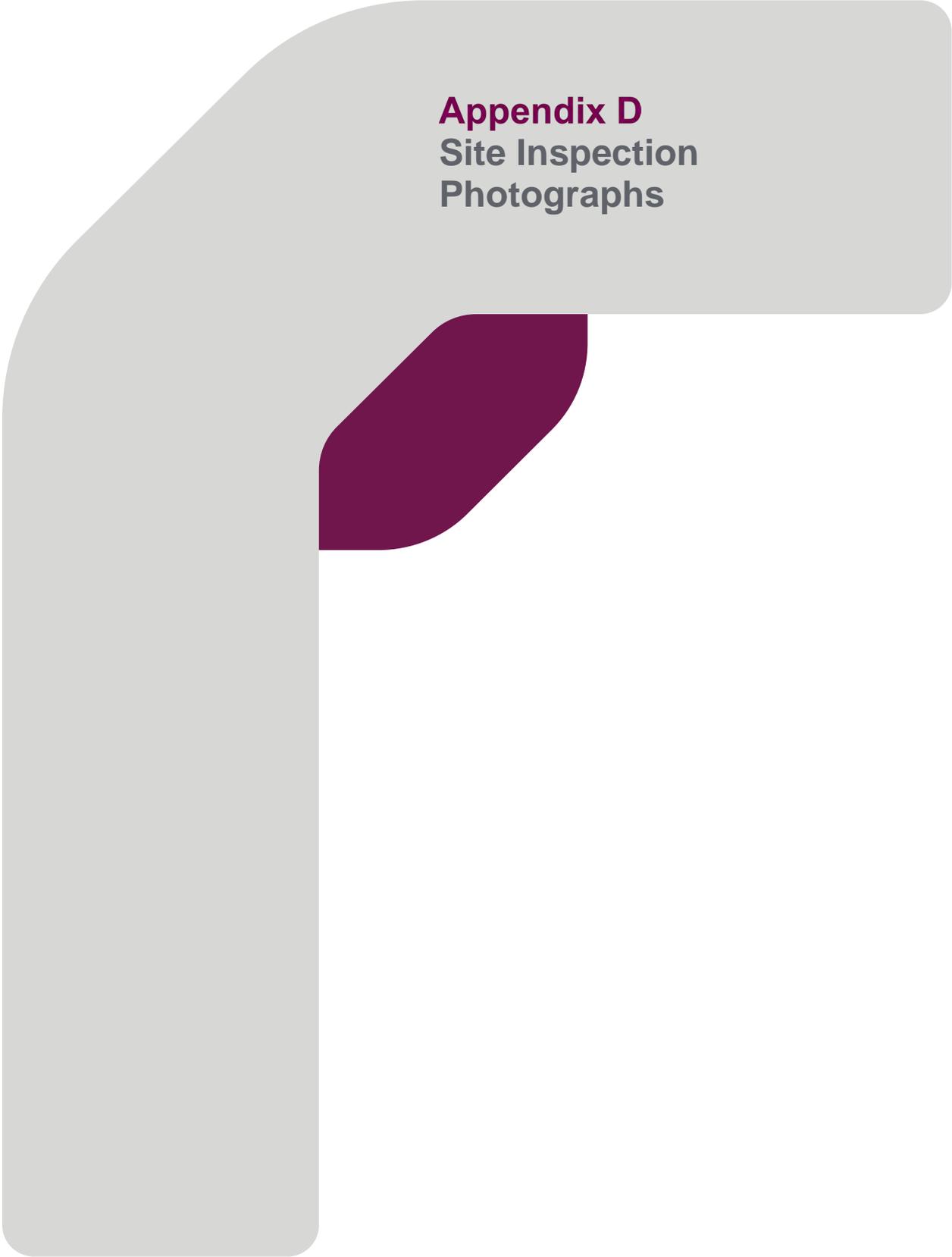
# AUDIT CHECKLIST – CONSULTATION SUMMARY

## Content

<b>AUDIT CHECKLIST – CONSULTATION SUMMARY</b> .....	<b>1</b>
Content .....	1
Department of Planning and Environment .....	2

**Table 1: AUDIT CHECKLIST – CONSULTATION SUMMARY**

Topic	Audit Observations	Recommendation
<b>Department of Planning and Environment</b>		
Whether the approved staged development/activities have been carried out in accordance with the Consent.	<p>The development is currently in Stage 1 and is generally being carried out in accordance with SSD 7401 consent conditions. Auditors were impressed by the relative level of compliance on site, noting only 4 minor non-compliances against conditions A27, B14, B16 and B53.</p> <p>The non-compliance against Condition A27 was due to Bettergrow being unable to provide evidence for submission of dilapidation reports to DPE. The reports were completed and were sighted by auditors.</p> <p>The non-compliance against Condition B14 was due to a detail being left out of the Construction and Demolition Waste Management Plan.</p> <p>The non-compliance against Condition B16 was a result of a misunderstanding of the consent condition, meaning the meteorological station was removed prematurely.</p> <p>The non-compliance against Condition B53 was due to not enough car parking spaces being marked to meet the consent condition.</p>	NA
Has the landscaping materials supplies facility commenced operation and is it operating in accordance with the Consent?	The landscaping materials supplies facility is not yet operating, nor has it been constructed.	NA
Determine whether all waste materials being stored correctly and in accordance with the Consent.	<p>All waste materials are neatly stored in appropriately bunded areas. No spills or litter was observed on site.</p> <p>All waste storage areas are appropriately signed.</p>	NA
Whether all waste streams are being managed in accordance with the Consent.	Auditors determined all waste streams are being managed effectively in accordance with SSD 7401.	NA
Whether records required by Conditions A17 and A18 of the Consent have been recorded as required.	Bettergrow representatives produced any and all records that were requested by auditors including weighbridge records and waste classification records.	NA



