Annual Review 2024/25

Redirect Recycling Wetherill Park

24 Davis Road, Wetherill Park NSW

Redirect Recycling

27 October 2025

Revision History

Rev No.	Revision Date	Author / Position	Details	Authorised	
				Name / Position	Signature
1	27/10/2025	James Sutton Environmental Manager	For submission to DPHI	James Sutton Environmental Manager	

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Annual Review Title Block

Name of operation	Redirect Recycling
Name of operator	Redirect Recycling
Development consent / project approval #	SSD 7401
Name of holder of development consent / project approval	Bettergrow Pty Ltd
Mining lease #	N/A
Name of holder of mining lease	N/A
Water Access Licence #	N/A
Name of holder of water licence	N/A
MOP/RMP start date	N/A
MOP/RMP end date	N/A

I, James Sutton, certify that this audit report is a true and accurate record of the compliance status of Redirect Recycling Pty Ltd for the period 23rd August 2023 to 22nd August 2024 and that I am authorised to make this statement on behalf of Redirect Recycling Pty Ltd

Note.

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

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

Name of authorised reporting officer	James Sutton
Title of authorised reporting officer	Environment Manager
Signature of authorised reporting officer	
Date	27/10/2025

1 Introduction

1.1 Scope

This Annual Review has been prepared for the Redirect Recycling Pty Ltd (reDirect) Wetherill Park site and covers the twelve-month reporting period from 23 August 2024 to 22 August 2025. This Annual Review has been prepared to satisfy condition C9 of Development Consent SSD 7401 issued by the Minister for Planning on 11 October 2017.

The reDirect facility is located at 24 Davis Road, Wetherill Park NSW and consists of a resource recovery facility purpose built for washing and processing of construction and liquid waste.

This Annual Review is submitted to NSW Department of Planning, Housing and Infrastructure (DPHI). The Annual Review is also made available on the reDirect website:

Redirect Recycling

reDirect maintained compliance with all necessary approvals and licenses (EPL 21092 & SSD-7401) during the reporting period with exception of two non-compliances recorded against SSD-7401 Schedule 2, Conditions A2 and C5 of the consent.

Table 1 Compliance

Relevant approval	Condition	Condition description (summary)	Compliance status	Non-compliance details	Where addressed in Annual Review
SSD 7401	C9	Annual review	2 x non-compliances	1. Installing and operating a 63,970-litre diesel fuel tank on the middle level of the facility between June 2024 and 6 June 2025. 2. Storing uncovered stockpiled material on the middle level of the facility between November 2022 and 9 December 2024. DPHI concluded: There was no known impact to the environment or human health and safety resulting from the breaches. The fuel tank and uncovered stockpiled material were removed from site. Redirect has a good compliance history in relation to the facility. A warning letter was issued 16 July 2025	1.4 Annual Review Requirements
EPL 21092	L3.1	Noise	Compliant	Nil	Section 4.5 Noise
EPL 21092	O3.1	Air Quality	Compliant	Nil	Section 4.2 Air Quality
EPL 21092	O5	Water Quality	Compliant	Nil	4.3 Surface Water & 4.4 Groundwater

1.2 Background

Consent for State Significant Development 7401 (SSD-7401) was initially granted by the NSW Department of Planning Housing and Infrastructure (DPHI) on 22 December 2017. The facility was commissioned in August 2022 and shortly after the licence was transferred to reDirect (a Borg Company) who currently operate the site (see Figure 1).

Figure 1 Regional Context

The development has been staged with only the wash plant operational at this time. The landscape supplies, food and garden organics approvals are not operational. Stage 1 includes the wash plant processing area only. Facilities covered under Stage 1 include:

- A main administration building, office and carpark constructed at the fore of the property. Site amenities, including toilets and kitchen, contained in the main administration building.
- Partially enclosed shed space, containing:
  - Two tier ground levels with external ramp to the west of the shed.
  - Four hydro-tips, and one dry feed hopper.
  - One weighbridge located west of the shed for the weighing of trucks on entry and prior to departure from the facility.
  - Screening walls.
  - Drill mud processing plant and equipment.
  - Drill mud machinery control rooms and internal office space.
- An inground sand filter located under the hardstand on the lower level of the site, adjacent to the south-western corner of the existing approved shed, to be used for stormwater retention and treatment.
- Rainwater / raw water storage tanks.

- Main thoroughfare, including:
  - A combined ingress/egress access driveway, providing a 12.5 m width at the western property boundary and facilitating connectivity between the off-street parking and internal heavy vehicle circulation areas.
  - Off-street parking spaces designed in accordance with AS2890.1 and AS2890.6.
- A combined ingress / egress driveway, providing a 5.5 m width adjacent to the eastern property boundary facilitating service access to the office complex and emergency access for Fire NSW.
- Internal hardstand areas and roadways.

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

- Hydro-excavation and drill muds;
- Concrete slurry;
- Stormwater;
- Street sweepings; and
- General solid waste (soils that meet EPL conditions).

1.3 Consent

Consent for State Significant Development 7401 (SSD-7401) was initially granted by the then NSW Department of Planning and Environment (DPHI) on 22 December 2017. Consent for Modification 1 of SSD-7401 (SSD-7401-MOD-1) was approved by the NSW Department of Planning, Industry and Environment (DPIE) on 21 April 2021, with consent for Modification 2 (SSD-7401-MOD-2) granted on 30 November 2021. Consent for Modification 3 (SSD-7401-MOD-3) was granted by DPHI (name reverted from DPIE) on 1 April 2022. Consent for Modification 4 (SSD-7401-MOD-4) was granted by Department of Planning, Housing and Infrastructure (DPHI) on 25 January 2024.

Approval for SSD-7401 permitted the construction and operation of a resource recovery facility to process up to 160,000 tonnes per year of waste comprising of:

- 60,000 tonnes per annum (tpa) of hydro-excavation, drill muds and fluids.
- 70,000 tpa of food and garden organics.
- 30,000 tpa of packaged and bulk food and liquids.

In addition, the approval for SSD-7401 allowed for the operation of a landscaping material supplies facility for the storage and sale of up to 40,000 tpa of landscaping supplies.

Approval of SSD-7401-MOD-1 allowed for the increase of processing capacity to 350,000 tpa in conjunction with the following:

- Introduction of additional waste streams.
- Demolition of existing structures.
- Construction of a partially enclosed shed.

SSD-7401-MOD-2 included the replacement of the 30, 000 L sediment basin and associated bioretention basin, located within the southwest corner of the subject site. In lieu of the detention and bioretention basins it was proposed to utilise an existing inground concrete pit that remains onsite as part of a decommissioned weighbridge. This pit was modified and improved to include a sand filter to treat onsite stormwater.

SSD-7401-MOD-3 included the following:

- Replacement of the five (5) approved weighbridges with one (1) 25 m by 4.2 m weighbridge located approximately 55 m from the Facility intersection with Davis Road.
- To facilitate weighbridge installation and improve site safety, vehicle parking spaces were reconfigured:
    - Five (5) parking spaces immediately east of the existing site office.
    - Two (2) parking spaces located north of the inground sand filter, abutting the western façade of the drill muds processing shed.
    - Five (5) parking spaces located on the hardstand area immediately north of the western parcel of retained Cumberland Plain Woodland.
    - Remaining parking spaces were not altered.
- Relocation of proposed humeceptor water treatment device to the north-western corner of the central portion of Cumberland Plain Woodland.
- Relocation of the 5,000 L rainwater tank to inside drill mud processing shed next to the control room. Rainwater from the existing office will now be captured via the Facility stormwater network.

SSD-7401-MOD-4 included an administrative amendment to reflect additional waste streams of concrete slurry and stormwater, originally assessed as appropriate in Modification 1, in the limits of consent.

This Annual Review covers facility operations conducted under Stage 1 of SSD-7401 (including modifications). Stage 2 (bulk landscape area and the food / garden organics processing area) is not operational, therefore assessment of conditions specific to Stage 2 have not been triggered or included within this report.

A summary of development consents including modifications currently held by Bettergrow Pty limited (original applicant) is presented in Table 2.

Table 2 Development Consents

Consent Description	Approval Date	Approval Authority	Approved Development
Development Consent SSD 7401	22 December 2017	NSW Minister for Planning	The construction and operation of a resource recovery facility to process up to 160,000 tonnes per year of waste comprising of: • 60,000 tpa of hydro-excavation, drill muds and fluids; • 70,000 tpa of food and garden organics; and • 30,000 tpa of packaged and bulk food and liquids. The operation of a landscaping material supplies facility for the storage and sale of up to 40,000 tpa of landscaping supplies.

Consent Description	Approval Date	Approval Authority	Approved Development
Development Consent SSD 7401 MOD 1	21 April 2021	NSW Minister for Planning	Increase the processing capacity to 350,000 tpa of waste; introduce additional waste streams; demolish existing structures; construct a partially Octenclosed shed; and increase the hours of operation to 24/7.
Development Consent SSD 7401 MOD 2	30 November 2021	NSW Minister for Planning	Amend the stormwater management system to include the use of an in-ground concrete pit with sand filter.
Development Consent SSD 7401 MOD 3	31 March 2022	NSW Minister for Planning	Amend the carparking configuration, replace the five on-site weighbridges with one weighbridge, relocate the 5 kilolitre underground rainwater tank to an above ground tank inside the drill muds processing shed and replace and relocate the Humeceptor with an Ecoceptor.
Development Consent SSD 7401 MOD 4	25 January 2024	NSW Minister for Planning	Administrative amendment to reflect additional waste streams of concrete slurry and stormwater, originally assessed as appropriate in Modification 1, in the limits of consent.

