

17<sup>th</sup> October 2023

Grabriel Peters Shaw  
Senior Compliance Officer  
Department of Planning and Environment  
[grabriel.petersshaw@dpie.nsw.gov.au](mailto:grabriel.petersshaw@dpie.nsw.gov.au)

**Re: Response to Recommendations - RPS - 2023 Independent Environmental Audit Redirect Wetherill Park – SSD 7401**

This letter has been prepared by Redirect Recycling Pty Ltd (reDirect) in response to the audit recommendations outlined within *2023 Independent Environmental Audit Redirect Recycling*, dated 10 October 2023 (ref: AU213010981) (RPS, 2023) (carried out in accordance with C13 of SSD-7401) and to satisfy C14 of the SSD-7401 Development Consent.

“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.”

A copy of the RPS (2023) *Audit Checklist* has been provided below (refer to *Appendix I - Audit Checklist: Response to RPS [2023] Recommendations*), with corresponding responses, actions and timeframes to each of the recommendations submitted for review by the Department of Planning and Environment.

Should the Department of Planning and Environment require any further clarification regarding the information provided herein, or any additional information, please contact me the undersigned.

Regards,



James Sutton  
Environmental Manager  
reDirect Recycling  
[suttonjd@redirectrecycling.com.au](mailto:suttonjd@redirectrecycling.com.au)

## Appendix I – Audit Checklist: Response to RPS (2023) Recommendations

**Table 1 Consolidated Consent SSD 7401 (RPS, 2023)**

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
<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:	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	reDirect Response
		<p>(a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;</p> <p>(b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>				
<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	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response																																												
			<p>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.</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Transaction Count</th> <th>Net(t)</th> <th>Gross(t)</th> </tr> </thead> <tbody> <tr> <td>CLEAN WATER</td> <td>7</td> <td>61.90</td> <td>213.80</td> </tr> <tr> <td>CONCRETE SLURRY</td> <td>11</td> <td>80.84</td> <td>293.38</td> </tr> <tr> <td>DRILL WATER</td> <td>8454</td> <td>41430.13</td> <td>185314.02</td> </tr> <tr> <td>EXCAVATED NATURAL MATERIAL</td> <td>10</td> <td>96.72</td> <td>207.70</td> </tr> <tr> <td>RAW STREET SWEEPINGS</td> <td>65</td> <td>115.16</td> <td>738.68</td> </tr> <tr> <td>SOILS (CT-1)</td> <td>28</td> <td>485.70</td> <td>935.62</td> </tr> <tr> <td>STORMWATER</td> <td>2</td> <td>7.02</td> <td>43.04</td> </tr> <tr> <td>TREATED DRILL MUD</td> <td>1</td> <td>34.00</td> <td>53.18</td> </tr> <tr> <td>WASHED SAND</td> <td>3</td> <td>86.86</td> <td>133.28</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>8581</b></td> <td><b>42398.33</b></td> <td><b>187932.90</b></td> </tr> </tbody> </table>	Name	Transaction Count	Net(t)	Gross(t)	CLEAN WATER	7	61.90	213.80	CONCRETE SLURRY	11	80.84	293.38	DRILL WATER	8454	41430.13	185314.02	EXCAVATED NATURAL MATERIAL	10	96.72	207.70	RAW STREET SWEEPINGS	65	115.16	738.68	SOILS (CT-1)	28	485.70	935.62	STORMWATER	2	7.02	43.04	TREATED DRILL MUD	1	34.00	53.18	WASHED SAND	3	86.86	133.28	<b>Grand Total</b>	<b>8581</b>	<b>42398.33</b>	<b>187932.90</b>			
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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.	<p>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.</p>	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.	<p>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</p>	Compliant																																														

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			that cannot be processed immediately are stored in a 250,000 L concrete pit, where materials are processed during off peak times (night hours).			
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. Bettergrow's Transaction Summary Report by product showed no receipt of compost on site. No compost was observed on site during site inspection.	Compliant		
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	Noted. Redirect will incorporate minor amendments into the next scheduled update of the OWMP (to be completed within 3 months of the completion of the Independent Environmental Audit).

