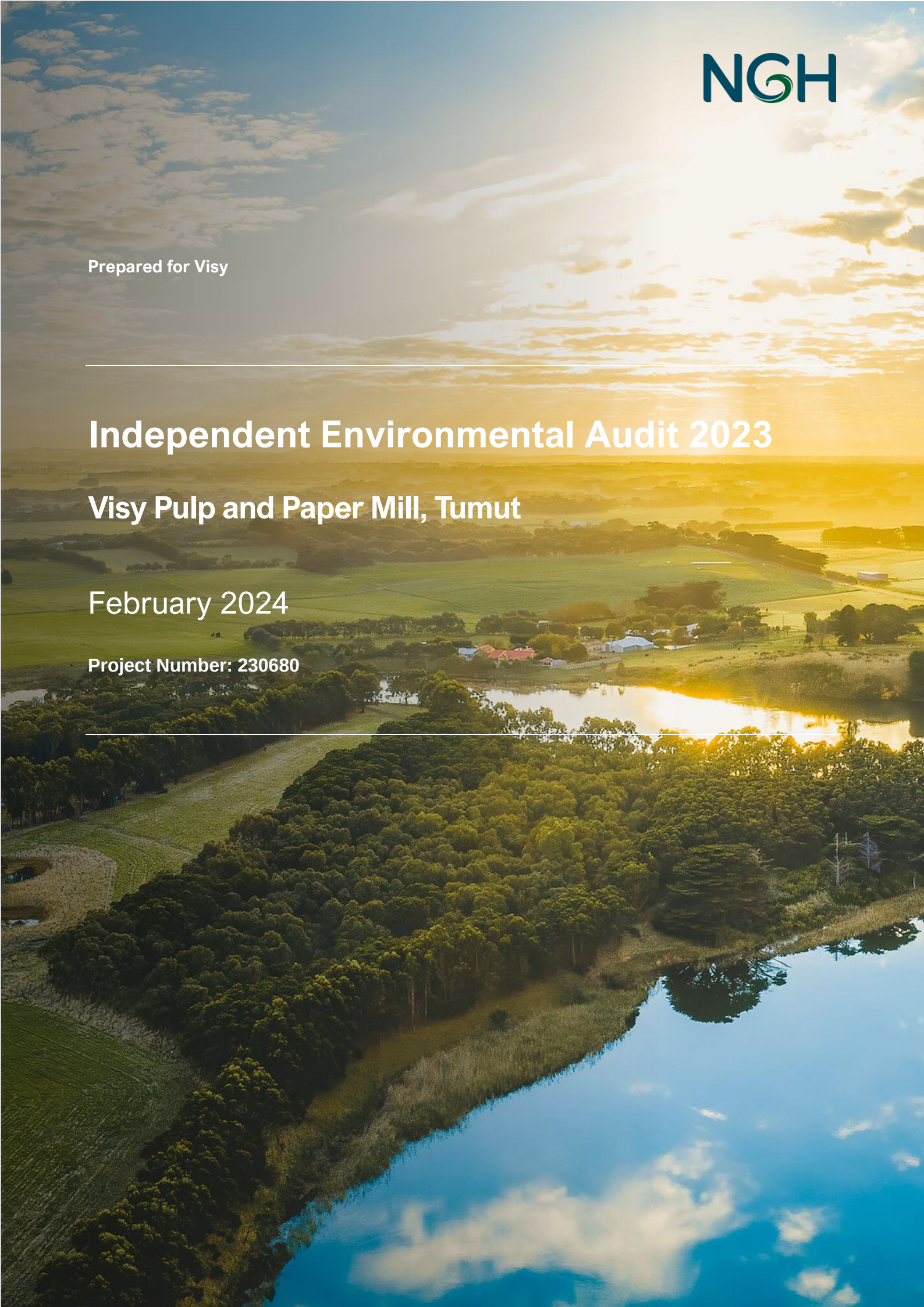


Prepared for Visy

Independent Environmental Audit 2023

Visy Pulp and Paper Mill, Tumut

February 2024

Project Number: 230680

Document verification

Project Title:	Visy Pulp and Paper Mill, Tumut
Project Number:	230680
Project File Name:	230680 Visy Tumut Independent Audit Report 2023_Final_v1.0

Revision	Date	Prepared by	Reviewed by	Approved by
Draft v1.0	2/02/2024	Whitney Heiniger	Natascha Arens	Natascha Arens
Final v1.0	23/02/2024	Whitney Heiniger	Natascha Arens	Natascha Arens

NGH Pty Ltd is committed to environmentally sustainable practices, including fostering a digital culture and minimising printing. Where printing is unavoidable, NGH prints on 100% recycled paper.

Table of contents

1. Introduction 5

1.1. Background 5

1.2. Audit team 5

1.3. Objective 5

1.4. Audit scope 6

1.5. Audit period 6

2. Audit methodology 7

2.1. Auditor approval 7

2.2. Audit process 7

2.3. Site inspection 7

2.4. Consultation 8

2.5. Compliance status descriptors 8

3. Audit findings 9

3.1. Document list 9

3.2. Compliance performance 11

3.3. Notices, orders and prosecutions 11

3.4. Non-compliant findings 12

3.5. Previous audit findings 19

3.6. Environmental Management System 23

4. Opportunities for improvement 24

Tables

Table 2-1 Compliance status descriptors used during the audit process 8

Table 3-1 Compliance summary for the reporting period 11

Table 3-2 Non-compliant findings reported during the audit 12

Table 3-3 Non-compliant findings from the previous reporting period and their current status 19

Appendices

Appendix A Audit table ..... A-I

Appendix B DPE Auditor approval ..... B-I

Appendix C Consultation ..... C-I

Appendix D Independent Auditor Declaration ..... D-VII

Appendix E Site inspection photos ..... E-IX

Acronyms and abbreviations

AQMP	Air Quality Management Plan
AR	Annual Return
BoM	Bureau of Meteorology
CA	Concept Approval
CAR	Corrective Action Request
CCC	Community Consultative Committee
CEMS	Continuous Emissions Monitoring System
COD	Chemical Oxygen Demand
DA	Development Approval
DPE	NSW Department of Planning and Environment (formerly DPIE)
ECMR	Environmental Compliance and Monitoring Report
EPA	Environment Protection Agency (NSW)
EPL	Environment Protection Licence
FEMR	Farm and Environmental Monitoring Report
IEA	Independent Environmental Audit
LNVMP	Landscape and Native Vegetation Management Plan
ML	Megalitres
NMP	Noise Management Plan
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVMP	Native Vegetation Management Plan
OEMP	Operational Environmental Management Plan
PA	Project Approval
POEO Act	*Protection of the Environment Operations Act 1997*

SMP	Soil Management Plan
SVC	Snowy Valleys Council
SWMP	Solid Waste Management Plan
TMP	Traffic Management Plan
TSC	Tumut Shire Council
WMP	Water Management Plan

1. Introduction

1.1. Background

NGH Pty Ltd (NGH) were engaged by Visy Pulp and Paper Pty Ltd (Visy) to carry out the Independent Environmental Audit for 2022 – 2023. The audit is required in accordance with Schedule 2, Condition 3.16 of the project approval MP 06_0159, as modified (the approval) for Visy's Tumut paper mill.

Stage 2, Phase 1A works were completed in 2015 as part of the modified approval including additions to one of the paper machines and an additional recycled cellulose fibre (RCF) Pulper. One major shutdown occurred during October 2023. The key achievements of 2022 - 2023 included:

- The key mill processes, including boilers, were shut down and maintained during the annual October shutdown
- Routine maintenance was carried out on CEMS analysers, as well as required part replacements
- Increased usage of wastepaper product in paper production
- Significant decrease in Continuous Emissions Monitoring System (CEMS) exceedances; 61 down from 323 in 21 – 22 reporting period
- Ongoing recovery of pine resources damaged by the 2019/2020 fires
- Less complaints (17) than the previous reporting period (21)
- Ongoing provision of sponsorship and funding to local community events and organisations.

1.2. 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 over 30 years' experience as an environmental professional and auditor and oversaw the audit process.

The site inspection was completed by Whitney Heiniger and Nicola Smith. Whitney has over five 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. Nicola has over 10 years of experience across multiple environmental disciplines in New South Wales (NSW) and has worked on planning and approval projects, post-approval environmental management, and a variety of projects in the renewable energy sector, extractive industries, infrastructure, manufacturing, and waste management.

1.3. Objective

The objective of the audit was to conduct an independent review of compliance with the Conditions of Approval for PA 06_0159, Condition 3.16 and DC 6/98 Condition 71 issued by the Minister for Planning, and in accordance with the requirements of the Independent Audit Post Approval Requirements, May 2020 (DPE 2020).

1.4. Audit scope

As required under PA 06_0159, Condition 3.16 and DC 6/98 Condition 71 the audit covered the following areas of the Visy, Tumut operations:

- Assessment of compliance with the conditions of both the PA and the DC
- All aspects of monitoring and environmental performance, both operational and organisational relating to the Tumut site
- Compliance with reporting requirements imposed on the site.

Statutory compliance of the Visy Tumut Mill was assessed with reference to the requirements of the following approvals and licences relevant to both Stage 1 and Stage 2 of Visy's Mill at Tumut:

- Development Consent 6/98 (Stage 1) (DA)
    - Development consent modifications Mod-45-5-2003 and supporting documentation.
    - Development consent modification 6/98 Mod 3 2012
- Concept Approval 06_0159 (CA)
- Project Approval 06_0159 as modified.

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

- Environmental Protection Licence (EPL) 10232
- Observations made during audit activities on site.

Statement of commitments made against the Final Environmental Assessment (EA) for the Stage 2 expansion (2007) were comprehensively covered in the 2013 audit and have not been revisited during this audit.

The audit was conducted with reference to the DPE guidelines, *Independent Audit Post Approval Requirements May 2020*.

1.5. Audit period

The reporting period for the audit is 1 July 2022 – 30 June 2023 inclusive.

2. Audit methodology

2.1. Auditor approval

The Department agreed to the nomination of Natascha Arens as Lead Auditor and Whitney Heiniger and Nicola Smith as Auditors for the Project on 10th November 2023 (Appendix B).

2.2. Audit process

Document review occurred prior to the day of the site inspection and was then largely completed following the site visit. 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 6th November 2023 indicating the dates of the site audit, scope, criteria, audit details and required project representatives.

An opening meeting was held on 23rd November 2023 at 8:45am on site at the main administration building. Present at the opening meeting were:

- Matt O'Donovan, Visy – HSE Manager
- Isabella Kane, Visy – Environmental Officer
- Whitney Heiniger, NGH – Auditor
- Nicola Smith, NGH – Auditor.

A closing meeting was held on 23rd November 2023 at 12:00pm at the main administration building. The above project staff were present at the closing meeting.

2.3. Site inspection

A site inspection with Matt O'Donovan and Isabella Kane was conducted following the audit opening meeting, including the following areas:

- Wastewater treatment and storage area
- Log delivery area and chipper
- Wood yard
- Recovery and power boiler
- Evaporation area
- Fibre and paper lines, including VPP9 and VPP10
- Plant control room
- Packing and distribution warehouse.

During the site inspection, conditions consisted of heavy rain and cool temperatures. The Bureau of Meteorology (BoM) weather station at Burrinjuck Dam (station 073007), approximately 45 kilometres (km) northeast of the site, recorded a maximum temperature of 21.7°C, minimum temperature of 15°C and 58 millimetres (mm) of rainfall on the day of the site inspection. Total rainfall for November 2023 at the Burrinjuck Dam weather station was 101.4mm. Rainfall intensity inhibited access to some areas of the site. It

is noted that the EPA completed an audit of the site's chemical handling and storage facilities in August 2023 and as such, this area was not comprehensively inspected during the site visit.

2.4. Consultation

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

- **NSW DPE** – consultation undertaken requesting approval of the Auditor. Approval received 10th November 2023 (Appendix B).
- **NSW DPE** – consultation request made via email 20th November 2023. DPE requested 24th November 2023 (Appendix C.1):

  "In addition to the consent condition requirements, please consider odour management, in particular."
- **NSW EPA** – consultation request made via email 20th November 2023. EPA requested 24th November 2023 (Appendix C.2):

  "…that the audit of Visy Pulp and Paper Tumut address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used or required in relation to any waste generated at the premises."
- **NSW DPE Water (formerly NRAR)** – consultation request made via email 23rd November 2023. DPE Water responded 21st December 2023 with input as outlined in Appendix C.3.
- **Snowy Valleys Council (SVC)** – consultation request made via email 20th November 2023. No input was received from SVC.

2.5. Compliance status descriptors

The compliance status for each requirement or commitment has been assessed in accordance with the criteria in Table 2-1 (DPE 2020).

Table 2-1 Compliance status descriptors used during the audit process

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

3. Audit findings

3.1. Document list

Documents were requested during the audit process 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 license requirements. Documents viewed included:

- Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023
- Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023
- Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023
- Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023
- Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023
- Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023
- Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023
- Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021
- Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023 (not assessed during this reporting period)
- Pollution Incident Response Management Plan (PLANS-VPP-TUM-HSE-010) 28 August 2023 (not assessed during this reporting period)
- EPL 10232
- Annual Return 2023 for EPL10232, submitted 10/08/2023
- Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2022 – 2023 (submitted 22/08/2023)
- EPA Clean-up Notice 3504075 - NSW EPA, 8/11/2023
- Email from Visy to DPE 28/10/2022, 12:50pm - Notification of Pollution Event
- Visy EPA Incident Report - 3/11/2022
- Visy Environmental Compliance and Monitoring Report (ECMR) 2023
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 1 Compliance Report
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 2 CEMS Exceedance Event Details
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 3 Odour Monitoring Results
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 4 Noise Compliance Monitoring Results Summary
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 5 Noise Mitigation Action Plan
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 6 Monthly Heavy Vehicle Movement Data
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 7 Farm and Environmental Monitoring Report (McMahon Earth Science)
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 8 Five Year Groundwater Piezometer Trend Cycle

- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 9 Complaints Register
- Visy Environmental Compliance and Monitoring Report 2023 – Appendix 10 Environmental Management Targets 2023/24
- Previous IEA Reports 2016 – 2022 (NGH)
- Email to DPE, EPA and SVC 26/09/2023, submitting ECMR 2023
- Visy Tumut Pulp and Paper Mill Annual Attended Noise Monitoring Report 2023 (EMM, March 2023)
- Ektimo Odour Testing Reports July 2022, February 2023
- Ektimo LDAR Testing Report February 2023
- Ektimo Emissions Testing Reports July 2022, November 2022, February 2023, May 2023
- Visy Waste Removal Records 2021 – 2023 (.xlsx)
- Letter from EPA regarding Resource Recovery Order & Exemption for Visy Material (DOC20/532167-1) July 2020
- EPA Woodlawn PHR acid mine tailings trial order 2020
- EPA Woodlawn PHR acid mine tailings exemption 2020
- EPA The Captains Flat alkaline material trial order 2022
- EPA The Captains Flat alkaline material trial exemption 2022
- Letter from EPA regarding Captains Flat alkaline material trial order and exemption 2022 (DW22/213-3) 21st June 2022
- Hazard Audit Report for Visy Pulp and Paper Tumut, Pinnacle Risk Management December 2021
- Visy ERT (Emergency Response Team) Personnel Skills Register (.xlsx)
- Compliance Audit Report - Liquid chemical storage and handling, EPL 10232 (NSW EPA, August 2023)
- Visy Winter storage Dam Capacity Record 2017 – 2023 (.xlsx)
- Email to WaterNSW – Visy Groundwater Data 26/09/2023
- Cooling Tower Monthly Water Treatment Service Reports July 2022 – June 2023 (Buckman Laboratories)
- Quarterly Maintenance Service Report March 2023 (Lear Siegler)
- Quarterly Maintenance Service Report June 2023 (Lear Siegler)
- Maintenance Report – Main Stack A Feb 2023 (Acoem)
- Visy Tumut Lime Kiln B Calibration Certificate February 2023 (Group Instrumentation)
- Visy Tumut Lime Kiln A, Main Stack, Lime Kiln B, Power Boiler, Recovery Boiler A, Recovery Boiler B Calibration Certificates May 2023 (Group Instrumentation)
- Visy Complaints Registers Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23
- Visy Complaints Audit Reports Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23
- Email submission to DPE, EPA, SVC – Quarterly Complaints Registers and Audit Reports 14/08/2023
- Visy Community Consultative Committee Meeting Minutes Aug 22, Dec 22, Feb 23, Apr 23, Jun 23
- Email to EPA – Visy Tumut VCCC FY23 Meetings minutes submission 26/09/2023
- Email to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Letter to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Visy Emergency Response Team List and Training Register
- Letter DPE Approval of Independent Auditors 10/11/2023
- Email to DPE providing 2022 IEA Report 28/11/2023

- Email from McMahon Earth Science describing EP M2.4 Special Methods 15/02/2024.

3.2. Compliance performance

Across the various project approvals, EPL and consultation requirements at total of 305 conditions were examined. The Project was found to be non-compliant with 15 of these (Table 3-1). Of these:

- Six are new non-compliant findings; and
- Seven are recurring non-compliant findings.

It is noted that four of the new non-compliant findings for the reporting period are a direct result of the discharge incident described in Section 3.3. A full description of each non-compliant finding is provided in Table 3-2.

Table 3-1 Compliance summary for the reporting period

	Concept Approval	Development Consent	Project Approval	EPL	Consultation	Total
Number of Conditions of Approval	17	105	79	101	3	**305**
Number of triggered Conditions	11	65	46	72	3	**197**
Number of Non-compliant findings	1	2	6	4	0	**13**

3.3. Notices, orders and prosecutions

One accidental offsite discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. At the time of the audit, the investigation outcome is noted as pending in the 2023 ECMR.

No other notices, orders or prosecutions occurred during the reporting period.

3.4. Non-compliant findings

Table 3-2 Non-compliant findings reported during the audit

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
CA 06_0159, Condition 1.3	If there is any inconsistency between this concept approval and any project approval granted for the project, this concept approval shall prevail to the extent of the inconsistency.	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Recurring**
DC 6/98, Condition 33	The Applicant shall ensure that the discharge of treated wastewater from the mill into Sandy Creek or any of its tributaries will: (a) have an average frequency of one in ten years or less; (b) be only as permitted by the EPA; and (c) will be fully recorded in terms of discharge amount, duration of discharge, and flow conditions in Sandy Creek at time of discharge.	One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection. No	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
		intentional discharges were made during the reporting period.		
DC 6/98, Condition 68	From the commencement of operations, and for such further periods as agreed necessary by the Applicant and the EPA, the Applicant shall undertake to the satisfaction of the EPA: (a) toxicity testing of irrigation re-use water; and (b) event based surface water monitoring, particularly during direct discharges from effluent ponds to Sandy Creek.	Similarly to previous audits, toxicity testing has not been carried out. This is an ongoing non-compliance as this CoA is intended to be retired.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Recurring**
PA 06_0159, Condition 1.2	In the event of an inconsistency between: a) the conditions of this approval and any document listed from condition 1.1 a) and 1.1f)inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b) any document listed from condition 1.1a) and 1.1f) inclusive, and any other document listed from condition 1.1 a) and 1.1f) inclusive, the most recent document shall prevail to the extent of the inconsistency.	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Recurring**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
PA 06_0159, Condition 2.2	The Proponent shall conduct all operations and activities on the site, including start-up and shut-down, in a manner that shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.	There were 17 odour complaints during the reporting period. This is down from 21 complaints in the previous period and well below 60+ complaints six years ago. The source of the odour was identified and in most cases minimised through action. Offensive odour is prevented from leaving the boundary most of the time, however compliance with this condition is not able to be achieved while odour complaints are received. It is noted that s129 of the POEO Act indicates that a defence for this occurrence can include the identification of odour on a Project's EPL. While EPL10232 does identify the potential for multiple odorous gasses, the EPL Annual Return 2023 identifies 13 exceedances of Sulphur dioxide, an odorous gas, at Point 1 during the reporting period.	Continue to investigate methods of reducing odour. Consider discussing the achievability of this condition, in its current form and rigid wording, with the Department.	**New**
PA 06_0159, Condition 2.4	The Proponent shall install and operate vapour compression evaporators for both new and existing plant to reduce the level of chemical oxygen demand in clean condensate. The vapour compression evaporators must be operated such that chemical oxygen demand in	A comparison of the COD levels in the clean condensate between 2007 and any time after 2010 is no longer meaningful. This is due to process changes in the production of clean condensate streams. Previous comparisons, now believed to be flawed, indicated a COD	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Recurring**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
	the clear condensate is reduced to 50 % of existing levels.	reduction in the clean condensate that was close to but less than 50%. A request has been made to DPE to remove this condition as part of Mod 6.		
PA 06_0159, Condition 2.10	The Proponent shall design, construct, operate and maintain the project to ensure that for each stack discharge point, the concentration of each pollutant listed in Table 2 to Table 5 inclusive is not exceeded. This condition only applies to the operation of the project, and to avoid any doubt, does not apply during start-up or shut-down. Reference conditions for in-stack concentrations described in this condition shall be reported to the reference conditions specified within Schedule 5 Part 3 of the Protection of the Environment Operations (Clean Air) Regulation 2002, except for emissions from the Main Stack 2, Natural Gas Boiler and Multi-Fuel Boiler where the applicable reference conditions are Dry, 273 °K, 101.3 kPa, 8 % 02.	Multiple exceedances identified during the reporting period - all exceedances documented in ECMR and the EPL Annual Return. It is also noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card.	Continue to investigate methods and equipment that can prevent exceedances. Ensure adequate spare parts are stored onsite for deployment in the event of a failure.	**Recurring**
PA 06_0159,	Except as may be expressively provided by an	As per **DC 6/98, Condition 33**.	No recommended action – this	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
Condition 2.17	Environment Protection Licence for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.		incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	
PA 06_0159, Condition 3.1	The Proponent shall determine the pollutant concentrations and emission parameters specified in Table 8 to Table 13 inclusive below, at each of the discharge points (established in strict accordance with the requirements of test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007)). Monitoring shall be undertaken during operation of the project, at the frequency indicated in the tables, unless otherwise agreed by the DECC.	The tables in the consent condition have been compiled from a past EPL. Discussions with DPE regarding inconsistent consent conditions have occurred. DPE have indicated that they are willing to discuss this issue.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Recurring**
EPL 10232, Condition 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.	As per **DC 6/98, Condition 33**.	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
EPL 10232, Condition L3.1	For each monitoring/discharge 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.	Various pollutant limits were exceeded at specified points during the reporting period, as detailed in the EPL Annual Return.	Continue to investigate methods and equipment that can prevent exceedances.	**Recurring**
EPL 10232, Condition O4.5	Effluent liquid waste pipelines and fittings must be clearly identified. Standard watertaps, hoses and valves must not be fitted to the pipelines of the effluent system. The effluent system must not be connected to other pipelines. Lockable valves or removable handles must be used where there is public access to the effluent.	The release of untreated wastewater into Sandy Creek on 28/10/202 occurred due to an isolation valve from the 6ML untreated wastewater dam not being shut prior to the transfer of treated wastewater to the winter storage dam. This valve location has been re-routed and completely isolated as a result of this incident and untreated wastewater no longer has the potential to mix with treated water or be discharged from the site.	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**New**
EPL 10232, Condition M2.2	Air monitoring requirements - 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.	It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card. Monitoring is otherwise being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable.	Ensure adequate spare parts are stored onsite for deployment in the event of a failure, as long delivery times were a key factor in the length of time for which the Stack A Flow analyser was offline.	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
		Monitoring is otherwise being carried out as required.		

3.5. Previous audit findings

Previous audit findings and their current status are presented in Table 3-3.