1.4 Annual Review Requirements

In accordance with condition C9 of Development Consent SSD 7401, annual review requirements and the sections within this review where these are addressed have been summarised in Table 3.

Table 3 Annual Review Requirements

Development Consent SSD 7401 – Condition C9	Section of Annual Review
Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Planning Secretary. This review must:	This Report
(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;	Section 2 Section 8
(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous reporting period, which includes a comparison of these results against the: i. the relevant statutory requirements, limits or performance measures/criteria; 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;	Section 4 Section 5
(c) identify any non-compliance during the reporting period, and describe what actions were (or are being) taken to ensure compliance;	Section 4 Section 7
(d) identify any trends in the monitoring data over the life of the Development;	Section 4
(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and	Section 4

Development Consent SSD 7401 – Condition C9	Section of Annual Review
(f) describe what measures will be implemented over the next reporting period to improve the environmental performance of the Development.	Section 8

1.5 Environment Protection Licence

reDirect operates in accordance with Environment Protection Licence 21092 (EPL 21092), issued by the NSW Environment Protection Authority (EPA) under Section 55 of the *Protection of the Environment Operations Act 1997*. The current Licence version date is 01 June 2023.

1.6 Water Licences

reDirect does not hold any water licences.

1.7 Trade Waste Licence

reDirect's Trade Waste Service Contract with Sydney Water for the discharge of liquid trade waste into Sydney Water's sewerage system was initially approved on 01 August 2022 prior to the site's operational start date (23 August 2022). Throughout the reporting period, trade wastewater sampling was conducted every 60 days or on the day the trade waste was discharged thereafter. Substance characteristics analysed included:

- Biochemical Oxygen Demand
- Ammonia (As N)
- Sulphate
- Suspended Solids
- Total Dissolved Solids

All trade waste results recorded in the reporting period were below trade waste criteria, except for sample dated 23 July 2025. Suspended solids measured for mass discharged (201kg) and concentration (784 mg/L) were both above the permitted Maximum Daily Mass (150 kg) and Acceptance Standard for concentration (600 mg/L), respectively.

Immediate and long-term corrective actions undertaken following notification to Sydney Water, included:

- Replacement of the faulty vacuum on the polymer system.
- Installation of both audible and visual alarms to alert staff immediately in the event of any failure or irregularity within the polymer makeup system.
- Training of new staff, with a renewed focus on the polymer system's function and monitoring.
- Review of operational procedures to ensure routine checks and greater vigilance around critical system components.

All other trade waste results were consistent with the previous reporting year (2023/2024).

1.8 Environmental Management Plans

As per Schedule 2 Part C of SSD 7401, the existing development is carried out in accordance with the Operational Environmental Management Plan (OEMP) and associated sub-plans.

In accordance with C8 Revision of Strategies, Plans and Programs, environmental management plans are required to be reviewed within three months of completion of an audit under C14 and/or approval of an annual report review under C9.

reDirect received correspondence from DPHI (18 January 2024) determining the Annual review undertaken for the period 23 August 2023 to 22 August 2024 to generally satisfy the reporting requirements of the consent.

In accordance with C8, reDirect conducted a review of all management plans. The following management plans were reviewed.

- Operational Environmental Management Plan
- Air Quality and Odour Management Plan
- Stormwater Management Plan
- Operational Waste Management Plan
- Flood Emergency Plan
- Water Management Plan
- Emergency Plan
- Operational Traffic Management Plan
- Conceptual Decommissioning management Plan

Amendments were made to the Operational Environmental Management Plan and the Water Management Plan and approved by DPHI 23 June 2025. No changes were deemed required to any of the other management plans. A record of the review was recorded in the relevant document control section of each management plan and the plans re-published on the reDirect website.

1.9 Contacts

Table 4 outlines the contact details for site personnel responsible for managing environmental operations at the reDirect facility.

Table 4 Site Personnel

Name	Title	Contact Details
Neale Hogarth	Manager	0498 692 443
James Sutton	Environmental Manager	0414 987 168

1.10 Actions Required from Previous Annual Review

Table 5 represents activities proposed in Section 8 of Annual Review 23/24 and corresponding comments regarding outcomes of those proposed activities.

Table 5 Proposed Activities in 2023/24 Reporting Period

Activities Proposed in Reporting Period	Results achieved in Reporting Period
Ongoing implementation of Environmental Management Plans for the existing development and the project.	Operational staff have continued to implement daily inspection checklists (as required under OEMP).
Complete installation of new hydro tip controls on top tier of the site.	New control panel located between hydro tip 2 & 3 was installed and commissioned.

Continue erosion and sediment control inspections and rectification works as necessary to manage stormwater discharge.	Staff have completed all necessary checks and maintenance items listed on the operational checklists and at the required intervals. Annual Surface Water monitoring has determined stormwater treatment at the site are generally reducing concentrations of key parameters prior to discharge.
Update current operational management plans to reflect recommendations from findings of the annual review and any relevant monitoring results.	Operational management plans were reviewed following the completion of the previous 2024 Annual Review. Amendments were made to the Operational Environmental Management Plan and the Water Management Plan and approved by DPHI 23 June 2025.

2 Operations during the Reporting Period

2.1 Production

Development Consent SSD 7401 allows for the receival and processing of up to 350,000 tonnes of waste per year, including 100,000 tonnes of liquid waste and 150,000 tonnes of general solid waste. During the reporting period reDirect received and processed a total of 79922.6 tonnes of combined liquid and general solid waste. A total of 49662.24 tonnes were recovered and beneficially reused under applicable resource recovery orders, 33.78 tonnes were sent for lawful disposal, comprising of trash and light organics. Remaining quantities were discharged to trade waste.

2.2 Facility Improvements

The following improvements were made to site infrastructure, plant and/or equipment during the reporting period:

- Installation of a new hydro tip control panel on the top level of the site. Allows hydro tips to be controlled whilst having full view of customer tipping operations.

See **Figure 2** for location of site infrastructure.

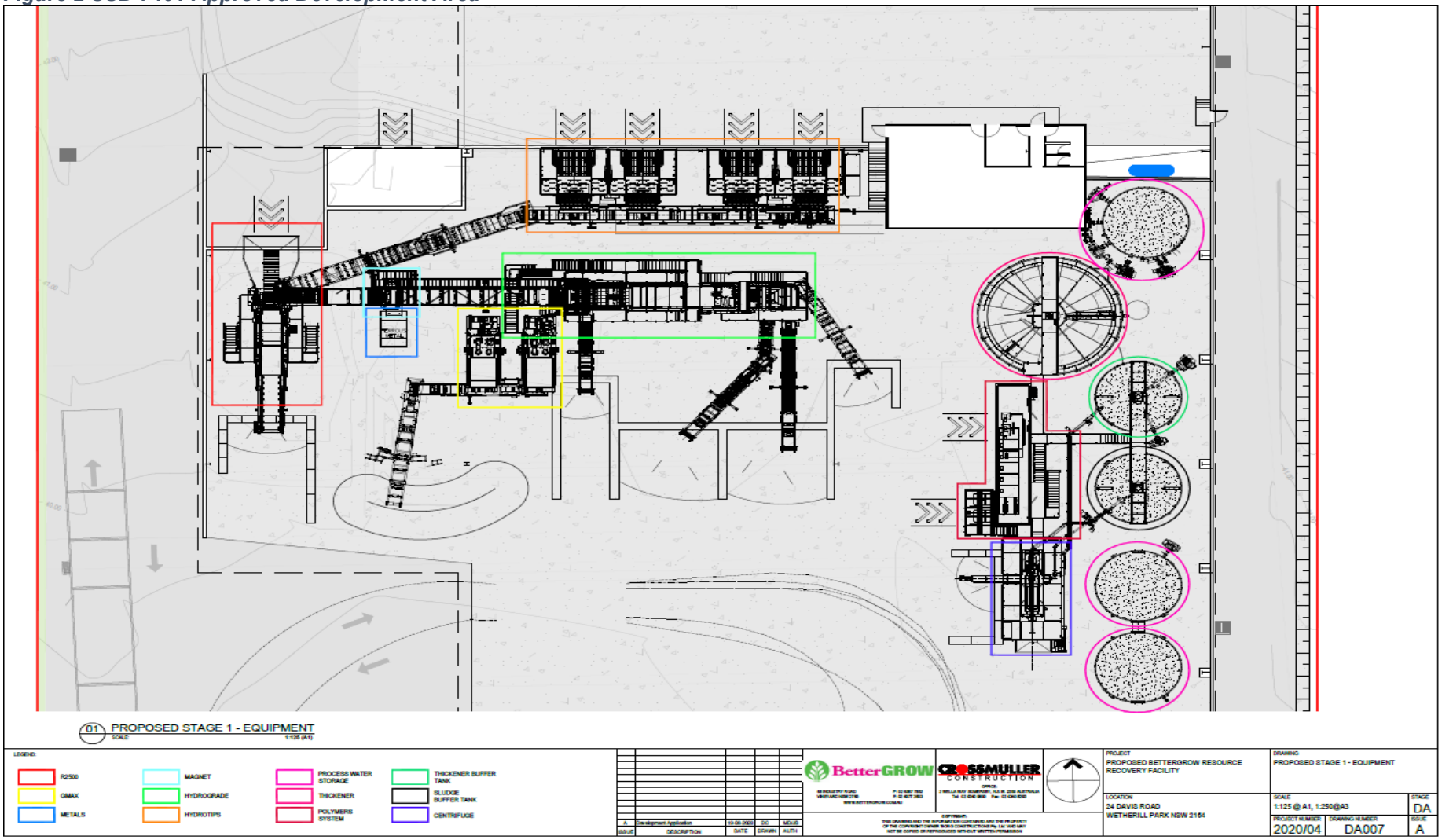
2.3 Site Activities

Environmental commitments and management/mitigation measures that were applied during the reporting period include the following:

- Operational works undertaken in accordance with the Operational Environmental Management Plan and sub-plans;
- Surface water sampling events;
- Site environmental inspections; and
- Site wide communication of environmental requirements via inductions and Toolbox Talks.