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					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 (b) combine any strategy, plan or program required by this consent.		Noted		
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	Auditors sighted 9 waste classification records/certificates provided upon request by Bettergrow. Auditors also sighted	Compliant		

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		the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	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.			
<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; (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.	Auditors sighted consultation between Bettergrow and: - Sydney Water Regarding the Trade Waste Agreement and Compliance Certificate - Fairfield City Council Regarding the Traffic Impact Assessment, a vehicular crossing inspection, driveway widening requirements, the Flood Management Plan - NSW EPA Regarding the Air Quality and Odour Management Plan  The consultation letters confirmed submission of consultation prior to submitting the required documentation. 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.	Compliant		
<b>STATUTORY REQUIREMENTS</b>						
DA20	A20	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and	Redirect Recycling has ensured that all relevant licences have been obtained to	Compliant		



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		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.	date. Relevant, up to date licences /permits/approvals include Environmental Protection Licence, Trade Waste Agreement and Construction Certificates.			
<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		
<b>STRUCTURAL ADEQUACY AND CERTIFICATION</b>						
DA22	A22	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. Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.	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. 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.	Compliant		

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DA23	A23	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.	No agreement was made between Bettergrow and Fairfield City Council regarding utility adjustments. No utility adjustments were required for the development.	Not triggered		
<b>UTILITIES AND SERVICES</b>						
DA24	A24	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.	No utility works were required or undertaken.	Not triggered		
DA25	A25	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.	Auditors sighted Sydney Water Approved Plans dated 28/04/2021.	Compliant		
DA26	A26	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.	Auditors sighted relevant compliance certificate from Sydney Water dated April 12, 2021, prior to operations commencement on 23 August 2022.	Compliant		
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>						
DA27	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	Non-compliant	Submit the reports to DPE as soon as possible.	reDirect uploaded all listed Dilapidation reports to the major projects planning portal on 17.10.2023.

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			<p>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>			
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		
<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.</p> <p>Auditors viewed service records for the loader and forklift used on site, demonstrating regular maintenance.</p>	Compliant		

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			<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>			
<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</p>	Compliant		

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			potential concerns about safety and environmental management.			
<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		
<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.	<p>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.</p> <p>Auditors sighted receipts for waste disposal dated 15 May 2023 provided by Sydney Recycling Park and corresponding outgoing weighbridge records.</p>	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	Compliant		

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			have been processed at the site outside the bounds of the EPL.			
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		
<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.	Bettergrow employed Sydney Environmental to perform the first Waste Classification Assessment Report dated 26 September 2022. Auditors reviewed every consequential Waste Classification Report provided to date including:	Compliant		

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			<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 Rapid Geo dated 15 June 2023</li> <li>- Excavated Natural Material Report by Alliance dated 6 July 2023</li> </ul> <p>Auditors observed waste disposal receipts and corresponding weighbridge records dated 15 May 2023.</p>			
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>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</p>	Compliant		

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		(iv) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste.	acceptance as required under Clause 27 of the PoEO Regulation. Training records demonstrating staff attendance of toolbox talks regarding the WP, OEMP and OWMP were also shown to auditors. Neither the EPA nor the Planning Secretary has requested waste tracking records be produced.			
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	All waste must be: (a) stored wholly within the designated waste storage areas; and (b) loaded and unloaded within the designated loading and unloading areas.	According to the Operational Waste Management Plan, liquid waste must be stored in appropriately banded containers and all other wastes (bar wastewater) are 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.	Compliant		
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;	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	Compliant		



Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(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.	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.			
<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; (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.	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 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.	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
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.	Noted. The CDWMP has been staged to only include Stage 1. Redirect will complete and submit an updated version of the CDWMP prior to the construction of Stage 2, the updated CDWMP will include projected quantities of waste materials.
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 dockets 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.	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			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.			
<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.	Noted. Redirect will review the location of the meteorological station prior to the commencement of Stage 2.
<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 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	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>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> <li>(d) trucks associated with the Development do not track dirt onto the public road network; and</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 signage</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(e) public roads used by these trucks are kept clean.	<p>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.</p> <p>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</p>			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			site. The site was observed to be in a very clean and tidy state.			
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	Site inspection confirmed the shed is physically capable of supporting roller	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		A in Appendix A) does not preclude the ability for roller doors to be retrofitted.	doors as per Drawing number DA100, should they need to be installed.			
<b>Odour</b>						
DA53	B21	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Redirect Recycling has never had a complaint or incident regarding offensive odour as defined under the POEO Act. This 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.	Compliant		
<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>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> </ul>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(vi) the installation of misting sprays above the truck entry/exit in the FGO and FLD building to suppress odour emissions (vii) conduct weekly cleaning of any tipping areas within the FGO or FLD building where interior walls have been contaminated with putrescible waste; (c) regularly maintain on-site surfaces to prevent dust re-entrainment from vehicle movements and other equipment use; (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; (e) ensure regular maintenance of the odour management system; and (f) record and respond to any air quality or odour complaints within 48 hours.	<ul style="list-style-type: none"> <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>			
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	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: <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</li> <li>(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;</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	Compliant		



Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<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>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> <p>e. Specific timing and triggers for management measures are detailed in table 7.</p> <p>f. Complaints protocol is outlined in the last row of Table 7.</p>			
DA57	B25	<p>The Applicant must:</p> <p>(a) not commence operation until the AQOMP required by Condition B24 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the AQOMP approved by the Planning Secretary for the duration of the Development.</p>	<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> <p>(a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Planning Secretary;</p>	<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	reDirect Response
		<p>(b) be carried out in accordance with the methodologies set out in the relevant EPA guidelines;</p> <p>(c) identify all significant odour sources at the site;</p> <p>(d) monitor odour and audit the Development whilst the FGO and FLD buildings are in full operation;</p> <p>(e) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints;</p> <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	<p>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.</p>	<p>Time period for completion has not yet been triggered.</p>	<p>Not triggered</p>		
DA60	B28	<p>The Applicant must comply with any reasonable requirement(s) of the Planning Secretary arising from the Odour Audit.</p>	<p>Time period for completion has not yet been triggered.</p>	<p>Not triggered</p>		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
<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 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. Sampling data for TWA discharges from commencement of operation until August 2023 was observed by auditors.	Compliant		
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		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
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 bunded in accordance with: (i) all relevant Australian Standards; and (ii) NSW EPA's Spill Management Bunding guidelines.	Auditors sighted the wastewater management system on site, confirming operational status.  Auditors sighted engineering certification of the wastewater management system by Jordan McCooe of CDE on 28 March 2022.	Compliant		
<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		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
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; (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.	Time period for completion has not yet been triggered.	Not triggered		
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	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>pollution of waters. Section 5.4 addresses specific Assessment Criteria against baseline and background conditions of groundwater.</p> <p>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 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	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	<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</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>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>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 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>			

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			<ul style="list-style-type: none"> <li>v. Section 10.1 details the Evacuation response procedure. Responsibilities, triggers and actions are clearly laid out.</li> <li>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.</li> </ul>			
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, about 1.45m above the Probably Maximum Flood level of 38m. All floor levels were also above the PMF during construction, with the temporary office outside the flood extent.	Compliant		
<b>Stormwater Management System</b>						
DA75	B43	The Applicant must design, install and operate a stormwater management system for the Development. The system must:	<ul style="list-style-type: none"> <li>a. The Stormwater Management Plan, prepared by Eclipse Consulting Engineers, contains the engineering</li> </ul>	Compliant		



Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<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>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 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.</p>			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			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.			
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 Book and the Fairfield City Wide DCP 2013.</p>	Compliant		
DA77	B45	<p>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</p>	<p>Identification Survey and Floor Level Certification signed by Registered Surveyor Jonathon Burke dated 6 July 2022 was sighted by auditors.</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response										
		levels have been constructed as approved must be submitted to the PCA.	The Compliance Certificate dated 15 June 2022, certified sediment and erosion control, stormwater drainage, external pavement, parking and access. 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.													
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	<p>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:</p> <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%	Landscaping materials supplies facility not relevant to Stage 1 of the development.	Not triggered		
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	As above.	Not triggered												

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		targets in Table 1.				
<b>Water Management Plan</b>						
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 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>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, 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</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<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>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> <p>g. The Groundwater Management Plan is contained in Section 5.</p> <p>i. Baseline conditions across the 13 groundwater monitoring</p>			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<ul style="list-style-type: none"> <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 the responsibilities and procedures should a chemical spill or fire occur on the site;</li> <li>(b) ensure the stormwater isolation valve functionality has a fail-safe function on power failure which automatically closes the</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> <li>b. Auditors sighted Compliance Certificate prepared by Eclipse Consulting Engineers, dated 15 June 2022, certified sediment and erosion</li> </ul>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>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>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. This is consistent with the approved plans for SSD7401-MOD3.</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
<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>(k) pedestrian paths on-site must be clearly marked at all times.</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	reDirect Response
			d. No vehicle queuing was observed during site inspection.			
			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.			
			f. There is adequate space on site to contain vehicles wholly on site before stopping.			
			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.			
			h. There were no obstacles observed anywhere in the driveway nor in any of the paths of traffic on site.			
			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.			
			j. Clearly marked signage was observed during site inspection (see Plate 13)			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			k. There are no pedestrian paths on site.			
<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>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</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(iii) provisions for requiring a dedicated traffic controller to stop exiting trucks to allow an entering truck to manoeuvre into the site unhindered.	<p>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 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.</p>			
DA88	B56	<p>The Applicant must:</p> <p>(a) not commence operation until the OTMP required by Condition B55 is approved by the Planning Secretary;</p> <p>And</p> <p>(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.</p>	<p>Auditors sighted DPE's approval letter referring to the OEMP Stage 1 containing the OTMP dated 24 August 2022.</p> <p>Upon site inspection auditors agreed the OTMP is being satisfactorily implemented. There have been no traffic related incidents recorded since the commencement of operation.</p>	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:	<p>There were 0 noise complaints during the construction period, in which works were carried out within the specified hours.</p> <p>Redirect has consent for 24/7 operation.</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response																												
<p><i>Table 2: Hours of Demolition and Construction</i></p> <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> <p><i>Table 3: Hours of Operation</i></p> <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	<p>Works outside of the hours identified in Condition B57 may be undertaken in the following circumstances:</p> <p>(a) works that are inaudible at the nearest sensitive receivers;</p> <p>(b) works agreed to in writing by the Planning Secretary;</p> <p>(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</p> <p>(d) where it is required in an emergency to avoid the loss of lives, property and /or prevent environmental harm.</p>	<p>Redirect Recycling Wetherill Park has received zero noise complaints, suggesting no audible work was conducted outside of the hours specified in Condition B57.</p>	Compliant																														
<p><b>Construction Noise Limits</b></p>																																		
DA91	B59	<p>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.</p>	<p>The Resource Recovery &amp; 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.</p>	Compliant																														