Table 3-3 Non-compliant findings from the previous reporting period and their current status

2022 ID	Details	Comment	2023 status
22/1	Solid Waste Management Plan requires update to accommodate material removal to Woodlawn mine rehab site. Plan will need to discuss onsite (north of waste handling area) and offsite management by external company. Refer s5.2 of 2017 WMP for initial considerations and initial application. Sighted during audit, update waiting for EPL variation. Ongoing non-compliant finding.	The SWMP has been updated during the 22 – 23 reporting period and incudes previously missing material.	**Closed**
22/2	Toxicity testing of irrigated effluent & event-based surface water monitoring is not occurring. This CoA is intended to be retired. Ongoing non-compliant finding.	Toxicity testing is not required by the EPA. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Open**
22/3	During the site inspection a large excavated area adjacent the waste yard, in the northeastern section of the mill footprint, was observed. High-resolution aerial imagery (latest 2020) shows this area previously comprised revegetation plantings. This fill material was utilised in the construction of the new Woodyard Stacker Reclaimer. Although a letter from GHD (dated 17 May 2021) confirms that the proposed stacker reclaimer should be considered as being consistent with the EP&A Act, no evidence was included in the letter that this extended to the excavation of fill from the observed area.	A modification application for the onsite storage shed and multiple other licence modifications has been lodged during the reporting period. Communication with DPE indicated that the excavated area had been noted and no further action has been requested.	**Closed**

2022 ID	Details	Comment	2023 status
	Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy have since lodged a mod application to regularise the use of the shed as built.		
22/4	Inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) identified in past audits are still outstanding. Ongoing non-compliant finding.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Open**
22/5	Non-compliance with consents as detailed in 22/3.	As per **22/3**.	**Closed**
22/6	COD reduction in clean condensate of 50% not achieved. COD cannot be comparatively measured with accuracy due to plant reconfiguration. This CoA is intended to be retired, discussions with DPE ongoing. Ongoing non-compliant finding.	This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	**Open**
22/7	Concentration limits have been exceeded at several of the discharge points. These are documented in the EPL annual return and subject to load-based licencing.	Visy continues to monitor and respond to exceedances of EPL limits.	**Recurring**
22/8	Exceedances reported for the averaging period and noted in ECMR 2021. Averaging periods appropriate.	Averaging periods are specified in the updated AQMP.	**Closed**
22/9	Some of the pollutants specified are not being monitored. The tables are from a historic EPL and do not represent the current EPL. Ongoing non-compliant finding.	This ongoing non-compliant finding is expected to be addressed through the	**Open**

2022 ID	Details	Comment	2023 status
		amalgamation of approvals relevant to the Project during Modification 6.	
22/10	Coarse Particle exceedances detailed in the EPL Annual Return 2022. Load limit = 31,000kg, coarse particulate annual load for FY22 was 65,342kg,	An EPL variation in 2023 has increased this load limit to 65,000kg and the 2022 – 23 coarse particulate load was within this limit.	**Closed**
22/11	Exceedances detailed in annual EPL return incl.: 1) Coarse Particulates at Point 1 & Point 22; 2) Total Solid Particles at Point 4 Lime Kiln; 3) Carbon Monoxide limit at Point 3; 4) Opacity Limit at Point 1 (Stack 1); 5) Nitrogen oxide limit at Point 1 (stack 1); 6) Opacity Limit at Point 22 (Main Stack 2); 7) Total Solid Particles at Point 1 (Stack 1); 8) Nitrogen Oxides Point 2 (Recovery Boiler A).	Various pollutant limits were exceeded at specified points during the 2022 – 23 reporting period, as detailed in the EPL Annual Return Continue to investigate methods and equipment that can prevent exceedances.	**Recurring**
22/12	Coarse Particulates, Carbon monoxide, Opacity, Nitrogen oxide and Total Solid Particles limits exceeded at specified points during the reporting period.	This finding was previously noted against L3.1 and 3.4 but is now captured in L3.1 to prevent unnecessary double up.	**Closed**
22/13	Exceedances reported from Point 2 (Recovery Boiler) as per L3.1.	L3.8 has been removed during the 2023 EPL variation.	**Closed**
22/14	Exceedances reported from Point 4 (Lime Kiln) as per L3.1.	L3.10 has been removed during the 2023 EPL variation.	**Closed**
22/15	Annual return due by 28th August, marked as received 30th August 2022 on EPA	The 2022 – 23 Annual Return was	**Closed**

2022 ID	Details	Comment	2023 status
	website.	submitted within the specified timeframe.	

3.6. Environmental Management System

Visy Pulp and Paper is 14001 certified. The Project holds and implements an Operational Environmental Management Plan (OEMP) which has been updated during the reporting period. The OEMP and associated subplans were reviewed during the audit process for compliance with the Project's various consents and it is noted that all subplans were updated either during the reporting period or immediately following the reporting period. The Plans reviewed included:

- Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023
- Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023
- Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023
- Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023
- Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023
- Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023
- Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023
- Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021.

The following plans were viewed but not assessed for compliance as they were updated outside of the reporting period:

- Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023
- Pollution Incident Response Management Plan (PLANS-VPP-TUM-HSE-010) 28 August 2023.

The performance of the OEMP is reviewed annually through the Environmental Compliance Management Report (ECMR) and the Independent Environmental Audit (IEA) (this audit). The Visy Environmental Compliance and Monitoring Report (ECMR) 2022 and internal audit reviews environmental performance for the reporting period.

The ECMR addresses the reporting requirements outlined in DC 6/98 CoA12. The environmental management targets incorporate targets specific to the site operation. Targets identified in the ECMR have been included in the OEMP and sub plans for next year. New targets have been identified for the 2022 – 23 financial year and results from 2021 – 22 targets are described in ECMR 2023 Appendix 10. The plans are updated when there are significant changes in work practices. No major changes in the processes and facilities have occurred over the last three years. The focus of 2022 – 23 revision was to continue managing both the availability of timber resources and staff, as well as continue to reduce complaints, emissions (odour) and resource use.

4. Opportunities for improvement

Three opportunities for environmental management improvement were identified during the audit.

The first opportunity for improvement relates to the untreated wastewater pond containing wastewater from the October 2023 plant maintenance shutdown. During the site inspection, multiple bird carcasses were observed on the pond liner at the water's edge that appeared to have died following contact with the untreated wastewater. Multiple live Australian wood ducks (*Chenonetta jubata*) were also observed within the general wastewater treatment area. All native birds are protected in NSW under the *Biodiversity Conservation Act 2016*. It is strongly recommended that Visy investigate a method of preventing fauna access to the wastewater pond, particularly following the annual shutdown period. It is noted that this observation occurred outside of the audit reporting period however has been included in this report to ensure action is able to be taken prior to the October 2024 shutdown.

The second opportunity for improvement relates to Condition 35 of DC 6/98, which specifies a requirement for consultation with the Department in the event that water table rise in the irrigation area is observed over 10cm/year over a five year period, or in the event that the irrigation area water table rises within two metres of the land surface. Both of these events have occurred within the reporting period and over the lifetime of the site as monitored since 2002. It is noted that water table rise has been previously observed to occur concurrently with increased rainfall and background bores generally follow the same fluctuations as the irrigation bores. Piezometer trend data and the annual Farm and Environmental Monitoring Reports (McMahon Earth Science) have been submitted to the Department, and now WaterNSW, on an annual basis. This is considered to satisfy the intent of Condition 35 DC 6/98 however it is recommended that Visy either undertake a formal consultation meeting with the relevant Department or confirm with the Department that the submission of annual data satisfies their requirements with respect to this Condition.

The third opportunity for improvement relates to Condition M2.4 of the EPL, which references Special Methods to be implemented during soil and groundwater sampling. The Farm and Environmental Monitoring Report 2023 does not currently reference these Special Methods however email communication with McMahon Earth Science confirmed that the specified methods were utilised during sampling activities. It is recommended that these Special Methods are referenced in future Farm and Environmental Monitoring Reports to clearly satisfy this condition.

Appendix A Audit table

Concept Approval Compliance Status - November 2023

Reference	Approval or licence requirement	Evidence collected 2023	Audit Finding	Compliance status	Action Reference
Concept Approval (CA_06_0159)					
Administrative Conditions					
1.1	The Proponent shall carry out the project generally in accordance with the: a) Major Projects Application 06_0159; b) Visy Pulp and Paper Proposed Mill Expansion, Tumut NSW, Final Environmental Assessment, prepared by Visy Pulp and Paper Pty Ltd and dated January 2007; c) Visy Pulp & Paper Proposed Mill Expansion, Tumut NSW, Submissions Report, prepared by Visy Pulp and Paper Pty Ltd and dated March 2007; d) the Statement of Commitments prepared by Visy Pulp and Paper Pty Ltd and dated 18 April 2007; e) the conditions of this approval.	ECMR 2023 EPA Clean-up Notice 3504075 - NSW EPA, 8/11/2023 Interview M O'Donovan Site observations	The Project has been carried out generally in accordance with the Project approvals. One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection. This incident is considered to be a one-off during the reporting period and the Project is considered to be generally in compliance with the specified approvals despite this incident.	Compliant	
1.2	In the event of an inconsistency between: a) the conditions of this approval and any document listed from condition 1.1a) and 1.1e) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b) any document listed from condition 1.1a) and 1.1e) inclusive, and any other document listed from condition 1.1 a) and 1.1 e) inclusive, the most recent document shall prevail to the extent of the inconsistency.		Noted	Not triggered	
1.3	If there is any inconsistency between this concept approval and any project approval granted for the project, this concept approval shall prevail to the extent of the inconsistency.	Previous audit report (NGH, 2022) Interview M O'Donovan	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	Not-compliant	
1.4	This concept approval shall operate from the date the approval is endorsed by the Minister.		Noted	Not triggered	
1.5	This concept approval shall lapse five years after the date the approval is endorsed by the Minister, unless works the subject of the project approval for the Tumut Mill Expansion (excluding the multi-fuel boiler component) are physically commenced on or before that date.		Noted	Not triggered	
2.1	The Tumut Mill Expansion, with the exception of the multi-fuel boiler (non-standard fuel) component, requires no further environmental assessment and is the subject of a separate instrument of approval.		Noted	Not triggered	
2.2	Pursuant to section 75P(1)(a) of the Environmental Planning and Assessment Act 1979, the following environmental assessment requirements apply with respect to the multi-fuel boiler (non-standard fuel) component: a) a detailed project-specific Statement of Commitments, consistent with the Statement of Commitments prepared for the concept plan, with a clear indication of any new or amended commitments relating to the project must be provided; b) a demonstration that the project is consistent with the requirements of this approval and generally consistent with the scope and intent of the concept outlined in the documents under condition 1.1 of this approval must be included; c) a Non-standard Fuel Assessment must be undertaken in accordance with the DECC's Guidance Note: Assessment of Non-standard Fuels (2005) which shall include but not necessarily limited to: i) a comprehensive assessment of the composition and characteristics of each fuel stream; ii) chemical characterisation of all proposed non-standard fuels; iii) description of pollution control equipment with a demonstration that Best Available Techniques have been employed where possible; iv) a detailed testing regime for proposed fuels specifying testing methodology, monitoring and contaminant thresholds; and proposed quality assurance and quality control procedures related to non--standard fuels on site and at supplier sites. d) an updated Air Quality Impact Assessment, must be prepared in accordance with Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2005), reflecting the finalised design, fuel composition and fuel source ratio. The assessment must demonstrate predicted compliance with the relevant NSW statutory emission limit and where no such limit exists demonstrate at a minimum predicted compliance with the emission limits described in the EU Waste Incineration Directive (2000); and e) detailed information regarding the installation and commissioning of the multi-fuel boiler must be	ECMR 2023 Interview M O'Donovan	No non-standard fuels have been used on site during the reporting period.	Not triggered	

3.1	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this concept approval and all related project approvals. The Program shall include, but not necessarily be limited to: a) provisions for periodic review of the compliance status of the project and its component parts; b) provisions for periodic reporting of compliance status to the relevant approval authority; c) a program for independent environmental auditing of the development, in accordance with /SO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing; d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance; e) provisions and framework that clearly demonstrate the regulatory interactions between approval instruments and licences, and those relevant to the existing mill and its operations.	ECMR 2023 EPL Annual Return 2023 Previous audit report (NGH, 2022) Email from M O'Donovan to DPE, EPA, SVC - submission of 2023 ECMR - 26/09/2023	Compliance tracking regularly completed by Visy as specified by this condition includes: a) periodic review using ECMR, EPL Annual Return. b) Annual EPL report and provision of EMR to relevant authorities sighted during site inspection c) Independent Auditing required and completed annually d) Non-compliances added to targets for subsequent years or immediate correction. e) EMR and management plans.	Compliant	
4.1	The Proponent shall continue to participate with the Community Consultative Committee. Subject to confidentiality, the Proponent shall submit all documents required under this approval to the Community Consultative Committee and make available such documents for public inspection on request.	VCCC meeting minutes: - 11th August 2022 - 6th December 2022 - 7th February 2023 - 6th June 2023 - 4th April 2023	Visy are holding quarterly CCC meetings, minutes sighted for each quarter.	Compliant	
4.2	Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation): a) a telephone number on which complaints about construction and operational activities at the site may be registered; b) a postal address to which written complaints may be sent; and c) an email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans VCCC meeting minutes Site observations	Number maintained and advertised through website, signage and in the VCCC minutes. Both a 24hour hotline and landline number are provided.	Compliant	
4.3	The Proponent shall record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the Director-General upon	Quarterly Complaints Registers - July 2022 - June 2023 Quarterly Complaints Audit Reports - July 2022 - June 2023	Complaints numbered 17 for the reporting period. Quarterly complaint audit reports sighted, included review of complaints and reference to reevant previous data. Odour issues comprised all complaints during the reporting period and each complaint has been investigated and responded to.	Compliant	
4.4	The Proponent shall establish and maintain a new website, or dedicated pages within its existing website for the provision of electronic information associated with the development. The Proponent shall publish and maintain up-to-date information on this website or dedicated pages including, but not necessarily limited to: a) information on the development, each of its project components and the current implementation status of each; b) a copy of this concept approval and all related project approvals; c) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the development; d) a copy of each monitoring program and each environmental management required under this concept approval or under each relevant project approval; e) details of the outcomes of reviews and audits of the development and each of its project components undertaken in accordance with the Compliance Tracking Program referred to under condition 3.1; and f) details of a contact point(s) to which community complaints or inquiries may be directed, including a telephone number, a postal address and an email address.	https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans	The Visy Tumut web site has Project assessment documents and consents, EPL and WALs, Management Plans, annual monitoring reports, EPL compliance report and most recent independent audit report. Contact details (24h) are also available on the website.	Compliant	
5.1	The Proponent shall develop an Operational Environmental Management System to outline the general environmental management practices and procedures to be followed during the operation of each project associated with this concept approval. The System shall be prepared in accordance with /SO14001:2004- Environmental Management Systems and shall aim to provide a single, consistent environmental management framework to be applied to each project and across projects.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023	OEMP updated during the reporting period (28th Feb 2023). The OEMP identifies that the site's EMS is certified to ISO14001:2015 and provides an overview of the whole EMS, including additional Management Plans.	Compliant	

5.2	The Operational Environmental Management System required under condition 5.1 of this concept approval shall be supplemented with specific Operational Environmental Management Plans for each project to meet the requirements of each project approval.	OEMP, AQMP, LNVMP, NMP, SMP, TMP, WMP, SWMP, PIRMP	A suite of environmental management plans exists for the project and each document is regularly reviewed and updated. Plans include OEMP, AQMP, LNVMP, NMP, SMP, TMP, WMP, SWMP and a PIRMP.	Compliant	
6.1	The Proponent shall notify the Director-General of any incident relating to a project associated with this concept approval which has actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Proponent shall provide full written details of the incident to the Director-General within seven days of the date on which the incident occurred.	Email from Visy to DPE 28/10/2022, 12:50pm - Notification of Pollution Event	One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. Visy notified DPE within 12 hours of the event via email (12:50pm on 28/10/22)	Compliant	
6.2	The Proponent shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 6.1 of this approval, within such period as the Director-General may require.	Interview M O'Donovan	One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection. DPE did not specify any particular requirements for incident response and this incident was handled by the NSW EPA.	Not triggered	
6.3	The Proponent shall, throughout the life of the project, prepare and submit for the approval of the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall be for each project associated with this concept approval and be consolidated with the AEMR for the existing plant. It shall review the performance of the each project against the Operation Environmental Management Plan (refer to in the relevant project approval), the conditions of this approval and other licences and approvals relating to the projects associated with this concept approval and those relating to the existing plant. The AEMR shall include, but not necessarily be limited to: a) details of compliance with the conditions of this approval; b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how theses complaints were address and resolved; c) identification of any circumstances in which the environmental impacts and performance of the project during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition 1.1 of this approval, with details of additional mitigation measures applied to the project to address recurrence of these circumstances d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident. The Proponent shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the project. The Director-General may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Proponent shall make copies of each AEMR available for public inspection on request.	ECMR 2023	ECMR 2023 provided during audit process. Compliance report included as App 1 to the document. Complaints detailed in section 3.1 and listed in App 9. Complaints from odour exceedances noted and source identified as are corrective actions. Monitoring results and interpretations documented in ECMR and App 3, 4, 6, 7, 8, and 10.	Compliant	

Development Consent Compliance Status - November 2023

Reference	Approval or licence requirement	Evidence collected 2023	Audit Finding	Compliance status	Action Reference
Development Consent					
1	Development shall be carried out as described in: (a) Development Application (DA) No.6/98; (b) the environmental impact statement prepared by Nolan ITU Pty Ltd and dated February, 1998; and (d) in accordance with the conditions and management strategies prepared and approved under the conditions of Schedule 2.	ECMR 2023 Site observations	The Project has been carried out generally in accordance with DA 6/98. Refer CA Condition 1.1.	Compliant	
2	In the event of an inconsistency between this consent and DA 6/98 (and accompanying EIS), this consent shall prevail.		Noted	Not triggered	
3	Pursuant to section 91AB(2) of the Act, this consent is issued for Stage 1 of the development.		Noted	Not triggered	
4	Pursuant to section 91AB(2) of the EP&A Act, a further consent shall be obtained for Stage 2 of the development.		Noted	Not triggered	
5	A consent granted in accordance with Condition 4 does not require a further development application under section 77 of the EP&A Act. However, any such consent will be subject to the Applicant preparing report(s) to the requirements of the Director-General on the environmental performance of Stage 1 of the development and additional information relating to Stage 2 operations. The Director-General shall consult with relevant Government authorities and the community and consider any submissions prior to the granting of a consent for Stage 2 of the development.		Noted	Not triggered	
6a	The Applicant shall meet the requirements of all public authorities having statutory responsibilities for environment protection, pollution control, and land and water conservation approvals and licences in respect of the mill and associated waste disposal streams encompassed by DA No.6/98.	ECMR 2023 Site observations	The Project holds all relevant licences and deals with licenced premises for offsite waste disposal and processing. While some non-compliances have been noted during this reporting period, the intent of this condition, being that the Project is generally compliant with statutory approvals, holds required licences and enacts the directions of public authorities, is considered to be met.	Compliant	
6b	The Applicant shall obtain from the Environment Protection Authority all necessary statutory approvals and licensing under the Protection of the Environment Operations Act 1997 and any approvals for construction under the Pollution Control Act 1970, Clean Air Act, 1970, Clean Waters Act 1970 and the Noise Control Act 1975, prior to the commencement of construction.		Historic condition - not assessed during this reporting period.	Not triggered	
7	The Applicant shall notify the Department, EPA, DLWC and the Council in writing of the dates of commencement of construction and of operation of the mill and of completion of commissioning.		Historic condition - not assessed during this reporting period.	Not triggered	
8	The Applicant shall submit for the approval of the Director-General a Conditions Compliance Report in two stages. (a) The first stage shall be submitted one month prior to the commencement of substantial construction and shall demonstrate that all conditions of consent and other regulatory requirements applicable at this stage have been complied with. (b) The second stage of the report shall be submitted 1 month prior to commencement of operations and shall demonstrate that all conditions of consent and other regulatory requirements applicable at this stage have been complied with.		Historic condition - not assessed during this reporting period.	Not triggered	
9	In preventing or controlling any polluting emissions or discharges from the mill, the Applicant shall apply “Best Available Technology (BAT)” to the fullest extent practicable as it relates to the type of plant, in consultation with the EPA.	ECMR 2023 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Visy employs CEMS for stack emissions at multiple locations on the plant. It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card. CEMS sensors are calibrated twice per year. Periodic stack testing is undertaken quarterly and odour monitoring was undertaken in Juy 2022 and February 2023. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant	

10	Prior to commencement of construction, the Applicant shall prepare a construction specific Environmental Management Plan (EMP) to the satisfaction of the Director-General following consultation with relevant Government Agencies and Tumut Shire Council. The EMP shall be prepared in accordance with the EIS, the conditions of this approval, all relevant Acts and Regulations and accepted best practice management procedures. The EMP shall cover specific environmental management objectives and strategies for the main environmental elements and shall address but not be limited to.....		Historic condition - not assessed during this reporting period.	Not triggered	
11	Prior to commencement of operations, the applicant shall prepare a project specific Environmental Management Plan (EMP) to the satisfaction of the Director-General following consultation with relevant Government Agencies and Tumut Shire Council. The EMP shall specifically cover the environmental management objectives, strategies and monitoring for the operation of the mill and be prepared in accordance with the EIS, the conditions of this approval, all relevant Acts and Regulations and accepted best practice management procedures. The EMP shall address but not be limited to: a) identification of the statutory and other obligations which the Applicant is required to fulfill during operation including all approvals and consultations/agreements required from authorities and other stakeholders, and key legislation and policies which control the Applicant's implementation of the project; b) definition of the role, responsibility, authority, accountability and reporting of all personnel (including sub-contractors) relevant to compliance with the EMP; c) measures to avoid the occurrence of adverse environmental impacts and measures to provide positive environmental offsets to unavoidable adverse environmental impacts; d) environmental management procedures for all operational processes which are important for the quality of the environment in respect of permanent and/or temporary works; e) monitoring, inspection and test plans for all activities and environmental qualities which are important to the environmental management of the project including performance criteria, specific tests, protocols (e.g. frequency and location) and procedures to follow including procedures for notifying all relevant authorities should non-compliance with any limits or performance standards specified in the EMP arise; f) requirements to undertake environmental audits to ensure that the EMP is working and steps the Applicant intends to take to ensure that all plans and procedures are being complied with; g) delegation of responsibility for breaches of the EMP or pertinent environmental legislation by sub-contractors regarding the receipt of any Penalty Infringement Notices issued by the EPA; and h) community consultation and notification strategy (including the local community, Council and all relevant authorities) and complaint handling procedures.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023	OEMP was updated during the reporting period and section contents have largely remained the same as previous revisions. Statutory obligations are included in Section 4. Roles and responsibilities documented Section 6. Management measures under the OEMP occur in various sections. Some mitigation measures are in the OEMP but most are included in the subplans. Monitoring and inspection is dealt with generically in section 16 and specific details are provided in the relevant subplans. Auditing addressed in Section 20. Community consultation is dealt with in Section 8. Map in Section 1 indicates overall site area.	Compliant	
12	Both the construction and operational EMP's shall be reviewed on an annual basis by the preparation of an environmental report which analyses the results of monitoring required in the EMP's. The report shall review the performance of the plant against the relevant EMP, the conditions of this consent, and other licences and approvals relating to the construction and operation of the plant. The first construction report shall be submitted one year from the date of this consent, and subsequent reports shall be submitted on the anniversary of this date or such other period as the Director-General may agree. To enable ready comparison with the Environmental Impact Statement's predictions, diagrams and tables, the report shall include, but not be limited to, the following matters: (a) a review of the effectiveness of environmental management of the plant in terms of EPA and DLWC requirements; (b) results of environmental monitoring in respect of air, water and noise pollution, which includes interpretation and discussion by a suitably qualified person; (c) discussion on the actual performance of the mill when compared with EIS predictions; (d) a listing of any variations obtained to approvals applicable to the subject area during the previous year; (e) a record of all heavy vehicle movements (3 tonne tare or greater) into and out of the site annually from the proposed development; and (f) set out environmental management targets for the next year. The applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from, or recommended by, the environmental report within such time as the Director-General may determine.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023 ECMR 2023	OEMP was updated in February 2023. The Annual Environmental Compliance and Monitoring Report 2023 addresses the requirements of the Consent management plans and the EPL. The ECMR 2023 investigates the performance of the Mill against the targets, Consent and EPL as required. Sufficient detail is provided to support the discussion. Non conformances particularly in response to odour are investigated, described and discussed. Specialist reports or summaries there of are presented in the Appendices, eg. Farm Environmental Monitoring, Odour and Emission Testing.	Compliant	
13a	The Applicant shall implement the recommendations contained in the preliminary hazard analysis prepared for the pulp and paper mill by Environmental Audits of Australia dated 2 January, 1998 unless otherwise modified by this consent.	Hazard Audit Dec 2021, Pinnacle Risk Management.	External hazard audits have been undertaken since this initial analysis and Visy holds an annual Hazard review process to identify issues and propose solutions. External hazard report by Pinnacle Risk Management in Dec 2021 found general compliance and some minor matters for attention by Visy, with implementation of these recommendations to be assessed in December 2024's hazard audit.	Compliant	