No activities associated with additional construction were undertaken within the reporting period.

Figure 2 SSD 7401 Approved Development Area



3 Waste Management

Waste generated at the reDirect site is managed in accordance with the Waste Management Plan that has been developed for the facility. The management process incorporates a system of recycling and reuse of waste materials where possible. Waste that cannot be incorporated into this system is removed from site and taken to landfill for lawful disposal.

3.1 Solid Waste

A summary of waste and resource recovery materials removed from reDirect Wetherill Park during the reporting period is provided in Table 6.

Table 6 Waste Management 2024/25

Month	Destination		
	Tonnes	Waste	Reuse / Disposal
September 2024	183.22	Recovered aggregate 5-20mm	Resource recovery material
	157.84	Recovered aggregate 20-40mm	
	74.35	Recovered aggregate 40-80mm	
	4160.88	Treated drill mud	
	616.7	Washed sand	
	33.78	Organics / light trash	Wanless Waste Management Kemps Creek
October 2024	109.24	Recovered aggregate 5-20mm	Resource recovery material
	3666.68	Treated drill mud	
	440.30	Washed sand	
November 2024	380.94	Recovered aggregate 5-20mm	Resource recovery material
	4077.90	Treated drill mud	
	814.94	Washed sand	
December 2024	73.68	Recovered aggregate 5-20mm	Resource recovery material
	2834.20	Treated drill mud	
	1168.78	Washed sand	
January 2025	1863.42	Treated drill mud	Resource recovery material
	787.72	Washed sand	
February 2025	220.74	Recovered aggregate 5-20mm	Resource recovery material
	37.52	Recovered aggregate 20-40mm	
	35.64	Recovered aggregate 40-80mm	
	2298.46	Treated drill mud	
	763.58	Washed sand	
March 2025	70.96	Recovered aggregate 5-20mm	Resource recovery material
	252.34	Recovered aggregate 20-40mm	

	112.96	Recovered aggregate 40-80mm	
	4147	Treated drill mud	
	1284.29	Washed sand	
April 2025	38.18	Recovered aggregate 5-20mm	Resource recovery material
	2181.46	Treated drill mud	
	651.12	Washed sand	
May 2025	214.64	Recovered aggregate 5-20mm	Resource recovery material
	2905.10	Treated drill mud	
	641.24	Washed sand	
June 2025	147.80	Recovered aggregate 5-20mm	Resource recovery material
	36.52	Recovered aggregate 20-40mm	
	3073.18	Treated drill mud	
	631.08	Washed sand	
July 2025	72.98	Recovered aggregate 5-20mm	Resource recovery material
	225.68	Recovered aggregate 20-40mm	
	3302.04	Treated drill mud	
	657.78	Washed sand	
August 2025	113.58	Recovered aggregate 5-20mm	Resource recovery material
	3619.38	Treated drill mud	
	516.20	Washed sand	
TOTAL	**33.78**	**Organics / light trash**	**Wanless Waste Management Kemps Creek**
	1625.96	**Recovered Aggregate 05–20mm**	**Resource recovery material**
	709.9	**Recovered Aggregate 20–40mm**	**Resource recovery material**
	222.95	**Recovered Aggregate 40–80mm**	**Resource recovery material**
	38129.7	**Treated Drilling Mud**	**Resource recovery material**
	8973.73	**Washed Sand**	**Resource recovery material**

Waste types in Table 6 are further described as:

- **Organics and Light Trash:** General waste including a mix of organics such as sticks, leaf litter and other organic matter mixed with light film plastic and other small anthropogenic inclusions.
- **Resource Recovery Material:** Material meeting a general or site-specific resource recovery order made under clause 93 of the 2014 Waste Regulation and/or section 286A of the Protection of the Environment Operations Act 1997.

There was no trackable waste generated during this reporting period.

3.2 Trade Waste

Redirect's current trade waste agreement (Consent no: 51950) allows for the following discharge rates to Sydney Water's wastewater system:

- Instantaneous maximum rate of pumped discharge 8,000 litres per second
- Maximum daily discharge 320 kilolitres
- Average daily discharge 200 kilolitres

The last sampling event conducted during the reporting period was completed on 24 July 2025, 29 days prior to the end of the reporting period. A total of 256 kilolitres were discharged during the sampling event, below the maximum daily discharge limits (320 kilolitres). Additionally, total trade waste discharged since the commencement of the agreement confirmed a total of 147,606 kilolitres had been disposed as trade waste up to this date, equating to a daily average below 200 kilolitres.

4 Environmental Monitoring and Performance

4.1 Environmental Management System

ReDirect operates in accordance with the Operational Environmental Management Plan (OEMP) as documented in Section 1.8. This OEMP aims to ensure adequate management, monitoring and mitigation systems are in place to protect the surrounding environment. Similarly, construction activities are undertaken in accordance with the Construction Environmental Management Plan (CEMP).

Environmental performance and management are conducted in accordance with the requirements of SSD 7401, its subsequent modifications (MOD1, MOD2, MOD3 & MOD4), and EPL 21092. Environmental performance and monitoring are an integral part of environmental management system. The measurement and evaluation of monitoring results allows for the assessment of performance against quantitative and qualitative standards and assists in the identification of any non-conformances or areas that may require additional attention.

4.2 Air Quality

Air quality is monitored in accordance with reDirect's Operational Air Quality and Odour Management Plan (AQOMP). Condition O3.1 of EPL 21092 states that:

"*The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises."*

Additionally, Condition L5.1 of EPL 21092 states that:

"The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises."

EPL 21092 does not specify dust monitoring be undertaken, the AQOMP assessed material handling and processing in the drill mud processing plant to have minimal fugitive dust emissions due to the high moisture content of waste received and retained within recovered processed materials. Additionally, road surfaces at the Site are sealed and processing is undertaken within the partially enclosed shed, currently no other activities approved under SSD-7401 are undertaken as part of the development. All current dust management procedures undertaken as part of the AQOMP and OEMP are currently deemed suitable and effective.

As Stage 1 operations only include the wash plant, dust emissions have been identified as the only air quality impact associated with these operations. Therefore, no management of odour generating activities was required during the reporting period.

4.3 Surface Water

Surface water is considered any water other than process water, leachate or wastewater being defined as:

- Process water, used in the processing of drill muds.
- Leachate water, generated from rain impacting soil stockpiles. Leachate is not anticipated to be generated onsite during Stage 1 of operations due to bulk storage bays being underneath the main processing shed.
- Wastewater, generated through the processing of drill muds that require disposal or have no further use on site.

Surface water is principally stormwater runoff from building roofs and areas outside waste processing or handling areas.

Surface water discharges from operational areas of the site and areas with potential to discharge off-site are summarised in the following table.

Table 7 Surface Water Sources and Management

Site Feature	Purpose	Runoff Water Sources	Management
Entrance Driveway	Site access	The driveway receives runoff from paved areas near the weighbridge and entrance areas.	Management under the surface water management plan – though this is considered a low risk of impact.
Drill Mud Processing Shed	Rainwater re-use	A portion of roof water runoff from the drill mud processing shed is to be directed by downpipes to an above-ground rainwater harvesting tank which has been sized to meet the facility's reuse demand for non-potable water of 5 kL. The harvested volume from the shed roof is reused internally through the amenities connections with tank overflows being diverted directly to the stormwater system. The remainder of the roof water collected is to be directed to the stormwater system.	Ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly. Regularly check the structural integrity of the tanks. Check for any accumulated litter, sediment, or debris on or within the tanks.
Stormwater System	Collection, treatment and transportation of stormwater from the site.	Runoff from majority of sealed surfaces on the site, all roof areas not connected to the rainwater tank system and rainwater tank overflow will be diverted into the stormwater system.	Management under the stormwater management plan (Eclipse 2021) and the WMP. Remove deposited sediment and debris from the sand filter bed/detention pit and Ecoceptor inlet/outlet areas. Regularly check the structural integrity of hydraulic structures.

In accordance with the reDirect Water Management Plan, annual (following a rainfall event) sampling of two locations on-site (SW1 in the sand filter and SW2 in the ecoceptor outflow) was undertaken during this reporting period.

A summary of the results is presented in Table 8.

Table 8 Surface Water Observations and Geotechnical Requirements

Parameter	Units	Criteria		SW01	SW02	FD01	Pass/Fail
		ANZECC & ARMCANZ 2000[1] & ANZG 2018[2]	Fletcher et al. 2004[3]				
pH	pH units	**6 to 8**	-	9.6	8.3	8.2	FAIL
TSS	mg/L	-	**40 – 500**	450	130	140	PASS
Total Oxidised Nitrogen	mg/L	**0.04**	-	1.2	0.75	0.85	FAIL
Total Nitrogen	mg/L	0.35	**0.7 – 6**	1.2	2.3	0.9	PASS
Total Phosphorus	mg/L	0.025	**0.08 – 0.8**	0.33	0.15	0.08	PASS
Copper	mg/L	0.0014	**0.02 – 0.3**	0.003	<0.001	0.003	PASS
Zinc	mg/L	0.008	**0.1 – 1**	<0.005	<0.005	<0.005	PASS

With the exception TN, the July 2025 SWME demonstrates concentrations of key parameters (TSS and TP) are lower at SW02 (down stream of the water treatment train) than SW01 (up stream of the stormwater system), which indicates stormwater treatment (i.e. water, sediment, and erosion controls) at the site are generally reducing concentrations of key parameters prior to discharge to stormwater.

