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**FOR A BETTER WORLD**

# Independent Environmental Audit Report 2022

## Visy Paper Mill Albury

February 2023

Project Number: 22-426



## Document verification

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## Table of contents

<b>Document verification .....</b>	<b>1</b>
<b>Table of contents .....</b>	<b>i</b>
<b>1. Audit scope and plan .....</b>	<b>4</b>
<b>2. Independent audit declaration.....</b>	<b>6</b>
<b>3. Report summary .....</b>	<b>7</b>
3.1. Introduction .....	7
3.2. Audit team.....	7
3.3. Objectives .....	7
3.4. Audit scope .....	8
3.5. Audit reporting period .....	8
3.6. Limitations.....	8
<b>4. Audit methodology .....</b>	<b>9</b>
4.1. Audit process .....	9
4.2. Site inspection .....	9
4.3. Consultation.....	10
4.4. Compliance status descriptors used in this report .....	10
4.5. Assessment against the audit protocol .....	10
<b>5. Audit findings.....</b>	<b>11</b>
5.1. Document list .....	11
5.2. Summary of compliance .....	12
5.3. Summary of non-compliance .....	12
5.4. Summary of not-triggered requirements .....	13
5.5. Previous audit non-compliant findings .....	13
5.6. Notices, orders or prosecutions .....	15
5.7. Development Consent approval .....	15
5.7.1. Environmental management.....	15
5.7.2. Specific environmental conditions .....	15
5.7.3. Monitoring .....	16
5.8. Environment Protection Licence .....	16
5.8.1. Administrative conditions .....	16
5.8.2. Specific environmental conditions .....	16
5.8.3. Monitoring and reporting.....	17

5.9. Consultation.....	17
5.10. Complaints.....	18
5.11. Incidents .....	18
5.12. Key strengths.....	18
<b>6. Recommendations.....</b>	<b>19</b>
<b>7. Conclusions .....</b>	<b>20</b>

## Tables

Table 5-1 Non-compliant findings recorded during this reporting period .....	12
Table 5-2 Previous audit (2018) non-compliant findings and current status.....	13

## Appendices

Appendix A Audit protocol.....	A-I
Appendix B DPE auditor approval .....	B-I
Appendix C Agency consultation .....	C-I
Appendix D Site inspection photos .....	D-V

## Acronyms and abbreviations

ACC	Albury City Council
AR	Annual Return
BoM	Australian Bureau of Meteorology
DA	Development Approval
DPE	Department of Planning and Environment (NSW) (formerly DPIE)
EIS	Environmental impact statement
EMR	Environmental Management Report
EMS	Environmental Management System
EPA	Environment Protection Agency (NSW)
EPL	Environment Protection Licence
ha	hectares
IEA	Independent Environmental Audit
km	kilometres
m	metres
NATA	National Association of Testing Authorities
NRAR	Natural Resource Access Regulator
NSA	Norske Skog Albury (now Visy Albury)
NSW	New South Wales
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
SOP	Safe Operating Procedure

# 1. Audit scope and plan

<b>AUDITED ORGANISATION</b>	<b>PROJECT</b>
Visy Albury Pty Ltd	Albury Paper Mill
<b>LOCATION OF AUDIT</b>	<b>DATE OF AUDIT</b>
Visy Albury Pulp and Paper 117 R W Henry Drive, Ettamogah NSW 2640	21 <sup>st</sup> November, 2022
<b>DEPTH OF AUDIT</b>	<b>SCOPE OF AUDIT</b>
Environmental Approval	Compliance with: <ul style="list-style-type: none"> <li>Development Consent Conditions DA-389-8-2003-i as modified</li> <li>EPL 1272</li> <li>Reporting period: 1 April 2020 to 21<sup>st</sup> November 2022</li> </ul>
<b>AUDIT CRITERIA</b>	<b>AUDIT DETAILS</b>
<ul style="list-style-type: none"> <li>Development Consent Conditions DA-389-8-2003-i as modified</li> <li>EPL 1272</li> </ul>	<p>Opening Meeting – 21/11/22, 08:45am</p> <p>Closing Meeting – 21/11/22, 17:00pm</p>
<b>PROJECT REPRESENTATIVES PRESENT</b>	<b>AUDIT TEAM</b>
Troy Watkins, Visy Site Supervisor and Environment Manager	<p>Mike Sutherland, NGH – Auditor</p> <p>Whitney Heiniger, NGH – Auditor</p> <p>Natascha Arens, NGH – Lead Auditor as approved by the NSW EPA (not present during site inspection)</p>
<b>AUDIT REPORT</b>	
A final Audit Report is provided to Visy at the completion of the audit process.	
<b>PREVIOUS AUDIT DATE</b>	<b>PREVIOUS AUDIT REFERENCE</b>
20 <sup>th</sup> – 21 <sup>st</sup> November 2018	Norske Skog Independent Audit Report 2018 Final (NGH, June 2022)

**AUDIT SUMMARY**

The audit involved an audit of compliance with the following:

- Development Consent Conditions DA-389-8-2003-i as modified
- EPL 1272

The audit included a site inspection, interviews and a desktop review of records and plans. The focus was on the current Project phase requirements. The audit considered and commented on conditions of approval and EPL requirements.

The audit found broad compliance was being achieved. Of the approval, consent and EPL requirements assessed it was found that:

- 7 were not compliant
- 82 were not triggered
- 139 were compliant.

Visy finalised the purchase of the Ettamogah paper mill from Norske Skog in April 2020. Since this sale, no paper has been produced on site and a skeleton crew of Visy staff are currently employed to maintain equipment, facilities and approvals, anticipating a re-opening of the mill within the next decade. As described in Section 3.5, the reporting period for this audit covers the period since Visy's acquisition of the site in order to clearly distinguish between periods of activity and inactivity and between the site's previous and current owners.

During the reporting period, some activities have been carried out on site that are generally in accordance with the Environmental Impact Statement (EIS) for the site but are not directly related to paper production. Visy Logistics are carrying out minor truck body maintenance works (replacement of tarps and fittings) in the existing maintenance bay, Global Factory Maintenance are manufacturing metal parts and fittings in the existing workshop and Visy Tumut is storing excess paper product in the existing storage facilities. Activities observed during the site inspection appeared generally compliant with environmental approvals and appeared to be carried out in a neat and competent manner.

A large portion of the recorded non-compliant findings are ongoing from the 2018 IEA due to the extended shutdown of the site. Management plans from NSA operations have remained largely untouched since the handover to Visy and will be updated prior to production recommencing on site. Other non-compliant findings include the exclusion of a required soil sampling location and the provision of a public complaints telephone number for the site.

Activities observed during the site inspection appeared generally compliant with environmental approvals and appeared to be carried out in a neat and competent manner.

## 2. Independent audit declaration

Project Name	Visy Paper Mill Albury
Consent No.	DA 389-8-2003-i as modified
Description of Project	Paper production
Project Address	117 R W Henry Drive, Ettamogah NSW 2640
Proponent	Visy Albury Pty Ltd
Operator Address	Level 11, 2 Southbank Boulevard, Southbank VIC 3006
Title of Audit	Independent Environmental Audit
Date	November 2022
<p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> <li>the audit has been undertaken in accordance with relevant condition(s) of consent and the <i>Independent Audit Post Approval Requirements (Department 2020)</i>;</li> <li>the findings of the audit are reported truthfully, accurately and completely;</li> <li>I have exercised due diligence and professional judgement in conducting the audit;</li> <li>I have acted professionally, objectively and in an unbiased manner;</li> <li>I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;</li> <li>I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;</li> <li>neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and</li> <li>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</li> </ul> <p>Notes:</p> <p>a) Under section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</p> <p>b) The <i>Crimes Act 1900</i> contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)</p>	
Name of Auditor	Natascha Arens
Signature	23/02/2023
Qualification	BAppSc, MEBM, Exemplar Global Lead Auditor
Email Address	natascha.a@nghconsulting.com.au
Company	NGH Pty Ltd
Company Address	Level 1, 31-33 Beaumont St, Hamilton NSW 2303



## 3. Report summary

### 3.1. Introduction

NGH Pty Ltd (NGH) were engaged by Visy Albury Pty Ltd (Visy) to carry out the Independent Environmental Audit for 2020 – 2022. The triennial audit is required in accordance with Schedule 4, Condition 6 of the modified project approval DA-389-8-2003-i (the approval) for their Ettamogah paper mill.

Visy finalised the purchase of the Ettamogah paper mill from Norske Skog in April 2020. Since this sale, no paper has been produced on site and a skeleton crew of Visy staff are currently employed to maintain equipment, facilities and approvals, anticipating a re-opening of the mill within the next decade. As described in Section 3.5, the reporting period for this audit covers the period since Visy's acquisition of the site in order to clearly distinguish between periods of activity and inactivity and between the site's previous and current owners.

During the reporting period, some activities have been carried out on site that are generally in accordance with the Environmental Impact Statement (EIS) for the site but are not directly related to paper production. Visy Logistics are carrying out minor truck body maintenance works (replacement of tarps and fittings) in the existing maintenance bay, Global Factory Maintenance are manufacturing metal parts and fittings in the existing workshop and Visy Tumut is storing excess paper product in the existing storage facilities. Activities observed during the site inspection appeared generally compliant with environmental approvals and appeared to be carried out in a neat and competent manner.

As no paper production has occurred during the reporting period, no solid or liquid waste for disposal as effluent has been produced, applied at the effluent reuse areas or discharged to the Murray River. Stormwater from the greater site footprint is still passing through the onsite 'effluent' infrastructure and as such terminology in this report referring to 'effluent' refers to stormwater, unless otherwise stated.

### 3.2. Audit team

A team of environmental auditing professionals from NGH was approved for the audit by the Department of Planning and Environment (Appendix B). Natascha Arens was approved as Lead Auditor. Natascha has around 30 years' experience as an environmental professional and auditor and oversaw the audit process.

The site audit was completed by Michial Sutherland and Whitney Heiniger. Michial has around 35 years' experience as an environmental professional and 25 years of auditing experience. Whitney Heiniger supported Michial during the audit. Whitney has over 4 years of experience as an environmental professional, including internal and external auditing, and has completed training as a Lead Auditor in Environmental Management Systems ISO 14001:2015 and ISO 19011:2018.

### 3.3. Objectives

The objectives of the audit were to conduct an independent review of compliance with the Conditions of Approval for modified project approval DA-389-8-2003-i issued by the Minister for Planning, and in accordance with the requirements of the *Independent Audit Post Approval Requirements*, May 2020 (DPE 2020).

### 3.4. Audit scope

Statutory compliance of the Visy Albury site was assessed with reference to the requirements of the conditions outlined in DA-389-8-2003-i as modified.

Monitoring and environmental performance, along with compliance with reporting requirements, were evaluated against:

- Environment Protection Licence (EPL) 1272
- Observations made during audit activities on site.

The audit was conducted in accordance with the new DPE guidelines, *Independent Audit Post Approval Requirements May 2020*.

### 3.5. Audit reporting period

The reporting period for the triennial audit is 1<sup>st</sup> April 2020 – 21<sup>st</sup> November 2022 inclusive. As specified in correspondence between Visy Albury and DPE provided in Appendix C.1, a shortened reporting period for this audit has been approved by DPE, ensuring the audit only addresses the period since Visy acquired the site from Norske Skog.

### 3.6. Limitations

The outcomes of this audit are based on the assessment that has been undertaken in accordance with the contracted scope of work and is subject to the applicable cost, time and other constraints. The assessment included a review of documentation, interviews with personnel and observations made during the site inspection.

The outcomes presented in this audit report are based on the assessment undertaken and relied on supplied information. NGH does not accept responsibility for any inaccurate information or omissions in the supplied information.

This report does not constitute legal advice in relation to environmental liabilities.

## 4. Audit methodology

### 4.1. Audit process

Document review occurred prior to the day of the site audit and was then largely completed during the onsite audit. The document review included a review of the Conditions of Approval, all management plans and sub plans, monitoring reports, correspondence with internal departments and external authorities, and available desktop information showing evidence of performance.

The Audit program was submitted to the Auditee on 15<sup>th</sup> November 2022 indicating the dates of the site audit, scope, criteria, audit details and required project representatives.

An Opening Meeting was held on 21<sup>st</sup> November 2022 at 8:45am on site at the main administration building. Present at the opening meeting were:

- Troy Watkins, Visy – Site Supervisor and Environment Manager
- Michial Sutherland, NGH – Auditor
- Whitney Heiniger, NGH – Auditor.

A closing meeting was held on 21<sup>st</sup> November 2022 at 17:00pm at the main administration building. The above project staff were present at the closing meeting.

### 4.2. Site inspection

A site inspection with Troy Watkins was conducted following the audit opening meeting, including the following areas:

- Wastewater treatment and storage area
- Testing laboratory
- Stormwater system, including ponds
- H<sub>2</sub>SO<sub>4</sub>, NaOH, N<sub>2</sub>, H<sub>2</sub>O<sub>2</sub>, Hydros (NaSH) and kerosene tank farm
- Hazardous chemical storage areas
- Chip storage area
- Wood mill
- Log storage shed
- Visy Logistics workshop and truck parking bays
- Global Factory Maintenance workshop
- Recycled fibre warehouse
- Product storage shed
- Paper machines
- Wastewater reuse area adjacent the Hume Highway.

It is noted that no areas used for paper production were operational at the time of the site inspection however were inspected to corroborate a lack of operations and to ensure general environmental compliance.

### 4.3. Consultation

Email consultation was undertaken with the following agencies prior to the audit:

- **NSW DPE** – consultation undertaken requesting approval of the Auditor. Approval received 5<sup>th</sup> October 2022 (Appendix B).
- **NSW DPE** – consultation request made via email 4<sup>th</sup> November 2022. No input was received from DPE.
- **NSW EPA** – consultation request made via email 4<sup>th</sup> November 2022. EPA requested 28<sup>th</sup> November 2022 (Appendix C.4):  
*“...that the audit of Visy Albury address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises.”*
- **NSW Department of Natural Resources Access Regulator (NRAR)** – consultation request made via email 4<sup>th</sup> November 2022. No input was received from NRAR.
- **Albury City Council (ACC)** – consultation request made via email 4<sup>th</sup> November 2022. No input was received from ACC.

### 4.4. Compliance status descriptors used in this report

The compliance descriptors used in this report are:

- **Compliant** Requirement has been met
- **Non-Compliant** Requirement has not been met
- **Not Triggered** Requirement not triggered.