13	At least one month prior to the commencement of construction (except for construction of preliminary works that are outside the scope of the hazard studies) of the proposed development, or within such further period as the Director- General or her nominee may agree, the Applicant shall prepare and submit for the approval of the Director-General the following studies.....		Historic condition - not assessed during this reporting period.	Not triggered	
14	At least two months prior to the commencement of operation of the proposed development, or within such further period as the Director-General may agree, the Applicant shall prepare and submit for the approval of the Director-General: (a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the proposed development. This plan should include detailed procedures for the safety of people in areas outside the development. The plan should be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. (b) Safety Management System A comprehensive safety management system, covering all operations on-site and associated transport activities involving hazardous materials. The system should clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records must be kept on-site and should be available for inspection by the Director-General upon request. The Safety Management System should be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, Safety Management.		Historic condition - not assessed during this reporting period.	Not triggered	
15	Within 24 hours of any incident associated with the operation and/or transport of the proposed development and with an actual or potential significant off-site impacts on people or the biophysical environment, a report shall be supplied to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventative measures.	Email from Visy to DPE 28/10/2022, 12:50pm - Notification of Pollution Event ECMR 2023	DPE was notified of the Sandy Creek discharge incident on Friday 28/10/2022. The incident occurred on 28/10/2022, placing this notification within the 24hr timeframe. A detailed report of the incident was prepared by the EPA, with the investigation outcome pending at the time of ECMR submission.	Compliant	
16	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and submit a report on the audit to the Director-General. This audit is to be carried out at the Applicant's expense by a duly qualified independent person or team to be approved by the Director-General. Further audits will be 7 required every three years or as may be requested by the Director-General. Hazard audits should be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.	Hazard Audit Dec 2021, Pinnacle Risk Management.	Hazard audit carried out within required timeframe (Nov 2021) and reported during the period 2021 - 2022. Audit prepared in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, *Hazard Audit Guidelines.* Next hazard audit due December 2024.	Compliant	
17	The proposed LPG storage area should be designed in accordance with Australian Standard AS-1596.	Interview M O'Donovan	No bulk LPG storage area has been constructed to date.	Not triggered	
18	All hazardous goods road tanker unloading areas shall have bunding to the size of the total quantity of the largest road tanker.	Previous audit report (NGH, 2021) Interview M O'Donovan	The 2021 review indicates that there is sufficient bunding. Recommendations made regarding storage of materials and maintenance of bund integrity. No material change in volume of bunding or tank dimensions for delivery of chemicals during the reporting period.	Compliant	
19	All dangerous goods vehicles delivering bulk dangerous goods to the site are to include brake interlocks or an alternative safety procedure to the satisfaction of the Director-General.	Interview M O'Donovan	Staff supervise unloading of tankers, valves not operable until trailer brakes engaged. Safety procedure documents unloading and brake interlock. Visy Protocols/contracts specifies the requirement for brake interlocks, no changes to procedure during the reporting period.	Compliant	
20a	The Applicant shall monitor all non-Applicant owned residences likely to be affected by construction or operation noise levels more than 5dB(A) LA10 above background noise levels to the satisfaction of the Environment Protection Authority from the commencement of construction and during the operation of the mill.	Visy Tumut Pulp and Paper Mill Annual Attended Noise Monitoring Report 2023 (EMM, March 2023)	Noise monitoring was undertaken in February 2023 in accordance with EPL requirements.	Compliant	
20b	The Applicant shall acoustically treat any non-Applicant owned residence affected by the construction or operation noise levels more than 5dB(A) LA10 above background noise levels under prevailing weather conditions (excluding temperature inversions) for longer than 6 months if requested by the owner to the satisfaction of the EPA.	ECMR 2023 Interview M O'Donovan	Residences at Glengarry, Reka, Whispering Pine, Pleasant View, Brentwood, Nolte, Deep Creek and Poverty Lane are identified in the ECMR 2023 as having signed agreements. No changes made during the reporting period.	Compliant	
21a	Any construction activity resulting in noise emission levels greater than 5 dB(A) above background, or resulting in tonal or impact noise likely to cause annoyance at the nearest residence shall be limited to the following hours: 7:00 a.m. to 6:00 p.m. - Monday to Friday 8:00 a.m. to 1:00 p.m. - Saturdays There should be no construction activities on Sundays and public holidays.		No construction activities undertaken during the reporting period.	Not triggered	

21b	Notwithstanding 21(a) above, construction activity resulting in noise emission levels greater than 5 dB(A) above background at the nearest residence may be permitted outside the times specified in 21(a) following; 1. written approval by the EPA; or alternatively 2. in accordance with an agreed Schedule of Works approved by the EPA following consultation with the community consultative committee.		No construction activities undertaken during the reporting period.	Not triggered	
22	Prior to the commencement of construction, the Applicant shall prepare in consultation with the EPA and Tumut Shire Council, and for the approval of the Director-General, a Construction Noise Management Plan. The Management Plan shall…..		Historic condition - not assessed during this reporting period.	Not triggered	
23	The Applicant shall ensure that noise emissions from the operation of the mill shall: (a) not exceed an LA10(15minute) noise emission limit of 40 dB(A) during the day (7am to 10pm) at the nearest residential receiver; and (b) not exceed an LA10(15minute) noise emission limit of 38 dB(A) during the night (10pm to 7am) at the nearest residential receiver. The noise emission limits in both (a) and (b) apply for prevailing meteorological conditions, except under conditions of temperature inversions. Any variations to the above hours of noise limits to be subject to EPA approval.	Visy Tumut Pulp and Paper Mill Annual Attended Noise Monitoring Report 2023 (EMM, March 2023)	Noise monitoring results from Feb 2023 indicate that noise emissions from the mill did not exceed the assessment criteria due to negotiated agreements. LAeq15min noise contributions were higher than target levels during six of the 24 measurements, however all of these were at properites with negotiated agreements. Noise was inaudable during 13 of 24 measurements. LAmax noise was within target levels at all locations, except for one night-time measurement at Pleasant View which has a negotiated noise agrement.	Compliant	
24	Should monitoring indicate increased levels of noise emissions due to temperature inversions, the Applicant shall: (a) document noise reports which identify increased emission levels or patterns of temperature inversions; (b) effect ameliorative measures in consultation with the EPA; and (c) amend and include the adopted ameliorative measures in the Noise Management Plan required by Condition 25 of this consent.	Visy Tumut Pulp and Paper Mill Annual Attended Noise Monitoring Report 2023 (EMM, March 2023)	All 24 noise measurements during attended noise monitoring were captured during weather conditions that would render noise limits applicable where relevant. Increased noise due to temperature inversions was not identified by EMM in the March monitoring report.	Not triggered	
25	Prior to the commencement of operations, the Applicant shall prepare in consultation with the EPA and Tumut Shire Council, and for the approval of the Director-General an Operational Noise Management Plan. The Management Plan shall demonstrate that all practical design and noise mitigation methods have been incorporated to minimise operational noise emissions. The plan should be included in the EMP required by Condition 11 of this consent and include but not be limited to the following: (a) information on the measures to be undertaken to achieve the noise levels specified in Condition 23; (b) complaints handling systems, noise monitoring, reporting of complaints and response actions; and (c) measures for dealing with low frequency noise and extreme noise incidences.	Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023	The Noise Management Plan (2023) addresses: a) In Section 6 b) In Sections 6.3, 7 and 8 c) In Section 6 - incidence recorded & the cause determined. Mitigation put in place and response given to complainant. Historic timing requirement (prior to operations) was not assessed during this reporting period.	Compliant	
26	In preventing or controlling polluted air emissions from the mill, the Applicant shall apply “Best Available Technology (BAT)” for this type of pulp and paper mill to achieve, at a minimum, compliance with the provisions of the USEPA’s NESHAP limits (MACT I, II, and III) to the satisfaction of the EPA.	ECMR 2023 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Visy employs CEMS for stack emissions at multiple locations on the plant. It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card. CEMS sensors are calibrated twice per year. Periodic stack testing is undertaken quarterly and odour monitoring was undertaken in Juy 2022 and February 2023. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant	
27	Prior to the commencement of operations, the Applicant shall prepare an Air Quality Management Plan in consultation with the EPA and Council and to the satisfaction of the Director-General. The Plan which should be incorporated into the operational EMP required by Condition 11, shall detail air quality safeguards and procedures for dealing with all emission discharges, dust control and monitoring for odour.	Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Plan updated in April 2023 including minor updates and edits. The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant	

28	Prior to the commencement of construction, the Applicant shall prepare an Erosion and Sediment Control Plan showing detailed run-off and erosion control measures for both construction and operational phases of the development. The plan shall be prepared in consultation with the Council and the EPA and for the approval of the Department of Land and Water Conservation. The Plan shall be incorporated into the EMPs required by Conditions 10 & 11 and shall include but not be limited to the following: i) the provision and maintenance of temporary measures during construction to prevent sediment and polluted waters discharging from the site; and ii) the provision and maintenance of permanent measures during the operation of the development to prevent sediment and polluted waters discharging from the site. The Plan shall be prepared in accordance with DLWC's Technical Handbook Urban Erosion and Sediment Control by Hunt (1992) and implemented to the satisfaction of the EPA in consultation with DLWC.		Historic condition - not assessed during this reporting period.	Not triggered	
29	All access roads and tracks should be constructed, designed and maintained in consultation with DLWC, and in accordance with the "Guidelines for the planning, construction and maintenance of tracks", Soil Conservation Service (1994). The Applicant shall comply with any requirements emanating from the guidelines as applicable.	Site observations Interview M O'Donovan	No new access roads or tracks have been created in this reporting period. The majority of roads onsite are sealed.	Compliant	
30	Foresty operations on the subject land must be carried out in accordance with "Forest code of practice for plantations on private lands in the South West slopes region of NSW".	Site observations Interview M O'Donovan	No forestry operations has taken place on the subject land during the reporting period.	Not triggered	
31	Any construction works within 40 metres of the bed or bank of Sandy Creek shall be designed and carried out to the satisfaction of DLWC.	Site observations Interview M O'Donovan	No construction activities within 40m of Sandy Creek were undertaken during the reporting period.	Not triggered	
32	To avoid erosion and contamination of groundwater, any earthwork structures for the storage of wastewater, diluted wastewater such as contaminated runoff from the irrigation area, and uncontaminated run-off, shall be designed, constructed and maintained to the satisfaction of DWLC.	IEA Report 2022 (NGH) ECMR 2023	Design for a 3ML waste water pond constructed in 2016 retrospectively completed November 2021 and approved February 2022, certified by McKenzies, sighted during 2022 audit and as part of modification application. Dam filled in during Feb 2022, new dam has been built and was sighted during 2022 audit.	Compliant	
33	The Applicant shall ensure that the discharge of treated wastewater from the mill into Sandy Creek or any of its tributaries will: (a) have an average frequency of one in ten years or less; (b) be only as permitted by the EPA; and (c) will be fully recorded in terms of discharge amount, duration of discharge, and flow conditions in Sandy Creek at time of discharge.	ECMR 2023 EPA Clean-up Notice 3504075 - NSW EPA, 8/11/2023 Interview M O'Donovan Site observations	One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection. No intentional discharges were made during the reporting period.	Not compliant	
34	Prior to the commencement of operations, the Applicant shall prepare a Waste Water Management Plan in consultation with the Council, EPA, and DLWC and for the approval of the Director-General. The Plan should be incorporated into the EMP required by Condition 11 of this consent and shall detail all measures to address potential land and waste management issues which will ensure the sustainable use of land. The Plan shall identify additional land capable, as applicable, of accommodating the irrigation of effluent to the satisfaction of the Director-General. The plan should also include but not be limited to: (a) crop management; (b) irrigation scheduling; (c) nutrient budgets; (d) salinity management measures; (e) site drainage control measures; (f) comprehensive soil details of areas proposed for irrigation; and (g) measures to ensure ongoing maximisation of water recycling and/or reuse.	Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	WWM requirements are addressed in the WMP: a) sections 4.4, 6.3, 7.4 b) sections 4.4.4, 4.4.5, 4.4.5.8, 4.4.5.9, 6.3 c) sections 4.3.1, 4.3.2, 4.3.4, 4.4.1, 4.4.4, 4.4.5.2, 4.4.5.8, 6.3.2, Appendix 2 d) sections 4.4.1, 4.4.5.3, 4.4.5.9, 4.5.3 e) sections 4.1, 4.4.5 f) section 4.1.4, 4.2.4, 4.4.1, 4.3.4, 7.3.1.2 g) sections 4.2.4 It is noted that the WMP was updated outside of the reporting period (18th July 2023) and this updated Plan will be assessed during the next IEA.	Compliant	
35	Should monitoring indicate that a watertable rise in either the shallow or deep piezometers exceeds an average 10 cm per year over a five year period, and/or that the watertable under the effluent irrigation area has risen within two (2) metres of the land surface, the Applicant shall carryout investigations in consultation with DWLC to determine the cause. If the cause is found to be the irrigation scheme, the Applicant shall develop and implement methods for preventing further rises to the satisfaction of the DLWC.	ECMR Appendix 8 - Groundwater Trend Cycle Farm and Environmental Monitoring Report 2023	Groundwater trend data provided as part of ECMR Appendix 8 indicates watertable rise of >10cm/yr over 5 years for multiple bore locations (background and irrigation) within the farm area. Multiple bores are also within 2m of the land surface. The Farm and Environmental Monitoring Report (FEMR) identifies that rainfall has likely contributed to past increases and background bores mimic the trends of the irrigation bores during historical periods of increased rainfall, indicating that irrigation is not the cause of watertable rise. It is noted that although formal consultation has not occurred with the Department, this piezometer data as well as the FEMR is submitted annually to WaterNSW and as such is considered compliant with the intent of this condition.	Compliant	

36	Prior to the commencement of operation, the Applicant shall, to the satisfaction of the Director-General prepare a program to monitor groundwater salinity levels in consultation with DLWC to the satisfaction of the EPA. If significant increases in salinity levels are found to be attributable to the irrigation scheme, the Applicant shall as relevant develop and implement methods for avoiding adverse impacts upon present or future beneficial uses of the area or adjoining streams to the satisfaction of the EPA and DLWC.	ECMR 2023 Farm and Environmental Monitoring Report 2023	The reporting does not indicate an increase in soil salinity in the irrigation area or groundwater salinity as measures at the piezometers across the site as a consequence of irrigation.	Compliant	
37	The Applicant shall not make unavailable to receive effluent those lands identified in the EIS for irrigation of effluent, or the contingency land for irrigation of effluent identified in the Waste Management Plan without the prior written consent of the Minister or their nominee.	ECMR 2023 Farm and Environmental Monitoring Report 2023	Land identified in the EIS for irrigation is being used for irrigation. It is noted that during the 22/23 reporting period, the highest irrigation levels (894ML) occurred since monitoring began in 2002.	Compliant	
38	Prior to the commencement of operations, the Applicant shall prepare in consultation with the EPA and DWLC a Surface Water Management Plan to the satisfaction of the Director-General. The plan shall be incorporated into the operational EMP required by Condition 11 and provide details of management measures to be taken during both the operation of the plant for the collection, treatment and disposal of surface water including details of: a) areas potentially subject to contaminated stormwater runoff; b) measures to prevent pollution of adjacent watercourses; c) proposed bunding for fuel, lubricants and chemical storage areas; d) total run-off detention for flood mitigation; and e) provision for the treatment of fire water on site, to prevent direct discharge to adjoining watercourses.	Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	The audit indicated the WMP addressed: a) Section 4.5 b) Section 4.1 d) Section 4.2 e) Section 4.2 It is noted that the WMP was updated outside of the reporting period (18th July 2023) and this updated Plan will be assessed during the next IEA.	Compliant	
39	The Applicant shall ensure that the fresh water storage dam and winter storages are constructed with a 600mm thick remoulded, recompacted clay liner with a permeability of less than 1 x 10-9 m/s.	Interview M O'Donovan	Historic condition - not assessed during this reporting period. It is noted that no structural changes to any dams occurred during the reporting period.	Not triggered	
40	The Applicant shall make provision to ensure that all uncontaminated surface runoff water leaves the site to the satisfaction of the DLWC.	Site observations during audit	No scouring of drainage paths was observed at the time of the audit. Waterways accepting overland flow were generally grassed and or tree lined. Mulch residue was observed as acting as erosion protection within the disturbed wood yard footprint.	Compliant	
41	Prior to the commencement of operations, the Applicant shall prepare a Solid Waste Management Plan in consultation with the Council and the EPA for the approval of the Director-General. The plan should be incorporated into the Operational EMP required by Condition 11 and include but not be limited to: (a) details regarding the continued viability of solid wastes returning to the pulping process; (b) details regarding ongoing analysis and monitoring for solids being disposed by landfill; (c) details of priority investigations into the beneficial reuse of purge fly ash and purge lime mud; and (d) other measures to reduce the amount of waste going to the Council's landfill sites.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023	The Solid Waste Management Plan (SWMP) a) Section 4.2 of the SWMP details the reuse of suitable solid waste in the pulping process as fuel and fibre sources. B) Section 3 of the SWMP details the analysis and monitoring waste and identifies the waste disposed of to landfill. C) Section 4.2 of the SWMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption. d) Section 5 of the SWMP details the landfill diversion strategy that Visy are employing. Recovery exemptions and orders currently being used have been updated in this revision of the Plan	Compliant	
42	Prior to the commencement of construction, the Applicant shall provide the Council with an estimate of the quantity of construction waste expected at the Council's landfill sites. Measures for dealing with construction waste shall also be included in the Construction EMP required by Condition 10.		Historic condition - not assessed during this reporting period.	Not triggered	
43	Prior to the commencement of construction, the Applicant shall consult with the Council regarding landfill charges for trade waste from the mill and the provision of recycling facilities.		Historic condition - not assessed during this reporting period.	Not triggered	
44	Prior to the commencement of on-site works (except for preparatory earthworks or other works deemed necessary to enable pre-alignment or other preliminary works to be undertaken), the Applicant shall design and construct a right angled, three way intersection capable of accommodating turning movements for BDoubles funded by the State Government. The intersection design shall also incorporate adequate site distance in both directions and turning lane facilities for both in bound and out bound vehicles. The intersection shall be located on a straight section of the Snowy Mountains Highway adjoining land owned by the Applicant. The intersection (to be funded by the NSW State Government) shall be located, designed and constructed to the satisfaction of the RTA and the Director-General.		Historic condition - not assessed during this reporting period.	Not triggered	
45	Prior to the commencement of on-site works (except for preparatory earthworks or other works deemed necessary to enable pre-alignment or other preliminary works to be undertaken), the Applicant shall design and construct a bitumen sealed standard road (to be funded by the NSW State Government) linking the intersection required by Condition 44 with the mill site. The road shall be designed and constructed to accommodate the geometric and pavement requirements for B-Doubles. The road should be kept watered to keep dust down prior to sealing being completed.	Interview M O'Donovan	No work has commenced in the construction of the refuelling area.	Not triggered	

46	Upon completion of the intersection and access road as required in Conditions 44 and 45, all vehicular access to the site including all trucks and visitor and employee vehicles, shall be via the new intersection and access road unless in the event of an emergency.	Site observations	The upgraded intersection and access road from the Snowy Mountains Highway is the site access.	Compliant	
47	The Applicant shall ensure that there will be no night time (10pm to 7am) semi-trailer or B-Double truck movements to and from the plant via the Snowy Mountains Highway through Adelong, except where, on the advice of the Director-General in consultation with the Council, such a restriction poses unacceptable impacts on alternative routes.	ECMR Appendix 6 Monthly HV Movement Data Complaints Register Interview M O'Donovan	Nil movements out of hours. A large proportion of paper movements, particulary export containers, are now on A-Double vehicles which can only use the Gocup Road.	Compliant	
48	The Applicant shall ensure that there will be no semi-trailer or B-Double truck movements to and from the plant via MR 280 north of Adelong (except for the disposal of waste at Adelong Landfill) unless the road is upgraded and given B-Double status.	ECMR Appendix 6 Monthly HV Movement Data	No truck movements via Tumblong/Adelong have been recorded. No upgrade of MR280 north of Adelong has occurred.	Compliant	
49	The Applicant shall ensure that the transport of waste to: (a) the Tumut landfill is restricted to the Snowy Mountains Highway (SH4) and Boonderoo Rd; and (b) the Adelong landfill is restricted to the Snowy Mountains Highway (SH4) and MR280.	Visy Waste Removal Records 2021 – 2023 (.xlsx) Interview M O'Donovan	Waste travels on Gocup Road and the Snowy Mountains Highway to facilities north of Tumut. Adelong landfill is no longer in use by the Project.	Compliant	
50	Prior to the commencement of operations, the Applicant shall prepare a Traffic Management Plan in consultation with the Council, RTA, and the EPA and to the satisfaction of the Director-General. The Plan which shall be incorporated into the Operational EMP required by Condition 11 of this consent shall include but not be limited to: (a) records of all vehicles heavy vehicles (3 tonne tare or greater) entering and leaving the site including details of times and access routes used; (b) measures to reduce sleep disturbance impacts in built up areas including reduced speed limits, prohibition on the use of exhaust brakes, and the provision of air bag suspension to heavy vehicles; (c) measures to reduce other impacts in built up areas including restricting heavy vehicle movements to main roads through townships, limiting parking within townships, and the cleaning of trucks; and (d) measures to ensure that the provisions of the Traffic Management Plan and Conditions 46-49 are implemented, i.e. education of drivers and any contractual agreements with operators of heavy vehicles which regularly service the site.	Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023 ECMR 2023 Appendix 6 Monthly HV Movement Data	The site Traffic Management Plan was updated during the reporting period. The specified content is addressed within the following sections: a) Section 7.1 b) Section 6.2.1 c) Section 6.4 d) Section 6.1.	Compliant	
51	The Applicant shall participate in the formulation of local roads maintenance requirements to ensure that funding identified for local road infrastructure associated with the operation of the mill is directed to those roads considered by Council, in consultation with the Direct-General, likely to be significantly and directly affected by the operation of the mill.	Email communication M O'Donovan 1/02/2024	Roads affected by mill operations are State-managed. It is noted that the $70M upgrade to Gocup Road, finalised in 2019, involved Visy and SVC lobbying together to successfully secure State funding for the upgrade.	Compliant	
52	The Applicant shall participate as required by the Director-General in any relevant committee/s established to investigate transport infrastructure initiatives in the region.	SWG website: https://murrayregionforestryhub.com.au/softwoods-working-group/ FIC website: http://forestindustrycouncil.com.au/members/	Visy is listed as a member of Softwoods Working Group (SWG) (now part of Murray Region Forestry Hub) & Forestry Industry Council (FIC) - focussed on improving the maintenance, standards & safety along the main haulage road.	Compliant	
53	Within 6 months prior to the commencement of operations, the Applicant shall, in consultation with RAC, Freight Rail, potential service providers and the Council undertake joint investigations as to the feasibility of re-opening the Cootamundra to Tumut Railway Line and/or other suitable lines with a view to transporting raw material (including waste paper and timber residues from Tumut) and finished product. The outcome of the investigations shall be submitted to the Director-General for incorporation into any wider investigation of rail transport options co-ordinated by the Director-General.		Historic condition - not assessed during this reporting period.	Not triggered	
54	The Applicant shall prepare a Landscape Plan to be integrated with the Native Vegetation Management Plan required by Condition 55 in consultation with the Council, the DLWC, NPWS and the Gilmore Landcare Group. The Plan shall be prepared by a suitably qualified and experienced professional and submitted for the approval of the Council prior to the commencement of construction. The Plan shall be incorporated into the EMP's required by Conditions 10 & 11 and include but not be limited to: (a) the existing landform of the site and the final landform when all proposed work is completed; (b) proposals for the irrigation areas and softwood plantations; (c) planting species, their purpose, maintenance requirements, irrigation requirements and illustration of typical visual character; (d) location of all hard and soft landscaping features; and (e) programs for staged work and maintenance of all landscaping and rehabilitation works. All site works shall be undertaken in accordance with the Plan and shall be supervised by a qualified professional Engineer or other suitably qualified person.	Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023	The LMP and NVMP are integrated and were reviewed and updated during the reporting period, May 2023. Pre-existing and final landforms landforms are described. Irrigations of softwood plantations has not occurred on site. Irrigation areas fully described in the Water Management Plan. Planting species and purpose are described in section 2 and app B, maintenance in section 3 and App G+H, illustrations are shown in App D,E+F. Existing and planted vegetations is described in Appendix A, C + F. Revegetation is described in app A + F.	Compliant	