Concentrations of heavy metals (copper and zinc) and nutrients were reported above the conservative ANZECC and ARMCANZ 2000 trigger values at the Ecoceptor outflow (SW02), indicative of the quality of stormwater being discharged from site. The elevated concentrations are not considered to pose an uncceptable risk to ecologocal receptors for the following reasons:

- The reported concetrations are low and fall within the expected concentration range for industrial sites, which is considered more representative of the sites's context;
- The intermittent nature of stormwater flows (being rainfall dependent);
- Dilution from mixing with other downstream discharges; and
- The significant distance to the nearest ecologogical receptor (approximately 1.5 kilometres)

Based upon the finding of the SWME, LRE reccommends the following:

- Continue annual surface monitoring to ensure stormwater management controls are performing as designed in accordance with the sites's WMP.

The next surface water sampling event is scheduled to be undertaken in July 2026.

A copy of the *Surface Water Monitoring July 2025 – 24 Davis Road, Wetherill Park, NSW* (Land Risk Environmental [LRE], 2024) has been included in Appendix A.

4.4 Groundwater

In accordance with the reDirect Water Management Plan, a monitoring network was established, including the installation of 6 shallow groundwater monitoring wells that intersect the water table located within the shale bedrock.

These wells were installed as part of the site infrastructure upgrades. Senversa (engaged by reDirect) designed a groundwater monitoring network that seeks to characterise groundwater both hydraulically up-gradient and down-gradient of the site. The location of the groundwater monitoring wells is presented on **Figure 3**. The groundwater monitoring network comprises:

- One well (MW06) that captures the quality of background groundwater migrating onto the site from the north.
- Five wells (MW01, MW02, MW03, MW04, MW05) placed in targeted locations with the following rationale.
- MW01 – Down gradient of the stormwater treatment sand filter box.
- MW02 – Down gradient of the Ecoceptor.
- MW03 – Western site boundary down gradient of neighbouring property.
- MW04 – Down gradient of the drill mud processing facility on eastern boundary.
- MW05 – Middle level of site in the vicinity of the historic aboveground storage tanks (ASTs).

The wells target the shallow groundwater as this is most susceptible to impact.

Figure 3 Groundwater Monitoring Locations

Baseline groundwater monitoring commenced at the same time as operations at the site and no detrimental statistical trends, considered to be associated with site operations, were noted in groundwater quality during the first two years of operation. It is considered unlikely that changes in groundwater quality would be noted from additional groundwater monitoring, given the sealed nature of the operational portion of the site, the low hydraulic conductivity of the underlying aquifer and adherence to the Applicant's Management and Mitigation Measures

that form Appendix B of the Development Consent. On this basis no groundwater monitoring was not required, nor conducted during the reporting period.

In accordance with Table 5.2 of the WMP, additional groundwater monitoring will be triggered under the following circumstances.

- Additional processing commences at the site (e.g. food and garden organics [FGO], food and liquid depackaging [FLD], or other trackable liquid waste),
- If a potentially contaminating substance is to be stored or used/processed on the site, or a major incident occurs at the site (e.g. spill or leak of liquid substance/leachate, fire, etc).

Future monitoring will likely be required - triggered as a response to changes in site activities such as the commencement of Stage 2 operations. The monitoring locations, and sampling, analytical and reporting schedules are provided in Table 9.

Table 9 Groundwater Monitoring Frequency

Type	Frequency	Monitoring Aspect	Locations	Analytical Schedule	Reporting Schedule
Baseline	Sampling every 6 months for a two year period	Gauging, sampling and analysis	MW01, MW02, MW03, MW04, MW05, MW06	Field: pH, electrical conductivity (EC), dissolved oxygen (DO) and redox potential. Laboratory: Ammonia (as N), nitrate, TN, TP, dissolved metals, TPH, BTEX, PAH.	Interpretive baseline report
Periodic	Annual, then reviewed after three years	Gauging, sampling and analysis	MW01, MW02, MW03, MW04, MW05, MW06	Field: pH, EC, DO and redox potential. Laboratory: TRH, TN, TP and dissolved metals. Additional contaminants based on the findings of the baseline assessment.	Annual data report, then 3-year interpretative report
Event	Triggered	Sampling and analysis*	As required*	As required*	Reporting as above

4.5 Noise

In accordance with EPL 21092, noise from the premises must not exceed the limits noted in Table 10. In accordance with Development Consent SSD-7401 all construction activities related to the development must also comply with the limits in Table 10.

Table 10 Noise Limits dB(A)

Location	Day $L_{Aeq(15\ minute)}$	Evening $L_{Aeq(15\ minute)}$	Night $L_{Aeq(15\ minute)}$	Night $L_{Aeq(1\ minute)}$
All sensitive receivers	35	35	35	45

Note: *Day* – The period from 7:00am to 6:00pm
Evening – The period from 6:00pm to 10:00pm
Night – The period from 10:00pm to 7:00am
L_{Aeq} means the equivalent continuous noise level – the level of noise equivalent the energy-average of noise levels occurring over a measurement period.

4.5.1 Operational Noise

EPL 21092 stipulates that noise monitoring is to be carried out upon the request of an authorised NSW EPA officer. If requested, noise monitoring must be undertaken in accordance with *Australian Standard AS 1055: 2018 Acoustics - Description and measurement of environmental noise*, and the compliance monitoring guidance provided in the NSW *Noise Policy for Industry* (EPA 2017).

During the 2024/25 reporting period, reDirect was not requested to complete any noise monitoring.

4.6 Traffic

In accordance with the reDirect Operational Traffic Management Plan (OTMP), observations of compliance are to be undertaken at three monthly intervals, to document any remedial actions required with employees, heavy vehicle drivers or haulage companies.

reDirect carry out daily observations of traffic management and compliance against mitigation measures included within the OTMP. Observations are recorded on the *Operational Environmental Management Plan – Wetherill Park Inspection Checklist*. No breaches of traffic management procedures were recorded during the reporting period. Refer to Appendix C - Example Quarterly OEMP Checklist for example records.

5 Community Relations

5.1 Environmental Complaints

No community complaints were received during the 2024/25 reporting period.

5.2 Community Liaison

5.2.1 Information Exchange

In accordance with EPL 21092 condition M3.1 and M3.2, reDirect operate a telephone complaints line for the purpose of receiving any complaints from the members of the public in relation to activities conducted at the premises or by any vehicle or mobile plant. The complaints line is published on the reDirect recycling website, so the public know how to contact reDirect should a scenario trigger a complaint.

6 Independent Audit

Development Consent SSD 7401 condition C13 sets out requirements for independent environmental audits of the Development. reDirect commissioned environmental consultants RPS AAP Consulting Pty Ltd (RPS) to conduct an Independent Environmental Audit (IEA) of

the site for operations audit period 23 August 2022 to 14 September 2023 (site inspection date) and construction period preceding operation of the site.

In accordance with SSD 7401 condition C13 the next IEA is scheduled for August 2026.

7 Environmental Incidents & Non-compliances

Environmental incidents are managed through reDirect's Pollution Incident Response Management Plan (PIRMP) and are logged in DataStation, reDirect's incident management system. Each incident report details the issue, the corrective and preventative actions taken, and the responsibilities and timing for completion of the actions. The report also includes any additional comments relevant to the incident and the completion date of corrective actions.

7.1 Incidents

A pollution incident that requires notification is defined in section 147 of the Protection of the Environment Operations Act 1997 as:

(a) Harm to the environment is material if:
   i. It involves actual of potential harm to the health or safety of human beings or the ecosystems that is not trivial, or
   ii. If results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations),
   and

(b) 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.

During this reporting period, there were no reportable environmental pollution incidents at the reDirect facility.

7.2 Non-conformances

reDirect maintained compliance with all necessary approvals and licenses (EPL 21092 & SSD-7401) during the reporting period with exception of two non-compliances recorded against SSD-7401 Schedule 2, Conditions A2 and C5 of the consent.

The breaches were assessed in accordance with the NSW Planning Compliance Policy. Following assessment DPHI issued *Warning Letter – Breach of section 4.2(1)(B) of the environmental planning and assessment Act 1979*, dated 16 July 2025 (DPHI, 2025). In reaching this decision, NSW Planning considered the particulars of the breaches and noted the following:

- There was no known impact to the environment or human health and safety resulting from the breaches.
- Redirect was cooperative throughout the investigation and removed the fuel tank and uncovered stockpiled material from the site.
- Redirect has a good compliance history in relation to the facility.

reDirect did not determine any other non-compliances to have occurred regarding operation of the site during the reporting period.

8 Activities Proposed for the next Annual Review Period

reDirect will endeavour to carry out the activities listed in Table 11 during the 2025/26 reporting period to assist with improving the environmental performance of the existing development and the project.