### 4.5. Assessment against the audit protocol

Following the site inspection T. Watkins, M. Sutherland and W. Heiniger occupied an office in the Visy administration area. The audit protocol provided in Appendix A was used as a tool to systematically examine and record the compliance status of consent and approval conditions during the previous 2.5 years. An opinion was formed on the available evidence in relation to the requirements and the compliance status. The compliance status was described as not triggered, not compliant or compliant. The evidence sighted, a description of the assessment and the compliance status were recorded electronically in the compliance protocol (Appendix A). A summary of non-compliance and requirements that were not triggered has been prepared (Section 5). Copies of emails, correspondence, reports, management plans and other evidence, where cited, were taken as evidence and for further cross referencing during the audit report preparation.

## 5. Audit findings

### 5.1. Document list

Documents were requested during the audit and were provided by Visy. Management Plans and Records were viewed electronically and in hard copy format. Records (photographs, notes, digital files) were made of the documents examined. Notes were made about the documents against and regarding the CoA and licence requirements. Documents viewed included:

- Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021
- Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022
- Norske Skog Paper Mill Albury – Independent Environmental Audit Report 2018 (NGH, November 2018)
- NSW EPA Annual Return Licence 1272 – 1/7/2020 – 30/6/2021
- NSW EPA Annual Return Licence 1272 – 1/7/2021 – 30/6/2022
- Notice of Variation of Licence No. 1272 (NSW EPA, 30 August 2022)
- Visy Environment Policy April 2022
- Letter from DPE – Albury Pulp Mill (DA389-8-2003-i) Independent Environment Audit Team Approval Request October 2022 (5 October 2022)
- Norske Skog Albury Mill – Water Management Plan (June 2010)
- Soil properties under tree plantations, crops and pastures irrigated with paper mill effluent at Albury in 2019 (Timberlands Research Pty Ltd, January 2020)
- Soil properties under tree plantations, crops and pastures irrigated with paper mill effluent at Albury in 2020 (Timberlands Research Pty Ltd, June 2021)
- Letter Advice - Soil monitoring in the tree plantations, crops and pastures irrigated with treated effluent from the Visy Albury Paper Mill (McMahon Earth Science, 16 December 2021)
- Letter Advice - Soil monitoring in the tree plantations, crops and pastures irrigated with treated effluent from the Visy Albury Paper Mill (McMahon Earth Science, 30 September 2022)
- Cleanaway Invoices – May 2020, June 2020, August 2020, September 2020
- Visy/Norske Skog Procedure - Steps to Crawl the Paper Machine (Jan 2020)
- Certificate of Analysis – Waterview Laboratory 22/11/2022
- ISO 45001:2018 OH&S Management System Audit - Visy Albury (BL management Consultants, 1/11/2022)
- V03-1002 Visy Environmental Aspects Register
- V03-4005 Visy Waste Management Plan
- V04-3002 Visy Complaints Management Procedure
- V04-3004 Visy Environmental Reporting Procedure
- V04-7002 Visy SOP Cooling Water Contamination Response Procedure
- V04-7003 Visy SOP Stormwater Contamination Response Procedure
- V04-7013 Visy SOP Oil Spill Response Procedure

- V04-7014 Visy SOP Oil Absorbent Material Disposal
- Email correspondence – Post Approval Document Received (DA389-8-2003-i-Mod-1-PA-2), DPE to Troy Watkins 19/08/2022
- Email correspondence – Norske Skog Albury Mill Triannual Environmental Compliance Report – Troy Watkins (29/03/2019) and Michael Machin (15/04/2019) to DPE
- Email correspondence – Visy Albury Mill Annual Environmental Compliance Report – Troy Watkins to DPE 27/08/2021
- Truck Weights Report (Sawmill Chip), Period 14 November 2022 – 20 November 2022 – Bergin’s Logging Pty Ltd
- Audit-01334: Health & Safety – Workplace Health and Safety – Safety Inspection, Process Audit (internal Visy Audit Report) – 21 November 2022
- Internal MS Excel Spreadsheet – Maryvale Flow Trends January 2020 – October 2022
- Gatehouse Audit Sheets – Visy Albury Security
- Chemalert Report – Sodium Hypochlorite Solution
- Chemalert Report – Oxamine 8100
- Fire and Alarm Service Records – Riverina Fire Solutions, September 2022 (ongoing)
- Fire Hydrant Maintenance Report – Stevnor Services, December 2019
- Visy Toolbox Talk – MTT-19 Waste and Recycling
- Visy Toolbox Talk – MTT-16 Housekeeping
- Visy Albury Site Specific Induction
- Visy Spill Kit Inspection Checklist.

## 5.2. Summary of compliance

Between the site Development Consent, EPL and consultation requirements, a total of 228 individual clauses or requirements were examined as part of the audit. Of those approval and consent clauses it was found that:

- 7 were non-compliant
- 82 were not triggered
- 139 were compliant.

## 5.3. Summary of non-compliance

Table 5-1 Non-compliant findings recorded during this reporting period

ID	Section of Report	CoA/EPL ID	Details
22/1	Section 5.7.1	Schedule 3, Condition 8(d)	The Water Management Plan requires updating to remove salinity offset scheme references. As the WMP has not been updated during the reporting period/extended shutdown, this condition remains non-compliant to be amended when plans are revised and re-submitted for approval.
22/2	Section 5.7.1	Schedule 3,	As the WMP has not been updated during the reporting

ID	Section of Report	CoA/EPL ID	Details
		Condition 8(f)(i)	period/extended shutdown, this condition remains non-compliant to be amended when plans are revised and re-submitted for approval. No clear plan to increase water use efficiency is currently documented in the WMP.
22/3	Section 5.7.1	Schedule 4, Condition 1(c)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. The EMS legislation register requires updating to remove superseded legislation and include new legislation.
22/4	Section 5.7.1	Schedule 4, Condition 1(e)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. E04-3002 Complaints Management Procedure and E05-2001 Non-conformance, Corrective and Preventative Actions Procedure do not mention cumulative impacts.
22/5	Section 5.8.2	EPL M2.3 (c)	No evidence of soil testing at the 'Davey Road area' supplied in soil testing reports.
22/6	Section 5.8.2	EPL M5.1	No site-specific contact details are available on the Visy website for the Albury site. Signage at site did not indicate a phone number to contact in the event of a complaint.
22/7	Section 5.8.2	EPL M5.2	As per EPL M5.1.

## 5.4. Summary of not-triggered requirements

A significant number of individual clauses were found to be 'not triggered' during the audit process due to the site's extended shutdown. These requirements can be found in Appendix A.

## 5.5. Previous audit non-compliant findings

Table 5-2 Previous audit (2018) non-compliant findings and current status

ID	Details	Comment	2022 Status
18/1	Several EPL limits were exceeded. These were the subject of additional changes through load-based licensing.	No EPL limits exceeded during the reporting period.	Closed
18/2	Norske Skog Albury (NSA) no longer participate in the Billabong Creek/Murray River Salt Interception Scheme.	No longer relevant due to cessation of paper production on site.	Closed
18/3	NSA have chosen to discontinue the Salinity offset scheme at the time of the Audit. No evidence was cited regarding consultation with the Director General DP&E.	No longer relevant due to cessation of paper production on site.	Closed
18/4	While efficient use of water in the plant was cited, no	No longer relevant due to	Closed



ID	Details	Comment	2022 Status
	clear plan to increase water use efficiency is documented within the WMP at the time of the audit.	cessation of paper production on site.	
18/5	At the time of the audit it could not be demonstrated that the PIRMP is referenced in the current WMP or the Emergency Response procedure.	No PIRMP currently exists for the site.	Open
18/6	Legislation in the Environmental Management Strategy needs to be updated to include recent legislative changes.	The EMS has not been updated since the 2018 audit.	Open
18/7	Cumulative impacts are not addressed in the Environmental Management Strategy.	The EMS has not been updated since the 2018 audit.	Open
18/8	Several exceedances and non-compliance have been identified and recorded in this audit reporting period.	No exceedances recorded during the reporting period.	Closed
18/9	Assessable pollutants discharged from the premises during the reporting period have exceed the load limit specified. Coarse particulates while decreasing continue to be an issue.	No exceedances recorded during the reporting period.	Closed
18/10	Oil and grease levels marginally exceeded for coiling water returns to the Murray River on several occasions in 2016/17 and 2017/18 periods.	No longer relevant due to cessation of paper production on site. No water discharged to the Murray River during the reporting period.	Closed
18/11	Three exceedances of 10,000 KL limit for discharge of water to the Murray River for 2016/17 and 2017/18: 10,377 KL in July 2017, and 10,300 and 10,200 KL in September 2017.	No exceedances recorded during the reporting period.	Closed
18/12	Soil aggregate stability test not completed or not reported in the 2017 Soil Properties Report. This was the case for the irrigation and control areas.	Aggregate stability testing carried out in 2019 and reported in 2020.	Closed
18/13	The complainant details are mostly recorded. Actions taken are recorded. Follow up with the complainant is not recorded.	No complaints received during the reporting period.	Closed
18/14	Any follow up with the complainant is unclear - it is unknown if they are satisfied with the course of action taken by Norske Skog.	No complaints received during the reporting period.	Closed
18/15	An exceedance on 28 November 2016 was not reported with 7 days of the event, it was reported to the EPA on 9 December 2016.	No exceedances recorded during the reporting period.	Closed



## 5.6. Notices, orders or prosecutions

No notices, orders or prosecutions were received by Visy Albury during the reporting period.

## 5.7. Development Consent approval

### 5.7.1. Environmental management

#### OEMP

The existing NSA Environmental Management System (EMS) comprises a series of interrelated word documents and excel tables. Each chapter of a typical OEMP is contained in a separate document. The various chapters within the NSA EMS reflect the requirements of a typical OEMP. As discussed with T Watkins during the audit process, Visy is progressively updating some NSA documentation into Visy format however a major overhaul of the EMS will only be conducted when paper production is confirmed for recommencement. Currently, the EMS broadly covers activities occurring on site however the scope of the individual management plans is much greater than current activities. Visy plans and Safe Operating Procedures (SOP) addressing current activities on site includes:

- V03-1002 Environmental Aspects Register
- V03-4005 Waste Management Plan
- V04-3002 Complaints Management Procedure
- V04-3004 Environmental Reporting Procedure
- V04-7002 SOP Cooling Water Contamination Response Procedure
- V04-7003 SOP Stormwater Contamination Response Procedure
- V04-7013 SOP Oil Spill Response Procedure
- V04-7014 SOP Oil Absorbent Material Disposal

**Non-compliant findings 22/1 – 22/4** relate to ongoing non-compliant aspects in the site EMS documentation that have not been addressed as part of the extended shutdown. It is anticipated that these conditions will remain non-compliant until such time that the EMS is updated for the recommencement of paper production.

### 5.7.2. Specific environmental conditions

#### Water

No water was discharged to the Murray River during the reporting period. Higher than average rainfall levels were recorded during the reporting period however irrigation of stormwater was carried out as required with no adverse impact to soil chemistry, structure or hydraulic loading in the utilisation area.

#### Air quality

No air quality monitoring has been carried out during the reporting period as no activities or equipment impacting upon air quality have operated.

## Waste

No significant waste amounts or streams have been produced on site during the reporting period. A Waste Management Plan (V03-4005) created by Visy for the site stipulates waste segregation measures to be implemented and destinations for waste currently being produced on site.

### 5.7.3. Monitoring

The Visy Environmental Management Reports (EMR) for the reporting period detail the environmental monitoring carried out on site under both the DA and EPL approvals. Water monitoring and soil monitoring have been carried out as required however air quality and noise monitoring were not required during the reporting period.

All laboratories used to analyse samples and report data are National Association of Testing Authorities (NATA) accredited and all test methods used are also NATA accredited.

## 5.8. Environment Protection Licence

### 5.8.1. Administrative conditions

As reported in the EMRs, no paper or chemical goods were produced during the reporting period. A variation to the EPL was received in August 2022, with limits of 0 – 10,000 tonnes (t) of dangerous goods and 0 – 30,000 t of paper or pulp production currently permitted by the EPL.

All activities have been carried out within the approved footprint and a hardcopy of the EPL was available on site at the time of the site inspection. No limit exceedances were recorded during the reporting period.

### 5.8.2. Specific environmental conditions

#### Hazard management

The minimal materials handled on site are stored, processed, moved and transported appropriately.

It is noted that no Pollution Incident Response Management Plan (PIRMP) exists for the site. A recommendation regarding this is presented in Section 6.

#### Air quality

No complaints were received during the reporting period in relation to air quality or odour and no air quality monitoring has been carried out due to the ongoing shutdown of the boiler.

#### Soil and water

No effluent was discharged to the Murray River during the reporting period. 'Effluent', comprised primarily of stormwater from the mill footprint, is being applied to the effluent reuse area, with reporting indicating that the volume of irrigation is managed to have a sustainable hydraulic load. Reports also indicate that the soil chemistry is changing but is still within acceptable limits. No discharge from the storage dams have been required. Soil and groundwater sampling has been

carried out as required with the exception of soil test plots at the Davey Road area, which is raised as **non-compliant finding 22/5**.

## Waste

As per Waste Management in Section 5.7.2.

## Noise

No noise complaints were received during the reporting period and no noise monitoring is currently required by the EPL. At the time of the inspection the site was largely silent except for occasional heavy vehicle movements and the sound of transformers humming in the background. The Hume Highway was clearly audible.

## Plant, traffic and transport

At the time of the audit plant and equipment was observed to be in accordance with relevant standards. Vehicles were not making excessive noise or smoke while under load. Vehicle movement areas were not producing visible particulate levels that could cross the property boundary. No noise or odour observed during the site inspection as no paper production is currently occurring.

Traffic movement on the site is controlled and recorded through the gatehouse and delivery areas. All vehicle movement is planned, signed and strictly regulated.

## Community and consultation

No complaints were received during the reporting period. During the audit, no site-specific contact details were sighted through which community complaints could be made. This is identified in **non-compliant findings 22/6 and 22/7**.

### 5.8.3. Monitoring and reporting

All monitoring records sighted during the audit were legible and often retained in both hardcopy and softcopy format. The EMR and Annual Returns (AR) detail all monitoring carried out on site.

No notification of environmental incidents to the EPA were made during the reporting period as none occurred.

## 5.9. Consultation

NGH consulted with the EPA regarding the 2022 IEA. The EPA requested that:

*“the audit of Visy Albury address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises.”*

During the audit process it was confirmed that Visy have surrendered any previous orders and exemptions held by Norske Skog due to the absence of paper production on site. No waste associated with paper production has been produced during the reporting period.

## **5.10. Complaints**

No complaints have been received during the reporting period.

## **5.11. Incidents**

No environmental incidents occurred during the reporting period.