55	Prior to the commencement of operations, the Applicant shall prepare a Native Vegetation Management Plan for the proposed property in consultation with and to the satisfaction of DWLC for all areas of retained vegetation, native planting, buffer areas and planted corridors. The Applicant shall ensure that: (a) retained native vegetation is appropriately fenced and signposted to exclude stock; (b) large hollow bearing trees shall be retained wherever possible; (c) native vegetation buffers are retained 50 metres to each side of Sandy Creek and 20 metres to each side of major drainage depressions; and (d) indigenous plant species shall be used in any site revegetation and any landscape planting associated with the mill site and access roads. The Plan shall be incorporated into the Operational EMP required by Condition 11.	Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023	The LMP and NVMP are integrated and were reviewed and updated during the reporting period, May 2023. Vegetation established continues to grow taking advantage of wetter winters between 2020 - 2023. No plantings in 2017-2023. Retained vegetation is fenced with appropriate signage. Large HBT have been retained and interspersed with plantings to promote connectivity. The creeks have been fenced on both sides and the buffer generally exceeds 50m, smaller drainage depressions have been fenced and revegetated with native trees and shrubs. No fire impact durring 19/20 summer. No significant losses.	Compliant	
56	Prior to the commencement of construction, the Applicant shall prepare in consultation with and to the satisfaction of DLWC and NPWS, a Native Vegetation Management Plan for all areas of retained native vegetation. The plan shall outline measures to be adopted by the Applicant to protect and enhance the existing conservation value of native vegetation and to improve the long term viability of native vegetation as flora and fauna habitat. The Plan shall be incorporated into the EMP's required by Conditions 10 & 11.		Historic condition - not assessed during this reporting period.	Not triggered	
57	Prior to the commencement of operations, a detailed monitoring program shall be prepared in consultation with the EPA and DWLC and submitted for approval by the Director-General. The program shall cover all aspects of environmental performance (both operational and organisational), and compliance with the reporting requirements and all conditions of consent, including Conditions 58 to 70. The program shall include all measures for monitoring stack and fugitive emissions, noise, water quality and waste management. The program which should be incorporated into the operational EMP required by Condition 11 shall include but not be limited to: (a) provisions for monitoring the implementation and effectiveness of the management plans required by this consent; (b) sampling locations, sampling frequencies and parameters to be tested; (c) characteristics of the existing environment, in particular, the existing ambient air levels; and (d) timing of monitoring reports. All monitoring analysis is to be undertaken by a suitably accredited NATA registered laboratory, or as otherwise agreed by the EPA.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023 NATA certificates sighted online and in monitoring reports	The OEMP details the need for monitoring and references the Environmental Performance, Measurement and Reporting (Procedure 205-0). The OEMP and subplans detail the location and methods for monitoring, evaluation criteria and reporting requirements. Specific environmental characteristics relevant to monitoring requirements are detailed in relevant subplans. NATA certificates were sighted for flyash and dregs & grits analysis EKTIMO NATA certification sighted at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO. McMahon NATA Certification sighted at https://nata.com.au/accredited-organisation/wagga-wagga-laboratory-3349-3342/?highlight=McMahon	Compliant	
58	Prior to the commencement of construction, the Applicant shall, to the satisfaction of the EPA, install a meteorological stations/s. The number of monitoring stations and the parameters to be measured shall be developed in consultation with the EPA.		Historic condition - not assessed during this reporting period.	Not triggered	
59	Prior to the commencement of operations, the Applicant shall establish an ambient monitoring station/s to the satisfaction of the EPA. The number of monitoring stations and the parameters to be measured shall be developed in consultation with the EPA.		Historic condition - not assessed during this reporting period. It is noted that two ambient monitoring stations are in place, one at the farm and one on top of Recovery Boiler B.	Not triggered	
60	The Applicant shall install continuous emission monitoring systems (CEMS) to monitor the combined exhaust gases from the stack. Monitoring of emissions from the recovery boiler, lime kiln and the powder boiler including oxygen, temperature, nitrogen oxides, acid gases, opacity, carbon monoxide, total reduced sulfides, sulphur oxides, and total volatile organic compounds shall be undertaken to the satisfaction of the EPA.	ECMR 2023 s3.2.1, ECMR 2023 Appendix 2 EPL Annual Return 2023	Continuous Emissions Monitoring (CEMS) have been installed to monitor exhaust gases from the stacks. It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card. This part was not able to be immediately replaced due to long delivery timeframes however spares are now being kept as a stock item onsite to prevent recurrence.	Compliant	
61	Within 12 months of the commencement of operations, and annually thereafter, the Applicant shall: (a) undertake a regulatory source emission test (including emissions of TCDD) on the recovery boiler, lime kiln and the power boiler; and (b) undertake an odour audit including a leak detection and repair (LDAR) program for all fugitive odour/VOC sources that are collected and ducted to each of the boilers.	Ektimo Emissions Testing Reports July 2022, November 2022, February 2023, May 2023 Ektimo Odour Testing Reports July 2022, February 2023 Ektimo LDAR Testing Report February 2023	Emission testing on the recovery boiler, lime kiln & power boiler provided by CEMS. External stack testing is undertaken quarterly by Ektimo. Sensors calibrated and checked six monthly. An odour audit is being conducted twice annually by Ektimo. The auditing took place in July 2022 and February 2023 during the reporting period, with LDAR completed February 2023.	Compliant	
62	Prior to the commencement of operations, the Applicant shall prepare in consultation with DLWC and the EPA and to the satisfaction of the DWLC, a groundwater monitoring strategy to assess any changes in groundwater quality and depth of both shallow and deep aquifers. The strategy shall include the installation by the Applicant of shallow and deep piezometers in areas which are representative of irrigated pasture, irrigated trees, non-irrigated buffers, and untreated areas. The piezometers shall be located following consultation with DWLC. The Applicant shall also install piezometers at off-site locations following consultation DWLC.	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2023 Farm and Environmental Monitoring Report 2023	A groundwater strategy has been developed and is described in the Water Management Plan June 2021. It include shallow and deep piezometers in irrigated and non-irrigated areas. The results are reported in the ECMR 2023.	Compliant	
63	Prior to the commencement of operations, the Applicant shall install piezometers in the vicinity of the winter storages as directed by DWLC to monitor for any groundwater mounding as a result of leakage from the storages. If significant leakage is found to occur the applicant shall immediately prepare and implement measures to prevent further leakage to the satisfaction of DWLC.	Farm and Environmental Monitoring Report 2023	Piezometers have been installed in the vicinity of the winter storage facility. Groundwater chemistry and standing water levels do not indicate leakage. No leakage or runoff identified in the Farm and Environmental Monitoring Report 2023.	Compliant	

64	Following installation, the Applicant shall provide DWLC with details of the location, depth, construction method and materials, and strata encountered of all piezometers for inclusion in the State Groundwater Data System under existing Bore Licence 40BL186472.	Interview M O'Donovan	No new piezos have been installed during the reporting period.	Compliant	
65	Within 12 months of the commencement of operations, and annually thereafter, the Applicant shall submit to DLWC an interpreted report on the groundwater monitoring program. The report shall contain copies of all raw data collected. The Applicant shall comply with all reasonable requirements of DWLC should it be deemed necessary to revise the groundwater monitoring strategy.	Submission email to WaterNSW dated 26/09/2023	Email sighted from Visy to WaterNSW dated 26/09/2023 included groundwater data submission.	Compliant	
66	The Applicant shall undertake an annual soils monitoring program in all areas used for effluent irrigation to the satisfaction of DWLC. The following tests shall be made in accordance with standards outlined in the NSW Agriculture publication Abbott, T.S. (ed) "Soil Testing Service - Methods and Interpretation". The program shall include but not be limited to the following tests: (a) pH (CaCl2) salinity as Ece 1:5; (b) exchangeable cations; (c) total nitrogen; (d) organic carbon; (e) available phosporous and phosphorus sorption; (f) exchangeable sodium percentage; and (g) emersion aggregate tests (EAT). The monitoring parameters set out in (a) to (g) shall be reviewed through consultation between the Applicant and DLWC two years following commissioning and, on the basis of good performance, the monitoring interval may, on the advice of DLWC, be increased.	ECMR Appendix 7 Farm and Environmental Monitoring Report (McMahon Earth Science)	A soils monitoring program for the irrigation areas is being completed annually and all required parameters are being assessed. It is noted that the McMahon report reports that "Overall soil health appears to be good with adequate humus levels and an abundance of earthworms in the topsoil."	Compliant	
67	If the soil monitoring program indicates that effluent irrigation is having an adverse impact on the sustainablity of soils within the irrigation area, then the Applicant shall prepare an amended plan of effluent disposal to the satisfaction of the DWLC.	ECMR Appendix 7 Farm and Environmental Monitoring Report (McMahon Earth Science)	Soil nutrient levels reported in the ECMR 2023 and attributes are typical of local soil conditions, with soil macronutrients improvements noted over the last 18 years.	Compliant	
68	From the commencement of operations, and for such further periods as agreed necessary by the Applicant and the EPA, the Applicant shall undertake to the satisfaction of the EPA: (a) toxicity testing of irrigation re-use water; and (b) event based surface water monitoring, particularly during direct discharges from effluent ponds to Sandy Creek.	Interview M O'Donovan	Similarly to previous audits, toxicity testing has not been carried out. This is an ongoing non-compliance as this CoA is intended to be retired.	Not compliant	Removal/consolidation of CoA.
69	All monitoring results arising from these conditions of consent shall be submitted annually to the EPA, DLWC, the Council and the Community Consultative Committee established under Condition 72.	Email to DPE, EPA and SVC 26/09/2023, submitting ECMR 2023	Results observed as being sent to appropriate departments on 26/09/2023	Compliant	
70	Upon request, the Applicant shall make available to the Director-General all monitoring results arising from these conditions of consent.	Interview M O'Donovan	No results requested this reporting period, monitoring results observed as available.	Compliant	
71	Twelve months after the approved commissioning period, the Applicant shall make arrangements for and bear the total cost of an independent and comprehensive environmental audit for the development. The environmental audit is to be carried out by a duly qualified independent person or team to be approved and appointed by the Director-General in consultation with the Council, DWLC and EPA. Further independent audits are to be conducted every twelve months or as directed by the Director-General. The independent environmental audit shall be undertaken to the requirements of the Director-General in consultation with EPA and Council and cover all aspects of monitoring and environmental performance, both operational and organisational, and compliance with reporting requirements and all conditions of this consent. The audit report shall be made available to the Director-General, Council and the Community Consultative Committee. The Applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from or recommended by the independent environmental audit and within such time as the Director-General shall agree.	Past Environmental reports for 2016, 2017, 2018, 2019, 2020, 2021, 2022. Letter DPE Approval of Independent Auditors 10/11/2023 Email to DPE providing 2022 IEA Report 28/11/2023	NGH Pty Ltd conducted audits 2017, 2018, 2019, 2020, 2021, 2022 and current. NGH team approved by DPE on 10/11/2023. Minutes of VCCC meetings show audit results shared during meetings and reports shared with DPE.	Compliant	
72	Prior to the commencement of construction, the Applicant shall establish a Community Consultative Committee. The Committee should include representatives of the Council and the local community and monitor compliance with conditions of this consent during the term of the development. Upon request, representatives of Government agencies will attend. The Chairperson and procedures for the Committee including frequency of meetings shall be determined by the Committee.	VCCC meeting minutes: - 11th August 2022 - 6th December 2022 - 7th February 2023 - 6th June 2023 - 4th April 2023	Meetings held every two months with local reps, Chamber of Commerce, Landcare, Visy reps. Plant operation and additional information, responses to enquiries and complaints.	Compliant	
73	Prior to the commencement of construction, the Applicant shall establish, operate, maintain and promote a telephone service that allows members of the public to directly contact nominated employees to report incidents of unacceptable noise or air quality impacts.	https://www.visy.com.au/env-appv-mgmt-plan/	Number maintained and advertised through web site, signage minutes of CCC.	Compliant	
74	From the commencement of construction, the Applicant shall maintain a complaints register which shall be used to record details of all complaints received from members of the public and actions taken by the Applicant in response to such complaints to the requirements of the Director-General.	Visy Complaints Registers Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23	A complaint resister is being maintained and electronically managed in Vault. It has sufficient detail to record track and manage complaints.	Compliant	

75	The Applicant shall audit the effectiveness of the service and the degree of public satisfaction with the complaints service to the requirements of the Director-General.	Visy Complaints Audit Reports Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23	Direct feedback from the public is not sought with each complaint, however, complainants have offered thanks for responses during previous reporting periods. The internal audit reports found the system was generally compliant.	Compliant	Consolidate CoA
76	The Applicant shall provide the Council and EPA with a copy of the complaints register every 3 months from the commencement of construction and within seven days of the end of each 3 month period. The data for each quarter shall be accompanied by an internal audit report of the system.	Email submission to DPE, EPA, SVC – Quarterly Complaints Registers and Audit Reports 14/08/2023	Complaints for the quarter forwarded with summation and analysis of the type and probable cause of complaint.	Compliant	
77	The Applicant shall ensure that all the recommendations of the Cultural Heritage Assessment described in Supplementary Report 3-3 of the EIS are implemented to the satisfaction of the Director-General.	Interview M O'Donovan Site observations	The original Project EIS was not reviewed during this audit period however no new works have occurred during the reporting period that would uncover additional heritage items. The heritage homestead onsite is clearly segregated from the remainder of the site and was observed to be surrounded by maintained landscape during the site visit.	Compliant	
78	Prior to construction, and in consultation with the Tumut/ Brungle LALC and NPWS, the Applicant shall submit to the satisfaction of NPWS, (i) measures to ensure that all scarred trees and campsites identified (Supplementary Report 3-3 of the EIS, Recommendation A2) as being outside the mill site but within the subject land, are not disturbed; and (ii) further consideration of (Supplementary Report 3-3 of the EIS, Recommendation A4) the need to have all scarred trees fenced and protected.		Historic condition - not assessed during this reporting period.	Not triggered	
79	Prior to the construction of the water supply pipeline, the Applicant shall undertake an archaeological and ecological assessment of the route in consultation with and for the approval of NPWS and the Director-General.		Historic condition - not assessed during this reporting period.	Not triggered	
80	In the event that Aboriginal artefacts are identified on the site during development through earthworks, construction or operation of the mill, the Applicant shall contact the NPWS and cease work in the relevant location pending investigation and assessment of their heritage value.	Interview M O'Donovan	No Aboriginal artefacts have been uncovered or reported during the reporting period.	Not triggered	
81	The Applicant shall ensure that any supplementary investigation of Aboriginal sites are undertaken by a qualified archaeologist.		Noted	Not triggered	
82	Within 3 months of on site construction works commencing, the Applicant shall maintain a Category 1, four wheel drive Fire Tanker with 3,600 litre water carrying capacity on site. The tanker shall have the ability to provide high water flow and pressure to standard fire hose lines.	Interview M O'Donovan	Isuzu Fire tanker available on site. Estimated volume 3600L. Additional 1500L tanker purchased Dec 2021 for use in log yard as initial response. No changes made to equipment setup during the reporting period.	Compliant	
83	For the purposes of local fire control, the Applicant shall make available the tanker required by Condition 82 to the Gilmore Bush Fire Brigade should it be required.	Interview M O'Donovan	The tanker is available on request - no requests made during the reporting period.	Compliant	
84	Within 6 months after the commencement of operations, the Applicant shall ensure: (a) that a minimum of ten staff that have received Rural Fire Service basic fire fighter (BF) standard training are available should they be required; and (b) that a minimum of one staff member with advanced fire fighting (AF) standard competency training is available should he/she be required.	Visy ERT (Emergency Response Team) Personnel Skills Register (.xlsx)	Personnel skills register confirms at least 10 people with basic fire fighter training and at least one person with AF training. Multiple people are trained to cover all shift times.	Compliant	
85	The Applicant shall ensure the maintenance of bush fire fighting equipment at all times in accordance with current bush fire control and safety practice and in consultation with Tumut Shire Council's Fire Control Officer.	Interview M O'Donovan	As per the 2021 audit ERT training includes tanker maintenance review and checks.	Compliant	
86	The Applicant shall liaise with the Council to monitor local housing demand during the construction stage of the mill, and in the event of shortage of rental accommodation, provide additional temporary accommodation facilities for use by its construction workforce.		Historic condition - not assessed during this reporting period.	Not triggered	
87	Prior to the commencement of any on-site works, the Applicant shall consult with NSW Fisheries to ensure that any road, causeway or pipe crossings of waterways span the entire waterway to prevent increases in stream velocities and blockages of fish passages.		Historic condition - not assessed during this reporting period.	Not triggered	
88	The Applicant shall appoint Officer responsible for environmental management and reporting whose qualifications are acceptable to the Director-General to be responsible for ensuring that all environmental safeguards proposed for the development in the EIS and as required by this consent and other statutory approvals, are enforced and monitored from the commencement of construction.	Interview M O'Donovan Interview I Kane	Matthew O'Donovan is the HSE manager. Isabella Kane (Enviro Officer since Nov 2022) is currently in the process of being approved as an alternate contact by the Department.	Compliant	
89	The Applicant shall design all lighting, roadworks and carparking to ensure that the site lighting is positioned to minimise reflectivity and light spill and that lights of vehicles are contained within the site as far as practicable to the satisfaction of the Council.	Visy Complaints Registers Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23	No lighting complaints were received during the reporting period.	Compliant	
90	The construction and operation of the proposed cooling tower must comply with Australian Standard AS 3666 - 1995 and with the microbial control provisions of the Public Health Act, 1991 and Regulation.	Monthly Water Treatment Reports (Buckman Laboratories) July 2022 – June 2023	Cooling towers maintained and monitored continuously. Water is tested and treated for microbial activity weekly and results are reported monthly. No exceedances noted in sampled Buckman reports.	Compliant	

91	The premises shall comply with the requirements of the Dangerous Goods Act 1975, as administered by WorkCover Authority and the EPA, and if necessary be licensed under this Act.	Hazard Audit Dec 2021, Pinnacle Risk Management.	External hazard report by Pinnacle Risk Management in Dec 2021 found general compliance and some minor matters for attention by Visy.	Compliant	
92	In the event that the Applicant and the Council or a Government agency, other than the Department of Urban Affairs and Planning, cannot agree on the specification or requirements applicable under this consent, the matter shall be referred by either party to the Director-General or if not resolved, to the Minister for Urban Affairs and Planning, whose determination of the disagreement shall be final and binding on the parties.		Noted	Not triggered	
93	The Applicant shall treat windows and consider appropriate acoustic barriers at the residences of Mr and Mrs Beale (Lot 4, DP 57228) and Mr F Dutton (Lot 1, DP 744422) if requested by the owners after commissioning of the pulp and paper mill to reduce traffic noise affects generated by the mill to the satisfaction of the EPA.	Interview M O'Donovan	Dutton residence sold to Steunkal has been resold to an unknown third party. The Beal residence has been previously demolished.	Compliant	Ofl 2017/005, Consolidate or remove condition
94	The Applicant shall give public notice of any impending wastewater discharge from its wastewater storages as well as notifying all persons downstream of the site to the Tumut River who use water from Sandy or Gilmore Creeks for domestic purposes.	EPL Annual Return 2023 Winter Storage Dam records	Nil intended discharges during the reporting period.	Not triggered	
95	The Applicant shall prior to commencing operations at the pulp and paper mill submit to the Director-General an assessment of the measures to be taken to minimise night time truck movements to and from the mill in a Truck Scheduling Report and shall incorporate such of the measures as required by the Director-General into the Traffic Management Plan required by Condition 50. The Scheduling Report shall be reviewed each 2 years or such longer period as determined by the Director-General.	ECMR 2023 ECMR Appendix 6 - Monthly HV Movement Data	Heavy vehicle movements submitted to DP&E on an annual basis in the ECMR. Figures are reviewed annually as part of the ECMR preparation. Truck movements minimised between WW and the Mill by backloading with white pulp. Introduction of A-doubles have decreased HV movement numbers for exported product and vehicles though Adelong. White pulp trained from Port (Sydney/Melbourne) to Wagga Wagga reducing HV numbers on the Hume Highway.	Compliant	
96	The Applicant shall report on a review of process water use in the mill two years after commencement of operation of the mill to the requirements of the Director-General. The review is to include consideration of improved recycling rates and reduced generation of wastewater. The Applicant shall then report each 3 years or at such longer period as determined by the Director-General.	Visy Process Water Review 23/12/21 Interview M O'Donovan	Process water reuse was last reviewed by a site process engineer on December 2021. The next review is due by December 2024.	Compliant	
97	If any landowner (as at the date of this consent) who is specified in the schedule hereunder so requests, the Applicant shall negotiate an option to purchase those properties at a price to be determined as provided in Conditions 98 -101. **Note: Refer to Consent for Schedule and requirements b) - f) if relevant during reporting period.**	Interview M O'Donovan	No land purchases have occurred during the reporting period.	Not triggered	
98	In respect of a request purchase land arising under Condition 97, the Applicant shall pay the owner the acquisition price which shall take into account and provide payment for: (i) a sum not less than the current market value of the owner's interest in the land used for its existing use at the date of this consent and all improvements thereon at this date as if the land was unaffected by the development proposal. (ii) the owner's reasonable compensation for disturbance allowance and relocation costs within the Tumut, Tumbarumba and Gundagai Local Government Areas. (iii) the owner's reasonable costs for obtaining legal advice and expert witnesses for the purposes of determining the acquisition price of the land and the terms upon which it is to be acquired.	Interview M O'Donovan	No land purchases have occurred during the reporting period.	Not triggered	
99	In the event that the Applicant and any owner referred to in Condition 97 cannot agree within the time limit upon the acquisition price of the land and/or the terms upon which it is to be acquired, then: (i) either party may refer the matter to the Director-General or his/her nominee, who shall request the President of the Australian Institute of Valuers and Land Economists to appoint a qualified independent valuer, suitably qualified in compensation issues, who shall determine, after consideration of any submissions from the land owner and the Applicant, the acquisition price. (ii) in the event that the independent valuer requires guidance on any contentious legal, planning or other issues, the independent valuer shall refer the matter to the Director-General or his/her nominee, who if satisfied that there is need for a qualified panel, shall arrange for the constitution of the panel. The panel shall consist of: 1) the appointed independent valuer, 2) the Director-General, or his/her nominee, and/or 3) the President of the Law Society of NSW or his/her nominee. The qualified panel shall, on the advice of the valuer, determine the issue referred to it and advise	Interview M O'Donovan	No land purchases have occurred during the reporting period.	Not triggered	
100	The Applicant shall bear the costs of any valuation or survey assessment requested by the Director-General in accordance with Condition 99.	Interview M O'Donovan	No requests for valuation or survey have occurred during the reporting period.	Not triggered	
101	Nothing in this consent precludes the Applicant from negotiating with any landowner the acquisition of property necessary for the operation of the mill.		Noted	Not triggered	