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response										
<b>Operational Noise Limits</b>																
DA92	B60	<p>The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 4.</p> <p><b>Table 4: Noise Limits dB(A)</b></p> <table border="1"> <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 LA1(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 LA1(1 minute)	All residential receivers	35	35	35	45	<p>The Resource Recovery &amp; 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.</p>	Compliant		
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA1(1 minute)												
All residential receivers	35	35	35	45												
DA93	B61	<p>The Applicant must:</p> <p>(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;</p> <p>(b) minimise the noise impacts of the development during adverse meteorological conditions;</p> <p>(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</p> <p>(d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</p>	<p>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.</p> <p>b. Meteorological conditions were considered in the development of the Noise and Vibration Impact Assessment (NVIA). The NVIA</p>	Compliant												

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>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.</p> <p>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.</p> <p>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 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.</p>			
<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		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
<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. 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.	Compliant		
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	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			Operational Vibration Testing Report to the DPE 7 September 2022.			
<b>HAZARDS AND RISK</b>						
DA98	B66	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids.</p> <p>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.</p>	<p>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’.</p> <p>Auditors were satisfied upon site inspection that all chemical, fuel and oil storage was in line with the relevant standards.</p>	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 maximum storage volume. The dangerous goods are stored in accordance with relevant Australian Standards and the Environment Protection Manual for Authorised	Compliant		



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			Officers: Bunding and Spill Management. Technical bulletin (EPA, 1997.” 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.			
DA100	B68	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997). 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.	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).”  Auditors were satisfied upon site inspection that storage of dangerous goods was in line with the relevant guidelines and consent conditions.	Compliant		
<b>LITTER AND PEST CONTROL</b>						
<b>Pests, Vermin and Noxious Weed Management</b>						
DA101	B69	The Applicant must: (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.	The Drivers Code of Conduct requires all trucks entering and exiting the premises to have their loads effectively covered at all times. All trucks entering and exiting the site were observed to have covered	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			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:	Auditors sighted the landscape documentation including a landscape Plan and Building Material Schedule dated 15 July 2020, along with the	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>(a) be prepared in consultation with Council;</p> <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>related Installation Certificate dated 2 August 2022. Auditors also sighted the 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</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>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		such as synthetic or aluminium composite panels comply with the relevant requirements of the NCC; and (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.	Auditors also viewed the Occupation Certificate dated 26 September 2022 for construction and operation of the resource recovery facility.			
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	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	reDirect Response
		<p>suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEHL by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEHL. 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.</p>				
<b>SECURITY</b>						
DA111	B79	<p>The Applicant shall:</p> <p>(a) maintain the perimeter fence and security gates on the site; and</p> <p>(b) ensure that the security gates on site are locked whenever the site is unattended.</p>	<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	<p>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:</p> <p>(a) include a schedule for the decommissioning of the Development;</p> <p>(b) detail how the following would be achieved:</p> <p>(i) ensure the site is left in a safe, stable and non-polluting manner;</p> <p>(ii) removal of all waste from the site;</p> <p>(iii) restoration of the site to the existing land use in accordance with State Environmental Planning</p>	<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> </ul>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>Policy No 55 – Remediation of Land; and</p> <p>(iv) ensure public safety is maintained.</p> <p>(c) include procedures for notification of the surrounding landowners;</p> <p>(d) include procedures for safe removal of any machinery and structures;</p> <p>(e) include measures to mitigate any environmental impacts associated with the removal of the development;</p> <p>(f) include details of monitoring that would be undertaken during the decommissioning of the development;</p> <p>and</p> <p>(g) be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.</p>	<ul style="list-style-type: none"> <li>- Ensures public safety is maintained via directions in Section 7.11</li> <li>- Contains procedures for notification of landholders in Section 5.</li> <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>The updated CEMP dated 24 August 2022 was reviewed by auditors during the audit.</p> <p>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>	Compliant		
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Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(f) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and (g) include the management plans required under Condition C2 of this consent.	Roles and responsibilities of employees are addressed in Section 3.1. The relevant management plans are addressed in Section 6 and appendicised.			
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;	a. The OEMP was approved by the DPE 24 August 2022.  b. The OEMP was prepared by the suitably qualified team at Space Urban Pty Ltd.  c. The environmental management framework for the development is described in extensive detail throughout Section 3 of the report.	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>(g) include the details of the groundwater monitoring as required by Condition B36;</p> <p>(h) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</p> <p>(i) describe the procedures that would be implemented to:</p> <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>d. The relevant statutory approvals are outlined in Section 1.1.1, including SSD 7401 MOD1, MOD2 and MOD3.</p> <p>e. The OEMP was designed to detail all operations on site and includes multiple 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</p>			



Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>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 determined to be satisfactory by auditors.</p>			
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	The Conditions Compliance Report was submitted to the DPE 26 April 2022 and	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		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.	is attached to the OEMP as Attachment 10.			
<b>MANAGEMENT PLAN REQUIREMENTS</b>						
DA119	C7	<p>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:</p> <p>(a) detailed baseline data            (b) a description of:            (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);            (ii) any relevant limits or performance measures/criteria; and            (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.            (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;            (d) a program to monitor and report on the:            (i) impacts and environmental performance of the Development; and            (ii) effectiveness of any management measures (see (c) above).            (e) a contingency plan to manage any unpredicted impacts and their consequences;            (f) a program to investigate and implement ways to improve the environmental performance of the Development over time;            (g) a protocol for managing and reporting any:            (i) incidents;            (ii) complaints;            (iii) non-compliances with statutory requirements; and</p>	<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 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</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(iv) exceedances of the impact assessment criteria and/or performance criteria. (h) a protocol for periodic review of the plan.	<p>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 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</p>			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>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 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.</p>			
<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>Condition not triggered. No annual reviews, modifications, incident reports or audits under condition C14 have been completed. All management plans will be</p>	Not triggered		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<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>	<p>reviewed following completion of the current audit under condition C14.</p>			
<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> <p>(ii) requirements of any plan or program required under this consent;</p> <p>(iii) the monitoring results of previous years; and</p> <p>(iv) the relevant predictions in the EIS.</p> <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the Development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p>	<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 completion of environmental performance review has not yet been triggered.</p>	Not triggered		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.				
<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 website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Redirect has committed to an annual environmental performance/management 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.	Compliant		
DA125	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,	This independent environmental audit has been commissioned to satisfy this condition.  a. The audit team were approved as experts by the DPE on 29 June 2023	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
		<p>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> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(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);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.</p> <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>(see approval letter attached to audit report).</p> <p>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.</p> <p>c. This audit checklist and the accompanying report contains all details assessed by the approved auditors regarding environmental performance and compliance.</p> <p>d. Management plans have been thoroughly reviewed by the approved auditors. Details of the reviews are contained in the associated audit report.</p> <p>e. Recommended actions for improvement are contained in the audit report.</p>			
DA126	C14	<p>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.</p>	<p>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.</p>	Compliant		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
<b>ACCESS TO INFORMATION</b>						
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> <li>• Conditions Compliance Report</li> <li>• Pollution Incident Response Management Plan</li> </ul>	Compliant	Ensure summaries of monitoring results are uploaded to the website after monitoring is undertaken.	



Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<ul style="list-style-type: none"> <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>			
			<p>v. The complaints register in the excel spreadsheet titled</p>			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations	reDirect Response
			<p>'Wetherill Park – OEMP Registers'</p> <p>vi. Annual reviews not yet undertaken.</p> <p>vii. This Independent Environmental Audit will be uploaded to the website upon completion.</p> <p>viii. No other matters have been required to be uploaded by the DPE.</p> <p>ix. The information reviewed was up to date at the time of inspection.</p>			

S = Schedule  
 C = Condition