## Appendix D Site Inspection Photographs



**Plate 1 – Appropriately banded storage areas outside shed**



**Plate 2 – Large sand screener**



Plate 3 – Aggregate sprayers



Plate 4 – Sand screener



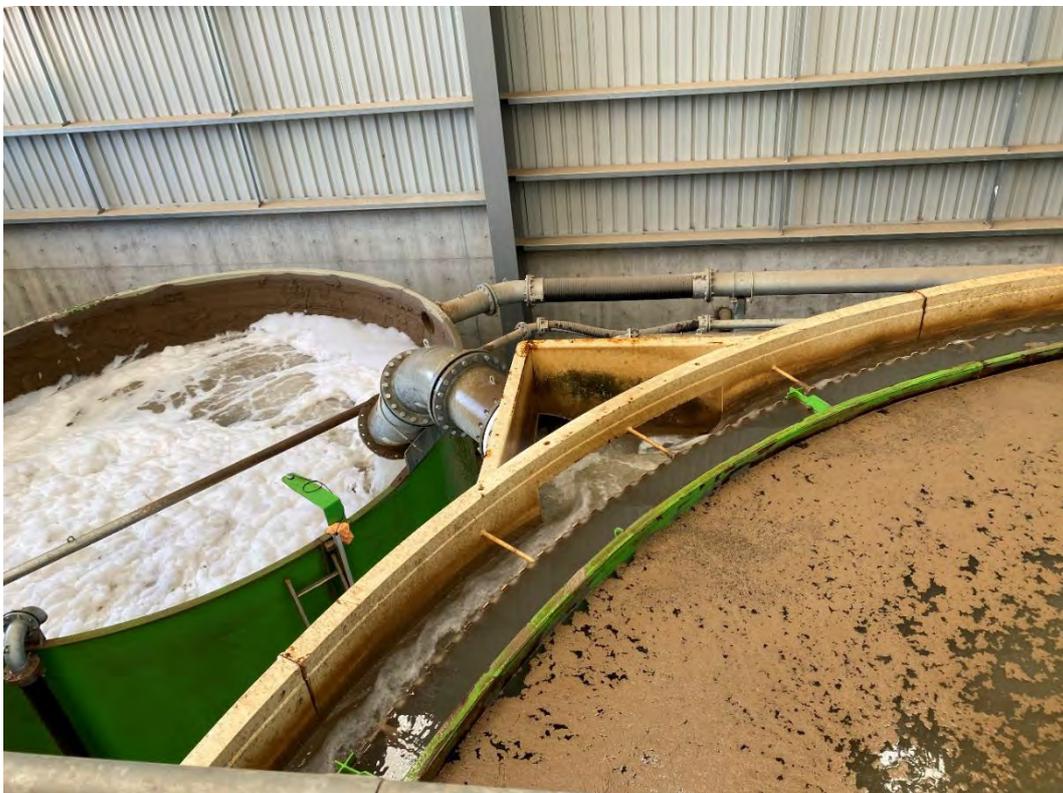
Plate 5 – Water tank in screener separating large solids