## **5.12. Key strengths**

The auditor notes the following key strengths regarding environmental performance as observed during the audit:

- The environmental controls on site, particularly the stormwater and sediment management system, are in good condition and well maintained
- Housekeeping and site cleanliness is of a very high standard
- Site staff are knowledgeable of statutory and best practice requirements in managing environmental compliance during the ongoing site shutdown
- Environmental records are thorough and organised
- Environmental management requirements are well communicated between site staff and communication between relevant agencies and site staff is evident.

## 6. Recommendations

The IEA identified seven non-compliant findings during the reporting period. A large portion of these non-compliant findings are ongoing from the 2018 IEA due to the extended shutdown of the site. Management plans from NSA operations have remained largely untouched since the handover to Visy and will be updated prior to production recommencing on site.

With respect to the non-compliant findings listed above and individual clauses presented in Appendix A, consideration should be given to the following:

- Current activities on site should continue to be monitored for compliance against the site environmental approval original EIS, ensuring that any activities carried out were assessed as part of anticipated paper production in the EIS.
- Ensure all environmental management plans are updated as per recommendations from the 2018 IEA and approved by the Planning Secretary prior to recommencement of paper production on site.
- Ensure soil testing is being carried out at all locations specified in the EPL or apply to have conditions changed if locations are not currently relevant.
- Make clearly available to the public via the Visy website a complaints line telephone number for the Albury site.
- A Pollution Incident Response Management Plan (PIRMP) is required for all EPL holders in NSW. A PIRMP should be produced as soon as practicable, particularly considering that this requirement has been declared as compliant on previous EPL Annual Returns.
- Visy may consider creating a scaled-back, interim Operational Environmental Management Plan to only cover activities occurring during the extended shutdown, with approval from DPE and the EPA.

## 7. Conclusions

In general, Visy are broadly compliant with the site Approval and EPL. A small number of non-compliant findings exist. Of the approval and EPL requirements it was found that:

- 7 were not compliant
- 82 were not triggered
- 139 were compliant.

It is the auditors' understanding that the majority of reported non-compliant findings are ongoing since the 2018 IEA and relate directly to management plans remaining un-updated until paper production recommences on site. The remaining non-compliant findings should be able to be rectified with relative ease as soon as practicable.

# Appendix A Audit protocol

Reference	Approval or licence requirement	Evidence collected Nov 2018	Evidence collected Nov 2022	Comments	Finding	Proposed Action
<b>Development Consent DA-389-8-2003-i as Modified</b>						
<b>Schedule 2 - Administrative Conditions</b>						
1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the development.			Noted	Not triggered	
2	The development shall be carried out generally in accordance with: a) Development Application N.687 and supporting Environmental Impact Statement prepared by Gutteridge, Haskins and Davey Pty Ltd dated March 1990. b) Development Application DA 147-92 and 41-92 and supporting Environmental Impact Inquiry dated 31 July, 21 August and 11 September 1992, prepared by Gutteridge Haskins and Davey Pty Ltd; c) Development Application DA389-8-2003-i and supporting Statement of Environmental Effects titled Norske Skog Albury Mill Paper Machine (PM1) Rebuild Statement of Environmental Effects, dated August 2003 and additional information dated 3, 27 and 30 October 2003; d) DA389-8-2003-i MOD 1 and supporting Statement of Environmental Effects titled "Norske Skog Albury Paper Mill, Revised Treated Process Water Management Strategies", dated October 2008; e) DA 389-8-2003-i MOD and supporting Statement of Environmental Effects titled "Norske Skog Albury Mill Statement of Environmental Effects Section 4.55 1(A) Minor Modifications Application, dated August 2019; and f) The conditions of this consent. In the event of an inconsistency between any document listed in 2a) to 2e) inclusive, the most recent document shall prevail to the extent of the inconsistency, and in the event of an inconsistency between the conditions of this consent and any document listed in 2a) to 2e) inclusive, the conditions of this consent shall prevail to the extent of the inconsistency.		Site observations Interview T Watkins	Activities on site are generally being carried out in accordance with the site approvals and the EIS. No paper production is currently occurring however activities consistent with those involved in paper production are occurring, with Visy Logistics carrying out minor truck maintenance works (replacement of tarps and fittings), Global Factory Maintenance manufacturing metal parts and fittings in the existing workshop and Visy Tumut storing excess paper product in the existing storage facilities. Activities observed during the site inspection appeared generally compliant with environmental approvals and appeared to be carried out in a neat and competent manner.	Compliant	Continue to ensure any additional activities carried out on site during the extended shutdown are consistent with activities approved in the site EIS.
3	The Applicant shall comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and			No requests made during the reporting period.	Not triggered	
	b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.			No requests made during the reporting period.	Not triggered	
4	The Applicant shall not produce at the site more than 300,000 tonnes per annum (tpa) of paper and 185,000 tpa of recovered paper.		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No paper has been produced during the reporting period.	Compliant	
5	With the approval of the Planning Secretary, the Applicant may submit any management plan or monitoring program required by this approval on a progressive basis.	N/A	Interview T Watkins	No plans have been submitted during the reporting period.	Not triggered	
6	The Applicant shall ensure that any new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA. Notes: - 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.	Certificate of compliance, Deacon Engineers, 8/9/16 Final Occupation certificate, ACC 19 Oct 2016	Site observations Interview T Watkins	No new buildings or structures were constructed during the reporting period.	Not triggered	
	The Proponent shall ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition; and	Planned Maintenance Schedules were cited for a historic planned shut downs including Paper Machine shut down April 18, Hog Hammer Mill May 2016, Thermo Mechanical Pulper Aug 2017 and Boiler shutdown Dec 2015.	Visy Procedure - Steps to Crawl the Paper Machine (Jan 2020) Site observations	Minimal plant and equipment is being used on site due to no paper production occurring. The site paper machines are crawled approximately every 2 months to ensure equipment viability in the event of the plant re-opening.	Compliant	



7	b) operated in a proper and efficient manner, in accordance with relevant standards.	Site observations HATCH (May 2016) to complete Background Noise Monitoring in 2015 Maintenance shutdown schedules for planned and emergency shutdowns, Oct 18 and Dec 18 Respectively. GreenCap March 2015, Occupational Hygiene Assessment - Personal Noise Dosimetry and Static Noise Measurement, Norske Skog, Albury	Site observations	At the time of the audit plant and equipment was observed to be in accordance with relevant standards. Vehicles were not making excessive noise or smoke while under load. Vehicle movement areas were not producing visible particulate levels that could cross the property boundary. No noise or odour observed during the site inspection as no paper production is currently occurring.	Compliant	
<b>Schedule 3 - Specific Environmental Conditions</b>						
<b>Soil and Water</b>						
1	Except as may be expressly provided in an environmental Protection Licence for the development, the Applicant shall comply with Section 120 of the Protection of the Environment Operations Act 1997.	NSAEMR 17-18 Ch 6 and EPL Annual Return 17-18	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	Operations are occurring in accordance with the POEO Act and no exceedances have occurred during the reporting period.	Compliant	
2	The Applicant may only discharge treated wastewater to the Murray River provided the wastewater is diluted at a ratio of greater than or equal to 600:1 (600 parts river water to 1 part wastewater) at the point of discharge in the Murray River and meets the following: a) wastewater is discharged in accordance with the timing requirements set out in the EPL, or as otherwise agreed in writing with the EPA; or	NSAEMR 2016, 2017, 2018	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No wastewater was discharged to the Murray River during the reporting period.	Not triggered	
	b) it offsets the salinity impact of the discharge on the Murray River by reducing the overall salt load in the Murray River at a ratio of at least 2:1 (2 parts salt load removed to 1 part discharged) in which case, a maximum of 2738 ML of treated wastewater may be discharged in a calendar year.  Note: This condition provides for flexibility in the timing of disposal of treated wastewater as per the EPL and enables the Applicant to participated in any Green Offsets Scheme that may re-establish.	Pers Com NSAEMR 17-18	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No wastewater was discharged to the Murray River during the reporting period.	Not triggered	
2A	Not withstanding condition 2), if the river discharge criterion cannot be met, the winter storage dam water level must be allowed to reach the spillway level, and treated wastewater must be sent directly to the Murray River in accordance with the requirements set out in the EPL.  Note: the release of such treated wastewater is to be managed with the objective of preventing or minimising the flow of water from the dam to Nine Mile Creek.		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No wastewater was discharged to the Murray River during the reporting period.	Not triggered	
3	The Applicant may supply effluent to third parties for reuse, provided the third party has the necessary approvals to receive and use the effluent.	Pers Com NSAEMR 17-18	Interview T Watkins Site observations	No effluent from paper production produced. No approvals currently exist for third parties to use the effluent and no third parties are currently using the Effluent. (Pers Com HSE). Stormwater generated from site is treated and used on the irrigation area.	Compliant	
4	The Applicant shall ensure that all effluent not discharged to the Murray River, or supplied to third parties, is irrigated to the irrigation area, in general accordance with the Statement of Environmental Effects titled Norske Skog Albury Paper Mill, Revised treated Process Water Management Strategies dated October 2008 and the Statement of Environmental Effects titled Norske Skog Albury Mill Paper Machine (PM1) Rebuild Statement of Environmental Effects, dated August 2003 and additional information dated 3, 27 and 30 October 2003.	NSAEMR 17-18 WMP	Interview T Watkins Site observations	Significant volumes of stormwater are not being generated on site. Effluent not discharged to the River. All water is held in the Winter Storage Dam before being irrigated.	Compliant	

5	The Applicant shall implement suitable erosion and sediment controls on site in accordance with the requirements in the Department of Housing and Landcom's Managing Urban Stormwater: Soils and Construction.	Site Observations at the time of the audit WMP and Appendix 6 - E03-4004 Stormwater Management Plan.	Site observations	At the time of the audit it was observed that the site was a mature site and open areas that were not wooded were largely grassed or paved. Mulched bunds, earth berms and other structures were used to breakup catchments and reduce stormwater flow paths. Water from the sealed log yard passed through chip bunds before entering the stormwater detention ponds. Water in the ponds did not exhibit suspended solids.	Compliant	
6	The Applicant shall manage stormwater run-off impacts of the development to the satisfaction of the Planning Secretary, and ensure that the Stormwater Management Scheme on site is generally consistent with the requirements in the latest version of Managing Urban Stormwater: Council Handbook (EPA).	Site Observations at the time of the audit WMP and Appendix 6 - E03-4004 Stormwater Management Plan.	Site observations	All water from site is directed to a series of stormwater and effluent ponds. Those ponds are tested and discharged as required by the Stormwater Management Plan sighted at the time of the audit. Most water from the site is discharged to the winter storage pond east of the Hume Highway for use as irrigation.	Compliant	
7	The Applicant shall ensure that all chemicals, fuels and oils are stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. All new bund(s) shall be designed and installed in accordance with the: a) requirements of all relevant Australian Standards; and	Site Observations at the time of the audit WMP and Appendix 6 - E03-4004 Stormwater Management Plan.	Site observations	At the time of the audit, observations were made of chemical, fuel and oil storage areas associated with the water and wastewater treatment plant, the paper machine area, the boiler and the recycled fibre area. Chemical, fuel and oil storage areas were bunded and in most cases covered to prevent stormwater ingress. Staining of surfaces outside of the bunds was not generally observed. No bunds were seen to be overtopping.	Compliant	
	b) EPA's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	WMP and Appendix 6 - E03-4004 Stormwater Management Plan.	Site observations Water Management Plan (WMP) (Norske Skog Albury 2010)	As above	Compliant	
	The Applicant must prepare and implement a Water Management Plan for the development, to the satisfaction of the Planning Secretary. The Plan must: a) be prepared by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary;	letters of review from Hillman (Dec 2009) and Thurley (Nov 2009) cited during audit.	Independent Environmental Audit Report 2018 (NGH November 2018)	The Water Management Plan has been prepared by NSA and reviewed by independent experts Hillman (Dec 2009) and Thurley (Nov 2009), letters of review sighted. Previous audits have acknowledged the DG's conditional approval of the plan. The newsprint mill is not currently operating. Small volumes of water generated by the site, 5.5ML/wk, half of which is stormwater, are irrigated east of the Hume Highway (Maryvale).	Compliant	
	b) be prepared in consultation with the EPA and DPIE - Water;	NSAEMR for each of the past three years. EPL Annual EPL returns.	Independent Environmental Audit Report 2018 (NGH November 2018)	Previous audit findings indicate that the plan was developed in consultation with EPA and DPIE - Water in 2009. This occurred well before the reporting period of this audit. The Plans Objectives and Performance Outcomes, Key Environmental Issues and Key Performance Criteria are discussed in the NSAEMR for each of the past three years. This report is provided to the EPA with Annual EPL returns.	Compliant	
	c) be submitted to the Planning Secretary for approval by the end of 2009, and approved before effluent is discharged to the Murray River;	Previous Audit Finding.	Independent Environmental Audit Report 2018 (NGH November 2018)	Previous audits have acknowledged the DG's conditional approval of the plan. This occurred well before the reporting period of this audit.	Compliant	
	d) be revised and approved by the Planning Secretary prior to changing the offset scheme;	Pers Com Troy Watkins. NSAEMR 16-17 and 17-18.	As above	As the WMP has not been updated during the reporting period/extended shutdown, this condition remains non-compliant to be amended when plans are revised and re-submitted for approval.	Non-compliant	Update the WMP to remove salinity offset scheme and submit plan to DG for approval.
	e) include a detailed water balance for the development;	WMP Chapter 5.4	As above	As per previous audits, the current WMP includes a detailed water balance in Chapter 5.4, Table 2 and Table 3 page 31.	Compliant	