Table 11 Proposed activities for 2025/2026 reporting period

Ongoing implementation of Environmental Management Plans for the existing development and the project.
Annual surface water monitoring at designated monitoring points.
Continue erosion and sediment control inspections and rectification works as necessary to manage stormwater discharge.
Update current operational management plans to reflect recommendations from findings of the annual review and any relevant monitoring results.

APPENDICIES

Appendix A – Annual Surface Water Report

Land Risk Environmental Pty Ltd
ABN: 74 675 377 321
Mobile: 0401 553 358
Email: martin@landriskenvironmental.com
Website: www.landriskenvironmental.com

6 August 2025

James Sutton
reDirect Recycling Pty Ltd
2 Wella Way
Somersby NSW 2250

Dear James

Surface Water Monitoring July 2025 – 24 Davis Road, Wetherill Park, NSW

Land Risk Environmental Pty Ltd ("LRE") was engaged by reDirect Recycling Pty Ltd ("reDirect") to undertake Surface Water Monitoring at 24 Davis Road, Wetherill Park, NSW (the "site"). The site is legally described as Lot 18 in Deposited Plan ("DP") 249417. A Surface Water Monitoring Event ("SWME") was undertaken for July 2025.

The objective of the SWME is to undertake the necessary works in accordance with Water Management Plan ("WMP") prepared by Senversa Pty Ltd, dated 5 April 2022 ("Senversa 2022") and the Annual Surface Water and Baseline Groundwater Condition Report, prepared by Senversa, dated 24 September 2024 ("Senversa 2024") for the site.

1. Scope of Work

The scope of works undertaken included:

- site attendance following a rainfall event, to undertake surface water sampling from the sand filter and Ecoceptor outflow to the stormwater system
- collection of three (3) surface water samples, being two (2) primary samples (SW01 & SW02) and one (1) duplicate sample (FD01)
- laboratory analysis of the surface water samples for parameters outlined and recommended within the Senversa 2022 and Senversa 2024

  including total suspended solids ("TSS"), total nitrogen ("TN"), total phosphorous ("TP"), pH, and heavy metals (copper and zinc only).

2. Works Performed

LRE attended site on 30 July 2025, following a rainfall event, to undertake surface water sampling from the sand filter and Ecoceptor outflow located within the southern and southeastern sections of the site, respectively.

Land Risk Environmental Pty Ltd
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Three (3) surface water samples, being two (2) primary samples (SW01 & SW02) and one duplicate sample (FD01), were collected using a dedicated disposable bailer and decanted into laboratory provided sampling containers for the required analysis. The sampling bottles were then stored in an iced cooler box for transport to the nominated laboratory under chain of custody documentation. The samples were submitted to Eurofins Environmental Testing Australia Pty Ltd ("Eurofins") which is a NATA accredited environmental laboratory for the analysis undertaken.

3. Analytical Results

The results of the laboratory analytical testing were outside of the specified water quality criteria for majority of parameters except for zinc, in all samples collected. The laboratory results and criteria are summarised in the table below.

A copy of the NATA accredited laboratory certificate is provided as an attachment.

Parameter	Units	Criteria		SW01	SW02	FD01	Pass/Fail
		ANZECC & ARMCANZ 2000[1] & ANZG 2018[2]	Fletcher et al. 2004[3]				
pH	pH units	**6 to 8**	-	9.6	8.3	8.2	FAIL
TSS	mg/L	-	**40 – 500**	450	130	140	PASS
Total Oxidised Nitrogen	mg/L	**0.04**	-	1.2	0.75	0.85	FAIL
Total Nitrogen	mg/L	0.35	**0.7 – 6**	1.2	2.3	0.9	PASS
Total Phosphorus	mg/L	0.025	**0.08 – 0.8**	0.33	0.15	0.08	PASS
Copper	mg/L	0.0014	**0.02 – 0.3**	0.003	<0.001	0.003	PASS
Zinc	mg/L	0.008	**0.1 – 1**	<0.005	<0.005	<0.005	PASS

Note:

[1]Australian and New Zealand Environment Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC & ARMCANZ 2000). Default trigger values for NSW, lowland rivers.

[2]Australian and New Zealand Environment Governments (ANZG) – Guidelines for Fresh and Marine Water Quality 2018 (ANZG 2018). Default guideline values for slightly to moderately disturbed system – freshwater.

[3] Fletcher T., Duncan H., Poelsma P., Lloyd S. – Stormwater Flow and Quality, and the Effectiveness of Non-Proprietary Stormwater Treatment Measures: A Review and Gap Analysis. Cooperative Research Centre for Catchment Hydrology, Technical Report 04/8, December 2004 (Fletcher et al. 2004). Stormwater runoff in urban or commercial/industrial areas as recommended by Senversa 2024.

Although the majority of analytes exceeded the ecological criteria in all collected samples, it is noted that the ANZECC & ARMCANZ 2000 default trigger values are highly conservative and do not account for localised conditions or surrounding land use. Given the highly disturbed, urbanised setting of the site, stormwater quality benchmarks reported by Fletcher et al. 2004 for urban and commercial/industrial areas along the east

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coast of Australia are considered more appropriate for comparison. Concentrations of TSS, TN, TP, copper, and zinc were below the Fletcher et al. 2004 guidelines. However, in the absence of updated benchmarks for pH and Total Oxidised Nitrogen, the ANZECC & ARMCANZ 2000 trigger values remain applicable for these parameters.

4. Conclusion

With the exception of TN, the July 2025 SWME demonstrates concentrations of key parameters (TSS and TP) are lower at SW02 (downstream of stormwater treatment train) than SW01 (upstream of stormwater system), which indicates stormwater treatment (i.e. water, sediment, and erosion controls) at the site are generally reducing concentrations of key parameters prior to discharge to stormwater.

Concentrations of heavy metals (copper and zinc) and nutrients were reported above the conservative ANZECC and ARMCANZ 2000 trigger values at the Ecoceptor outflow (SW02), indicative of the quality of stormwater being discharged from site. The elevated concentrations are not considered to pose an unacceptable risk to ecological receptors for the following reasons:

- the reported concentrations are low and fall within the expected concentration range for industrial sites, which is considered more representative of the site's context.
- the intermittent nature of stormwater flows (being rainfall dependent)
- dilution from mixing with other downstream discharges
- and the significant distance to the nearest ecological receptor (approximately 1.5 kilometres).

Based upon the finding of the SWME, LRE recommends the following:

- continue annual surface water monitoring to ensure soil, erosion and stormwater management controls are performing as designed in accordance with the site's WMP.

The next surface water sampling event is scheduled to be undertaken in July 2026.

5. Attachments

- Figure 1 – Site Location and Features
- Figure 2 – Surface Water Monitoring Locations
- NATA Accredited Laboratory Certificate
- LRE Report Limitations.

Site Location

Site Boundary

Sand Filter Box

Ecoceptor

N

0 — Approximate Scale (m) — 70

Image Source: Google Maps & Nearmap

CLIENT
reDirect Recycling Pty Ltd

PROJECT
Surrface Water Monitoring May 2025
24 Davis Road, Wetherill Park, NSW

TITLE
Figure 1 - Site Location and Features

SCALE	DATE	DRAWING NO.	ISSUE
NTS	06/08/2025	066 - Figure 1	A

DRAWN	REVIEWED	JOB NO.
M.L.	J.L.	066

LRE | LAND RISK ENVIRONMENTAL
Land Risk Environmental Pty Ltd
ABN 74 675 377 321
PO Box Q1910
Queen Victoria Building
Sydney NSW 1230

Site Boundary

Surface Water Sample Location

N

0 — Approximate Scale (m) — 90

Image Source: Nearmap

CLIENT
reDirect Recycling Pty Ltd

PROJECT
Surrface Water Monitoring May 2025
24 Davis Road, Wetherill Park, NSW

TITLE
Figure 1 - Surface Water Monitoring Locations

SCALE	DATE	DRAWING NO.	ISSUE
NTS	06/08/2025	066 - Figure 2	A

DRAWN	REVIEWED	JOB NO.
M.L.	J.L.	066

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Land Risk Environmental Pty Ltd
1/9 Hooper Street
Randwick
NSW 2031

NATA Accredited
Accreditation Number 1261
Site Number 18217

Accredited for compliance with ISO/IEC 17025 – Testing
NATA is a signatory to the ILAC Mutual Recognition Arrangement for the mutual recognition of the equivalence of testing, medical testing, calibration, inspection, proficiency testing scheme providers and reference materials producers reports and certificates.

Attention: **Martin Leong**

Report **1250257-W**
Project name WETHRILL PARK NSW
Project ID 66
Received Date Jul 30, 2025

Client Sample ID			**SW01**	**SW02**	**FD02**
Sample Matrix			**Water**	**Water**	**Water**
Eurofins Sample No.			**S25-JI0081058**	**S25-JI0081059**	**S25-JI0081060**
Date Sampled			**Jul 30, 2025**	**Jul 30, 2025**	**Jul 30, 2025**
Test/Reference	LOR	Unit			
Nitrate & Nitrite (as N)	0.05	mg/L	1.2	0.75	0.85
Nitrate (as N)	0.02	mg/L	1.1	0.62	0.65
Nitrite (as N)	0.02	mg/L	0.17	0.13	0.20
pH (at 25 °C)	0.1	pH Units	9.6	8.3	8.2
Phosphate total (as P)	0.01	mg/L	0.33	0.15	0.08
Total Kjeldahl Nitrogen (as N)	0.2	mg/L	< 0.2	1.5	< 0.2
Total Nitrogen (as N)*	0.2	mg/L	1.2	2.3	0.9
Total Suspended Solids Dried at 103°C to 105°C	5	mg/L	450	130	140
Heavy Metals					
Copper (filtered)	0.001	mg/L	0.003	< 0.001	0.003
Zinc (filtered)	0.005	mg/L	< 0.005	< 0.005	< 0.005

Sample History

Where samples are submitted/analysed over several days, the last date of extraction is reported.