Plate 6 – Sand, organics and recovered aggregate conveyor belts



**Plate 7 – Recovered aggregate being sprayed and washed**



**Plate 8 – Scum tank separating clean water before discharge to sewer through TWA**



Plate 9 – Dirty water storage tanks



Plate 10 – Truck observed covering load prior to leaving site



**Plate 11 – Clean workshop floor showing appropriately banded storage areas for stockpiles**



**Plate 12 – Oversize material stockpile showing bunding on shed floor**

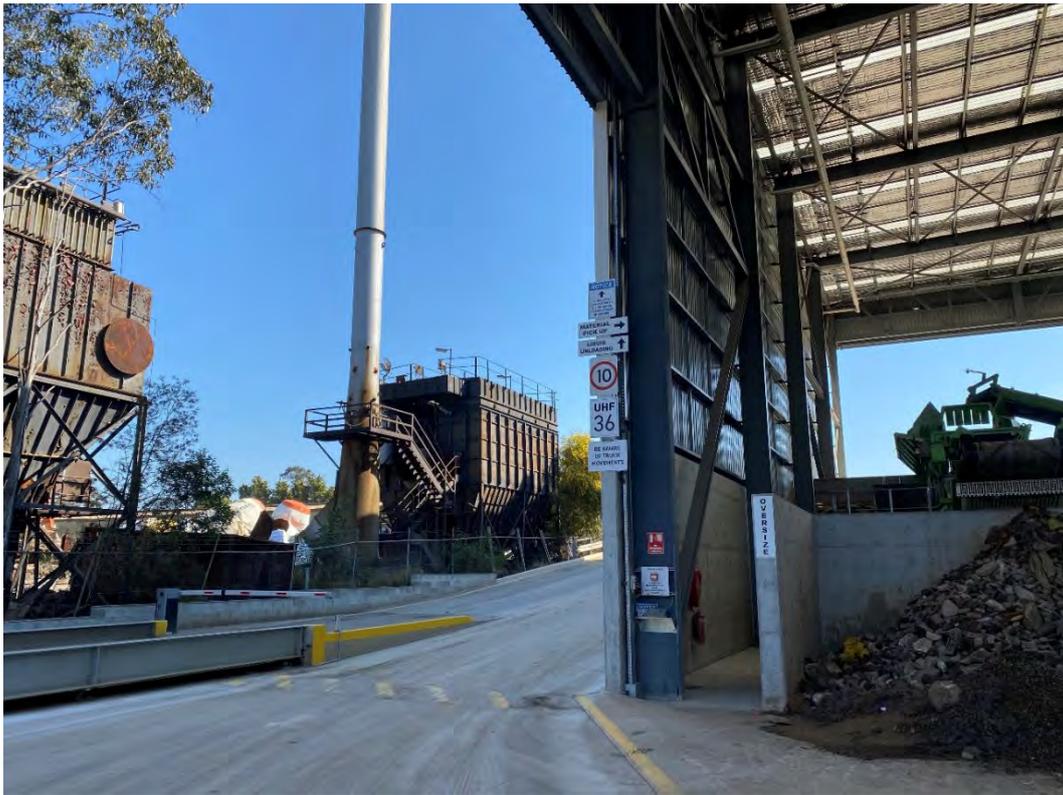


Plate 13 - Appropriate traffic control signage

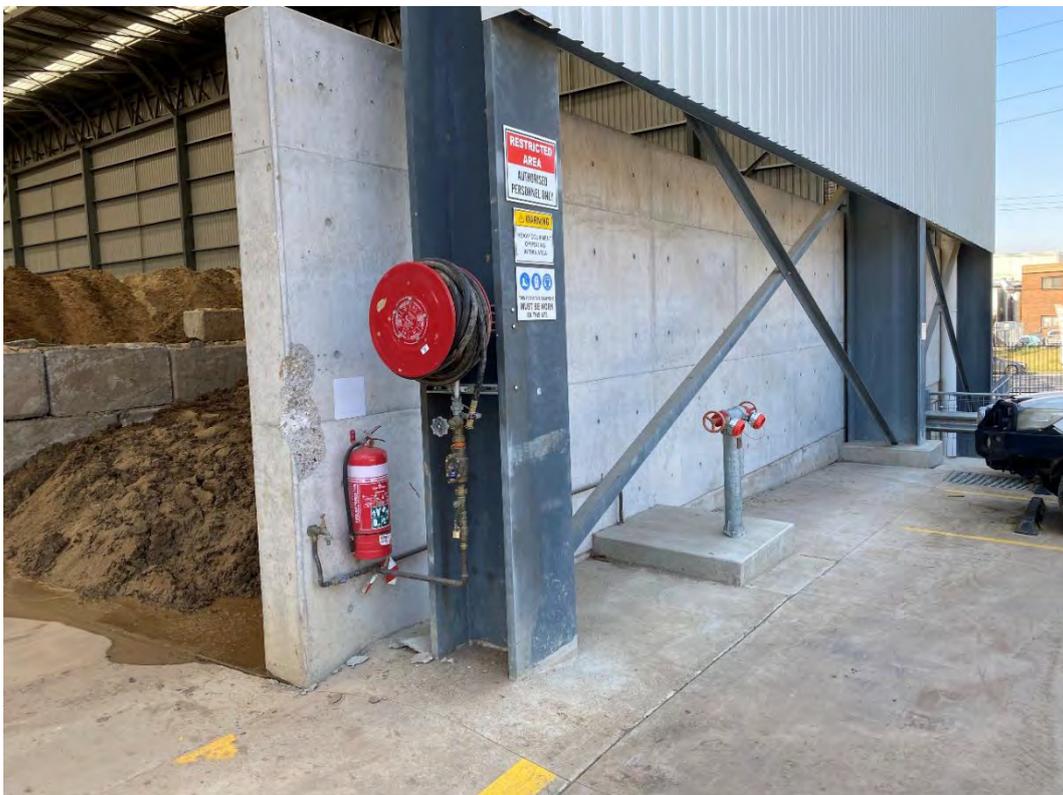


Plate 14 - Firefighting equipment



**Plate 15 - Roll bund across shed entrance**



**Plate 16 - Native woodland at front of property well maintained and free of weeds**



**Plate 17 - Stormwater drain across carpark entrance**



**Plate 18 - Stormwater sandfilter system**



**Plate 19 – Meteorological Station installed prior to construction**



**Plate 20 - Meteorological station at time of site inspection**