8	f) describe the development's water management system in detail, including: (i) the measures that would be implemented to improve water efficiency on site, and reduce the use of potable water;	WMP	As above	As the WMP has not been updated during the reporting period/extended shutdown, this condition remains non-compliant to be amended when plans are revised and re-submitted for approval. The WMP lists several investigations into use of groundwater, desalination, municipal waste water use, all with a view to minimise potable water use. However, these investigations have discounted the options for a number of reasons. As such while efficient use of water in the plant is acknowledged no clear plan to increase water use efficiency is documented within the plan at the time of the audit.	Non-compliant	Investigate, document and plan for water use efficiency in the WMP.
	(ii) the stormwater management system on site;	WMP Chapter 5.8	As above	Stormwater management is appropriately described in chapter 5.8 and Appendix 6 of the WMP June 2010.	Compliant	
	(iii) the treatment and discharge of effluent to the Murray River;	WMP Chapter 5.5 and 6	As above	The treatment and discharge effluent to the Murray River is detailed in Chapter 5.5 and chapter 6. Sufficient detail is provided to describe the stages of the process and predicted impacts.	Compliant	
	(iv) the supply of effluent to third parties (if any);	WMP Chapter 5.6 and App 5 and 5.1	As above	The WMP June 2010 has sufficient detail in Chapter 5.6 and Appendices 5 and 5.1 to manage the supply of waste water to third parties.	Compliant	
	(v) the irrigation of effluent to the irrigation area and management of soil and groundwater in this area; and	WMP Chapter 5.5.3 and App 9	As above	The irrigation of effluent and management of soil/groundwater in this area is dealt with in the WMP June 2010 Chapter 5.5.3 and Appendix 9. Sufficient detail and procedures are available to manage and monitor the effluent irrigation.	Compliant	
	(vi) the scheme to offset the salinity impacts associated with discharging effluent to the Murray River;	WMP Chapter 6, 7 and 7.3.4, and App 9 & 11	As above	The salinity offset scheme is adequately detailed in the WMP June 2010 in Chapter 6, 7 and 7.3.4, and in Appendix 9 & 11.	Compliant	
	g) include a description of: (i) the relevant statutory requirements;	WMP Chapter 4	As above	The WMP June 2010 describes statutory requirements in Chapter 4. The description is focussed on the consent, Water Management Act 2000, Water Sharing Plan, Regional Environmental Plan Murray REP 2 and the EPL 1272. The text is general and reflects some of the impacts and requirements from the statutory matters. Additional detail could be provided but may not affect a greater level of environmental protection.	Compliant	
	(ii) the measures that would be used to judge the performance of the water management system, and trigger the implementation of any contingency plans;	WMP Chapter 7 and App 9	As above	Chapter 7 and appendix 9 of the WMP detail measures for monitoring and evaluating the water management system. The trigger levels for action are established in Chapter 5 and the EPL.	Compliant	
	h) include a comprehensive program to monitor and report: (i) the water efficiency of the development;	WMP Chapter 5 and 7	As above	The WMP June 2010 in Chapter 5 and 7 describes water use, monitoring and reporting. It is also noted that additional monitoring has been added to the effluent irrigation scheme to better monitor irrigation flows. However there is no clear target to reduce water use by a % or nominated volume or a means to monitor same.	Compliant	
	(ii) the effectiveness of the stormwater management system;	WMP Chapter 5 and 7, and App 6, 9 and 11	As above	The WMP June 2010 describes how the stormwater management system is monitored, sampled and tested in Chapter five, chapter 7 and Appendix 6, 9 and 11.	Compliant	
(iii) the volume of effluent discharged to the Murray River and/or supplied to third parties;	WMP Chapter 5.5 and 7, and App 8, 9 and 11	As above	The treatment and discharge effluent to the Murray River is detailed in Chapter 5.5 and chapter 7 and appendix 8,9 and 11. A number of other work procedures also support this information.	Compliant		

	(iv) the quality of the effluent discharged to the Murray River, and the effects of these discharges on the water quality of the Murray River downstream of the discharge point;	WMP chapter 7, App 9 and EMP 46	As above	The WMP chapter 7, Appendix 9 and Environmental Monitoring Plan(EMP) 46 details the monitoring and evaluation of the impacts of the effluent on the Murray River. EMP46 has resulted in a Report titled <i>A comparison of the 2008 and 2014 NSA monitoring of effluent discharge to the Murray River</i> Albury June 2015, this report details the methodology for assessing the impact on the Murray River.	Compliant	
	(v) the effects of the effluent discharges on the ecology of the Murray River, including ecotoxicological testing, chemical scanning for organic species, sediment sampling and analysis of organic compounds;	WMP chapter 7, App 9 and EMP 46	As above	As above	Compliant	
	(vi) the effects of the irrigation scheme on the irrigation areas (including areas not currently in use); and	WMP Chapter 5.5.3	As above	Chapter 5.5.3 of the WMP describes the monitoring of soils and groundwater. It also describes a range of trigger values for soils and groundwater to ensure sustainability. This chapter also indicates that effluent application rates were less than envisaged.	Compliant	
	(vii) the effectiveness of the scheme to offset the salinity impacts associated with discharging effluent to the Murray River, including the EC levels at Morgan;	WMP Chapter 5.5.4 and 5.7	As above	Chapter 5.5.4 and 5.7 of the WMP describes the offset of impacts from discharges to the Murray. Environmental Monitoring Plan(EMP) 46 details the monitoring and evaluation of the impacts of the effluent on the Murray River. EMP46 has resulted in a Report titled <i>A comparison of the 2008 and 2014 NSA monitoring of effluent discharge to the Murray River</i> Albury June 2015, this report details the methodology for assessing the impact on the Murray River.	Compliant	
	i) identify the contingency measures that would be implemented should the impacts of the development approach or exceed the relevant standards or performance measures referred to in g) above;	WMP Chapter 8 and App 6, App 7, App 14 and App 16	As above	The contingency measure that would be implemented are described in the WMP Chapter 8, Stormwater contamination responses are described in App 7, App 14 describes the Cooling Water Contamination Response, App 16 describes the incident response procedure.	Compliant	
	j) include a program to investigate and implement ways to improve the environmental performance of the development over time;	WMP Chapter 9 and App 15.	As above	Continuous environmental improvement is dealt with through the management cycle and described the WMP chapter 9. The process relies on setting targets and objectives App 15, maintaining an enviro goals register and establishing clear processes. In addition Ch 5.3.3 commits the mill to investigating and implementing leading edge technologies.	Compliant	
	k) include a protocol for managing and reporting incidents and complaints; and	WMP chapter 10 and app 16 and 17. Emergency Response Manual E04 7014.	As above	Incident reporting and complaint management are described in WMP chapter 10 and app 16 and 17.	Compliant	
	l) include a protocol for periodic review of the plan.	WMP in Chapter 11 and App 15 and 18.	As above	Periodic review and document control is detailed in the WMP in Chapter 11 and App 15 and 18.	Compliant	
<b>Air</b>						
9	Except as may be expressly provided in an EPL for the development, the Applicant shall ensure that the development complies with Section 129 of the Protection of the Environment Operations Act, 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997 provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	NSER 2018	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Site observations Annual Return 2020 - 2021 Annual Return 2021 - 2022	No complaints were received during the reporting period.	Compliant	

10	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the development.	Site observations NSER 2018 Complaints table.	Site observations	During the audit it was observed that: Heavy vehicles were moving around site without producing dust. Access roads to the site and most internal traffic movement areas were sealed. Carparks and heavy vehicle movement areas are sealed. Areas not sealed are landscaped and or have native vegetation. No complaints have been received regarding dust over the reporting period. Sealed roads are swept periodically.	Compliant	
<b>Waste</b>						
11	The Applicant shall ensure that all waste generated on the site is classified in accordance with the EPA's Waste Classification Guidelines: Part 1 Classifying Waste and disposed of to a facility that may lawfully accept the waste.	E03-4005 Waste Management Plan. NSER 2018	Site observations Cleanaway invoices Visy Albury – Waste Management Plan (April 2020)	The Waste Management Plan requires that waste generated on site is classified in accordance with EPAW's Waste Classification Guidelines: Part 1 Classifying Waste. Cleanaway invoices indicate minor amounts of segregated office waste, carboard and steel are taken from site. Segregated waste receptacles observed on site.	Compliant	
12	The Applicant shall update their existing Solid Waste Management Plan for the site in consultation with EPA and to the satisfaction of the Planning Secretary. This plan must: a) be submitted to the Planning Secretary for approval within 12 months of the approval of DA 389-8-2003-i MOD 1;	Previous Audits	Independent Environmental Audit Report 2018 (NGH November 2018) Visy Albury – Waste Management Plan (April 2020)	As the original NS plan would have been submitted and approved over 15 years ago and has not been cited as a non compliance with the previous audits, the auditor assumes that this is compliant. With the mill currently in a mothballed state minimal waste is being produced, and most is managed by Cleanaway or irrigated. A new Visy Waste MP has been implemented for scaled-back site operations.	Compliant	
	b) characterise all waste imported, exported and re-used on site according to the current waste classification guidelines, and include procedures for classifying each of the waste materials;	E03-4005 Waste Management Plan. NSER 2018	Site observations Cleanaway invoices Visy Albury – Waste Management Plan (April 2020) Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	The mothballed mill is currently producing minor amounts of waste. For Past mill operations: The Waste Management Plan requires that waste generated on site is classified in accordance with EPAW's Waste Classification Guidelines: Part 1 Classifying Waste. The EMRs provide a description and summary of waste produced and reused on site.	Compliant	
	c) include details of the quantities and destinations of all waste materials;	E03-4005 Waste Management Plan. NSER 2018, 2017	As above	Section 8 of the 2020 and 2021 EMRs describes the quantity and destination of minimal waste being produced on site.	Compliant	
	d) describe the measures in place to minimise and manage waste, including the current bio-solid land application;	E03-4005 Waste Management Plan section 1.3.6 and 2 E05-4013-01 Biosolid spreading audit checklist	Independent Environmental Audit Report 2018 (NGH November 2018) Visy Albury – Waste Management Plan (April 2020)	The previous Norske Skog Waste MP section 1.3.6 and 2 details the minimisation of waste and the reuse of biosolids. The Biosolid spreading audit checklist provides a means the regulate the application of biosolids to land. No biosolid waste has been produced during the reporting period and is not included in the updated Visy plan.	Compliant	
	e) describe the options available to further reduce and reuse waste;	E03-4005 Waste Management Plan section 1.3 and 2.2	Visy Albury – Waste Management Plan (April 2020) Site observations	The Visy Waste Management Plan looks at the opportunities to further reduce and reuse waste. Minimal waste is being produced on site during the extended shutdown.	Compliant	

	f) confirm that all waste materials are sent to sites that can lawfully accept the waste; and	ACC Landfill EPL 6017 AP Delaney EPL 10069	Cleanaway invoices Visy Albury – Waste Management Plan (April 2020) Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July	Minimal waste is being produced during the extended shutdown, general waste is taken to Albury City Council landfill.	Compliant	
	g) describe the bio-solid land application monitoring program, detail the results of this monitoring and prepare a monitoring and reporting program.	E04-3004 Environmental Reporting Procedure. E03-4005 Waste Management Plan section 1.3.6 and 2	Visy Albury – Waste Management Plan (April 2020)	Section 1.3.6 of the Visy Waste Management Plan describes Biosolid disposal however no biosolids have been produced during the reporting period.	Compliant	
<b>Noise</b>						
13	The Applicant shall ensure that the noise from the operation of the development does not exceed the noise limits in accordance with the EPA's Industrial Noise Policy or its successor.	NSER 2018, 2017, 2016 E05-1003-06 Internal Noise Monitoring Form. E05-3001 Environmental Records Register GreenCap March 2015, Personal Noise Dosimetry and Static Noise Measurement, NS, Albury	Site observations Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July	Noise monitoring is not occurring for the site. At the time of the audit the site was largely silent except for occasional HV movements and the sound of transformers humming in the background. The Hume Highway was clearly audible.	Compliant	
<b>Transport</b>						
14	The Applicant shall ensure that all parking generated by the development is accommodated on site. No staff vehicles associated with the development shall park or queue on the public road system at any stage.	Observations on Site Google Images	Site observations Aerial imagery (MetroMap 2022)	Ample parking was available on site at the time of the audit. Aerial imagery shows ample parking available at the time of the images.	Compliant	
<b>Visual</b>						
15	The Applicant shall ensure that all new lighting associated with the development: a) complies with the latest version of Australian Standard AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and	Observations on site	Site observations	Internal road lighting was observed to be standard street lighting with globes and deflectors commonly seen in residential areas. Lighting fixed to the exterior of buildings was standard fluorescent or halogen units with appropriate shielding and weather proofing common to industrial facilities. buildings	Compliant	
	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.	Observations on site	Site observations	Access road lighting was overhead and directed /focused on the road and shielded from upward and lateral spill. Facility lighting was had directional screens and diffusers for fluorescent and halogen fittings.	Compliant	
16	All landscaping work is to be carried out to the satisfaction of Council and effectively maintained at all times to Council's satisfaction.	Observations on site	Site observations	Landscaping works have been established for several years with most tree planting being well matured. The 3 ha of native plantings adjacent to Eight Mile creek were about 9m high and mature.	Compliant	
17	No approval is given for any advertising structures and Council's separate approval is to be obtained for any proposed advertising signs.	Observations on site	Site observations	No advertising signage was observed on the access road RW Henery Drive to the site. Directional signage was evident prior to the site but was not badged with advertising.	Compliant	
<b>Energy Efficiency</b>						
18	The Applicant shall ensure the development is energy efficient, in accordance with industry best practice, to the satisfaction of the Planning Secretary.	Previous audit report NSEMR 2017 and 2018	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Previously noted as compliant during operations. Paper mill is currently not operating and in caretaker mode, secondary activities not powered unless in use or for maintenance.	Compliant	
	The Applicant shall prepare and implement an Energy Efficiency Program for the development, to the satisfaction of the Planning Secretary. The program must: a) be submitted to the Planning Secretary for approval by July 2010;	Previous audit report	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Noted as compliant in previous audits.	Compliant	
	b) compare the proposed energy usage ratio of the development to other existing paper mills, and set benchmarks for industry best practice;	Previous audit report	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Noted as compliant in previous audits. Paper mill currently not operating and in caretaker mode.	Compliant	

19	c) investigate energy efficiency measures available, such as solar panels and cogeneration;	Previous audit report	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Noted as compliant in previous audits. Steam generator installed in 2016 producing 3-4 MW.	Compliant	
	d) describe the measures that would be implemented onsite, demonstrating the use of best available technology;	Previous audit report	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Noted as compliant in previous audits. Papermill not operating and in caretaker mode.	Compliant	
	e) include a program to monitor and report on the efficiency of the development, ensuring the development would continue to operate at industry best practice over time. Note: Should the Applicant be required, by any government policy or law, to prepare a document covering any of the requirements of this Energy Efficiency Program, the Proponent may submit that document for whichever part of the program it relates to.	NSEMR 2017 and 2018	Independent Environmental Audit Report 2018 (NGH November 2018) Site observations	Noted as compliant in previous audits. Papermill currently not operating and in caretaker mode.	Compliant	

**Schedule 4 - Environmental Management, Monitoring, Auditing and Reporting**

**Environmental Management Strategy**

1	The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) be approved by the Planning Secretary before effluent is discharged to the Murray River;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. This condition is considered compliant as per previous audits however this system will need to be thoroughly updated prior to the commencement of operations on site.	Compliant	
	b) provide the strategic context for environmental management of the development;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above	Compliant	
	c) identify the statutory requirements that apply to the development;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. E03-2002 Legislative & Other Requirements Register provides a comprehensive list of the relevant legislation. However, it needs review to remove withdrawn legislation (e.g. Noxious Weeds Act) and include new legislation such as the NSW Biosecurity Act 2015. This remains non-compliant.	Non-compliant	Review and update legislation register
	d) describe in general how the environmental performance of the development would be monitored and managed;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. This condition is considered compliant as per previous audits however this system will need to be thoroughly updated prior to the commencement of operations on site.	Compliant	
	e) describe the procedures that would be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above	Compliant	
	- receive, handle, respond to, and record complaints;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above	Compliant	
	- resolve any disputes that may arise during the course of the development;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above	Compliant	
	- respond to any non-compliance;	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above	Compliant	
- manage cumulative impacts; and	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. E04-3002 Complaints Management Procedure and E05-2001 Nonconformance, Corrective and Preventative Actions Procedure do not mention cumulative impacts. This remains non compliant.	Non-compliant	Include references to cumulative impacts in the Coms procedure.	