If the date and time of sampling are not provided, the Laboratory will not be responsible for compromised results should testing be performed outside the recommended holding time.

Description	Testing Site	Extracted	Holding Time
Total Nitrogen Set (as N)			
Nitrate & Nitrite (as N)	Melbourne	Aug 01, 2025	28 Days
- Method: LTM-INO-4450 Nitrogens by Discrete Analyser			
Nitrate (as N)	Melbourne	Aug 01, 2025	28 Days
- Method: LTM-INO-4450 Nitrogens by Discrete Analyser			
Nitrite (as N)	Melbourne	Aug 01, 2025	2 Days
- Method: LTM-INO-4450 Nitrogens by Discrete Analyser			
Total Kjeldahl Nitrogen (as N)	Melbourne	Aug 01, 2025	28 Days
- Method: APHA 4500-Norg B,D Total Kjeldahl Nitrogen by FIA			
pH (at 25 °C)	Sydney	Jul 30, 2025	6 Hours
- Method: LTM-GEN-7090 pH in water by ISE			
Phosphate total (as P)	Sydney	Jul 30, 2025	28 Days
- Method: E052 Total Phosphate (as P)			
Total Suspended Solids Dried at 103°C to 105°C	Sydney	Jul 30, 2025	7 Days
- Method: LTM-INO-4070 Analysis of Suspended Solids in Water by Gravimetry			
Heavy Metals (filtered)	Sydney	Jul 30, 2025	180 Days
- Method: LTM-MET-3040 Metals in Waters, Soils & Sediments by ICP-MS			

eurofins

web: www.eurofins.com.au
email: EnviroSales@eurofinsanz.com

Eurofins Environment Testing Australia Pty Ltd
ABN: 50 005 085 521

Melbourne	Geelong	Sydney	Canberra	Brisbane	Newcastle
6 Monterey Road	19/8 Lewalan Street	179 Magowar Road	Unit 1,2 Dacre Street	1/21 Smallwood Place	1/2 Frost Drive
Dandenong South	Grovedale	Girraween	Mitchell	Murarrie	Mayfield West
VIC 3175	VIC 3216	NSW 2145	ACT 2911	QLD 4172	NSW 2304
+61 3 8564 5000	+61 3 8564 5000	+61 2 9900 8400	+61 2 6113 8091	+61 7 3902 4600	+61 2 4968 8448
NATA# 1261	NATA# 1261	NATA# 1261	NATA# 1261	NATA# 1261	NATA# 1261
Site# 1254	Site# 25403	Site# 18217	Site# 25466	Site# 20794 & 2780	Site# 25079

Eurofins ARL Pty Ltd
ABN: 91 05 0159 898

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+61 8 6253 4444
NATA# 2377
Site# 2370 & 2554

Eurofins Environment Testing NZ Ltd
NZBN: 9429046024954

Auckland	Auckland (Focus)	Christchurch	Tauranga
35 O'Rorke Road	Unit C1/4 Pacific Rise	43 Detroit Drive	1277 Cameron Road
Penrose	Mount Wellington	Rolleston	Gate Pa
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IANZ# 1327	IANZ# 1308	IANZ# 1290	IANZ# 1402

Company Name: Land Risk Environmental Pty Ltd
Address: 1/9 Hooper Street
Randwick
NSW 2031

Project Name: WETHRILL PARK NSW
Project ID: 66

Order No.:
Report #: 1250257
Phone:
Fax:

Received: Jul 30, 2025 3:05 PM
Due: Aug 6, 2025
Priority: 5 Day
Contact Name: Martin Leong

Eurofins Analytical Services Manager : Adam Bateup

Sample Detail						Copper (filtered)	pH (at 25 °C)	Phosphate total (as P)	Total Suspended Solids Dried at 103°C to 105°C	Zinc (filtered)	Total Nitrogen Set (as N)
Melbourne Laboratory - NATA # 1261 Site # 1254											X
Sydney Laboratory - NATA # 1261 Site # 18217						X	X	X	X	X	
External Laboratory											
No	**Sample ID**	**Sample Date**	**Sampling Time**	**Matrix**	**LAB ID**						
1	SW01	Jul 30, 2025		Water	S25-Jl0081058	X	X	X	X	X	X
2	SW02	Jul 30, 2025		Water	S25-Jl0081059	X	X	X	X	X	X
3	FD02	Jul 30, 2025		Water	S25-Jl0081060	X	X	X	X	X	X
Test Counts						3	3	3	3	3	3

Internal Quality Control Review and Glossary

General

1. Laboratory QC results for Method Blanks, Duplicates, Matrix Spikes, and Laboratory Control Samples follow guidelines delineated in the National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended May 2013. They are included in this QC report where applicable. Additional QC data may be available on request.
2. Unless otherwise stated, all soil/sediment/solid results are reported on a dry weight basis.
3. Unless otherwise stated, all biota/food results are reported on a wet weight basis on the edible portion.
4. For CEC results where the sample's origin is unknown or environmentally contaminated, the results should be used advisedly.
5. Actual LORs are matrix dependent. Quoted LORs may be raised where sample extracts are diluted due to interferences.
6. Results are uncorrected for matrix spikes or surrogate recoveries except for PFAS compounds where annotated.
7. SVOC analysis on waters is performed on homogenised, unfiltered samples unless noted otherwise.
8. Samples were analysed on an 'as received' basis.
9. Information identified in this report with **blue** colour indicates data provided by customers that may have an impact on the results.
10. This report replaces any interim results previously issued.

Holding Times

Please refer to the 'Sample Preservation and Container Guide' for holding times (QS3001).

For samples received on the last day of holding time, notification of testing requirements should have been received at least 6 hours before sample receipt deadlines as stated on the SRA.

If the Laboratory did not receive the information in the required timeframe, and despite any other integrity issues, suitably qualified results may still be reported.

Holding times apply from the sampling date; therefore, compliance with these may be outside the laboratory's control.

For VOCs containing vinyl chloride, styrene and 2-chloroethyl vinyl ether, the holding time is seven days; however, for all other VOCs, such as BTEX or C6-10 TRH, the holding time is 14 days.

Units

mg/kg: milligrams per kilogram	**mg/L:** milligrams per litre	**ppm:** parts per million
µg/L: micrograms per litre	**ppb:** parts per billion	**%:** Percentage
org/100 mL: Organisms per 100 millilitres	**NTU:** Nephelometric Turbidity Units	**MPN/100 mL:** Most Probable Number of organisms per 100 millilitres
CFU: Colony Forming Unit	**Colour:** Pt-Co Units (CU)	

Terms

APHA	American Public Health Association
CEC	Cation Exchange Capacity
COC	Chain of Custody
CP	Client Parent - QC was performed on samples pertaining to this report
CRM	Certified Reference Material (ISO17034) - reported as percent recovery.
Dry	Where moisture has been determined on a solid sample, the result is expressed on a dry weight basis.
Duplicate	A second piece of analysis from the same sample and reported in the same units as the result to show comparison.
LOR	Limit of Reporting.
LCS	Laboratory Control Sample - reported as percent recovery.
Method Blank	In the case of solid samples, these are performed on laboratory-certified clean sands and in the case of water samples, these are performed on de-ionised water.
NCP	Non-Client Parent - QC performed on samples not pertaining to this report, QC represents the sequence or batch that client samples were analysed within.
RPD	Relative Percent Difference between two Duplicate pieces of analysis.
SPIKE	Addition of the analyte to the sample and reported as percentage recovery.
SRA	Sample Receipt Advice
Surr - Surrogate	The addition of a similar compound to the analyte target is reported as percentage recovery. See below for acceptance criteria.
TBTO	Tributyltin oxide (*bis*-tributyltin oxide) - individual tributyltin compounds cannot be identified separately in the environment; however, free tributyltin was measured, and its values were converted stoichiometrically into tributyltin oxide for comparison with regulatory limits.
TCLP	Toxicity Characteristic Leaching Procedure
TEQ	Toxic Equivalency Quotient or Total Equivalence
QSM	US Department of Defense Quality Systems Manual Version 6.0
US EPA	United States Environmental Protection Agency
WA DWER	Sum of PFBA, PFPeA, PFHxA, PFHpA, PFOA, PFBS, PFHxS, PFOS, 6:2 FTSA, 8:2 FTSA

QC - Acceptance Criteria

The acceptance criteria should only be used as a guide and may be different when site-specific Sampling Analysis and Quality Plan (SAQP) have been implemented.

RPD Duplicates: Global RPD Duplicates Acceptance Criteria is ≤30%; however, the following acceptance guidelines are equally applicable:

Results <10 times the LOR:	No Limit
Results between 10-20 times the LOR:	RPD must lie between 0-50%
Results >20 times the LOR:	RPD must lie between 0-30%

NOTE: pH duplicates are reported as a range, not as RPD

Surrogate Recoveries: Recoveries must lie between 20-130% for Speciated Phenols & 50-150% for PFAS. SVOCs recoveries 20 – 150%, VOC recoveries 50 – 150%

PFAS field samples containing surrogate recoveries above the QC limit designated in QSM 6.0, where no positive PFAS results have been reported or reviewed, and no data was affected.