Project Approval Compliance Status - November 2023

Reference	Approval or licence requirement	Evidence collected 2023	Audit Finding	Compliance status	Action Reference
Project Approval 06_0159					
Administrative Conditions					
1.1	The Proponent shall carry out the project generally in accordance with the: a) Major Projects Application 06_0159; b) Visy Pulp and Paper Proposed Mill Expansion, Tumut NSW, Final Environmental Assessment, prepared by Visy Pulp and Paper Ply Ltd and dated January 2007; c) Visy Pulp & Paper Proposed Mill Expansion, Tumut NSW, Submissions Report, prepared by Visy Pulp and Paper Ply Ltd and dated March 2007; d) the concept approval granted with respect to the Visy Tumut Mill Expansion (06_0159); e) the Statement of Commitments prepared by Visy Pulp and Paper Ply Ltd dated 18 April 2007;and f) the conditions of this approval.	Site observations Interview M O'Donovan ECMR 2023	The Project has been carried out generally in accordance with the specified approvals. Refer CA Condition 1.1. Production for the period was 671,885t, under the 800,000t/a limit approved in 2017. It is noted that Modification 6 is expected to be approved by the next audit. This modification will include an expansion to the waste yard, construction of a clothing storage shed, construction of a wastewater spare parts shed and construction of a refuelling facility adjacent to the site gatehouse (originally approved under Mod 3).	Compliant	
1.2	In the event of an inconsistency between: a) the conditions of this approval and any document listed from condition 1.1 a) and 1.1f)inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b) any document listed from condition 1.1a) and 1.1f) inclusive, and any other document listed from condition 1.1 a) and 1.1f) inclusive, the most recent document shall prevail to the extent of the inconsistency.	EPL, WALs, RRE, RRO, ECMR 2023	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	Not compliant	
1.3	Notwithstanding condition 1.2, if there is any inconsistency between this project approval and the concept approval for the Visy Tumut Mill Expansion, the concept approval shall prevail to the extent of the inconsistency.	Interview M O'Donovan	Noted	Not triggered	
1.4	The Proponent shall comply with any reasonable requirement(s) of the Director-General arising from the Department's assessment of: a) any reports, plans or correspondence that are submitted in accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans or correspondence.	Interview M O'Donovan	Noted	Not triggered	
1.5	The Proponent shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	EPL, WALs, RRE, RRO, ECMR 2023 Interview M O'Donovan	Refer to Condition 91 Development Consent EPL10232 WAL 40AL405643 WAL 40AL405644 NDG035066 (Dangerous Goods) Woodlawn PHR acid mine tailings trial order 2020 Woodlawn PHR acid mine tailings trial exemption 2020 The Project EPL was updated on 5/07/2023 but updated conditions have been applied to the reporting period as per Visy discussions with EPA.	Compliant	
2.1	The Proponent shall construct the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	Site observations Complaint Registers	No dust observed on site at the time of the site inspections and no dust complaints received during the reporting period. Main access roads onsite are sealed. Water carts are available on site for dust suppression if required.	Compliant	
2.2	The Proponent shall conduct all operations and activities on the site, including start-up and shut-down, in a manner that shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.	ECMR 2023	There were 17 odour complaints during the reporting period. This is down from 21 complaints in the previous period and well below 60+ complaints six years ago. The source of the odour was identified and in most cases minimised through action. Offensive odour is prevented from leaving the boundary most of the time, however compliance with this condition is not able to be achieved while odour complaints are received. It is noted that s129 of the POEO Act indicates that a defence for this occurrence can include the identification of odour on a Project's EPL. While EPL10232 does identify the potential for multiple odorous gasses, the EPL Annual Return 2023 identifies 13 exceedances of Sulphur dioxide, an odorous gas, at Point 1 during the reporting period.	Not compliant	

<table>
<tr><td>2.3</td><td>The Proponent shall install and operate odour collection and reduction systems for all relevant new plant. This shall include incorporating new plant into the existing NCG Collection System and Condensate Treatment System.</td><td>Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023</td><td>The capture and management of gasses causing odour is a key aspect of existing and new plant. Air Quality Management Plan (April 2023) details the sources and management of emissions. Reference to the odour complaint system identifies the sources of most odour complaints. This indicates that Visy staff are aware of the various odour sources producing complaints. Annual plant shutdowns will typically include modifications to the plant and in subsequent years this has focused on odour management. Repairs to the liquor tank 102 roof have decreased fugitive emissions by improving the operation of the HVLC system. Increased focus on process control has also decreased odour generation. This represents evidence of ongoing improvement in odour management.</td><td>Compliant</td><td></td></tr>
<tr><td>2.4</td><td>The Proponent shall install and operate vapour compression evaporators for both new and existing plant to reduce the level of chemical oxygen demand in clean condensate. The vapour compression evaporators must be operated such that chemical oxygen demand in the clear condensate is reduced to 50 % of existing levels.</td><td>Interview M O'Donovan</td><td>A comparison of the COD levels in the clean condensate between 2007 and any time after 2010 is no longer meaningful. This is due to process changes in the production of clean condensate streams. Previous comparisons, now believed to be flawed, indicated a COD reduction in the clean condensate that was close to but less than 50%.

A request has been made to DPE to remove this condition as part of Mod 6</td><td>Not compliant</td><td>Make application to DPE to consolidate or remove condition - in progress at time of audit.</td></tr>
<tr><td>2.5</td><td>Prior to the commencement of construction, the Proponent shall submit to the satisfaction of the Director-General, a detailed report on the proposed use of vapour compression evaporators. The report shall be prepared in consultation with the DECC and shall demonstrate how the vapour compression evaporator system will reduce chemical oxygen demand in clean condensate to at least 50% of existing levels.</td><td></td><td>Historic condition - not assessed during this reporting period.</td><td>Not triggered</td><td></td></tr>
<tr><td>2.6</td><td>Prior to the commencement of operation, the Proponent shall submit to the satisfaction of the Director-General, a detailed report on all feasible and reasonable mitigation measures to reduce adverse odour impacts arising from startup and shutdown activities. The report is to be prepared in consultation with the DECC and shall include but not necessarily be limited to:
a) investigations into the timing and sequencing of plant activities such that adverse odour impacts are minimised; and
b) the effect of prevailing weather conditions on plant activities in regard to adverse odour impacts.</td><td></td><td>Historic condition - not assessed during this reporting period.</td><td>Not triggered</td><td></td></tr>
<tr><td>2.7</td><td>The Proponent shall utilise Best Available Techniques in accordance with the European Commission Reference Document On Best Available Techniques in the Pulp and Paper Industry (2001) for all combustion sources and air emission control equipment associated with the project.</td><td>Site observations
ECMR 2023
Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023</td><td>The operation of the plant is managed through continuous monitoring of process inputs and outputs and conditions. Odour sources are routinely monitored by certified external parties. Inclusion of advanced controllers on lime kilns during previous reporting periods has improved overall controls. Detailed information on employed technology systems is included in the updated AQMP (April 2023).</td><td>Compliant</td><td></td></tr>
<tr><td>2.8</td><td>Prior to the installation of any equipment associated with the project that discharges to air, the Proponent shall submit manufacturer's performance guarantees for that equipment to the DECC. The documentation shall demonstrate to the DECC's satisfaction that the equipment, when operating at design load will comply with the air discharge limits specified under condition 2.10 of this approval.</td><td></td><td>Historic condition - not assessed during this reporting period.</td><td>Not triggered</td><td></td></tr>
<tr><td>2.9</td><td>For the purposes of this approval, air monitoring/ air discharge points shall be identified as provided in Table 1 below.
Table 1 - Identification of Air Monitoring and Discharge Points
<table><tr><th>Monitoring / Discharge Point</th><th>Monitoring/ Discharge Point Location</th></tr><tr><td>Main Stack 2</td><td>Main Stack 2</td></tr><tr><td>Recovery Boiler 2</td><td>In the discharge duct downstream of Recovery Boiler 2 and before the junction with Main Stack 2</td></tr><tr><td>Natural Gas Boiler</td><td>In the discharge duct downstream of Natural Gas Boiler Electro-static Precipitator and before the junction with Main Stack 2</td></tr><tr><td>Multi-fuel Boiler</td><td>In the discharge duct downstream of the Multi-Fuel Boiler after the fabric filters and before the junction</td></tr><tr><td></td><td>with the Main Stack</td></tr><tr><td>Lime Kiln 2</td><td>Lime Kiln 2 discharge duct before the junction with the Main Stack</td></tr><tr><td>Gas Turbine</td><td>In the discharge stack from the Gas Turbine</td></tr></table></td><td>ECMR 2023</td><td>A Continuous Emissions Monitoring System (CEMS) is installed and monitors at Stack 1 and Stack 2, with multiple combustion units discharging through these locations. Locations identified in s3.2.1 of the 2023 ECMR against EPL and PA Condition 2.9 requirements.</td><td>Compliant</td><td></td></tr>
</table>

2.10	The Proponent shall design, construct, operate and maintain the project to ensure that for each stack discharge point, the concentration of each pollutant listed in Table 2 to Table 5 inclusive is not exceeded. This condition only applies to the operation of the project, and to avoid any doubt, does not apply during start-up or shut-down. Reference conditions for in-stack concentrations described in this condition shall be reported to the reference conditions specified within Schedule 5 Part 3 of the Protection of the Environment Operations (Clean Air) Regulation 2002, except for emissions from the Main Stack 2, Natural Gas Boiler and Multi-Fuel Boiler where the applicable reference conditions are Dry, 273 °K, 101.3 kPa, 8 % 02. **Table 2 - Maximum Allowable Discharge Concentration Limits (Main Stack 2)** Pollutant / 100 Percentile limit (mgm^{-3}) Cadmium 0.5 Chlorine 100 Mercury 0.5 Nitrogen Oxides 400 Hydrogen Chloride** 50 Sulfur Dioxide** 250 Total Solid Particulates 50 Sulfuric acid mist and sulfur trioxide (as SO_3) 20 Opacity* 20 TCDD (equivalent)* 0.1 Hydrogen Fluoride 20 Type 1 and Type 2 Substances (in aggregate) 1 TRS (as H_2S) 2 * Note: The unit of measure for Opacity is %Opacity and for TCDD (equivalent) it is ng/m^3. ** Note: is the maximum allowable discharge concentration limit for the multi-fuel boiler operating on standard fuels only. **Table 3 - Maximum Allowable Discharge Concentration Limits (Natural Gas Boiler)** Pollutant / 100 Percentile limit (mgm^{-3}) Nitrogen Oxides 100 Solid Particulates 30 Carbon Monoxide 120 Type 1 and Type 2 Substances (in aggregate) 0.5 **Table 4 - Maximum Allowable Discharge Concentration Limits (Multi-fuel Boiler)** Pollutant / 100 Percentile limit (mgm^{-3}) Cadmium 0.06 Mercury 0.06 Hydrogen Chloride 90 Dioxins & Furnans* 0.1 Nitrogen Oxides 300 **Table 6 – Averaging Periods** Pollutant / Averaging Period TRS (as H_2S) 1 hour SO2 1 hour HCl 1 hour Nitrogen Oxides (as NO_2) 1 hour Opacity 6 minutes All other pollutants As per test methods specified in condition 3.1 Solid Particulates 26 Carbon Monoxide 120 Type 1 and Type 2 Substances (in aggregate) 1 * Note: The unit of measure for Dioxins & Furans is ng/m^3. **Table 5 - Maximum Allowable Discharge Concentration Limits (Gas Turbine)** Pollutant / 100 Percentile limit (mgm^{-3}) Nitrogen Oxides 70 Solid Particulates 10 Carbon Monoxide 20	ECMR 2023 EPL Annual Return 2023	Multiple exceedances identified during the reporting period - all exceedances documented in ECMR and the EPL Annual Return. It is also noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card.	Not-compliant	
2.11	Averaging periods applicable for pollutants emitted from the discharge points described in condition 2.9 are listed in Table 6 unless otherwise specified by the DECC. **Table 6 – Averaging Periods** Pollutant / Averaging Period TRS (as H_2S) 1 hour SO2 1 hour HCl 1 hour Nitrogen Oxides (as NO_2) 1 hour Opacity 6 minutes All other pollutants As per test methods specified in condition 3.1	Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Averaging periods for each pollutant are specified in the AQMP (April 2023) as described in Table 6.	Compliant	
2.12	The Proponent shall ensure that the vibration resulting from construction and operation of the project does not exceed the evaluation criteria presented in British Standard BS6472 for low probability of adverse comment, at any affected residential dwelling. **Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings** Place and time / Low probability of adverse comment m·s$^{-1.75}$ 1) / Adverse comment possible m·s$^{-1.75}$ / Adverse comment probable m·s$^{-1.75}$ 2) Residential buildings 16 h day 0.2 to 0.4 / 0.4 to 0.8 / 0.8 to 1.6 Residential buildings 8 h night 0.1 to 0.2 / 0.2 to 0.4 / 0.4 to 0.8	Site observations Interview M O'Donovan	No vibration monitoring completed. No vibratory works (blasting, rock breaking, piling, compaction etc) carried out during the reporting period. No residences within close proximity to the site.	Not triggered	
2.13	The Proponent shall only undertake construction activities associated with the project that would generate an audible noise at any residential premises during the following hours: a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays.	ECMR 2023	No construction undertaken during the reporting period.	Not triggered	
2.14	The hours of construction activities specified under condition 2.13 of this approval may be varied with the prior written approval of the Director-General. Any request to alter the hours of construction specified under condition 2.13 shall be: a) considered on a case-by-case basis; b) accompanied by details of the nature and need for activities to be conducted during the varied construction hours; and c) accompanied by written evidence of the DECC's agreement with the proposed variation in construction times, after providing any information necessary for the DECC to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of receptors in the vicinity of the site		Historic condition - not assessed during this reporting period.	Not triggered	

<table>
<tr><td>2.15</td><td>The Proponent shall design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 7, at those locations and during those periods indicated. The maximum allowable noise contributions apply under wind speeds up to 3 ms·' (measured at 1 0 metres above ground level), and under temperature inversion conditions of up to 3 °C/ 100 metres and wind speeds up to 2ms·1.
Table 7 - Maximum Allowable Noise Contribution
<table><tr><th>Location</th><th>Day
7:00am to 6:00pm Mondays to Saturdays
8:00am to 6:00pm Sundays and public holidays</th><th>Evening
6:00pm to 10:00pm on any day</th><th colspan="2">Night
10:00pm to 7:00am Mondays to Saturdays
10:00pm to 8:00am Sundays and public holidays</th></tr><tr><td></td><td>$L_{Aeq(15\ minute)}$</td><td>$L_{Aeq(15\ minute)}$</td><td>$L_{Aeq(15\ minute)}$</td><td>L_{Amax}</td></tr><tr><td>Pleasant View*</td><td>40</td><td>40</td><td>40</td><td>45</td></tr><tr><td>Deep Creek*</td><td>39</td><td>39</td><td>39</td><td>45</td></tr><tr><td>Reka* & Glengarry*</td><td>36</td><td>36</td><td>36</td><td>45</td></tr><tr><td>Any other residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table>* Note: Residence names are those described in Appendix N of the EA.</td><td>ECMR 2023</td><td>The attended noise monitoring data indicated that noise from the site was inaudible during 13 out of 24 measurements. Site LAeq (15min) noise contributions were higher than relevant target levels during six of the 24 measurements, however noise agreements exist with all properties monitored. One night period measurement exceeded the target level by 9 dB (Pleasant View) however a negotiated agreement is in place with this resident. In general, considering estabished noise agreements are in place with eight residences adjacent the Project site (Mod-4, August 2020), the site is compliant.</td><td>Compliant</td><td></td></tr>
<tr><td>2.16</td><td>For the purpose of assessment of noise contributions specified under condition 2.15 of this approval, noise from the project shall be:
a) at any point within the residential boundary, or at any point within 30 metres of the dwelling where the dwelling is more than
b) 30 metres from the boundary; and
c) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.

Notwithstanding, should direct measurement of noise from the project be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-General prior to the implementation of the assessment method.</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Noise monitoring conducted at the appropriate locations during the reporting period, with suitable alternative locations determined by EMM as required and in accordance with the Noise Policy for Industry (NSW EPA, 2017).</td><td>Compliant</td><td></td></tr>
<tr><td>2.17</td><td>Except as may be expressively provided by an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.</td><td>ECMR 2023
EPA Clean-up Notice 3504075 - NSW EPA, 8/11/2023
Interview M O'Donovan
Site observations</td><td>One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection.</td><td>Not-compliant</td><td></td></tr>
<tr><td>2.18</td><td>The project shall be designed and employ surface water management techniques such that existing run-off volumes along creeks and drainage lines from the site are maintained at similar levels post-construction.</td><td>Site observations
Interview M O'Donovan</td><td>All clean stormwater runoff is directed to controlled water quality treatment ponds prior to release off site. It is noted that the Water Management Plan (PLANS-VPP-TUM-HSE-007-5)for the site was updated on 18th July 2023 however this will be captured in the next reporting period.</td><td>Compliant</td><td></td></tr>
<tr><td>2.19</td><td>Soil and water management controls shall be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities, in accordance with Landcom's Managing Urban Stormwater: Soils and Conservation.</td><td></td><td>Historic condition - not assessed during this reporting period.</td><td>Not triggered</td><td></td></tr>
<tr><td>2.20</td><td>Prior to the commencement of site preparation works, the Proponent shall undertake acid sulfate soil testing for areas of the site to be disturbed during site preparation and construction. Acid sulfate soil testing shall be consistent with the DECC's Environmental Guideline Assessing and Managing Acid Sulfate Soil and the Acid Sulfate Soil Management Advisory Committee (ASSMAC) document Acid Sulfate Soil Manual.
Should testing indicate that any potential or actual acid sulfate soils may be disturbed during site preparation works or the construction of the project, the Proponent shall prepare an Acid Sulfate Soil Management Plan (refer to condition 5.2).</td><td></td><td>Historic condition - not assessed during this reporting period.</td><td>Not triggered</td><td></td></tr>
<tr><td>2.21</td><td>All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials.</td><td>ECMR 2023
Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023</td><td>Waste is directed to waste facilities at:
> Hi Quality EPL 10398 Goulburn
> Tumbalong Landfill (commenced January 2021) EPL 21440
> Belette's Landfill EPL 20596
> Woodlawn EPL 20476 Goulburn.
> Captains Flat EPL 21721.

Dregs and Grits, Fly Ash and Boiler Sand waste was taken to both Captains Flat and Woodlawn sites until 19th February 2023, after which only Woodlawn was utilised.</td><td>Compliant</td><td></td></tr>
</table>

2.22	The Proponent shall maximise the treatment, reuse and/ or recycling on the site of any waste oils, excavated soils, slurries, dusts and sludges associated with the project, to minimise the need for treatment or disposal of those materials outside the mill facility.	ECMR 2023 Interview M O'Donovan	Oils taken by contractor Cleanaway contractors. Excavated soils are stored at the rear of the plant and used on site for earthworks. Organic dusts are fed to the boiler. Slurries and sludges are processed in the waste water treatment system and irrigated on site. Resource recovery exemption now in place for the reuse of Dregs and grits, fly ash and boiler sand at Woodlawn Mine and Captains Flat Mine rehabilitation sites. A total of 8,651t was sent to these sites during the reporting period.	Compliant	
2.23	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023 ECMR 2023	In accordance with EPL condition L5.1, Visy accepted 248,695t of waste paper, 1,375,471t of pulpwood logs and 382,136t of sawmill chip as a raw fibre source during the reporting period. Visy also powered the boilers on site with waste generated on site and received from off site in the form of timber residues.	Compliant	
2.24	The Proponent shall ensure that all liquid and / or non-liquid waste generated and / or stored on the site is assessed and classified in accordance with Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (DECC, 2004), or any future guideline that may supersede that document.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023	Waste is being classified using the NSW EPA (2014) 'Waste Classification Guidelines Part 1: Classifying Waste'	Compliant	
2.25	The Proponent shall undertake effluent irrigation on the existing and expanded areas identified in the EA in a manner that ensures the long term sustainability of this activity. Mitigation and management practices are to be determined in consultation with DPI and shall include, but not be limited to: a) the use of crops that will reduce soil salinity levels; b) measures to maintain crop biodiversity such as cropping patterns based on 1, 2, 3 and 4 years of Lucerne rotation under different paddocks; c) the provision of subsurface drainage under low-lying areas which receive effluent; and d) the use of best practise ameliorative measures where soil improvement is determined to be necessary.	Farm and Environmental Monitoring Report 2023 ECMR 2023 Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021	Mitigation and management measures are outlined in the WMP and discussed in the Farm and Environmenta Monitoring Report. Management measures are being deemed generally effective as can be seen in the monitoring results for the reporting period. Waste water testing is routinely carried out. Soil and plant analysis of crops/pastures is completed for the monitoring period on the Gadara Park Farm. Nutrient balances calculated to ensure net accumulation of nutrients is managed. Soils are limed to manage soil pH. Crops are rotated between millet, winter cereals and lucerne.	Compliant	
2.26	The Proponent shall not make unavailable to receive effluent those lands identified in the EA for the purpose of contingency land for the irrigation of effluent.	Farm and Environmental Monitoring Report 2023 ECMR 2023	All farm land identified in the EA is available for irrigation. It is noted that during the 22/23 reporting period, the highest irrigation levels (894ML) occurred since monitoring began in 2002.	Compliant	
2.27	The winter storage dam extension shall be constructed with a 600 mm thick remoulded, recompacted clay liner with a permeability of less than 1 x 10Â·9 m/s and shall not exceed a total water volume of approximately 900ML.	Site observations Interview M O'Donovan	No extension of the winter storage dam occurred in the reporting period.	Compliant	
2.28	Discharge of treated wastewater from the project into Sandy Creek or any of its tributaries shall only occur as permitted by the DECC and in accordance with the DECC's Environmental Guidelines: Use of Effluent by Irrigation (2004). Discharge information shall be recorded to the satisfaction of the DECC and shall include discharge volume, duration of discharge and flow conditions of Sandy Creek or any of its tributaries at the time of discharge.	ECMR 2023	No treated wastewater was intentionally discharged from site during the reporting period. The discharge incident into Sandy Creek (28/10/2022) is addressed in Condition 2.17 (and across various other approvals) and is not considered to be covered by the intent of this condition.	Not triggered	
2.29	The Proponent shall demolish all relevant structures strictly in accordance with AS 2601-1991: The Demolition of Structures, as in force at 1 July 1993.	Interview M O'Donovan	No demolition has occurred during the reporting period.	Not triggered	
2.30	Prior to the commencement of construction, the Proponent shall consult with the Civil Aviation Safety Authority in relation to any modifications to instruments or procedures required at the Tumut Aerodrome, or other airports where relevant, as a result of any air plume associated with the project. At the request of the Civil Aviation Safety Authority, the Proponent shall fund any such modifications to the satisfaction of the Director-General.		Historic condition - not assessed during this reporting period.	Not triggered	
2.31	The Proponent shall store and handle all dangerous goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with: a) all relevant Australian Standards; b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) the EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management. In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.	Pinnacle Hazard Audit Dec 2021 Compliance Audit Report - Liquid chemical storage and handling, EPL 10232 (NSW EPA, August 2023)	External hazard report by Pinnacle Risk Management in Dec 2021 found general compliance and some minor matters for attention by Visy, with implementation of these recommendations to be assessed in December 2024's hazard audit. It is noted that the EPA undertook a Compliance Audit - Liquid chemical storage and handling in August 2023. All findings were either Code Blue (administrative) or Code Yellow (low risk) however this occurred outside of the reporting period and will be assessed during the 2024 IEA.	Compliant	