	- respond to emergencies; and	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	No changes have been made to the site's environmental management system since the previous audit due to the site's ongoing shutdown. This condition is considered compliant as per previous audits however this system will need to be thoroughly updated prior to the recommencement of operations on site.	Compliant	
	f) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development.	Previous audit report Environmental Management documentation E01 to E05	Independent Environmental Audit Report 2018 (NGH November 2018)	As above.	Compliant	
<b>Environmental Reporting</b>						
2	As soon as practicable, and with the 24 hours following detection of an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant shall notify the Department and other relevant agencies of the exceedance/incident.	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No exceedances recorded during the reporting period.	Compliant	
3	Within 6 days of notifying the Department and other relevant agencies of an exceedance/incident, the Applicant shall provide the Department and these agencies with a written report that: a) describe the date, time, and nature of the exceedance/incident; b) identify the cause (or likely cause) of the exceedance/incident; c) describe what action has been taken to date; and d) describe the proposed measures to address the exceedance/incident.	No Incidents have been reported in the reporting period	As above	As above	Not triggered	
		As Above	As above	As above	Not triggered	
		As Above	As above	As above	Not triggered	
		As Above	As above	As above	Not triggered	
4	Within 12 months of the commencement of effluent discharge to the Murray River, and annually thereafter, the Applicant shall submit an Annual Environmental Management Report to the Planning Secretary. This report must: a) identify the standards and performance measures that apply to the development;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Email - Submission of Visy Albury Mill Annual Environmental Compliance Report 27 August 2021	Standards and performance measures are identified in the EMRs and evidence of submission to DPE sighted.	Compliant	
	b) include a summary of the complaints received during the year, and compare this to the complaints received in the previous years;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	EMR Section 2 provides a complaint summary.	Compliant	
	c) include a summary of the monitoring results for the development during the past year;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Section 3 provides a summary of the monitoring results.	Compliant	
	d) include an analysis of these monitoring results against the relevant: - impact assessment criteria/limits specified in this consent and the EPL;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR provides an analysis of criteria and limits in various section of the report.	Compliant	
	- monitoring results from previous years; and	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Sections 4 and 5 provide a results history and trends.	Compliant	
	- predictions in the SEE supporting DA 389-8-2003-I MOD 1;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Section 5 provides a description of compliance with predictions in the SEE .	Compliant	
	e) identify any trends in the monitoring results over the life of the development;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Sections 4 and 5 provide a results history and trends.	Compliant	
	f) identify any non-compliance during the previous year;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Section 6 provides record of non-compliance with the EPL during the year.	Compliant	
	g) describe what actions were, or are being, taken to ensure compliance;	NSER 2018, 2017, 2016 EPL Annual Return 2017, 2018	As above	EMR Section 6 provides record of actions to address non- compliance with the EPL during the year.	Compliant	
	h) must include a copy of: i. the Water Monitoring Report;	NSER 2018, 2017, 2016	As above	EMR Section 7 provides a summary of the Water Monitoring Plan and the Water Monitoring Report.	Compliant	
	ii. The Solid Waste Monitoring Report; and	NSER 2018, 2017, 2016	As above	EMR Section 8 provides the Solid Waste Monitoring Report.	Compliant	
	iii. The Energy Efficiency Monitoring Report.	NSER 2018, 2017, 2016	As above	EMR Section 9 provides the Energy Efficiency Monitoring Report.	Compliant	



Auditing					
5	Within 12 months of the approval of DA 389-8-2003-I MOD 1, or within such further period as the Planning Secretary may agree, the Applicant shall submit to the Planning Secretary, for approval, a report containing the findings and an implementation program for the current external audit of the Safety Management System. The implementation program shall also include any matters outstanding from previous audits. Every three years thereafter, the Applicant shall submit the most recent external Safety Management System Audit report for the approval of the Planning Secretary.	December 2018 BMLC WHS Legislative Compliance Audit (NSW).	ISO 45001:2018 OH&S Management System Audit - Visy Albury (BL management Consultants, 1/11/2022)	2022 Safety Audit documentation sighted.	Compliant
6	Within 2 years of the approval of DA 389-8-2003-I MOD 1, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Planning Secretary;	July 2015 Audit Report. Letter from NS to DP&E 21/1/2016 submitting 2015 Audit. This audit 2018	Independent Environmental Audit Report 2018 (NGH November 2018) Letter from DPE – Albury Pulp Mill (DA389-8-2003-i) Independent Environment Audit Team Approval Request October 2022 (5 October 2022)	Previous auditor approved by DPE and previous audit submitted to DPE. Current auditor approved by DPE.	Compliant
	b) be undertaken in consultation with EPA, DPIE - Water and Council;	July 2015 Audit Report Emails to DPE, ACC, EPA and 19/11/2018	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	The 2018 audit report describes consultation with relevant agencies. NGH requested agency feedback as part of this audit. One response received from EPA and addressed.	Compliant
	c) assess whether the development is being carried out in accordance with industry best practice;	Previous 2015 audit report. NSEMR 2017 and 2018. This Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	The 2018 audit report and this audit assess the development against industry best practice.	Compliant
	d) assess the environmental performance of the development, and assess whether it is complying with the relevant requirements in this consent and any relevant EPL;	Previous 2015 audit report. NSEMR 2017 and 2018. This Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	The previous audit assessed the performance of Visy against the Consent and EPL requirements. This audit has also assessed Visy performance against the Consent and EPL requirements.	Compliant
	e) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;	Previous 2015 audit report. NSEMR 2017 and 2018. This Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	The previous audit assessed the performance of Visy against the Consent and EPL requirements. This audit has also assessed Visy performance against the Consent and EPL requirements.	Compliant
	f) review the adequacy of strategies, plans or programs required under these approvals; and, if necessary,	Previous 2015 audit report. NSEMR 2017 and 2018. This Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	Plans and programs have been previously approved by NSW DPE. Plans and programs were reviewed in part by the previous audit. This audit has also looked at the plans and made comment on adequacy in light of the ongoing site shutdown.	Compliant
	g) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals. Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Planning Secretary.	Previous 2015 audit report. NSEMR 2017 and 2018. This Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) This audit	Plans and programs reviewed in the previous audit were the subject of recommendations for improvement. This audit has also made comment on the plans and made suggestions for improvement where relevant.	Compliant
7	Within 6 weeks of completing this audit, or as otherwise agreed by the Planning Secretary, the Applicant shall submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	July 2015 Audit Report. Letter from NS to DP&E 21/1/2016 submitting 2015 Audit.	Independent Environmental Audit Report 2018 (NGH November 2018) Email - Norske Skog Albury mill Triannual Environmental Compliance Report submission (from NSA to DPE, 15/04/2019)	The email to DPE provided both the report and its findings as well as a detailed action plan within the specified timeframe.	Compliant
8	Within 3 months of submitting an audit report to the Planning Secretary, the Applicant shall review and if necessary revise the strategy/plans/programs required under this approval to the satisfaction of the Planning Secretary.		Independent Environmental Audit Report 2018 (NGH November 2018) Interview T Watkins	This activity occurred outside the agreed reporting period for this audit. NSA plans will be updated to include required content and meet Visy plan requirements prior to the recommencement of production.	Not triggered
9	The Applicant must submit an Audit of the Offset Scheme, to the EPA and the Planning Secretary within 3 months of completion of the 5 year 'proof of concept' period. The Audit must describe any additional mitigation measures that would be implemented should the Offset Scheme not meet the EPA's requirements for a Green Offset Scheme.	Previous 2015 audit report.	Independent Environmental Audit Report 2018 (NGH November 2018)	The previous audit report acknowledges compliance of this condition and, as it relates to timing, this is considered an ongoing compliance.	Compliant

**Environment Protection Licence 1272**

**ADMINISTRATIVE CONDITIONS**

A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2.1. The activities are listed according to their scheduled activity classification, fee based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p>	<p>2017/18 Norske Skog Albury Environmental Management Report - Section 1.1. Soft copy and sighted at time of audit.</p>	<p>Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 MetroMap aerial imagery (3/09/2022) Site observations</p>	<p>All activities are carried out at the specified premises and within prescribed production limits. No chemical or paper has been produced during the reporting period.</p>	Compliant				
							<table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Chemical production</td> <td>Dangerous goods production</td> <td>0 - 10000 T annual production capacity</td> </tr> <tr> <td>Paper or pulp production</td> <td>Paper or pulp production</td> <td>0 - 30000 T annual production capacity</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity
Scheduled Activity	Fee Based Activity	Scale							
Chemical production	Dangerous goods production	0 - 10000 T annual production capacity							
Paper or pulp production	Paper or pulp production	0 - 30000 T annual production capacity							

A2.1	<p>The licence applies to the following premises:</p> <table border="1"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>EFFLUENT REUSE SCHEME</td> </tr> <tr> <td>MARYVALE AND ROSEVALE</td> </tr> <tr> <td>ETTAMOGAH</td> </tr> <tr> <td>NSW 2640</td> </tr> <tr> <td>LOT 2 DP 10665, LOT 7 DP 10665, LOT 8 DP 10665, LOT 6 DP 264463, LOT 15 DP 813569, LOT 2 DP 823347, LOT 100 DP 1000761, LOT 101 DP 1000761, LOT 102 DP 1000761, LOT 103 DP 1000761, LOT 12 DP 1031998, LOT 52 DP 1061520, LOT 22 DP 1191688, LOT 1 DP 1281191</td> </tr> <tr> <td>VISY ALBURY</td> </tr> <tr> <td>117 R W HENRY DRIVE</td> </tr> <tr> <td>ETTAMOGAH</td> </tr> <tr> <td>NSW 2640</td> </tr> <tr> <td>LOT 3 DP 258810, LOT 8 DP 264463, LOT 9 DP 264463, LOT 10 DP 264463, LOT 21 DP 604181, LOT 2 DP 1126922, LOT 1 DP 1157984</td> </tr> </tbody> </table>	Premises Details	EFFLUENT REUSE SCHEME	MARYVALE AND ROSEVALE	ETTAMOGAH	NSW 2640	LOT 2 DP 10665, LOT 7 DP 10665, LOT 8 DP 10665, LOT 6 DP 264463, LOT 15 DP 813569, LOT 2 DP 823347, LOT 100 DP 1000761, LOT 101 DP 1000761, LOT 102 DP 1000761, LOT 103 DP 1000761, LOT 12 DP 1031998, LOT 52 DP 1061520, LOT 22 DP 1191688, LOT 1 DP 1281191	VISY ALBURY	117 R W HENRY DRIVE	ETTAMOGAH	NSW 2640	LOT 3 DP 258810, LOT 8 DP 264463, LOT 9 DP 264463, LOT 10 DP 264463, LOT 21 DP 604181, LOT 2 DP 1126922, LOT 1 DP 1157984	<p>Review of six maps cadastre and google maps images of plant and irrigation areas.</p>	<p>MetroMap aerial imagery (3/09/2022) Site observations</p>	<p>The activities of the operation are restricted to the lots listed.</p>	Compliant	
Premises Details																	
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A2.2	<p>In relation to A2.1 the premises also includes the pipeline from the Norske Skog Mill to the effluent reuse areas.</p>	<p>Review development for the site. Pers com HSE Manager.</p>	Noted	Noted	Not triggered	
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A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p>	<p>EPL Annual Returns for 2017 and 2018. NSEMR 2017 and 2018. Observations on site at the time of the audit.</p>	<p>Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Site observations Interview T Watkins</p>	<p>The activities are generally carried out in accordance with the EPL.</p>	Compliant	
	<p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p>The information form was not cited at the time of the audit.</p>	<p>Site observations Interview T Watkins</p>	<p>Activities have been generally carried out in accordance with the EPL and all available information. The information form was not sighted at the time of the audit.</p>	Compliant	

**DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND**

P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1"> <thead> <tr> <th colspan="4">Air</th> </tr> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>Discharge to air, air emissions monitoring</td> <td>Discharge to air, air emissions monitoring</td> <td>Common stack serving the 2 boilers.</td> </tr> </tbody> </table>	Air				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	11	Discharge to air, air emissions monitoring	Discharge to air, air emissions monitoring	Common stack serving the 2 boilers.	<p>EPL Annual Returns for 2017 and 2018. NSEMR 2017 and 2018.</p>	<p>Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022</p>	<p>No stack monitoring has been carried out during the reporting period as boilers have not operated in this time.</p>	Not triggered	
		Air																
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description															
11	Discharge to air, air emissions monitoring	Discharge to air, air emissions monitoring	Common stack serving the 2 boilers.															