QC Data General Comments

1. Where a result is reported as less than (<), higher than the nominated LOR, this is due to either matrix interference, extract dilution required due to interferences or contaminant levels within the sample, high moisture content or insufficient sample provided.
2. Duplicate data shown within this report that states the word "BATCH" is a Batch Duplicate from outside of your sample batch but within the laboratory sample batch at a 1:10 ratio. The Parent and Duplicate data shown are not data from your samples.
3. pH and Free Chlorine analysed in the laboratory - Analysis on this test must begin within 30 minutes of sampling. Therefore, laboratory analysis is unlikely to be completed within holding time.Analysis will begin as soon as possible after sample receipt.
4. Recovery Data (Spikes & Surrogates) - where chromatographic interference does not allow the determination of recovery, the term "INT" appears against that analyte.
5. For Matrix Spikes and LCS results, a dash "-" in the report means that the specific analyte was not added to the QC sample.
6. Duplicate RPDs are calculated from raw analytical data; thus, it is possible to have two sets of data.

Quality Control Results

Test	Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Method Blank							
Nitrate & Nitrite (as N)	mg/L	< 0.05			0.05	Pass	
Nitrate (as N)	mg/L	< 0.02			0.02	Pass	
Nitrite (as N)	mg/L	< 0.02			0.02	Pass	
Phosphate total (as P)	mg/L	< 0.01			0.01	Pass	
Total Kjeldahl Nitrogen (as N)	mg/L	< 0.2			0.2	Pass	
Total Suspended Solids Dried at 103°C to 105°C	mg/L	< 5			5	Pass	
Method Blank							
Heavy Metals							
Copper (filtered)	mg/L	< 0.001			0.001	Pass	
Zinc (filtered)	mg/L	< 0.005			0.005	Pass	
LCS - % Recovery							
Nitrate & Nitrite (as N)	%	99			70-130	Pass	
Nitrate (as N)	%	99			70-130	Pass	
Nitrite (as N)	%	106			70-130	Pass	
Phosphate total (as P)	%	95			70-130	Pass	
Total Kjeldahl Nitrogen (as N)	%	108			70-130	Pass	
Total Suspended Solids Dried at 103°C to 105°C	%	88			70-130	Pass	
LCS - % Recovery							
Heavy Metals							
Copper (filtered)	%	100			80-120	Pass	
Zinc (filtered)	%	98			80-120	Pass	

Test	Lab Sample ID	QA Source	Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Spike - % Recovery									
				Result 1					
Total Kjeldahl Nitrogen (as N)	B25-Jl0082438	NCP	%	91			70-130	Pass	
Total Suspended Solids Dried at 103°C to 105°C	S25-Jl0080311	NCP	%	113			70-130	Pass	
Spike - % Recovery									
Heavy Metals				Result 1					
Copper (filtered)	S25-Jl0078702	NCP	%	90			75-125	Pass	
Zinc (filtered)	S25-Jl0078702	NCP	%	18			75-125	Fail	Q08
Spike - % Recovery									
				Result 1					
Phosphate total (as P)	S25-Jl0081059	CP	%	75			70-130	Pass	

Test	Lab Sample ID	QA Source	Units	Result 1	Result 2	RPD	Acceptance Limits	Pass Limits	Qualifying Code
Duplicate									
				Result 1	Result 2	RPD			
Nitrate & Nitrite (as N)	M25-Au0003354	NCP	mg/L	< 0.05	< 0.05	<1	30%	Pass	
Nitrate (as N)	M25-Au0003354	NCP	mg/L	< 0.02	< 0.02	<1	30%	Pass	
Nitrite (as N)	M25-Au0003354	NCP	mg/L	< 0.02	< 0.02	<1	30%	Pass	
Phosphate total (as P)	S25-Jl0081058	CP	mg/L	0.33	0.31	5.0	30%	Pass	
Total Suspended Solids Dried at 103°C to 105°C	S25-Jl0080311	NCP	mg/L	25	22	15	30%	Pass	
Duplicate									
Heavy Metals				Result 1	Result 2	RPD			
Copper (filtered)	N25-Jl0071718	NCP	mg/L	0.59	0.58	2.0	30%	Pass	
Zinc (filtered)	N25-Jl0071718	NCP	mg/L	0.052	0.052	<1	30%	Pass	
Duplicate									
				Result 1	Result 2	RPD			
Total Kjeldahl Nitrogen (as N)	S25-Jl0081059	CP	mg/L	1.5	1.3	18	30%	Pass	

Comments

Sample Integrity

Custody Seals Intact (if used)	N/A
Attempt to Chill was evident	Yes
Sample correctly preserved	Yes
Appropriate sample containers have been used	No
Sample containers for volatile analysis received with minimal headspace	Yes
Samples received within HoldingTime	Yes
Some samples have been subcontracted	No

Qualifier Codes/Comments

Code	Description
Q08	The matrix spike recovery is outside of the recommended acceptance criteria. An acceptable recovery was obtained for the laboratory control sample indicating a sample matrix interference.

Authorised by:

Nileshni Goundar	Analytical Services Manager
Luke Holt	Senior Analyst-Inorganic
Mickael Ros	Senior Analyst-Metal
Ryan Phillips	Senior Analyst-Inorganic

Glenn Jackson
Managing Director

Final Report – this report replaces any previously issued Report

- Indicates Not Requested

* Indicates NATA accreditation does not cover the performance of this service

Measurement uncertainty of test data is available on request or please click here.

CHAIN OF CUSTODY RECORD

ABN 50 005 085 521

☑ **Sydney Laboratory** Unit F3 Bld.F, 16 Mars Rd, Lane Cove West, NSW 2066 02 9900 8400 EnviroSampleNSW@eurofins.com

☐ **Brisbane Laboratory** Unit 1, 21 Smallwood Pl., Murarrie, QLD 4172 07 3902 4600 EnviroSampleQLD@eurofins.com

☐ **Perth Laboratory** Unit 2, 91 Leach Highway, Kewdale WA 6105 08 9251 9600 EnviroSampleWA@eurofins.com

☐ **Melbourne Laboratory** 2 Kingston Town Close, Oakleigh, VIC 3166 03 8564 5000 EnviroSampleVic@eurofins.com

Company	Land Risk Environmental	Project №	066	Project Manager	Martin Leong
Address	PO Box Q1910, Queen Victoria Building, Sydney, NSW	Project Name	Wethrill Park, NSW	EDD Format (ESdat, EQuIS, Custom)	
Contact Name	Martin Leong			Sampler(s)	Martin Leong
Phone №	0401 553 358			Handed over by	Martin Leong
Special Directions				Email for Invoice	martin@landriskenvironmental.com
Purchase Order				Email for Results	martin@landriskenvironmental.com
Quote ID №					

Analyses (Note: Where metals are requested, please specify "Total" or "Filtered"; SUITE pricing; SUITE codes must be used to attract SUITE pricing)

Turnaround Time (TAT) Requirements (Default will be 5 days if not ticked): ☐ Overnight (9am)* ☐ 1 Day* ☐ 2 Day* ☐ 3 Day* ☑ 5 Day ☐ Other ( ) * Surcharges apply

№	Client Sample ID	Sampled Date/Time (dd/mm/yy hh:mm)	Matrix (Solid (S) Water (W))	Total suspended solids (TSS)	Total Phosphorus	Total Nitrogen	Heavy Metals (copper & zinc only)	pH	1L Plastic	250mL Plastic	125mL Plastic	200mL Amber Glass	40mL VOA vial	500mL PFAS Bottle	Jar (Glass or HDPE)	Other (Asbestos AS4964, WA Guidelines)	Sample Comments / Dangerous Goods Hazard Warning
1	SW01	30/07/25	W	X	X	X	X	X									Please filter for dissolved metals
2	SW02	30/7/25	W	X	X	X	X	X									Please filter for dissolved metals
3	FD02	30/7/25	W	X	X	X	X	X									Please filter for dissolved metals
4																	
5																	
6																	
7																	
8																	
9																	
10																	# 1250257
	Total Counts			3	3	3	3	3									

Method of Shipment	☐ Courier (#) ☑ Hand Delivered ☐ Postal	Name	Martin Leong	Signature	[signature]	Date	30/7/25	Time 13 : 45
Eurofins | mgt Laboratory Use Only	Received By [signature]	(SYD) | BNE | MEL | PER | ADL | NTL | DRW	Signature [signature]	Date	30/7/25	Time	3:05	Temperature 0.1
	Received By	SYD | BNE | MEL | PER | ADL | NTL | DRW	Signature	Date	__/__/__	Time	__:__	Report №

Land Risk Environmental Pty Ltd

Report Limitations

We advise that unless specifically stated otherwise within the body of this document, the following Limitations apply to our Report:

- Sections within this Report may contain additional Limitations relevant to the reporting discipline concerned. These must be reviewed as additional limitations that stand separately, and in addition to, the following Limitations.
- No reliance should be placed on draft reports, draft conclusions or draft advice issued by us as they may be subject to further work, revision and other factors which may mean that drafts are substantially difference from any Final report or advice issued.
- Inaccessible areas covered up or otherwise made inaccessible which may include ceiling voids, wall cavities and service risers, have not been inspected. Therefore, we are unable to comment as to whether such inaccessible areas are free from hazardous materials.
- Where a variety of multiple units or tenanted areas are inspected, a random selection of each type of unit / area was inspected and used for the basis of this report.
- This Report is not a certification, a warranty or guarantee and has been scoped in accordance with the instructions given and the time allowed.
- The scope of the Report is described in the fee proposal accepted by the instructing client.
- This Report has been prepared for the benefit of the instructing client named on the cover of the document. This Report is not to be reproduced, in whole or part, without the express written authorisation of Land Risk Environmental Pty Ltd.
- The findings of this report are valid for six calendar months from the date of issue of the Draft version of the Report.
- Unless specifically stated otherwise, all cost estimates provided throughout the Report are subject to the following Limitations:
    - Estimates are indicative only and are provided as a guide to "order of magnitude" of the cost item. Items of work are not fully described or detailed reflecting the high-level nature of the assessment, the amount of information available and the purpose for which they are prepared;
    - Actual costs may vary dependent on exact scope, timing, market pressure and contractual conditions.
    - Where there is a budget for investigative works, the budget is for those works only and does not include for any works that are recommended following those further investigations.
    - We have assumed that WH&S /OH&S requirements will be similar to those encountered in the present and have made no allowances for any additional measures that may be required in the future.