2.32	At least one month prior to the commencement of construction of the project, the Proponent shall prepare and submit for the approval of the Director-General, the following studies: a) an updated Fire Safety Study for the mill site including the expansion project, covering all aspects detailed in the Department's publication Hazardous Industry Planning Advisory Paper No. 2 - Fire Safety Guidelines and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The Study shall include a strict maintenance schedule for essential services and other safety measures. The Study shall be submitted for approval to the Commissioner of the NSW Rural Fire Service prior to submission to the Director-General; and b) a Construction Safety Study for the project, prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 - Construction Safety Study Guidelines. Specific consideration must be given to the interaction of construction work with existing plant and operations. The commissioning portion of the Study may be submitted two months prior to commissioning the project.		Historic condition - not assessed during this reporting period.	Not triggered	
2.33	At least two months prior to the commencement of commissioning of the project the Proponent shall prepare and submit for the approval of the Director-General the following studies: a) an updated Emergency Plan for mill operations including the expansion project. The Plan shall be prepared in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the project; and b) an updated Safety Management System, covering all operations at the site including the expansion project and any associated transport activities involving hazardous materials. The System shall clearly specify all safety-related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to safety procedures. The System shall be developed in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.		Historic condition - not assessed during this reporting period.	Not triggered	
2.34	The Proponent shall ensure that the sweep path of the largest vehicle entering and exiting the site and manoeuvrability through the site is accordance with AS 2890.2-2002 Parking facilities - Off-street commercial vehicle facilities and to the satisfaction of Council.	Interview M O'Donovan	This is a historical condition however the sweep path appears appropriate, no changes to traffic access have been made during the reporting period and no complaints or incidents relating to traffic access have occurred during the reporting period.	Compliant	
2.35	The Proponent shall install traffic calming measures on internal roads and ensure that all internal roads are appropriately marked and signposted so as to assist safe vehicular movement throughout the plant.	Site observations	Multiple traffic-calming measures including clear signage and frequent speed bumps were observed during the site inspection.	Compliant	
2.36	The Proponent shall maximise the use of B-doubles and backloading, and where possible the use of super b-doubles, so as to reduce the number of heavy vehicle movements from site.	ECMR 2023	General truck configurations have remained the same for the past few years, including the reporting period. General configurations include maximising the use of B-doubles and A-doubles as well as backloading. General configuration includes: Logs ave. 94% B doubles and 6% semi-trailers, ave. log truck load B double = 39t, semi-trailer = 28t. Sawmill chip 52% B doubles and 48% semi-trailers, ave. load 37t B double and 29t semi-trailer. Paper domestic was 20% A-Double, 70% B doubles and 5% semi-trailers, ave. load 36t B double and 24t semi-trailer. Paper export 100% A-Double 50t/load	Compliant	
2.37	The Proponent shall ensure that there will be no night-time (10pm to 7am) semi-trailer, super B-Double or B-Double movements to and from the plant via the Snowy Mountains Highway through Adelong or to and from the plant via MR 280 north of Adelong.	ECMR Appendix 6 Monthly HV Movement Data Complaints Register 2022/23	No truck movements via Tumblong/Adelong have been recorded during the reporting period and no complaints regarding out of hours movements have been received during the reporting period.	Compliant	
2.38	The Proponent shall, subject to appropriate road safety, ensure that all trucks associated with the project must: a) utilise air bag suspension; b) minimise the use of exhaust brakes at night in residential areas; and c) be operated in a manner so as to reduce adverse noise impacts.	Interview M O'Donovan Complaints Register 2022/23	Drivers and employees at Visy site are inducted and trained, with all Visy Logistics drivers trained by Visy Logistics during a separate onboarding process. A toolbox talk developed February 2015 and has been used to train new and existing staff. No complaints have been received from the public regarding airbrake noise for the reporting period.	Compliant	

2.39	Prior to the commencement of construction, the Proponent shall discuss the implementation of the road safety measures such as road speed reductions, driveway traffic vision mirrors and increased signage with Council. The Proponent shall supply any relevant information as required by Council to determine the need and suitability of such measures. Council may then make representation of such matters to the Local Traffic Committee to recommend consideration by the RTA.		Historic condition - not assessed during this reporting period.	Not triggered	
2.40	The Proponent shall stagger start and finish times for construction teams as far as practicable such that the traffic impact on the intersection of Snowy Mountain Highway and Bachelor's Valley Way is minimised.		Historic condition - not assessed during this reporting period.	Not triggered	
2.41	Prior to the commencement of construction the Proponent shall prepare and implement a Workforce Housing Strategy. The Strategy is to be developed in consultation with the Department of Housing and Council and shall be submitted to the Director-General for approval. The Strategy shall include, but is not necessarily limited to a program for monitoring the supply and affordability of rental accommodation during the construction stage and contingency measures to be implemented in the event of a shortfall in affordable rental accommodation.		Historic condition - not assessed during this reporting period.	Not triggered	
2.42	The Proponent shall ensure that all external lighting associated with the project is mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway. The lighting shall be the minimum level of illumination necessary and shall comply with AS 4282(/NT) 1997 -Control of Obtrusive Effects of Outdoor Lighting.	Visy Complaints Registers Jul 22 – Sept 22, Oct 22 – Dec 22, Jan 23 – Mar 23, Apr 23 – Jun 23	Plant lighting at the time of the audit was observed to be fixed and directed toward the plant. Lights face towards work areas, no light complaints recorded. Solar lights are installed at Gadara Road intersection for queueing trucks.	Compliant	
2.43	The Proponent shall, at the request of the landowner for the land listed as Lot 4 DP 793196, negotiate an option to purchase this land.	Interview M O'Donovan	No land purchase requests have occurred during the reporting period.	Not triggered	
2.44	Independent valuation of the land shall commence at the request of the landowner. The landowner may request up to three independent valuations which shall be funded by the Proponent.	Interview M O'Donovan	No land purchase requests have occurred during the reporting period.	Not triggered	
2.45	The acquisition price shall take into account and provide payment for: a) the current market value of the land as if it was unaffected by the existing mill and this project; b) reasonable compensation to the landowner for disturbance allowance and relocation costs within the Gundagai, Tumbarumba or Gundagai local government areas; c) the landowner's reasonable costs for obtaining legal advice and expert opinion for the purposes of determining the acquisition price of the land and the terms upon which it is to be acquired.	Interview M O'Donovan	No land purchases have occurred during the reporting period.	Not triggered	
2.46	The landowner and the Proponent shall negotiate the terms of any option to purchase in good faith within six months of the offer to purchase being received by the landowner or, alternatively, any other form of agreement acceptable to both parties. In the event of a dispute over the valuation or terms of purchase of the landowner's property which is unresolved after twelve months of the offer being received, either party may refer the matter to the Director-General for resolution. The Director-General's determination of any such dispute shall be final and binding on the parties. Any valuation or survey assessment required by the Director-General to resolve this matter shall be funded by the Proponent.	Interview M O'Donovan	No land purchases have occurred during the reporting period.	Not triggered	

3.1	The Proponent shall determine the pollutant concentrations and emission parameters specified in Table 8 to Table 13 inclusive below, at each of the discharge points (established in strict accordance with the requirements of test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007)). Monitoring shall be undertaken during operation of the project, at the frequency indicated in the tables, unless otherwise agreed by the DECC. **Table 8 – Periodic Pollutant and Parameter Monitoring (Main Stack 2)** Pollutant/ Parameter | Units of Measure | Method | Frequency Cadmium | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Chlorine | mgm^{-3} | TM-7, TM-8 | Annually Chromium | mgm^{-3} | OM-4 | Annually Flow | Nm^3/s | CEM-6 | Continuous Hazardous substances | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Hydrogen chloride | mgm^{-3} | TM-8 | Continuous Hydrogen fluoride | mgm^{-3} | TM-9 | Annually Mercury | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O2) | % | CEM-3 | Continuous Sulfuric acid mist and sulfuric trioxide (as SO3) | mgm^{-3} | TM-3 | Annually Sulphur dioxide | mgm^{-3} | CEM-2 | Continuous TCDD (equivalent) | ngm^{-3} | TM-18 | Annually TRS (as H2S) | mgm^{-3} | CEM-5 | Continuous Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 9 – Periodic Pollutant and Parameter Monitoring (Recovery Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Flow | Nm^3/s | CEM-6 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly Volatile Organic Compounds | mgm^{-3} | CEM-8 | Continuous **Table 10 – Periodic Pollutant and Parameter Monitoring (Natural Gas Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Flow | Nm^3/s | CEM-6 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | Other approved method 1 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 11 – Periodic Pollutant and Parameter Monitoring (Multi-Fuel Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Cadmium | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Chromium | mgm^{-3} | OM-4 | Quarterly Flow | Nm^3/s | CEM-6 | Continuous Hazardous substances | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Mercury | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous TCDD (equivalent) | mgm^{-3} | TM-18 | Quarterly Temperature | °C | Other approved method 1 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 12 – Periodic Pollutant and Parameter Monitoring (Lime Kiln 2)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 13 – Periodic Pollutant and Parameter Monitoring (Gas Turbine)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | TM-32 | Quarterly Moisture | % | TM-22 | Quarterly Nitrogen oxides | mgm^{-3} | TM-11 | Quarterly Oxygen (O_2) | % | TM-25 | Quarterly Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly	ECMR 2023 Annual Return 2023	The tables in the consent condition have been compiled from a past EPL. Discussions with DPE regarding inconsistent consent conditions have occurred. DPE have indicated that they are willing to discuss this issue.	Not compliant	Make application to DPE to consolidate or remove condition - in progress at time of audit.
3.2	Within 90 days of the commencement of each phase of the project, or as may be agreed by the Director-General, and during a period in which the project is operating under design loads and normal operating conditions, the Proponent shall undertake a program to confirm the air emission performance of the project. The program shall include, but not necessarily be limited to: a) point source emission sampling and analysis subject to the requirements listed under condition 3.1; b) a comprehensive air quality impact assessment, using actual air emIssIon data collected under a). The assessment shall be undertaken strictly in accordance with the methods outlined in Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA. 2005); c) a comparison of the results of the air quality impact assessment required under b) above, and the predicted air quality impacts detailed in the documents listed under condition 1.1 of this approval; d) a comparison of the results of the air quality impact assessment required under b) above, and the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007); and e) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to air quality impacts. A report providing the results of the program shall be submitted to the Director-General and DECC within 28 days of completion of the testing required under a).	Interview M O'Donovan	No new phases have occurred during the reporting period.	Not triggered	

3.3	In the event that the program undertaken to satisfy condition 3.2 of this approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to: a) greater point source emissions or ground-level concentrations of air pollutants than predicted in the documents listed under condition 1.1 of this approval; or b) greater point source emissions or ground-level concentrations of air pollutants than the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007); then the Proponent shall provide details of remedial measures to be implemented to reduce point source emissions or ground-level concentrations of air pollutants to no greater than that predicted in the documents listed under condition 1.1 of this approval and to meet the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007). Details of the remedial measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.	Interview M O'Donovan	No new phases have occurred during the reporting period.	Not triggered	
3.4	Within 90 days of the commencement of each phase of the project and every year thereafter, or as may be agreed by the Director-General, the Proponent shall commission an independent, qualified person or team to undertake odour performance monitoring. The independent person or team shall be approved by the Director-General prior to the commencement of monitoring. The monitoring program shall occur during a period in which the project is operating under design loads and normal operating conditions. The program shall include, but not necessarily be limited to: a) point and area source emission sampling and analysis subject to the requirements listed under condition 3.1; b) a comprehensive odour assessment, using actual air emission data collected under a). The assessment shall be undertaken strictly in accordance with the methods outlined in Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2005) and Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (EPA, 2006); c) a comparison of the results of the odour impact assessment required under b) above, with the predicted odour impacts detailed in the documents listed under condition 1.1 of this approval and previous odour performance assessments undertaken to satisfy this condition; d) a comparison of the results of the odour assessment required under b) above, and the impact assessment criteria detailed in Technical Framework -Assessment and Management of Odour from Stationary Sources in NSW (DECC, 2006) and Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (EPA, 2006); and e) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to odour impacts. A report providing the results of the program shall be submitted to the Director-General and DECC within 28 days of completion of the testing required under a).	Ektimo Odour Testing Reports July 2022, February 2023 Ektimo LDAR Testing Report February 2023	An odour audit is being conducted twice annually by Ektimo. The auditing took place in July 2022 and February 2023 during the reporting period, with LDAR completed February 2023.	Compliant	
3.5	In the event that the program undertaken to satisfy condition 3.4 of the approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to greater odour impacts than that predicted in the documentation listed under condition 1.1 of this approval, then the Proponent shall provide details of remedial measures to be implemented to reduce odour impacts to levels required by that condition. Details of the remedial measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.		Noted	Not triggered	
3.6	Within 12 months of the commencement of operation of each phase of the project, the Proponent shall undertake a revised Human Health Impact Assessment using actual air emission data collected. Specific attention must be given to emissions of nitrogen dioxide, sulphur dioxide and chlorine gas. Emissions of PAHs must be included in this assessment unless it can be demonstrated that PAH emission levels are below detection limits. The revised Human Health Impact Assessment shall be submitted to the Director-General and NSW Health within three months of commencement of emission data collection.	Interview M O'Donovan	No new phases have occurred during the reporting period.	Not triggered	

3.7	Within 90 days of the commencement of each phase of the project, or as may be agreed by the Director-General, and during a period in which the project is operating under design loads and normal operating conditions, the Proponent shall undertake a program the Director-General, and during a period in which the project is operating under design loads and normal operating conditions, the Proponent shall undertake a program to confirm the noise emission performance of the project. The program shall meet the requirements of the DECC, and shall include, but not necessarily be limited to: a) noise monitoring, consistent with the guidelines provided in the New South Wates Industrial Noise Policy (EPA, 2000), to assess compliance with condition 2.15 of this approval; b) methodologies, locations and frequencies for noise monitoring (including at sites assessed in the EA); c) identification of monitoring sites at which pre- and post-project noise levels can be ascertained; and d) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to noise impacts. A report providing the results of the program shall be submitted to the Director-General and the DECC with 28 days of completion of the testing required under a).	Interview M O'Donovan	No new phases have occurred during the reporting period.	Not triggered	
3.8	In the event that the program undertaken to satisfy condition 3. 7 of the approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to greater noise impacts than permitted under condition 2.15 of this approval, then the Proponent shall provide details of remedial measures to be implemented to reduce noise impacts to levels required by that condition. Details of the remedial measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.		Noted	Not triggered	
3.9	Within 12 months of commencement of operation of the first phase of the project, the Proponent will have conducted four quarterly noise monitoring assessments at all the locations identified in Appendix O of the EA. Traffic noise monitoring results will be compared with the predicted traffic noise impacts detailed in the documents listed under condition 1.1 and the DECC's Environmental Criteria for Road and Traffic Noise (1999). In the event that the monitoring program indicates that the traffic noise associated with the project will lead to an exceedance of traffic noise criteria and greater noise impacts than that predicted in the documentation listed under condition 1.1, then the Proponent shall provide details of mitigation measures to be implemented to reduce traffic noise impacts. Details of the mitigation measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require, and be accompanied by evidence that the DECC is satisfied that the mitigation measures are acceptable. A report providing the results of the traffic noise monitoring shall be submitted to the Director-General and the DECC with 28 days of completion of the testing.		Historic condition - not assessed during this reporting period.	Not triggered	
3.10	Prior to the commencement of the first phase of the project, the Proponent shall prepare and implement a Soil Monitoring Program to monitor the soil health of areas affected by effluent irrigation. The soil monitoring program shall be undertaken to the satisfaction of DPI and shall be conducted within 12 months of operation and every 12 months thereafter, unless otherwise agreed to by the Director-General. The soil monitoring program shall include, but not necessarily limited to: a) installation of soil moisture probes for daily soil moisture monitoring; b) calibration of existing soil moisture probes to ensure spatial coverage of hydrogeological conditions of effluent irrigation areas; c) determination of appropriate soil sampling locations in new irrigation areas ensuring spatial coverage of hydrogeological conditions; and d) soil sampling consistent with the DECC's Environmental Guidelines for the Utilisation of Treated Effluent by Irrigation (2004) undertaken twice a year, before and after the irrigation season.	ECMR 2023 Farm and Environmental Monitoring Report 2023	As outlined in the Farm and Environmental Monitoring Report: a) soil moisture probes are installed under the irrigation areas and are used to monitor and schedule irrigation. b) The probes are calibrated c) Soil sample locations recorded d) Soil sampling is biannually, before & after irrigation season as specified in the CoA.	Compliant	
3.11	In the event that the soil monitoring program described in condition 3.10 indicates that effluent irrigation is having an adverse impact on the sustainable use of soils within the irrigation area, then the Proponent must undertake soil amelioration measures in consultation with DPI such that the adverse impacts are effectively mitigated.	ECMR 2023 Farm and Environmental Monitoring Report 2023	The soil and groundwater monitoring results from 2022/23 do not indicate changing soil parameters of an adverse nature.	Not triggered	
3.12	Prior to the commencement of the first phase of the project, the Proponent shall prepare and implement a Surface and Groundwater Monitoring Program. The program shall be undertaken to the satisfaction of DECC and shall include but not necessarily be limited to the identification of monitoring locations, frequency and parameters for the monitoring of groundwater impacts associated with effluent irrigation. The program will give consideration to the positioning of groundwater monitoring locations adjacent to the drainage line downstream of the irrigation areas specified in the EA and between the irrigation areas referred to in the EA as CP6, CP7 and CP8.	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2023 Farm and Environmental Monitoring Report 2023	A surface water and groundwater monitoring program is being implemented. The 2023 Farm and Environmental Monitoring Report (McMahon) includes monitoring locations, frequencies and parameters to be monitored.	Compliant	

3.13	Within 90 days of the commencement of operation of each phase of the project, or as may be agreed by the Director-General, the Proponent shall submit a report detailing compliance with conditions 2.32 and 2.33 of this approval. The report shall include, but not necessarily be limited to: a) dates of study, plan or system completion, and commencement of construction and commissioning; b) actions taken or proposed to implement recommendations made in the studies, plans or systems; and c) responses to each requirement that may be requested by the Director-General in respect to the implementation of any measures arising from recommendations of the studies or reports described by conditions 2.32 and 2.33.	Interview M O'Donovan	No new phases have occurred during the reporting period.	Not triggered	
3.14	Twelve months after the commencement of operation of the first phase of the project, or within such period otherwise agreed by the Director-General, the Proponent shall commission an independent, qualified person or team to undertake a Hazard Audit of the project. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. A Hazard Audit Report shall be submitted for the approval of the Director-General no later than one month after the completion of the Audit. Further Hazard Audit of the expansion shall be included in the Hazard Audit required of the existing plant, or as otherwise agreed or required by the Director-General. Hazard Audits shall be carried out in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 5 - Hazard Audit Guidelines. The hazard audit report shall be accompanied by a program for the implementation of all recommendations made in the hazard audit report. It the Proponent intends to defer the implementation of a recommendation, justification must be included.	Refer to DA Condition 16	Compliant	Compliant	
3.15	Within 12 months of the commencement of the first phase of the project, the Proponent shall undertake an Odour Audit of the project. The Odour Audit must include a leak detection and repair program, as outlined in the USEPA Maximum Achievable Control Technology Rules, for the entire foul gas and foul condensate collection systems. The Odour Audit Report shall be submitted to the satisfaction of the DECC no later than one month after the completion of the Audit. Further Odour Audits shall include the existing plant and shall be undertaken annually, or as otherwise agreed or required by the Director-General.	Refer to DA Condition 61	Compliant	Compliant	
3.16	Twelve months after the commencement of operation of the first phase of the project, and every three years thereafter, or as otherwise agreed or required by the Director-General, the Proponent shall commission an independent, qualified person or team to undertake an Environmental Audit of the project. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. An Environmental Audit Report shall be submitted for the approval of the Director-General within one month of the completion of the Audit. The Audit shall: a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing; b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project; c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works. The Director-General may require the Proponent to undertake works to address the findings or recommendations presented in the Report. Any such works shall be completed within such time as the Director-General may require. The Environmental Audit Report shall be made available for public inspection on request. Further Environmental Audit Reports of the project shall be included in the Environmental Audit Reports for the existing plant. If the preparation and submission of a Hazard Audit Report and an Environmental Audit Report are required at the same time, the requirements of condition 3.14 and 3.16 of this approval may be satisfied with a single report prepared by a single independent person or team approved by the Director-General.	Refer to DA Condition 71	Compliant	Compliant	
4.1	The Proponent shall continue to participate with the Community Consultative Committee. Subject to confidentiality, the Proponent shall submit all documents required under this approval to the Community Consultative Committee and make available such documents for public inspection on request.	Refer to CA Condition 4.1	Compliant	Compliant	
4.2	Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation): a) a telephone number on which complaints about construction and operational activities at the site may be registered; b) a postal address to which written complaints may be sent; and c) an email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	Refer to CA Condition 4.2	Compliant	Compliant	

4.3	The Proponent shall record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the Director-General upon request.	Refer to CA Condition 4.3	Compliant	Compliant	
5.1	The Proponent shall prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during construction of the project. The Plan shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to.....		Historic condition - not assessed during this reporting period.	Not triggered	
5.2	As part of the Construction Environmental Management Plan for the project, required under condition 5.1 of this approval, the Proponent shall prepare and implement the following…..		Historic condition - not assessed during this reporting period.	Not triggered	
5.3	The Proponent shall update the existing Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the project and existing plant. The Plan shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to: a) identification of all statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all approvals, licences, approvals and consultations; b) a description of the roles and responsibilities for all relevant employees involved in the operation of the project; c) overall environmental policies and principles to be applied to the operation of the project; d) standards and performance measures to be applied to the project, and a means by which environmental performance can be periodically reviewed and improved, where appropriate; e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; f) the additional studies listed under condition 5.4 of this approval; and g) the environmental monitoring requirements outlined under conditions 3.1 to 3.16 of this approval, inclusive. The Plan shall be submitted for the approval of the Director-General no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Director-General. Operation shall not commence until written approval has been received from the Director-General.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023	The OEMP has been updated during the reporting period. These requirements have been addressed as follows: a) Section 4 of the OEMP describes and lists relevant approvals and legislation. b) Section 6 of the OEMP describes roles & responsibilities c) Sections 1 and 2 of the OEMP describes the role of the environmental policy and procedures employed by Visy. d) Sections 16 - 21 describe monitoring, management review and improvement. e) Section 5 of the OEMP describes the objectives targets and management of the OEMP. f) Sections 1 and 9 describe the additional air quality actions required. Specific management plans support the OEMP in this respect. g) Section 16 of the OEMP and the Management Subplans describes monitoring for the Visy operation. The OEMP and most subplans have been updated within the reporting period, as reflected in relevant condition evidence.	Compliant	
5.4	As part of the Operation Environmental Management Plan for the project, required under condition 5.3 of this approval, the Proponent shall prepare and implement the following Management Plans:	Conditions 5.4 a) to e).	All management plans have been prepared as specified.	Compliant	