	<p>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>	N/A	As below.	As below.	Compliant	
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P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <i>Water and land</i>			EPL Annual Returns for 2017 and 2018. NSEMR 2017 and 2018.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	Both the EPL annual returns and the EMRs nominate monitoring points 13 - 23 with the location descriptions adjacent. Due to the ongoing extended shutdown, quantities of discharged water have been significantly reduced during the reporting period. No water has been discharged under the Green Offset Scheme or to the Murray River during the reporting period.	Compliant		
	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description					
	1	Discharge to waters, Effluent quality and volume monitoring	Discharge to waters, Effluent quality and volume monitoring	Effluent discharged under the Green Offset Scheme or the "winter release" contingency provision: Pump house beneath sand filters (composite samples) or final outfall flume (grab samples)					
	2	Discharge to waters; Cooling water volume and quality monitoring	Discharge to waters; Cooling water volume and quality monitoring	Cooling Water Discharge: Inlet structure for return water pipeline that discharges to the Murray River					
	3		Discharge to utilisation area	Maryvale Effluent Reuse Area					
	6	Effluent quality monitoring		Maryvale effluent storage dam					
	7	Volume monitoring		Maryvale effluent reuse system; Flow meter downstream of irrigation pump station.					
	9	Groundwater quality monitoring		Maryvale monitoring bore network, and the monitoring bores in the expanded irrigation area.					
	10	Soil monitoring		Maryvale: Various soil monitoring sites in the pine plantation, and the expanded irrigation area; and Centre pivot irrigation area on lot 6 DP264463.					
	12	Discharge to utilisation area; effluent volume monitoring	Discharge to utilisation area; effluent volume monitoring	Various locations along the Return Water Pipeline					
	13	Effluent quality monitoring		4 Day pond outlet					
	14	Groundwater quality monitoring		Deep monitoring Bore D3, Ettamogah Forest					
	15	Groundwater quality monitoring		Deep monitoring Bore D4, Ettamogah Forest					
	16	Groundwater quality monitoring		Deep monitoring Bore D5, Ettamogah Forest					
	17	Groundwater quality monitoring		Deep monitoring Bore D6, Ettamogah Forest					
	18	Groundwater quality monitoring		Shallow monitoring Bore S7, Ettamogah Forest					
	19	Groundwater quality monitoring		Shallow monitoring Bore S8, Ettamogah Forest					
	20	Groundwater quality monitoring		Shallow monitoring Bore S11, Ettamogah Forest					
	21	Groundwater quality monitoring		Shallow monitoring Bore S17, Roosevelt Pasture Irrigation					
	22	Groundwater quality monitoring		Shallow monitoring Bore S20, Davey 1 Pasture Irrigation					
	23	Groundwater quality monitoring		Shallow monitoring Bore S21, Davey 2 Pasture Irrigation					
<b>LIMIT CONDITIONS</b>									
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations act 1997.			EPL Annual Returns for 2017 and 2018. NSEMR 2017 and 2018.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	No pollution incidents have been recorded for the reporting period and activities have been carried out generally in accordance with the POEO Act.	Compliant		
L2.1	For each monitoring/dischage point or utilisation area specified in the table(s) below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.				Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	No concentration limit exceedances have occurred during the reporting period.	Compliant		
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.				Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No effluent was discharged under the Green Offset scheme (Point 1) during the reporting period. No cooling water was discharged to the Murray River (Point 2) during the reporting period.	Not triggered		
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table(s).				Noted	Noted	Not triggered		

L2.4	Water and/or Land Concentration Limits		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No effluent was discharged under the Green Offset scheme (Point 1) during the reporting period. No cooling water was discharged to the Murray River (Point 2) during the reporting period.	Not triggered																																																																																										
	<p><b>POINT 1</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>30GM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Biochemical oxygen demand</td> <td>milligrams per litre</td> <td>14</td> <td>18</td> <td></td> <td>20</td> </tr> <tr> <td>Copper</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>0.05</td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td>2</td> <td></td> <td></td> <td>3</td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td>4</td> <td>7</td> <td></td> <td>15</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 - 8.5</td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td></td> <td>0.3</td> <td></td> <td>0.5</td> </tr> <tr> <td>Total dissolved solids</td> <td>milligrams per litre</td> <td>1650</td> <td></td> <td></td> <td>2000</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>20</td> </tr> <tr> <td>Zinc</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>0.4</td> </tr> </tbody> </table> <p><b>POINT 2</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>30GM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>5</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 - 8.5</td> </tr> <tr> <td>Total dissolved solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>200</td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	30GM concentration limit	100 percentile concentration limit	Biochemical oxygen demand	milligrams per litre	14	18		20	Copper	milligrams per litre				0.05	Nitrogen (ammonia)	milligrams per litre	2			3	Nitrogen (total)	milligrams per litre	4	7		15	Oil and Grease	milligrams per litre				10	pH	pH				6.5 - 8.5	Phosphorus (total)	milligrams per litre		0.3		0.5	Total dissolved solids	milligrams per litre	1650			2000	Total suspended solids	milligrams per litre				20	Zinc	milligrams per litre				0.4	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	30GM concentration limit	100 percentile concentration limit	Oil and Grease	milligrams per litre				5	pH	pH				6.5 - 8.5	Total dissolved solids	milligrams per litre				200				
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L3.1	The licensee must assess, classify and manage any waste generated at the premises in accordance with the Waste Guidelines prior to dispatching the waste off site.	E04-7007 SOP Hazardous Chemical and Industrial Waste Management. WAARP reports to NSW EPA. 2017/18 Environmental Management Report.	Site observations Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	Appropriate waste segregation observed on site. Waste is classified as per the guidelines as indicated in annual environmental reports.	Compliant																																																																																										
<b>OPERATING CONDITIONS</b>																																																																																															
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and	Site observations at the time of the audit. NSEMR 17/18. Complaint logs.	Site observations Interview T Watkins Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	At the time of the audit it was evident that the site was clean and tidy and any remaining chemicals are stored appropriately and in minimal quantities. No complaints were received during the reporting period.	Compliant																																																																																										
	b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site observations at the time of the audit. NSEMR 17/18. Complaint logs.	Site observations Cleanaway invoices	At the time of the audit it was evident that the waste processing areas and equipment were not in use but small amounts of waste are stored appropriately and collected by a licenced transporter for disposal.	Compliant																																																																																										
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and	Planned Maintenance Shut down programs and unplanned maintenance shutdown programs. Observations on site.	Visy Procedure - Steps to Crawl the Paper Machine (Jan 2020) Site observations	Minimal plant and equipment is being used on site due to no paper production occurring. The site paper machines are crawled approximately every 2 months to ensure equipment viability in the event of the plant re-opening.	Compliant																																																																																										
	b) must be operated in a proper and efficient manner.	Observations on site. Maintenance schedules. NSEMR 17/18.	Site observations	At the time of the audit plant and equipment was observed to be in accordance with relevant standards. Vehicles were not making excessive noise or smoke while under load. Vehicle movement areas were not producing visible particulate levels that could cross the property boundary. No noise or odour observed during the site inspection as no paper production is currently occurring.	Compliant																																																																																										

<b>O3.1</b>	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	AS for O2.1	Site observations Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No dust was observed during the site inspection. No complaints (dust or otherwise) have been received during the reporting period.	Compliant	
<b>O4.1</b>	The quantity of effluent applied to the utilisation area(s) must not exceed the capacity of the utilisation area(s) to effectively utilise the effluent. For the purpose of this condition, "effectively utilise" includes the ability of the soil to absorb the nutrient, salt and hydraulic loads and the applied organic material without causing harm to the environment.  Note: For the purpose of this condition "irrigation area" includes areas that are being rested, areas prepared for re-planting, and areas where the irrigation infrastructure is being reconfigured or modified, and the actions are in accordance with a documented effluent application management plan.	Soil Properties under Tree Plantations, Crops and Pastures Irrigated with Paper Mill Effluent at Albury in 2015. Soil Properties under Tree Plantations, Crops and Pastures Irrigated with Paper Mill Effluent at Albury in 2017.	Soil Properties Report - Timberlands Research June 2021 Letter Advice - McMahon Earth Science December 2021 Letter Advice - McMahon Earth Science September 2022	Similarly to previous audits, the reports indicate that the volume of irrigation is managed to have a sustainable hydraulic load. The reports also indicate that the soil chemistry is changing but is still within acceptable limits. 'Effluent' produced during paper production has not been applied to the utilisation areas during the reporting period but stormwater continues to be applied.	Compliant	
<b>O4.2</b>	Adequate notices, warning the public not to drink or otherwise use the treated effluent, must be erected on the site. These notices must be legible English and in any other languages as may be necessary, and must indicate at least that the water is use is "Reclaimed Water - Unfit for Drinking".	Not investigated at the time of the audit	Site observations	Signage observed on multiple onsite taps indicating water from taps is 'NOT DRINKING WATER', accompanied by imagery indicating that water is not to be consumed. Taps are able to be switched between potable water and treated effluent.	Compliant	
<b>O5.1</b>	The obscuration meter installed on the boiler chimney must be set to give an alarm whenever the shade of smoke exceeds 20% capacity.	Not investigated at the time of the audit	Site observations	Boiler has not operated during the reporting period.	Not triggered	
<b>MONITORING AND RECORDING CONDITIONS</b>						
<b>M1.1</b>	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period.	Certificates of Analysis – Waterview Laboratory (various) Interview T Watkins Independent Environmental Audit Report 2018 (NGH November 2018)	Hard copies of monitoring records sighted at time of audit for each monitoring site. Records date before 2013. Results from each hard copy are transferred to a digital record.	Compliant	
<b>M1.2</b>	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted	Hard copies of reports are formatted by the NATA Laboratory and/or Albury Council. All reports are legible, and are easily accessible in softcopy. Data has/can also been exported as raw excel data. Sighted at time of audit.	Compliant	
	b) kept for at least 4 years after the monitoring or event to which they relate took place; and	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted	Copies of records and data extend past the four year retention period. Hard copies dating back further than 2013 were sighted in the office.	Compliant	
	c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted	No requests made during the reporting period. All records available in legible form.	Compliant	
	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken;	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period. Sampling Techniques Manual and Schedule.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted	Dates of which the samples taken are recorded on the monitoring records.	Compliant	

M1.3	b) the time(s) at which the sample was collected;	Sampling Techniques Manual and Schedule. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period showing dates of sampling.	Certificates of Analysis – Waterview Laboratory (various) Independent Environmental Audit Report 2018 (NGH November 2018)	Monitoring schedule, timing and methodology are recorded in the Norske Skog Albury (NSA) Sampling Techniques Manual and Schedule. Sample times were not available on provided record however the implementation of the previous NS manual has been considered compliant in previous audits and has not been superseded by Visy.	Compliant																																		
	c) the point at which the sample was taken; and	Sighted monitoring records at time of audit, MOPS system. Raw recorded data also exported from the online MOPS recording system provided for the 2017/18 monitoring period. Sampling Techniques Manual and Schedule.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted	Monitoring points clearly recorded on monitoring records sighted.	Compliant																																		
	d) the name of the person who collected the sample.	Sampling Techniques Manual and Schedule.	Certificates of Analysis – Waterview Laboratory (various) Hardcopy records of laboratory reports sighted Interview T Watkins	Responsibility of monitoring and sampling is detailed within the NSA Sampling Techniques Manual and as such is considered compliant. Minimal staff on site, responsibility for sampling and organising sampling lies with T Watkins.	Compliant																																		
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency specified opposite in the other columns.		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	Monitoring has been carried out as per points identified in M2.2 and M2.3	Compliant																																		
M2.2	Water and/ or Land Monitoring Requirements POINT 13	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Biochemical oxygen demand</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>Total dissolved solids</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> <tr> <td>Zinc</td> <td>milligrams per litre</td> <td>Monthly</td> <td>Representative sample</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Biochemical oxygen demand	milligrams per litre	Monthly	Representative sample	Nitrogen (total)	milligrams per litre	Monthly	Representative sample	pH	pH	Monthly	Representative sample	Phosphorus (total)	milligrams per litre	Monthly	Representative sample	Total dissolved solids	milligrams per litre	Monthly	Representative sample	Total suspended solids	milligrams per litre	Monthly	Representative sample	Zinc	milligrams per litre	Monthly	Representative sample	Soft copies of the 2016/17 and 2017/18 EPA Annual Returns Report and the 2016/17 and 2017/18 Environmental Management Report. Raw data from the MOPS system. Reports also available on the Norske Skog website.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	The 2020 and 2021 EMRs and EPA Annual Return Reports show compliance with the EPA monitoring requirements for each pollutant at Point 13 during the reporting period.	Compliant	
	Pollutant	Units of measure	Frequency	Sampling Method																																			
Biochemical oxygen demand	milligrams per litre	Monthly	Representative sample																																				
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	POINT 14,15,16,17,18,19,20,21,22,23	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Conductivity</td> <td>microsiemens per centimetre</td> <td>Quarterly</td> <td>Representative sample</td> </tr> <tr> <td>Nitrate</td> <td>milligrams per litre</td> <td>Yearly</td> <td>Representative sample</td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td>Yearly</td> <td>Representative sample</td> </tr> <tr> <td>pH</td> <td>milligrams per litre</td> <td>Quarterly</td> <td>Representative sample</td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td>Yearly</td> <td>Representative sample</td> </tr> <tr> <td>Standing Water Level</td> <td>metres</td> <td>Quarterly</td> <td>No method specified</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Quarterly	Representative sample	Nitrate	milligrams per litre	Yearly	Representative sample	Nitrogen (total)	milligrams per litre	Yearly	Representative sample	pH	milligrams per litre	Quarterly	Representative sample	Phosphorus (total)	milligrams per litre	Yearly	Representative sample	Standing Water Level	metres	Quarterly	No method specified	As above	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Annual Return 2020 - 2021 Annual Return 2021 - 2022	The 2020 and 2021 EMRs and EPA Annual Return Reports show compliance with the EPA monitoring requirements for each pollutant at Points 14 - 23 during the reporting period.	Compliant					
Pollutant	Units of measure	Frequency	Sampling Method																																				
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Standing Water Level	metres	Quarterly	No method specified																																				
	The licensee must undertake the following soil monitoring, analysis and interpretation program: a. Soil Monitoring sample depths: Test depths (cm): 0-10 20-30 50-60 80-90 (Tree lot areas only)	Soil Testing and Monitoring Reports from Norske Skog website. Hard copy of 2017 report provided on day of audit.	Soil Properties Report - Timberlands Research June 2021 Letter Advice - McMahon Earth Science December 2021 Letter Advice - McMahon Earth Science September 2022	Each plot had annual testing carried out at all depths specified by the Licence. This is then compared with annual results for each reporting period to analyse trends.	Compliant																																		