ABN: 74 675 377 321

Email: hello@landriskenvironmental.com

Website: www.landriskenvironmental.com

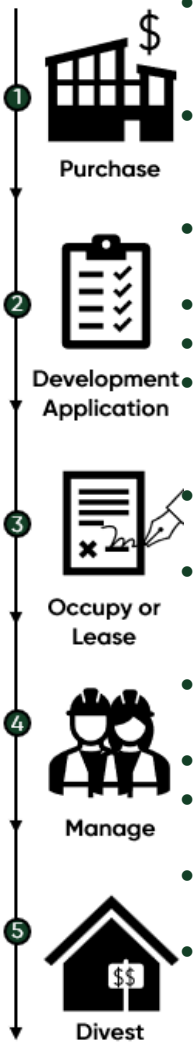
Land Risk Environmental Pty Ltd

Capabilities

About Land Risk Environmental

Land Risk Environmental Pty Ltd (LRE) specialise in technical due diligence environmental advisory services involving contaminated land and hazardous materials. Our goal is to minimise human, ecological and financial exposure to contaminated land and hazardous material risks.

Service Offerings



- Environmental & Hazardous Materials Assessment / Review
- Targeted Environmental Investigation

- Preliminary Site Investigation
- Detailed Site Investigation
- Remedial Action Plan
- Validation Assessment

- Baseline Environmental Investigation
- End of Lease Environmental Investigation

- Environmental Management Plan
- Compliance Monitoring
- Hazardous Material Survey & Management Plan
- Fuel System Operation Plan

- Vendor Environmental & Hazardous Materials Assessment / Review

Licenses & Certifications

- Certified Environmental Practitioner – General
- SafeWork NSW Licensed Asbestos Assessor
- OH&S Construction Induction Card

Experience

LRE's team members have a combined 20 years of experience in the areas of contaminated land management, environmental investigations and hazardous materials assessments. At LRE, we have extensive experience in undertaking property due diligence investigations and providing technical and commercial advice to property investors and managers in Australia and New Zealand. Our team have been involved in numerous commercial and industrial property portfolio transactions and have worked with a range of clients including government agencies, private companies, utility providers and real estate investment trusts.

Our experience includes the following sectors:

- Commercial Office, Industrial & Logistics, Retail
- Health Care & Aged Care
- Hotel & Leisure
- Build to Rent
- Purpose Built Student Accommodation
- Defence
- State Significant Infrastructure
- Petroleum Storage Facilities & Service Stations
- Chemical Manufacture

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Appendix B – Example Quarterly OEMP Checklist

OPERATIONAL ENVIRONMENTAL MANGEMENT PLAN – WETHERILL PARK INSPECTION CHECKLIST

Location:	reDirect – Wetherill Park	**Date:**	30.06.25
Inspection Completed By:	M.Stewart	**Signature:**	M.P.Stewart

1. General Management and mitigations ☐ **N/A**		**Frequency**	**Y/N/NA**	**General Comments**
1.2	Employees and contractors have been inducted and are suitably trained.	As required	Y	
1.3	Plant and equipment being used is in good working condition at the start of the day?	Daily	Y	

2. Traffic mitigations ☐ **N/A**		**Frequency**	**Y/N/NA**	**General Comments**
2.1	Traffic is continually monitored by Operations Coordinator?	Daily	Y	
2.2	Alll car spaces are free from obstruction and maintained for use by employees and visitors?	Daily	Y	
2.3	Vehicles are entering and leaving the site in forward direction.	Daily	Y	

3. Air quality, odour and dust mitigations ☐ **N/A**		**Frequency**	**Y/N/NA**	**General Comments**
3.1	Good dust management procedures are being implemented (inside building): Sweeper working and being used?	Daily	Y	
3.2	Good dust management procedures are implemented (outside the building): Sweeper working and being used?	Daily	Y	
3.3	Residual waste has been transported offsite (check general waste bin capacity)?	Daily	Y	

5. Stormwater mitigations ☐ **N/A**		**Frequency**	**Y/N/NA**	**General Comments**
5.1	Are there any spills that have been left unattended?	Daily	N	
5.2	Have storm water drains been inspected for any build up of sediment, debris, litter and vegetation within drainage system?	Monthly	Y	
5.3	If materials identified in stormwater drains, has it been removed?	Monthly	Y	
5.4	Inflow areas and pit grates have been inspected and clear of litter / debris?	Monthly	Y	
5.5	Ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly.	Monthly	Y	
5.6	Site structires to be regularly checked for erosion and scouring	Monthly	Y	
5.7	Treatment areas and structures will be regularly checked for the build up of litter material	Monthly	Y	
5.8	Remove grate and inspect internal walls and base. Remove any collected sediment, debris, litter and vegetation. Inspect and ensure grate is clear following any removal of objects. Ensure flush placement of grate upon refitment.	Quarterly (Mar, Jun, Sep, Dec)	Y	Lift grate,brush out lip for grate and down walls remove debris replace grate

5.9	Have all drainage structures been inspected noting any dilapidation, if so have repairs been carried out?	Bi-annually (Jun, Dec)	Y	Inspected no action required
5.10	Rainwater tank – has tank been checked for evidence of litter and functioning properly	Bi-annually (Jun, Dec)	Y	Check Basket – no litter
5.11	Rainwater tank – has tank been checked for evidence of access by pests (birds, insects, mosquito larvae ect.)	Bi-annually (Jun, Dec)	Y	Empty tank inspect no sign of pests
5.12	Rainwater tank – has structural integrity of tank been inspected? Note any dilapidation or repairs required / completed.	Bi-annually (Jun, Dec)	Y	No repairs required
5.13	The sediment chamber of the Ecoceptor will be reqgularly checked and cleaned and any damaged covers replaced.	Bi-annually (Jun, Dec)	Y	Checked no action required

6. Vermin and pest management mitigations ☐ N/A		**Frequency**	**Y/N/NA**	**General Comments**
6.1	Drainage sumps and catch drains will be inspected daily and cleaned regularly to prevent providing a habitat for pests.	Ongoing	Y	
6.2	Has the site been inspected for windblown litter? Any identified litter must be removed and disposed appropriately.	Ongoing	Y	
6.3	All overhead structures and internal roofs are visually inspected weekly to ensure they are kept clean.	Ongoing	Y	

7. Pollution management mitigations ☐ N/A		**Frequency**	**Y/N/NA**	**General Comments**
7.1	Are all dangerous goods stored appropriately according to their ADG classes and compatibility?	Daily	Y	
7.2	Has training on the pollution incident response management plan been provided in toolbox?	As required	Y	

8. Fire management mitigations ☐ N/A		**Frequency**	**Y/N/NA**	**General Comments**
8.1	Fire extinguishers are positioned at readily accessible points, including on mobile plant	Daily	Y	

9. Noise and vibration mitigations ☐ N/A		**Frequency**	**Y/N/NA**	**General Comments**
9.1	Are defective plant parked up and not being used?	As required	Y	

10. Waste management mitigations ☐ N/A		**Frequency**	**Y/N/NA**	**General Comments**
10.1	All waste stored on site onsite is permitted by the EPL?	Daily	Y	
10.2	The total amount of waste stored at the premises is under EPL Authorised Amount?	Daily	Y	
10.3	The total amount of waste received daily is being recorded via the weighbridges in place?	Daily	Y	

11. Flooding mitigations ☐ N/A		Frequency	Y/N/NA	General Comments
11.1	Inspection and maintenance of the Flood Emergency Kit will be undertaken as required to ensure all components are present and in operating condition.	Bi-annually (Jun, Dec)	Y	Fully stocked and in good condition
11.2	Yearly (at minimum) evacuation drills will be implemented as part of ongoing training onsite.	Yearly	Y Dec 2024	Next due Dec 25

12. Biodiversity ☐ N/A		Frequency	Y/N/NA	General Comments
12.1	Weed treatment will occur alongside maintenance of landscaping within subject site. This supports compliance with the NSW Biosecurity Act 2015.	Quarterly (Mar, Jun, Sep, Dec)	Y	

OPERATIONAL ENVIRONMENTAL MANGEMENT PLAN – WETHERILL PARK INSPECTION CHECKLIST

Action Plan - to be transferred as a 'Hazard Report'				
Actions required	**Action assigned to**	**Date assigned**	**Date to be completed**	**Signature**
Storage and Reference	**Inspection Completed By**			**Date**
To be reviewed at Site Meeting.				

Workplace inspection checklists must be completeddaily, stored in the site file and uploaded to Datastation before the end of each day.

Appendix C – Appendix D – Community Complaints

Complaint No	Category	Date Received	Property	Detail	Follow Up Actions
NIL	-	-	-	-	-

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