5.4a	a) an updated **Air Quality Management Plan** to outline measures to minimise impacts from the project and existing plant on local and regional air quality. The Plan shall include, but not necessarily be limited to: i) identification of all major sources of particulate and gaseous air pollutants that may be emitted from the project, being both point-source and diffuse emissions, including identification of the major components and quantities of these emissions; ii) monitoring for gaseous and particulate emissions from the project, in accordance with any requirements of the DECC; iii) procedures for the minimisation of gaseous and particulate emissions from the project; iv) pro-active and reactive management and response mechanisms for particulates, odour and gaseous emissions, with specific reference to measures to be implemented and actions to be taken to minimise and prevent potential elevated air quality and odour impacts on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project at any time; v) specific procedures for the management of generating efficiency and the minimisation of greenhouse gas emissions per unit of electricity generated; vi) procedures aimed at maximising the efficiency of the start-up and shut-down cycles for the project; vii) provision for regular review of air quality monitoring data, with comparison of monitoring data with that assumed and predicted in the documents listed under condition 1.1 of this approval, including verification of air quality modelling and predictions, as may be relevant; viii) Plans for regular maintenance of process equipment to minimise the potential for leaks and fugitive emissions; and ix) a contingency plan should an incident, process upset or other initiating factor lead to elevated air quality impacts, whether above normal operating conditions or environmental performance goals/ limits.	Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	The updated AQMP (April 2023) addresses these requirements as follows: i) In section 4.1 ii) In section 7 iii) In section 6 iv) In section 6 v) In section 6.6 and app J vi) In section 6.3 vii) In sections 8 and 9 viii) In section 6.3.2 ix) In section 6.4.	Compliant	
5.4b	b) an updated **Water Management Plan** to outline measures that will be employed to manage water on the site, to minimise soil erosion and the discharge of sediments and other pollutants to lands and/ or waters throughout the life of the project. The Plan shall consolidate the existing Surface Water Management Plan, Wastewater Management Plan and the Groundwater Monitoring Plan. The Plan shall be based on best environmental practice and shall address the requirements of the Department, DECC and Council. The Plan shall include, but not necessarily be limited to: i) consideration of all reasonable and feasible options to avoid discharge to ground and/or ambient waters including methods to minimise the volume of contaminated water and effluent generated, recycling and reusing water and effluent; ii) identification of clean and dirty water areas on site maps for different stages of the project and identification of criteria for nomination of areas as clean or dirty; iii) details of water management measures to be implemented for clean and dirty waters; iv) calculations for a water balance for all waters generated on the site including potential volumes of groundwater, stormwater and process water for treatment on-site or off-site, proposed discharges, recycling or reuse; v) details of the remedial actions to be taken by the Proponent and site operators in response to an exceedance of concentration limits or other performance criteria for the on-site or ambient water management controls; vi) characterisation of wastewater qualities and quantities for reuse on-site shall be characterised and irrigation management practices specified; vii) specification of wastewater reuse areas shall be specified on site maps for the existing plant and the project, including contingency land; viii) contingency plans in the event that that areas of land used for effluent irrigation become unavailable; ix) specific details shall be provided in relation to the times, locations, volumes and qualities of water to be irrigated, including how the quality of water to be used for irrigation will be assessed; x) specific details regarding the groundwater monitoring program including monitoring procedures, locations, frequency and parameters; xi) a detailed description of measures to mitigate adverse groundwater impacts and trigger conditions for their implementation;	Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	The WMP addresses the requirements of: i) In section 4 ii) In section 4 iii) In section 4 iv) In section 4 v) In section 4 vi) In section 4 vii) In section 4 viii) In section 4 ix) In section 4 x) In section 4 xi) In section 4. It is noted that the WMP was updated outside of the reporting period (18th July 2023) and this updated Plan will be assessed during the next IEA.	Compliant	

5.4c	c) an updated **Noise Management Plan** to detail measures to mitigate and manage noise during the operation of the existing plant and the project. The Plan shall be formed in consultation with the DECC and shall include, but not necessarily be limited to: i) procedures to ensure that best management practice and best available technology economically achievable is being considered and implemented; ii) procedures to generate suitable documentation for annual environmental auditing, that demonstrates that the noise limits and noise goals specified under this approval are being met; iii) identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits and noise goals specified under this approval; iv) identification of activities that will be carried out in relation to the project and the associated noise sources; v) procedures for periodic consideration of noise impacts at the relevant receivers against the noise limits and noise goals specified under this approval; vi) details of all management methods and procedures that will be implemented to control individual and overall noise emissions from the site during operation; vii) reactive and pro-active strategies for dealing promptly with any noise complaints, including documentation of a fast response (eg within one hour), the completed action on a complaint, and feedback from the complainant (eg within 24 hours); and viii) noise monitoring and reporting procedures.	Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023	The updated NMP (March 2023) addresses these requirements as follows: i) In sections 1, 2 and 6 ii) In Section 9 iii) In Section 4 iv) In Section 4.1 v) In Section 8 vi) In Section 6 vii) In Sections 6.3 and 8.2 viii) In Sections 7 and 8.	Compliant	
5.4d	d) an updated **Traffic Management Plan** to detail measures to mitigate and manage traffic impacts during the operation of the existing plant and project. The Plan shall meet the requirements of the RTA and Council and shall include, but not necessarily be limited to: i) a driver education program to ensure that noisy heavy vehicle practises are not unnecessarily used near sensitive receivers and that route curfews are respected; ii) best noise practise in the selection and maintenance of heavy vehicle fleets; iii) movement scheduling where practicable to reduce impacts during sensitive time periods; iv) specific measures for ensuring that all heavy vehicle operators associated with the existing plant and project implement the Traffic Management Plan, including the use of penalties for breaches of the Plan; v) specific measures for minimising noise impacts at identified sensitive areas, including a program for the implementation of all feasible and reasonable mitigation measures at the Steunkal and Beale residences; vi) a system for identifying and ensuring conformance with the Plan, including conformance monitoring, procedures for implementing and monitoring corrective and preventative action, and penalties for breaches of the Plan; and vii) a continual improvement process for assessing Plan effectiveness and implementing improvements to the Plan.	Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023	The updated TMP (March 2023) addresses these requirements as follows: i) In section 6 ii) In sections 4.3 and 6.2 iii) In section 6 iv) In section 6 v) In section 6 and in the NMP vi) In sections 7, 8 and 9 vii) In section 1 and 9	Compliant	
5.4e)	e) a **Soil Management Plan** to detail measures to mitigate and manage adverse impacts on soil in areas affected by effluent irrigation associated with the project, including the existing plant. The Plan shall be based on best environmental practice and shall be developed in consultation with the DPI. The plan shall include, but not necessarily be limited to: i) a detailed identification of soil types and properties within each irrigation area ; ii) a monitoring regime for assessing soil health; iii) a detailed description of conditions that would trigger the implementation of soil amelioration measures; and iv) methodologies for soil improvement that are considered feasible and reasonable.	Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023	The updated SMP (April 2023) addresses these requirements as follows: i) In section 4 ii) In section 6 iii) In section 3, 6 and 7 iv) In section 4.7	Compliant	

EPL Compliance Status - November 2023

<table>
<tr><th>Reference</th><th>Approval or licence requirement</th><th>Evidence collected 2023</th><th>Audit Finding</th><th>Compliance status</th><th>Action Reference</th></tr>
<tr><td colspan="6">EPL 10232 - 5th July 2023</td></tr>
<tr><td>A1.1</td><td>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. 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.
<table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Paper or pulp production</td><td>Paper or pulp production</td><td>> 150000 T annual production capacity</td></tr></table></td><td>ECMR 2023</td><td>Production for the period was 671,885t. EPL allows for production over 150,000t.</td><td>Compliant</td><td></td></tr>
<tr><td>A2.1</td><td>The licence applies to the following premises:
<table><tr><th>Premises Details</th></tr><tr><td>VISY PULP & PAPER PTY LTD</td></tr><tr><td>1302 SNOWY MOUNTAINS HIGHWAY</td></tr><tr><td>TUMUT</td></tr><tr><td>NSW 2720</td></tr><tr><td>LOT 1 DP 45454, LOT 2 DP 45454, LOT 8 DP 113036, LOT 9 DP 113036, LOT 1 DP 120724, LOT 1 DP 134634, LOT 2 DP 134634, LOT 3 DP 134634, LOT 4 DP 256920, LOT 1 DP 403328, LOT 1 DP 415843, LOT 2 DP 415843, LOT 2 DP 531481, LOT 2 DP 598661, LOT 9 DP 668538, LOT 173 DP 729525, LOT 100 DP 757220, LOT 101 DP 757220, LOT 102 DP 757220, LOT 109 DP 757220, LOT 112 DP 757220, LOT 113 DP 757220, LOT 114 DP 757220, LOT 115 DP 757220, LOT 116 DP 757220, LOT 117 DP 757220, LOT 118 DP 757220, LOT 119 DP 757220, LOT 130 DP 757220, LOT 131 DP 757220, LOT 132 DP 757220, LOT 159 DP 757220, LOT 203 DP 757220, LOT 204 DP 757220, LOT 209 DP 757220, LOT 224 DP 757220, LOT 225 DP 757220, LOT 255 DP 757220, LOT 278 DP 757220, LOT 5 DP 757228, LOT 12 DP 757228, LOT 14 DP 757228, LOT 19 DP 757228, LOT 42 DP 757228, LOT 57 DP 757228, LOT 61 DP 757228, LOT 62 DP 757228, LOT 63 DP 757228, LOT 64 DP 757228, LOT 76 DP 757228, LOT 84 DP 757228, LOT 91 DP 757228, LOT 92 DP 757228, LOT 93 DP 757228, LOT 94 DP 757228, LOT 103 DP 757228, LOT 105 DP 757228, LOT 106 DP 757228, LOT 107 DP 757228, LOT 109 DP 757228, LOT 115 DP 757228, LOT 116 DP 757228, LOT 117 DP 757228, LOT 118 DP 757228, LOT 119 DP 757228, LOT 138 DP 757228, LOT 172 DP 757228, LOT 211 DP 757252, LOT 219 DP 757252, LOT 220 DP 757252, LOT 221 DP 757252, LOT 222 DP 757252, LOT 223 DP 757252, LOT 224 DP 757252, LOT 229 DP 757252, LOT 230 DP 757252, LOT 235 DP 757252, LOT 4 DP 793196, LOT 1 DP 832090, LOT 4 DP 1004478, LOT 102 DP 1035564, LOT 103 DP 1035564, LOT 15 DP 1035849, LOT 1 DP 1082770</td></tr></table></td><td>Site observations
Interview M O'Donovan</td><td>The premises and activities are located as per the EPL. This licence condition was updated to reflect previously missing lots on the EPL folowing purchases of land in 2007/2008.</td><td>Compliant</td><td></td></tr>
<tr><td>A3.1</td><td>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
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</td><td>ECMR 2023</td><td>Works and activities carried out on site are in accordance with the proposed intent of the Licence. The Sandy Creek discharge incident is addressed by L1.1 of this Licence.</td><td>Compliant</td><td></td></tr>
<tr><td>P1.1</td><td>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.
<table><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><tr><td>1</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Main Stack 1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>2</td><td>Discharge to Air</td><td></td><td>Recovery Boiler A as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>3</td><td>Discharge to Air</td><td></td><td>Power Boiler as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>4</td><td>Discharge to Air</td><td></td><td>Lime Kiln A as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>16</td><td>Fly Ash Quality Monitoring</td><td></td><td>Power Boiler - Fly Ash discharge as outlined in DOC22/252324 on 30 March 2022</td></tr><tr><td>17</td><td>Bottom Ash Quality Monitoring</td><td></td><td>Power Boiler - Bottom ash discharge as outlined in DOC22/252324 to the EPA on 30 March 2022</td></tr><tr><td>18</td><td>Fuel Quality Monitoring</td><td></td><td>Power Boiler - Fuel Bins as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>19</td><td>Discharge to Air</td><td></td><td>Power Boiler - Discharge duct as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>20</td><td>Fluidized Bed Sand Quality Monitoring</td><td></td><td>Fluidised bed sand storage bin - as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>21</td><td>Discharge to Air</td><td></td><td>Lime Kiln B as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>22</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Main Stack 2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td><td>ECMR 2023
Annual EPL Return 2023</td><td>Monitoring points were generally monitored during the reporting period.</td><td>Compliant</td><td></td></tr>
<tr><td>P1.2</td><td>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.</td><td>ECMR 2023
Annual EPL Return 2023</td><td>The discharge points nominated in P1.3 are being monitored as per the EPL.</td><td>Compliant</td><td></td></tr>
</table>

<table>
<tr>
<td>P1.3</td>
<td>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.

Water and land
<table><tr><th>EPA Identi-fication no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>9</td><td>Wet weather discharge Volume Monitoring</td><td>Wet weather discharge Volume Monitoring</td><td>Outlet pipe from the 480 ML storage pond into Sandy Creek as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>10</td><td>Effluent quality monitoring Volume Monitoring</td><td>Effluent quality monitoring Volume Monitoring</td><td>Decant line from the sequencing batch reactor as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>11</td><td>Water quality monitoring</td><td></td><td>Sandy Creek, upstream of overflow discharge point as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>12</td><td>Water quality monitoring</td><td></td><td>Sandy Creek, downstream of overflow discharge point as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>25</td><td>Soil quality monitoring</td><td></td><td>SMS 1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>26</td><td>Soil quality monitoring</td><td></td><td>SMS 2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>27</td><td>Soil quality monitoring</td><td></td><td>SMS 3 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>28</td><td>Soil quality monitoring</td><td></td><td>SMS 4 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>29</td><td>Soil quality monitoring</td><td></td><td>SMS 5 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>30</td><td>Soil quality monitoring</td><td></td><td>SMS 6 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>31</td><td>Soil quality monitoring</td><td></td><td>SMS 7 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>32</td><td>Groundwater quality monitoring</td><td></td><td>BH2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>33</td><td>Groundwater quality monitoring</td><td></td><td>BH3 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>34</td><td>Groundwater quality monitoring</td><td></td><td>BH7S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>35</td><td>Groundwater quality monitoring</td><td></td><td>BH7D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>36</td><td>Groundwater quality monitoring</td><td></td><td>BH8S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>37</td><td>Groundwater quality monitoring</td><td></td><td>BH8D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>38</td><td>Groundwater quality monitoring</td><td></td><td>BH9 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>39</td><td>Groundwater quality monitoring</td><td></td><td>BH10D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>40</td><td>Groundwater quality monitoring</td><td></td><td>BH11S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>41</td><td>Groundwater quality monitoring</td><td></td><td>BH11D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>42</td><td>Groundwater quality monitoring</td><td></td><td>BH13 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>43</td><td>Groundwater quality monitoring</td><td></td><td>BH14 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>44</td><td>Groundwater quality monitoring</td><td></td><td>BH15S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>45</td><td>Groundwater quality monitoring</td><td></td><td>BH15D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>46</td><td>Groundwater quality monitoring</td><td></td><td>BH1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td>
<td>ECMR 2023
Annual EPL Return 2023</td>
<td>The discharge points nominated in P1.1 are being monitored as per the EPL.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>P1.4</td>
<td>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.

Noise/Weather
<table><tr><th>EPA identi-fication no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>23</td><td>Meteorological Station</td><td>Weather Station on top of Recover Boiler B building as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>24</td><td>Meteorological Station</td><td>Weather Station south east of mill as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td>
<td>ECMR 2023</td>
<td>Monitoring has been carried out from both meteorological stations during the reporting period.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>L1.1</td>
<td>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.</td>
<td>ECMR 2023
EPL Annual Return 2023</td>
<td>One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed the accidental discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection.

No intentional discharges to Sandy Creek occurred during the reporting period. All other exceedances have been recorded as part of the EPL Annual Return.</td>
<td>Not-compliant</td>
<td></td>
</tr>
<tr>
<td>L2.1</td>
<td>The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.</td>
<td>ECMR 2023
Annual EPL Return 2023</td>
<td>The coarse particulate load was increased to 65000kg during the EPL variation process, meaning the 58005kg actual load is now compliant. All other loads compliant.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>L2.2</td>
<td>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.
Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.

<table><tr><th>Assessable Pollutant</th><th>Load limit (kg)</th></tr><tr><td>BOD (Enclosed Water)</td><td>20300.00</td></tr><tr><td>Coarse Particulates (Air)</td><td>65000.00</td></tr><tr><td>Fine Particulates (Air)</td><td>100000.00</td></tr><tr><td>Nitrogen (total) (Enclosed Water)</td><td>4600.00</td></tr><tr><td>Nitrogen Oxides (Air)</td><td>900000.00</td></tr><tr><td>Phosphorus (total) (Enclosed Water)</td><td>800.00</td></tr><tr><td>Salt (Enclosed Water)</td><td>500000.00</td></tr><tr><td>Total suspended solids (Enclosed Water)</td><td>30500.00</td></tr><tr><td>Zinc (Enclosed Water)</td><td>180.00</td></tr></table></td>
<td>Noted</td>
<td>Noted</td>
<td>Not triggered</td>
<td></td>
</tr>
</table>

<table>
<tr><td>L3.1</td><td>For each monitoring/discharge 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.</td><td>EPL Annual Return 2023</td><td>Various pollutant limits were exceeded at specified points during the reporting period, as detailed in the EPL Annual Return.</td><td>Not-compliant</td><td>A range of maintenance measures were implemented to minimise exceedances.</td></tr>
<tr><td>L3.2</td><td>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</td><td>EPL Annual Return 2023</td><td>pH specified in Points 9 and 10 - no discharge from Point 9 during the reporting period and all pH recordings within specified limit at Point 10.</td><td>Compliant</td><td></td></tr>
<tr><td>L3.3</td><td>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.</td><td></td><td>Noted</td><td>Not triggered</td><td></td></tr>
<tr><td>L3.4</td><td>Air Concentration Limits
POINT 1,22<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>400</td><td></td><td></td><td></td></tr><tr><td>TCDD (equivalent)</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>TRS (as H2S)</td><td>milligrams per cubic metre</td><td>3.6</td><td></td><td></td><td></td></tr><tr><td>Chlorine</td><td>milligrams per cubic metre</td><td>100</td><td></td><td></td><td></td></tr><tr><td>Total Solid Particles</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>250</td><td></td><td></td><td></td></tr><tr><td>Opacity</td><td>percent Opacity</td><td>20</td><td></td><td></td><td></td></tr><tr><td>Sulfuric acid mist and sulfur trioxide (as SO3)</td><td>milligrams per cubic metre</td><td>20</td><td></td><td></td><td></td></tr><tr><td>Hydrogen chloride</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td></td><td></td><td></td></tr></table>POINT 3<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Dioxins & Furans</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>Mercury</td><td>milligrams per cubic metre</td><td>0.06</td><td></td><td></td><td></td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>30</td><td></td><td></td><td></td></tr><tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>140</td><td></td><td></td><td></td></tr><tr><td>Hazardous substances</td><td>milligrams per cubic metre</td><td>0.6</td><td></td><td></td><td></td></tr><tr><td>Cadmium</td><td>milligrams per cubic metre</td><td>0.06</td><td></td><td></td><td></td></tr></table></td><td></td><td>Noted</td><td>Not triggered</td><td></td></tr>
<tr><td>L3.5</td><td>The limits detailed for Point 3 are only applicable when non-standard fuel is being burnt in the power boiler.</td><td></td><td>Noted</td><td>Not triggered</td><td></td></tr>
<tr><td>L3.6</td><td>Water and/or Land Concentration Limits
POINT 9<table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr><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>5.5 - 9.5</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr></table>POINT 10<table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr><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>5.5 - 9.5</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr></table></td><td>EPL Annual Return 2023</td><td>No exceedances recorded at Points 9 or 10 during the reporting period.</td><td>Compliant</td><td></td></tr>
</table>

<table>
<tr><td>L3.7</td><td>The averaging period applicable for pollutants emitted to the air are as detailed below:
<table><tr><th>Pollutant</th><th>Averaging period</th></tr><tr><td>TRS (as H2S)</td><td>1 hour</td></tr><tr><td>SO2</td><td>1 hour</td></tr><tr><td>HCl</td><td>1 hour</td></tr><tr><td>Nitrogen Oxides (as NO2)</td><td>1 hour</td></tr><tr><td>Opacity</td><td>6 minutes</td></tr><tr><td>Solid particles</td><td>24 hours</td></tr><tr><td>CO</td><td>1 hour</td></tr><tr><td>All other pollutants</td><td>As per test methods specified in Clauses M2 and M3</td></tr></table>Reference conditions
Unless otherwise specified by the EPA, the reference condition for Points 1,3 and 22 are Dry 273 0K, 101.3 kPA, 8% O2</td><td></td><td>Noted</td><td>Not triggered</td><td></td></tr>
<tr><td>L4.1</td><td>For each discharge point or utilisation area specified below (by a point number), the volume/mass of:
a) liquids discharged to water; or;
b) solids or liquids applied to the area;
must not exceed the volume/mass limit specified for that discharge point or area.
<table><tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr><tr><td>9</td><td>kilolitres per day</td><td>3000</td></tr><tr><td>10</td><td>kilolitres per day</td><td>16000</td></tr></table></td><td>EPL Annual Return 2023</td><td>No water was discharged from Point 9 during the reporting period and the greatest discharge from Point 10 was 1925 kL/day.</td><td>Compliant</td><td></td></tr>
<tr><td>L4.2</td><td>For each discharge point specified below (by a point number), the volume of emissions to air must not exceed the volume limit specified for that discharge point.
<table><tr><th>Point</th><th>Units of Measure</th><th>90 percentile volume limit</th><th>100 percentile volume limit</th></tr><tr><td>1</td><td>Nm3/s</td><td>90.5</td><td>100</td></tr></table></td><td>EPL Annual Return 2023</td><td>The mean flow in cubic metres per second was 52.40 and the peak was 94.91 (limit100).</td><td>Compliant</td><td></td></tr>
<tr><td>L5.1</td><td>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.
<table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>NA</td><td>Wood waste</td><td>Biomaterial from forestry operations and sawmill residue including uncontaminated organic fibrous wood residues and natural wood waste. This does not include native forest biomaterial as defined by the Protection of the Environment Operations (General) Regulation</td><td>As specified in each particular resource recovery exemption</td><td>NA</td></tr></table></td><td>ECMR 2023</td><td>Wood chip from mills is accepted on site. No waste is being disposed of at the premises. Recycled paper is accepted on site - cardboard boxes, paper clippings & commons.</td><td>Compliant</td><td></td></tr>
<tr><td>L5.2</td><td>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, excluding the following:
(a) Waste paper or cardboard for reprocessing into recycled paper;
(b) Wood residues for pulping;
(c) Standard fuels;
(d) Non-standard fuels.