<b>M2.3</b>	b. Test elements: i) Annual chemical tests, all depths - pH (H2O + CaCl2) - EC (1:5) - Extractable sulphate - Exchangeable cations (Ca, Mg, K, Na) - ESP	Soil Testing and Monitoring Reports from Norske Skog website. Hard copy of 2017 report provided on day of audit.	As above	Each plot had chemical parameters tested annually as specified by the Licence. This is then compared with annual results for each reporting period to analyse trends.	Compliant	
	ii) Physical test, once every 5 years, all depths - Emmerson aggregate stability	Soil Testing and Monitoring Reports from Norske Skog website. Hard copy of 2017 report provided on day of audit.	Soil Properties Report - Timberlands Research January 2020	Physical aggregate stability testing was carried out in 2019. This is outside of the agreed reporting period but satisfies this condition regardless.	Compliant	
	c. Test locations - establish and maintain representative soil test plots as follows: - Tree plantation area: 4 irrigated area sample plots		As above	Sampling has been carried out at plots as specified by the Licence.	Compliant	
	- Ettamogah and Maryvale area: 9 irrigated area and 4 control area plots		As above	Sampling has been carried out at plots as specified by the Licence.	Compliant	
	- Rosevale area: 3 irrigated area and 1 control area plots		As above	Sampling has been carried out at plots as specified by the Licence.	Compliant	
- Davey Road area: 3 irrigated area and 1 control area plots		As above	Sampling has not been carried out at the Davey Road area as specified.	Non-compliant	Implement soil testing or alter the condition to remove.	
d. Sustainability assessment: The licensee must prepare and submit to the EPA no later than 60 days after the end of the reporting period an assessment of the sustainability of the effluent reuse area. This assessment must also document the basis of the claimed effluent reuse weighting in accordance with the relevant load calculation protocol.	Electronic copies of the 2016/17 and 2017/18 EPL Annual Returns Report. The 2016/17 and 2017/18 Environmental Management Report. Soil Testing and Monitoring Reports 2017 and 2018.	Email - Visy Albury Mill Annual Environmental Compliance Report (Visy to EPA, 27/09/2021)	The reports are prepared and there is no record of non-compliance in the EPL. Evidence of submission of the EMR to the EPA sighted during the audit.	Compliant		
<b>M3.1</b>	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	E05-1002 Environmental Monitoring and Sampling Manual.	Independent Environmental Audit Report 2018 (NGH November 2018) E05-1002 Environmental Monitoring and Sampling Manual	As the site is still operating under many NSA procedures during this transition period, this condition is considered compliant as per previous documentation.	Compliant	
<b>M4.1</b>	The licensee must keep a legible record or all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No complaints were received during the reporting period.	Not triggered	
<b>M4.2</b>	The record must include details of the following: a) the date and time of the complaint;		As above	No complaints were received during the reporting period.	Not triggered	
	b) the method by which the complaint was made;	Synergie Report 8/5/2018	As above	No complaints were received during the reporting period.	Not triggered	
	c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		As above	No complaints were received during the reporting period.	Not triggered	
	d) the nature of the complaint;		As above	No complaints were received during the reporting period.	Not triggered	
	e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.		As above	No complaints were received during the reporting period.	Not triggered	
<b>M4.3</b>	The record of a complaint must be kept for at least 4 years after the complaint was made.	E04-5001 Document Control Complaints register.	Independent Environmental Audit Report 2018 (NGH November 2018)	Previous audits have sighted records retained for longer than 4 years. No complaints were received during the reporting period.	Compliant	

<b>M4.4</b>	The record must be produced to any authorised officer of the EPA who asks to see them.		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No complaints were received during the reporting period.	Not triggered						
<b>M5.1</b>	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Norske Skog Website	Site observations <a href="https://www.visy.com.au/locate">https://www.visy.com.au/locate</a>	No site-specific contact details are available on the Visy website for the Albury site. Signage on site did not indicate a phone number to contact in the event of a complaint.	Non-compliant	Post a site-specific phone number on the Visy website for use by the public or install appropriate signage.					
<b>M5.2</b>	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Norske Skog Website	Site observations <a href="https://www.visy.com.au/locate">https://www.visy.com.au/locate</a>	As above	Non-compliant	As above					
<b>M5.3</b>	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	Noted	Noted	Noted	Not triggered						
<b>M6.1</b>	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area;	EPL Annual Returns for the last three years. Annual ER	Annual Return 2020 - 2021 Annual Return 2021 - 2022	The 2020-21 and 2021-22 Annual Returns show continuous monitoring of each point for the volume of liquids discharged to water or applied to an area (kilolitres per day). No water discharged to waters or utilisation area (Point 2 and Point 12) during the reporting period.	Compliant						
	b) the mass of solids applied to the area;	IBIS Property List, Created 2006 and last edited November 2018. S-A-FR02 - BIOSOLID DELIVERIES PDF 2017 and 2018.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No solids produced or applied during the reporting period due to the extended shutdown. Applied quantities recorded as 0.	Compliant						
	c) the mass of pollutants emitted to the air;	Electronic copies of the 2016/17 and 2017/18 EPL Annual Returns Report. The 2016/17 and 2017/18 Environmental Management Report.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No air monitoring occurred during the reporting period as the boiler was not operational during this time.	Not triggered						
	at the frequency and using the method and units of measure, specified below.  POINT 2,7,12 <table border="1" data-bbox="142 901 753 954"> <thead> <tr> <th>Frequency</th> <th>Unit of Measure</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Continuous</td> <td>kilolitres per day</td> <td>Flow meter and continuous logger</td> </tr> </tbody> </table>	Frequency	Unit of Measure	Sampling Method	Continuous	kilolitres per day	Flow meter and continuous logger	Electronic copies of the 2016/17 and 2017/18 EPL Annual Returns Report. The 2016/17 and 2017/18 Environmental Management Report. E05-1002 Environmental Monitoring and Sampling Manual. REP 2017-18 MOPS data extraction for EPA Annual Report.	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Flow rates for the discharge points nominated are measured continuously when discharging in units and frequency specified.	Compliant
Frequency	Unit of Measure	Sampling Method									
Continuous	kilolitres per day	Flow meter and continuous logger									
<b>REPORTING CONDITIONS</b>											
	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance,	2016/17 and 2017/18 Annual Returns Report, and details from the EPA Website	Annual Return 2020 - 2021 Annual Return 2021 - 2022	An Annual Returns Report is provided to the EPA each financial/reporting year. The first section of the report (Section A) details a Statement of Compliance and licence details/conditions.	Compliant						
	2. a Monitoring and Complaints Summary,	2016/17 and 2017/18 Annual Returns Report	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Section B of the Annual Returns Report summarises monitoring and complaints for the financial/reporting year.	Compliant						
	3. a Statement of Compliance - Licence Conditions,	2016/17 and 2017/18 Annual Returns Report	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Section C of the Annual Returns Report details licence conditions and compliance details	Compliant						
	4. a Statement of Compliance - Load based Fee,	2016/17 and 2017/18 Annual Returns Report	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Section D of the Annual Returns Report details load based fee calculations	Compliant						



R1.1	5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,	2016/17 and 2017/18 Annual Returns Report	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Section E of the Annual Returns Report details the requirements to prepare a Pollution Incident Response Management Plan	Compliant	The Annual Return includes this section however no PIRMP for the site exists. A PIRMP is required for all holders of an EPL and should be produced as soon as practicable.
	6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and	2016/17 and 2017/18 Annual Returns Report, Norske Skog website and EPA website	Annual Return 2020 - 2021 Annual Return 2021 - 2022 <a href="https://www.visy.com.au/about/sustainability/monitoring-data">https://www.visy.com.au/about/sustainability/monitoring-data</a>	Section F of the Annual Returns Report details the requirements to publish data. Data is published on the Visy website.	Compliant	
	7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	2016/17 and 2017/18 Annual Returns Report and EPA website	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Section G of the Annual Returns Report details a summary of the Environmental Management System and Practices. The Annual Report is written within the EPA form which has been returned to the EPA.	Compliant	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	EPA Website	<a href="https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued">https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued</a>	An Annual Return has been provided to the EPA each reporting year since May 2001.	Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and		EPL 1272 Interview T Watkins	Not assessed during this audit as this relates to Norske Skog as the transferring licensee and occurred outside of the reporting period (transfer came into effect on 20 March 2020).	Not triggered	
	b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.		<a href="https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued">https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued</a>  EPL 1272	Additional annual returns completed during the transfer period by Visy as specified.	Not triggered	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or		Noted	Not applicable	Not triggered	
	b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.		Noted	Not applicable	Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	EPA Website	<a href="https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued">https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1272&amp;id=1272&amp;option=licence&amp;searchchange=licence&amp;range=POEO%20licence&amp;prp=no&amp;status=Issued</a>	All Annual Returns Reports provided to the EPA within 60 days of the end of the reporting period, as shown on the EPA website.	Compliant	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	2014/15 to 2017/18 Annual Returns reports provided by Norske Skog	Annual Return 2020 - 2021 Annual Return 2021 - 2022	Annual Returns for the reporting period provided by Visy during the audit.	Compliant	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or	2014/15 to 2017/18 Annual Returns reports provided by Norske Skog. Screen shot of submission page. LBL Letters from EPA	Annual Return 2020 - 2021 Annual Return 2021 - 2022	The 2020/21 and 2021/22 Annual Return Reports were signed and dated by the licence holder.	Compliant	
	b) by a person approved in writing by the EPA to sign on behalf of the licence holder. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	2014/15 to 2017/18 Annual Returns reports provided by Norske Skog. Screen shot of submission page. LBL Letters from EPA	Annual Return 2020 - 2021 Annual Return 2021 - 2022	As above		Not triggered

R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Emails for each exceedance event from Norske Skog to EPA		No incidents occurred during the reporting period.	Not triggered	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Emails for each exceedance event from Norske Skog to EPA	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	No incidents occurred during the reporting period.	Not triggered	
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or		Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022	An EPA officer has not requested any additional information and no incidents have occurred during the reporting period.	Not triggered	
	b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.		As above	As above	Not triggered	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		As above	As above	Not triggered	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event;		As above	As above	Not triggered	
	b) the type, volume and concentration of every pollutant discharged as a result of the event;		As above	As above	Not triggered	
	c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;		As above	As above	Not triggered	
	d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;		As above	As above	Not triggered	
	e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		As above	As above	Not triggered	
R3.4	f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		As above	As above	Not triggered	
	g) any other relevant matters.		As above	As above	Not triggered	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		As above	As above	Not triggered	
<b>GENERAL CONDITIONS</b>						
G1.1	A copy of this licence must be kept at the premises to which the licence applies.		EPL 1272 - hardcopy (site observations)	A copy was made available during the site inspection.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Current EPL hard Copy.	EPL 1272 - hardcopy (site observations)	Current EPL available in the Administration Building at the time of the audit	Compliant	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.		EPL 1272 - hardcopy (site observations)	A copy was made available during the site inspection.	Compliant	
<b>SPECIAL CONDITIONS</b>						
	The licensee may only discharge treated waste water to the Murray River, other than as permitted under the Green Offset Scheme in accordance with the following conditions: a) Provided the river disposal criterion of 1:600 dilution is met at the point of discharge in the Murray River:	2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water discharged to the Murray River during the reporting period.	Not triggered	
	i. On October 1 of each year, or as otherwise agreed in writing by the EPA, if the water level in the winter storage dam exceeds 213.0m ADH (or 6.3m depth) the treated wastewater from the mill shall be diverted by the return pipeline to the Murray River until the water level in the dam has receded to 212.8m AHD (or 6.1m depth).	2016/17 and 2017/18 Annual Environmental Management Report. Email from NSA to EPA Mon 18/09/2017 4:57 PM cited.	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water required to be discharged to the Murray River during the reporting period.	Not triggered	

E1.1	ii. On 1 March each year, or as otherwise agreed in writing by the EPA, if the water in the winter storage dam exceeds 211.1m AHD (or 4.4m depth) the treated wastewater from the mill shall be diverted by the return pipeline to the Murray River either until 30 April of that year, or until the water level in the dam has receded to 210.7m AHD (or 4.0m depth) whichever occurs first.	2015/16, 2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water required to be discharged to the Murray River during the reporting period.	Not triggered	
	b) If the river disposal criterion cannot be met, the winter storage dam water level must be allowed to reach the spillway level. At that stage, treated wastewater must be sent directly to the Murray River by the return pipeline regardless of whether the river disposal criterion can be met. The release of treated wastewater must be managed with the objective of preventing or minimising flow of water from the dam to Nine Mile Creek.	2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water required to be discharged to the Murray River during the reporting period.	Not triggered	
	c) The licensee must not discharge dissolved salts into the Murray River except in accordance with any licensing conditions imposed by the EPA.	2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water discharged to the Murray River during the reporting period.	Not triggered	
	d) The licensee must not discharge diethylene triamine Penta acetic acid (DTPA) into the Murray River except in accordance with any licensing conditions of the EPA.	2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	No water discharged to the Murray River during the reporting period.	Not triggered	
E2.1	The effluent reuse area shall be expanded if necessary in accordance with the following requirements: a) If the water use of the scheme for any rolling two year period after 1 January 1997 is less than that projected by the model used to generate the EIS estimates of water utilisation, the licensee must put in place measures to rectify this inadequacy in the water utilisation, within one month of the end of that two year period. These measures could involve expanding the irrigation plantation area and/or implementing alternative procedures as outlined in the EIS, such as reduction in water usage in the mill, to the requirements of the EPA.	2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	The effluent irrigation area has not been significantly increased or reduced during the reporting period.	Not triggered	
	b) If after 1 January 1997, the monitoring program establishes that there are soil structural, nutrient or toxicity problems in the irrigated plantations, the licensee shall within one month of notification by NSW Agriculture, expand the irrigated plantation area and/or implement alternative procedures as outlined in the EIS, to the requirements of NSW Agriculture and the EPA.	Soil Properties under Tree Plantations, Crops and Pastures Irrigated with Paper Mill Effluent at Albury, Hopmans 2017	Soil Properties Report - Timberlands Research June 2021 Letter Advice - McMahon Earth Science December 2021 Letter Advice - McMahon Earth Science September 2022	Some changes in salinity, pH, sodicity and sulphate were observed during the reporting period however these changes are not considered major in light of long-term trends. No soil structural, nutrient or toxicity problems reported.	Not triggered	
	c) Should larger irrigated plantation areas be required within Maryvale as a result of Condition a) or b) above, then the larger areas shall be irrigated in accordance with the same principles set out in the EIS (pages 6-25; 6-26; 6-27) prepared by Gutteridge, Haskins & Davey Pty Ltd, dated May 1992.	As above	As above	Not required during the reporting period.	Not triggered	
E3.1	Effluent may be supplied to a third party from the return water pipeline or from the Ettamogah Reuse Scheme for the purpose of effluent reuse subject to the following conditions: a) EPA must be advised in writing a minimum of seven (7) working days prior to the supply of effluent; and b) The third party has demonstrated that they have obtained all necessary approvals.	Effluent has not been supplied to a third party	As above	Effluent has not been supplied to a third party.	Not triggered	
	a) The licensee may establish and operate the Green Offset Scheme as detailed in the statement of Environmental Effects titled "Norske Skog Albury Paper Mill, Revised Treated Process Water Management Strategies (October 2008). b) Through the implementation of a Green Offset Scheme, a maximum of 2738ML of effluent per annum may be discharged to the Murray River.	2015/16, 2016/17 and 2017/18 Annual Environmental Management Report	Visy Albury Environmental Management Report – 1 July 2020 to 30 June 2021 Visy Albury Environmental Management Report – 1 July 2021 to 30 June 2022 Interview T Watkins	The Green Offset scheme was not implemented during the reporting period as no effluent was discharged to the Murray River.	Not triggered	
		As above	As above	As above	Not triggered	

E4.1	c) The Green Offset Scheme must ensure: i. the salinity impacts on the Murray River are offset by reducing the overall salt load at a ratio of 2:1 (2 parts removed to 1 part discharged); and	As above	As above	As above	Not triggered													
	ii. The effluent is diluted at a ratio greater than or equal to 600:1 (600 parts river water to 1 part effluent) at the point of discharge in the Murray River.	As above	As above	As above	Not triggered													
	d) The licensee must implement the following monitoring program to assess the impacts to the receiving environment of discharges under a green offset.  <b>Discharge water monitoring</b>	As above	As above	As above	Not triggered													
	<table border="1"> <thead> <tr> <th>Monitoring requirement</th> <th>Tests</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Ecotoxicological assays</td> <td>48hr acute (immobilisation) test</td> <td rowspan="4">Every six months for 2 years, annually thereafter</td> </tr> <tr> <td>72hr algal growth inhibition (cell yield) test</td> </tr> <tr> <td>96hr fish imbalance test</td> </tr> <tr> <td>7-day chronic (3-brood) reproductive impairment test</td> </tr> <tr> <td rowspan="2">Chemical analysis</td> <td>Microtox test</td> <td rowspan="2">Annually</td> </tr> <tr> <td>Poly chlorinated dibenzo-p-dioxins and poly chlorinated dibenzofurans</td> </tr> </tbody> </table>	Monitoring requirement	Tests	Frequency	Ecotoxicological assays	48hr acute (immobilisation) test	Every six months for 2 years, annually thereafter	72hr algal growth inhibition (cell yield) test	96hr fish imbalance test	7-day chronic (3-brood) reproductive impairment test	Chemical analysis	Microtox test	Annually	Poly chlorinated dibenzo-p-dioxins and poly chlorinated dibenzofurans				
	Monitoring requirement	Tests	Frequency															
	Ecotoxicological assays	48hr acute (immobilisation) test	Every six months for 2 years, annually thereafter															
		72hr algal growth inhibition (cell yield) test																
		96hr fish imbalance test																
		7-day chronic (3-brood) reproductive impairment test																
	Chemical analysis	Microtox test	Annually															
Poly chlorinated dibenzo-p-dioxins and poly chlorinated dibenzofurans																		
Receiving environment monitoring must be conducted for sites at the following locations: i. control (upstream of discharge location) and	As above	As above	As above	Not triggered														
ii. Impact (downstream of discharge location).	As above	As above	As above	Not triggered														
<table border="1"> <thead> <tr> <th>Monitoring requirement</th> <th>Tests</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>In river ecological analysis</td> <td>Identification, bioassessment metrics and multivariate statistical analysis of aquatic macroinvertebrates collected using artificial substrate samplers</td> <td>Every five years</td> </tr> <tr> <td>River sediment chemical analysis</td> <td>Cadmium, copper, iron, manganese zinc, total nitrogen, total phosphorus</td> <td>Every five years</td> </tr> </tbody> </table>	Monitoring requirement	Tests	Frequency	In river ecological analysis	Identification, bioassessment metrics and multivariate statistical analysis of aquatic macroinvertebrates collected using artificial substrate samplers	Every five years	River sediment chemical analysis	Cadmium, copper, iron, manganese zinc, total nitrogen, total phosphorus	Every five years	As above	As above	As above	Not triggered					
Monitoring requirement	Tests	Frequency																
In river ecological analysis	Identification, bioassessment metrics and multivariate statistical analysis of aquatic macroinvertebrates collected using artificial substrate samplers	Every five years																
River sediment chemical analysis	Cadmium, copper, iron, manganese zinc, total nitrogen, total phosphorus	Every five years																
E4.2	The licensee must review the frequency of testing required under Clause (d) (Receiving environment monitoring) if any results of the monitoring program required under Clause (d) (Discharge water monitoring) of this condition indicate the potential for adverse ecological impacts.	As above	As above	As above	Not triggered													
E4.3	The monitoring samples for each monitoring requirement under this condition are to be collected within the specified frequency timeframes, with the timeframes commencing on the date effluent discharge commences under the green offset scheme.	As above	As above	As above	Not triggered													
E4.4	The licensee shall prepare and implement a Green Offset Scheme Validation Program to be submitted to the EPA within 2 years of the commencement of the scheme and every 3 years thereafter. The program must: i. be conducted by a suitably qualified and experienced person;	As above	As above	As above	Not triggered													
	ii. Evaluate the Green Offset Scheme in accordance with the requirements of the Protection of the Environment Operations (General) Regulation 2012 Clause 144;	As above	As above	As above	Not triggered													
	iii. Assess the operation of the Green Offset Scheme;	As above	As above	As above	Not triggered													
	iv. Assess the water quality of the effluent discharged to the Murray River;	As above	As above	As above	Not triggered													
	v. assess the total volume of effluent discharged;	As above	As above	As above	Not triggered													
	vi. Assess the monitoring results under the monitoring scheme referred to in Clause (d) above;	As above	As above	As above	Not triggered													
	vii. Assess the electrical conductivity (EC) achieved at Morgan;	As above	As above	As above	Not triggered													
	viii. Detail the contingencies that will be implemented should complaints of exceedances occur;	As above	As above	As above	Not triggered													
	ix. Demonstrate the ongoing effectiveness of the Green Offset Scheme (including that the offset ratio and the effluent discharge dilution ratio) referred to in Clause c) above are being met.	As above	As above	As above	Not triggered													
E4.5	The applicant must submit an audit of the Green Offset Scheme within three months of completion of the 5 year "proof of concept" period. The audit must describe any additional mitigation measures that will be implemented should the green offset scheme not meet its performance requirements.	As above	As above	As above	Not triggered													
E4.6	The Green Offset Scheme detailed in Clause E4 is deemed to be a Green Offset under the provisions of the load calculation protocol. For the purposes of calculating the assessable load discharged from Point 1 under the provisions of the Green Offset in the Load Calculation Protocol, an offset ratio of 2:1 will apply.	As above	As above	As above	Not triggered													

ES.1	The Licensee must advise the EPA in writing of the intention to recommence production at the premises at least 60 days prior to production recommencing.		Site observations	Production has not recommenced during the reporting period.	Not triggered	
<b>Consultation</b>						
<b>NSW EPA</b>						
1	NSW EPA requests that the audit of Visy Albury address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises.	As above	Interview T Watkins Site observations	Previous recovery orders and exemptions for the site have been surrendered by Visy due to no operations occurring on site. No waste requiring orders or exemptions is currently being generated on site.	Not triggered	

## Appendix B DPE auditor approval

Department of Planning and Environment

Mr Troy Watkins  
Site Supervisor and Environment Manager  
VISY ALBURY PTY LTD  
117 R W HENRY DRIVE  
ETTAMOGAH NSW 2640  
05/10/2022

Dear Mr Watkins

**Albury Pulp Mill - (DA389-8-2003-I-Mod-1)  
Independent Environment Audit Team approval request October 2022**

I refer to your request (DA389-8-2003-i-Mod-1-PA-4) for the Secretary's approval of suitably qualified persons to undertake the Tri-Annual Independent Environment Audit (IEA) and prepare the IEA report for Albury Pulp Mill in accordance with Schedule 4 condition 6 of DA389-8-2003 i.

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced to undertake the Tri-Annual IEA and prepare the Report. Consequently, I can advise that the Secretary approves the appointment of the below team from NGH Pty Ltd;

Natasha Arens – Lead Auditor  
Michial Sutherland – Auditor and  
Whitney Heiniger – Auditor.

Please ensure this correspondence is appended to the Independent Audit Report. This approval is conditional of the team being independent of the development.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements and the condition of approval. Failure to meet these requirements will require revision and resubmission.

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

Should you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

# Appendix C Agency consultation

## C.1 Department of Planning and Environment – Reporting Period

**From:** Troy Watkins <[troy.watkins@visy.com.au](mailto:troy.watkins@visy.com.au)>  
**Sent:** Tuesday, 15 November 2022 2:04 PM  
**To:** Georgia Dragicevic <[Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@planning.nsw.gov.au)>  
**Cc:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>  
**Subject:** Triennial Independent Environmental Audit reporting period

Hello Georgia

I hope you are well and enjoyed your holiday crossing the Nullarbor Plain.

Last week we had a consultant onsite auditing our Safety Management System, as required by DA-389-8-2003-i. She is currently finalising her report and we are working on some actions to address the non-conformances. We will submit a copy of this report and associated response to any recommendations before the end of the year.

The Independent Environmental Audit is scheduled to start Monday 21 November, but we are still having some 'discussions' around the period of time the audit should cover. Some direction from the Department of Planning and Environment is required.

What is relevant environmentally for the current idle conditions of the site is very different from when it was operational. The hazards are significantly reduced due to the limited activity on site.

Also, access to all the evidence to prove compliance when the site was under Norske Skog's operational control is not available.

In summary, to potentially have non-conformances relating to a period of time when the site was operational doesn't make any sense in my opinion. I would suggest the audit covers the period from when Visy gained operational control of the site (1 April 2020) up to 30 September 2022. This will cover the last 2.5 years while the site has been idle.

Your consideration and response to the above comments would be appreciated.

Kind Regards  
Troy Watkins  
VPP Albury Site Supervisor & Environment Manager

M: 0437 871 181  
E: [Troy.Watkins@Visy.com.au](mailto:Troy.Watkins@Visy.com.au)



Our vision is to be the global leader in creating sustainable packaging solutions for a better world

**From:** Georgia Dragicevic <[Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@planning.nsw.gov.au)>  
**Sent:** Friday, 18 November 2022 12:46 PM  
**To:** Troy Watkins <[troy.watkins@visy.com.au](mailto:troy.watkins@visy.com.au)>  
**Cc:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>  
**Subject:** RE: Triennial Independent Environmental Audit reporting period

Hi Troy,


The department has considered your request and advises the audit period covering the last 2.5 years, since Visy acquired the site is acceptable.


Kind Regards,  
Georgia








## C.2 Department of Planning and Environment

22-426 - Albury Paper Mill - Independent Environmental Audit

 Michial Sutherland  
To [Compliance@planning.nsw.gov.au](mailto:Compliance@planning.nsw.gov.au)  
Cc [Matthew O'Donovan](#); [Troy Watkins](#); [Whitney Heiniger](#)  
Bcc [338e018d-7b6a-4eb1-9b96-4f2d863a91cf.metaPublish@thehub.nghenvironmental.com.au](#)

 NGH request for DPIE consultation Visy Albury Audit 2022.pdf .pdf File

  Reply  Reply All  Forward 

Fri 4/11/2022 2:21 PM

Hi Katrina,

Please find attached a consultation request for the Visy Albury Paper Mill - Independent Environmental Audit.

Kind Regards

Mike

**MICHIAL SUTHERLAND**  
BUSINESS DEVELOPMENT MANAGER NQ  
MEIANZ



M. 0427 953 053  
E. [michial.s@nghconsulting.com.au](mailto:michial.s@nghconsulting.com.au)  
Level 4 67-75 Denham Street  
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NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

## C.3 Albury City Council

22-426 - Albury Paper Mill - Independent Environmental Audit

 Michial Sutherland  
To [info@alburycity.nsw.gov.au](mailto:info@alburycity.nsw.gov.au)  
Cc [Matthew O'Donovan](#); [Troy Watkins](#); [Whitney Heiniger](#)  
Bcc [446ba628-48a4-4813-99e1-959170381caa.metaPublish@thehub.nghenvironmental.com.au](#)

 NGH request for ACC consultation Visy Albury Audit 2022.pdf .pdf File

  Reply  Reply All  Forward 

Fri 4/11/2022 2:44 PM

Hi,

Please find attached a consultation request for the Albury Mill Audit.

Regards

Mike

**MICHIAL SUTHERLAND**  
BUSINESS DEVELOPMENT MANAGER NQ  
MEIANZ



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## C.4 NSW Environment Protection Agency

**From:** Michial Sutherland <[michial.s@nghconsulting.com.au](mailto:michial.s@nghconsulting.com.au)>  
**Sent:** Friday, 4 November 2022 3:37 PM  
**To:** EPA West Operations Regional Mailbox <[EPA.Westopsregional@epa.nsw.gov.au](mailto:EPA.Westopsregional@epa.nsw.gov.au)>  
**Subject:** 22-426 - Albury Paper Mill - Independent Environmental Audit

Hi,

Please find attached a consultation request for the DPE Independent Environmental Audit at Visy Albury.

Regards

Mike

**MICHIAL SUTHERLAND**  
BUSINESS DEVELOPMENT MANAGER NQ  
MEIANZ



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**From:** Briohny Seaman <[Briohny.Seaman@epa.nsw.gov.au](mailto:Briohny.Seaman@epa.nsw.gov.au)>  
**Sent:** Monday, 28 November 2022 10:41 AM  
**To:** Michial Sutherland <[michial.s@nghconsulting.com.au](mailto:michial.s@nghconsulting.com.au)>  
**Subject:** FW: 22-426 - Albury Paper Mill - Independent Environmental Audit

Hi Mick,

Thank you for the email.

The EPA would like to request that the audit of Visy Albury address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises.

Regards,

**Briohny Seaman**  
Senior Operations Officer  
Regulatory Operations  
NSW Environment Protection Authority  
D 02 6983 4918 | M 0417 203 094



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

*The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.*

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

## C.5 NSW Department of Natural Resources Access Regulator

22-426 - Albury Paper Mill - Independent Environmental Audit



Michial Sutherland

To [nrar.servicedesk@industry.nsw.gov.au](mailto:nrar.servicedesk@industry.nsw.gov.au)

Cc [Matthew O'Donovan](#); [Troy Watkins](#); [Whitney Heiniger](#)

Bcc [da515c15-33ce-46ba-8a22-03d96326ebb3.metaPublish@thehub.nghenvironmental.com.au](mailto:da515c15-33ce-46ba-8a22-03d96326ebb3.metaPublish@thehub.nghenvironmental.com.au)



Fri 4/11/2022 3:14 PM



NGH request for NRAR consultation Visy Albury Audit 2022.pdf  
.pdf File

Hi,

Please find attached a consultation request for the DPE audit of Visy Albury.

Kind Regards

Mike

**MICHIAL SUTHERLAND**  
BUSINESS DEVELOPMENT MANAGER NQ  
MEIANZ



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## Appendix D Site inspection photos



Wastewater treatment infrastructure not in use



Testing laboratory used infrequently for equipment calibration





Switchboard indicating most processes in 'off' position



Wood mill not currently in use





Woodchip yard – all logs on site have been chipped and are being removed for use at Visy Tumut



Global Factory Maintenance workshop in workshop premise used by Visy during production





Visy Logistics utilising the workshop facility for basic truck body maintenance



Parts of the paper production line have been removed for use on Visy premises elsewhere during the site's extended shutdown





Bales stored within the Recycled Fibre Warehouse



Paper machines not in use





Product stored on site by Visy Tumut



Site storage dam, adjacent the main office





Dangerous goods and safety signage at diesel bowser, fully stocked spill kit adjacent



Signage at Lake Ettamogah indicating that water should not be consumed