Note: For the purposes of Condition L5.2, the following definitions apply:
Standard Fuels - Natural gas; and untreated and uncontaminated timber, timber off-cuts and residues from sawmills and forestry operations.
Non-Standard Fuels - Any wood or plant based fuel that does not meet the criteria for Standard Fuels.</td><td>ECMR 2023</td><td>As per L5.1.</td><td>Compliant</td><td></td></tr>
</table>

<table>
<tr><td>L6.1</td><td>Noise from the premises must not exceed the sound pressure level (noise) limits presented in the table below. Note: the limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table.

Note: For the purpose of the above condition L6.1 (*) refers to Residences identified in "Visy Pulp and Paper, Proposed Mill Expansion Tumut NSW, final Environmental Assessment" dated January 2007.

<table><tr><th>Location</th><th>Day LAeq (15 minute)</th><th>Evening LAeq (15 minute)</th><th>Night LAeq (15 minute)</th><th>Night LAmax</th></tr><tr><td>"Pleasant View" (*)</td><td>40</td><td>40</td><td>40</td><td>45</td></tr><tr><td>"'Deep Creek" (*)</td><td>39</td><td>39</td><td>39</td><td>45</td></tr><tr><td>"Reka" and "Glengarry" (*)</td><td>36</td><td>36</td><td>36</td><td>45</td></tr><tr><td>Any other residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table></td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>The attended noise monitoring data indicated that noise from the site was inaudible during 13 out of 24 measurements. Site LAeq (15min) noise contributions were higher than relevant target levels during six of the 24 measurements, however noise agreements exist with all properties monitored. One night period measurement exceeded the target level by 9 dB (Pleasant View) however a negotiated agreement is in place with this resident. In general, considering estabished noise agreements are in place with eight residences adjacent the Project site (Mod-4, August 2020), the site is compliant.</td><td>Compliant</td><td></td></tr>
<tr><td>L6.2</td><td>For the purpose of Condition L6.1 above
Day is defined as 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays;
Evening is defined as 6pm to 10pm on day day; and
Night is defined as 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</td><td></td><td>Noted.</td><td>Not triggered</td><td></td></tr>
<tr><td>L6.3</td><td>Noise-enhancing meteorological conditions
a) The noise limits set out in Condition 6.1 apply under the following meteorological conditions:
i) Assessment period: Day; meteorological conditions: Stability Categories A, B, C, D and E with wind speeds up to and including 3m/s at 10m above ground level.
b) For those meteorological conditions not referred to in Condition 6.3(a), the noise limits that apply are the noise limits in Condition 6.1 plus 5dB.</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Section 5 of the EMM Annual Attended Noise Monitoring Report notes that "All 24 noise measurements were captured during weather conditions that would render noise limits applicable where relevant".</td><td>Compliant</td><td></td></tr>
<tr><td>L6.4</td><td>For the purposes of condition L6.3:
a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as Bureau of Meteorology AWS at Tumut, NSW,
b) Stability category shall be determined using the 'Pasquill-Gifford stability classification scheme' method from section D1.3.1 of Fact Sheet D of the Noise Policy for Industry (NSW EPA, 2017).</td><td>EMM Annual Attended Noise Monitoring Report, March 2023

http://www.bom.gov.au/climate/dwo/IDCJDW0212.shtml</td><td>Section 3.3 of the EMM Annual Attended Noise Monitoring Report (March 2023) notes that data was collected from the on-site AWS and no 'Tumut' weather station is listed on the NSW BoM map of stations.
Section 4.1 of the report describes the use of Pasquill-Gifford stability categories.</td><td>Compliant</td><td></td></tr>
<tr><td>L6.5</td><td>To assess compliance:
a) With the LAeq(15minute) or the LAmax noise limits in conditions L6.1 and L6.3, the noise measurement equipment must be located:
i) Approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to the premises, or where applicable,
ii) In an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premise; or where applicable,
iii) In an area within 50 metres of the boundary of a National Park or Nature Reserve.
b) With the LAeq(15minute) or the LAmax noise limits in conditions L6.1 and L6.3, the noise measurement equipment must be located:
i) At the reasonably most affected point at a location where there is no residence at the location; or,
ii) At the reasonably most affected point within an area at the location prescribed by condition L6.5(a).</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Section 3.1 of the EMM Annual Attended Noise Monitoring Report (March 2023) describes the selection of assessment locations as specified and as per each site's individual requirements.</td><td>Compliant</td><td></td></tr>
<tr><td>L6.6</td><td>A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to In condition L6.5 (a) or L6.5 (b).

Note: For condition L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Noted. Refer L6.1 and L6.5.</td><td>Not triggered</td><td></td></tr>
<tr><td>L6.7</td><td>For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 of the Noise Policy for industry (NSW EPA,2017) may be applied, if appropriate, to the noise measurement by the noise monitoring equipment.</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Section 3.1 of the EMM Annual Attended Noise Monitoring Report (March 2023) describes the use of this correction factor as required.</td><td>Compliant</td><td></td></tr>
<tr><td>L6.8</td><td>Noise measurements must not be undertaken where rain or wind speed at the microphone level will affect acquisition of valid measurements.</td><td>EMM Annual Attended Noise Monitoring Report, March 2023</td><td>Section 5 of the EMM Annual Attended Noise Monitoring Report notes that "All 24 noise measurements were captured during weather conditions that would render noise limits applicable where relevant".</td><td>Compliant</td><td></td></tr>
</table>

L6.9	The noise limits specified in condition L6.1 do not apply to any residence where a noise agreement is in place between the licensee and the owner of those residences in relation to noise impacts and/or noise limits.	EMM Annual Attended Noise Monitoring Report, March 2023	The attended noise monitoring data indicated that noise from the site was inaudible during 13 out of 24 measurements. Site LAeq (15min) noise contributions were higher than relevant target levels during six of the 24 measurements, however noise agreements exist with all properties monitored. One night period measurement exceeded the target level by 9 dB (Pleasant View) however a negotiated agreement is in place with this resident. In general, considering estabished noise agreements are in place with eight residences adjacent the Project site (Mod-4, August 2020), the site is compliant	Compliant	
L7.1	The total mass of Non-standard Fuel, excluding the sub-category of "Known Fuel not Requiring Further Testing", used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler.	ECMR 2023 Interview M O'Donovan	Non-standard fuels are not used on site.	Not triggered	
L7.2	The minimum exit velocity for Stack 2 when the recovery boiler is operating at or above 70% of the applicable design firing rate is as follows in table below. For the purpose of this condition, tds/day is tonnes dry solids per day for the new recovery boiler. **Phase** / **Equipment discharging to Stack 2** / **Minimum exit velocity m/s @ 750tds/day** / **Minimum exit velocity m/s @ 900tds/day** 1a / New recovery boiler (NRB) / 18.4 / 22.1	Previous audit report (NGH, 2016)	As per 2016 audit. As of 2016, the current sampling point is located approximately halfway up the stack where the diameter is larger and velocity is lower. The Visy process engineers have used current readings to calculate the velocity at the top where the stack. Based on these calculations the main stack velocity is approximately 24.8m/s which is above 70% of the applicable firing rate.	Compliant	
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 b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site observations ECMR 2023 OEMP and Subplans	Materials handling, manufacturing and waste management is planned, monitored and reviewed in a competent and on going manner. Monitoring results indicate that environmental performance is largely compliant and continues to improve where required.	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 b) must be operated in a proper and efficient manner.	Site observations Interview M O'Donovan	Plant and equipment are maintained using a systematic planned maintenance system and a range of contractors and internal staff. Planned maintenance shutdowns occur annually and unplanned shut downs are used to complete maintenance listed in order of priority.	Compliant	
O2.2	Equipment used to conduct any monitoring required by this licence must: (a) be properly calibrated to ensure that it measures as accurately as possible; and (b) be maintained and serviced at least as often as often is recommended by the manufacturer or supplier.	ECMR 2023 Acoem, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	
O2.3	Where maintenance, calibration or operation are detailed as part of the standards listed in the licence limit or monitoring sections of this licence, then the maintenance, calibration or operation must be undertaken in accordance with the standard.	ECMR 2023 Acoem, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise dust at the boundary of the premises.	Site observations ECMR 2023 Interview M O'Donovan	Access roads to the site and most internal access roads are sealed. Unsealed roads are sheeted with hard roadbase. The chip piles and logs are sprayed to reduce dust emissions. No dust complaints received during the reporting period.	Compliant	
O4.1	Effluent resulting from the operation of the premises must only be applied to the defined irrigation area.	ECMR 2023 Farm and Environmental Monitoring Report 2023	Farm and Envrionental Monitoring Report indicates that 894 megalitres of effluent was irrigated over 110ha of land via five centre pivots and a soft hose travelling irrigator. It is noted that this is the highest irrigation amount since monitoring began in 2002.	Compliant	
O4.2	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' include the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.	ECMR 2023 Farm and Environmental Monitoring Report 2023	The effluent and solids applied the farm soils are sampled tested and assessed. The soils are similarly assessed. The soils are not showing any elevated parameters relating to the key waste characteristics. Overall soil health is improving over the long-term use of the site.	Compliant	
O4.3	Effluent application must not occur in a manner that causes surface runoff.	ECMR 2023 Farm and Environmental Monitoring Report 2023	Real time soil moisture is monitored to schedule irrigation so soil does not become over saturated. Approximately average monthly rainfall was reported during the 22/23 reporting period. Evaporation for the reporting period was generally lower than average. No runoff reported during the reporting period.	Compliant	
O4.4	Spray from effluent application must not drift beyond the boundary of the premises.	ECMR 2023 Farm and Environmental Monitoring Report 2023	No complaints regarding spray drift were recorded. No spray drift was noted by farm manager during irrigation. Centre pivots have coarse nozzle size to minimise small droplets.	Compliant	

O4.5	Effluent liquid waste pipelines and fittings must be clearly identified. Standard watertaps, hoses and valves must not be fitted to the pipelines of the effluent system. The effluent system must not be connected to other pipelines. Lockable valves or removable handles must be used where there is public access to the effluent.	Site observations EPA Incident Report - 3/11/2022 Interview M O'Donovan	The release of untreated wastewater into Sandy Creek on 28/10/202 occurred due to an isolation valve from the 6ML untreated wastewater dam not being shut prior to the transfer of treated wastewater to the winter storage dam. This valve location has been re-routed and completely isolated as a result of this incident and untreated wastewater no longer has the potential to mix with treated water or be discharged from the site.	Not-compliant	
O4.6	Public access to any effluent utilisation area must be denied during effluent application and until the effluent application area has dried.	Site observations Interview M O'Donovan	The irrigation area is located on private property. The irrigation area is located 6.5 km from the closest centre of population. The irrigation area is fenced and has a lockable gate.	Compliant	
O4.7	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 in use is "Reclaimed Water - Unfit for Drinking".	Site observations Interview M O'Donovan	Public do not have access to site. Signage on access to the effluent application area requires replacement.	Compliant	Replace signage
O4.8	Prior to any discharge to Sandy Creek, approval in writing must be obtained from the EPA. This application for discharge must be submitted to the EPA at least two weeks before the requested start date for discharge.	ECMR 2023 EPL Annual Return 2023	No intentional discharges to Sandy creek have occurred in the reporting period. The intent of this condition is considered to refer to intentional discharges only and does not refer to the accidental discharge incident that occurred during the reporting period.	Not triggered	
O4.9	The application for discharge must be accompanied by supporting documentation, which includes: (a) Volume of effluent generated, the volume of effluent reused, and the percentage capacity of the holding dam, for both the system as designed and the actual volumes for the previous 12 months. This information is to be presented in both text and graphical form. (b) Details of reasons for the discharge in the event that it is proposed to discharge in a year when the rainfall has been less than the wettest year in ten.	ECMR 2023 EPL Annual Return 2023	Refer O4.8.	Not triggered	
O5.1	Only the following materials (Standard Fuels) may be used within the power boiler: a) Bark; b) Fines (small pieces of wood chip and dust from the pulp log chipping process); c) Softwood and hardwood residues; d) Forest residues; e) Non-Standard Fuels.	ECMR 2023 EPL Annual Return 2023	The power boiler utilises fuels listed in this condition, except non-standard fuels.	Compliant	
O5.2	The total mass of Non-standard Fuel, excluding the sub-category of "Known Fuel not Requiring Further Testing", used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler.	ECMR 2023 Interview M O'Donovan	No non-standard fuels are used on site.	Not triggered	
O5.3	After plant commissioning and at least annually thereafter, an odour audit must be carried out. Part of this odour audit must include a leak detection and repair program (LDAR) (as outlined in the MACT Rules) for the entire foul gas and foul condensate collection systems.	Ektimo Odour Testing Reports July 2022, February 2023 Ektimo LDAR Testing Report February 2023	An odour audit is being conducted twice annually by Ektimo. The auditing took place in July 2022 and February 2023 during the reporting period, with LDAR completed February 2023.	Compliant	
M1.1	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.	ECMR 2023 Annual EPL Return 2023	All monitoring records are maintained electronically and some in hard copy. The results of monitoring are reported in ECMR 2023 and the EPL Annual Return 2023.	Compliant	
M1.2	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; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Internal electronic monitoring records Reports from external specialist consultants	All records are kept electronically and in legible format.	Compliant	
M1.3	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; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	ECMR 2023 (specifically appendices) Annual Return 2023 Farm and Environmental Monitoring Report 2023 Water storage records 2016 - 2023	The records sighted included the: date of sampling, time of sampling, point of sampling and the name of person sampling (or person managing the dataset).	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:		Noted - compliance assessed against M2.2 and M2.3 individually.	Not triggered	

M2.2	Air Monitoring Requirements POINT 1.22 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Chlorine / milligrams per cubic metre / Yearly / TM-7 & TM-8 Flow / normalised cubic metres per second / Continuous / CEM-6 Hydrogen chloride / milligrams per cubic metre / Continuous / TM-8 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 Sulfur dioxide / milligrams per cubic metre / Continuous / CEM-2 Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / Yearly / TM-3 TCDD (equivalent) / nanograms per cubic metre / Yearly / TM-18 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Quarterly / TM-15 TRS (as H2S) / milligrams per cubic metre / Continuous / CEM-5 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Yearly / TM-12, TM-13 & TM-14 POINT 2 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Methanol / milligrams per cubic metre / Yearly / TM-35 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Oxygen (O2) / percent / Continuous / CEM-3 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 POINT 3 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Cadmium / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Mercury / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 TCDD (equivalent) / milligrams per cubic metre / Special Frequency 2 / TM-18 Temperature / degrees Celsius / Continuous / Other Approved Method 1 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 POINT 4,21 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 POINT 16 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 4 / Representative sample POINT 17 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 4 / Representative sample POINT 18 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Ash / percent / Special Frequency 5 / Representative sample Chlorine / milligrams per kilogram / Special Frequency 5 / Representative sample Copper / milligrams per kilogram / Special Frequency 5 / Representative sample Fluorine / milligrams per kilogram / Special Frequency 5 / Representative sample Organochlorine pesticides / milligrams per kilogram / Special Frequency 5 / Representative sample Organophosphate pesticides / milligrams per kilogram / Special Frequency 5 / Representative sample Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 5 / Representative sample POINT 19 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 4 / TM-12, TM-13 & TM-14	EPL Annual Return 2023	It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card. Monitoring is otherwise being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable. Monitoring is otherwise being carried out as required.	Not-compliant	

POINT 20

Pollutant	Units of measure	Frequency	Sampling Method
Type 1 and Type 2 substances in aggregate	milligrams per kilogram	Special Frequency 4	Representative sample

M2.3

Water and/ or Land Monitoring Requirements

POINT 9

Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	Special Frequency 1	Grab sample
Nitrogen (total)	milligrams per litre	Special Frequency 1	Grab sample
pH	pH	Special Frequency 1	Grab sample
Phosphorus (total)	milligrams per litre	Special Frequency 1	Grab sample
Total dissolved solids	milligrams per litre	Special Frequency 1	Grab sample
Total suspended solids	milligrams per litre	Special Frequency 1	Grab sample
Zinc	milligrams per litre	Special Frequency 1	Grab sample

POINT 10

Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	6 Times a year	Grab sample
Nitrogen (total)	milligrams per litre	6 Times a year	Grab sample
Oil and Grease	milligrams per litre	6 Times a year	Grab sample
pH	pH	6 Times a year	Grab sample
Phosphorus (total)	milligrams per litre	6 Times a year	Grab sample
Sodium Adsorption Ratio	sodium adsorption ratio	6 Times a year	Grab sample
Total dissolved solids	milligrams per litre	6 Times a year	Grab sample
Total suspended solids	milligrams per litre	6 Times a year	Grab sample
Zinc	milligrams per litre	6 Times a year	Grab sample

POINT 11,12

Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	Special Frequency 1	Grab sample
Nitrogen (total)	milligrams per litre	Special Frequency 1	Grab sample
pH	pH	Special Frequency 1	Grab sample
Phosphorus (total)	milligrams per litre	Special Frequency 1	Grab sample
Total dissolved solids	milligrams per litre	Special Frequency 1	Grab sample

POINT 25,26,27,28,29,30,31

Pollutant	Units of measure	Frequency	Sampling Method
Aggregate stability	As approp.	Special Frequency 3	Special Method 1
Aluminium	parts per million	Special Frequency 3	Special Method 1
Available phosphorus	parts per million	Special Frequency 3	Special Method 1
Conductivity	millisiemens per centimetre	Special Frequency 3	Special Method 1
Exchangeable aluminium	parts per million	Special Frequency 3	Special Method 1
Exchangeable calcium	parts per million	Special Frequency 3	Special Method 1
Exchangeable magnesium	parts per million	Special Frequency 3	Special Method 1
Exchangeable potassium	parts per million	Special Frequency 3	Special Method 1
Exchangeable sodium	parts per million	Special Frequency 3	Special Method 1
Exchangeable sodium percentage	percent	Special Frequency 3	Special Method 1
Nitrate	parts per million	Special Frequency 3	Special Method 1
Nitrogen (total)	parts per million	Special Frequency 3	Special Method 1
Organic carbon	percent	Special Frequency 3	Special Method 1
pH	pH	Special Frequency 3	Special Method 1
Phosphorus Sorption Capacity	As approp.	Special Frequency 3	Special Method 1

POINT 32,33,34,35,36,37,38,39,40,41,42,43,44,45

Pollutant	Units of measure	Frequency	Sampling Method
Conductivity	millisiemens per centimetre	Every 6 months	Special Method 2
Depth	metres	Quarterly	Special Method 2
Nitrate	parts per million	Every 6 months	Special Method 2
pH	pH	Quarterly	Special Method 2

EPL Annual Return 2023

All water and land monitoring has been carried out at specified locations during the reporting period.

Compliant

M2.4	**Special Frequency Details** Special Frequency 1: On the day discharge of effluent into Sandy Creek commences, and monthly thereafter. Special Frequency 2: Quarterly when non-standard fuels are being burnt in the Power Boiler, and not required at other times. Special Frequency 3: Yearly for topsoils, and every 3 years for the subsoils. Special Frequency 4: a) Sampling and analysis under Special Frequency 4 is not required if only "Standard Fuel" or "Known Fuels Not Requiring Further Testing" is being burnt in the Power Boiler. b) Sampling and analysis must be done once every three months. Sampling of Point 3 (Power Boiler duct downstream of electro-static precipitator), Point 19 (Power Boiler duct upstream of the electro-static precipitator)) and Point 18 (boiler fuel feed) must be done concurrently. c) Sampling of the bottom ash and fly ash from Points 16 and 17 must representative of the ash generated during the time of the sampling at Points 3 and 19. d) Sampling of Point 20 (fluidised bed sand) must be representative of the fluidised bed sand in the Power Boiler during the sampling at Points 3 and 19. Special Frequency 5: a) Sampling and analysis under Special Frequency 5 is not required if only "Standard Fuel" or "Known Fuels Not Requiring Further Testing" is being burnt in the Power Boiler. b) Sampling and analysis must be undertaken every month, except that on every second month the samples are to be taken at the same time as the sampling done at Points 3 and 19 in accordance with Special Frequency 4.	ECMR 2023 Farm and Environmental Monitoring Report 2023	Special Frequency 1: N/A during the reporting period, no intentional discharges into Sandy Creek. Special Frequency 2: N/A during the reporting period, no non-standard fuels burned. Special Frequency 3: Topsoils sampled by McMahon as per timings specified Special Frequency 4: N/A during the reporting period, no non-standard fuels burned. Special Frequency 5: N/A during the reporting period, no non-standard fuels burned.	Compliant	
	Special Methods Details Special Method 1: At each soil sampling site, 10 representative samples shall be taken on a 30 metre by 30 metre grid. Special Method 2: Sample to be collected in accordance with the "Approved Methods for the Sampling and Analysis of Water Pollutants in NSW"	ECMR 2023 Farm and Environmental Monitoring Report 2023 Email comm D McMahon 15/02/24	Specific methodology for various tests are listed throughout the Farm and Environmental Monitoring Report for the reporting period however methodologies that match Special Methods 1 and 2 are not described. Email communication with McMahon Earth Sciences confirmed both special methods were implemented during the reporting period. It is recommended that future Farm and Environmental Monitoring Reports reference these methodologies specifically within the body of the report.	Compliant	Reference the methodologies as described in M2.4 in future Farm and Environmental Monitoring Reports.
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	Ektimo Emissions Testing Reports July 2022, November 2022, February 2023, May 2023	Laboratory Reports show that monitoring is being undertaken as required NATA accredited lab for all test methods - 14601 EKTIMO NATA certification sighted at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO.	Compliant	
M3.2	All air emission monitoring points and equipment must be installed and operated strictly in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.	Ektimo Emissions Testing Reports July 2022, November 2022, February 2023, May 2023 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Ektimo Emission Testing Reports list approved methods in Section 4. AQMP lists approved methods in Section 2.	Compliant	
M3.3	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.	ECMR 2023 Farm and Environmental Monitoring Report 2023	Specific methodology for various tests are listed throughout the Farm and Environmental Monitoring Report for the reporting period.	Compliant	
M4	Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.	EPL Annual Return 2023	All monitoring data reported in the EPL Annual Return 2023 is used to calculate the load calculations in accordance with the protocol listed in the Administrative Conditions of the EPL.	Compliant	
M5.1	The licensee must collect and analyse meteorological data for the parameters specified for each of the following monitoring point at the frequency and using the method specified for each parameter.	ECMR 2023	Two meteorological monitoring stations commissioned in 2014 are located to the southeast of the mill site (Monitoring Point 24) and on top of the Recovery Boiler B building (Monitoring Point 23)	Compliant	

M5.2	Meteorological monitoring at Point 24 **Parameter** / **Units of measure** / **Averaging period** / **Method** / **Frequency** Siting / NA / NA / AM-1 / NA Wind speed @ 10 m / m/s / 1 hour / AM-4 / Continuous Wind direction @ 10 m / o / 1 hour / AM-4 / Continuous Sigma Theta @ 10 m / o / 1 hour / AM-4 / Continuous Temperature @ 2m / oK / 1 hour / AM-4 / Continuous Temperature @ 10 m / oK / 1 hour / AM-4 / Continuous Total Solar Radiation @ 10 m / W/m2 / 1 hour / AM-4 / Continuous	ECMR 2023	As per M5.1	Compliant	
M6.1	The licensee must keep a legible record of 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.	Quarterly Complaints Registers - July 2022 - June 2023 Quarterly Complaints Audit Reports - July 2022 - June 2023	All complaints received are entered into the VAULT complaint system when received. The complaints sighted included the details required in EPL M6. Refer to CA Condition 4.3	Compliant	
M6.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; 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; d) the nature of the complaint; 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.		Complaints register observed to contain all required information. Refer to CA Condition 4.3.	Compliant	
M6.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Visy VAULT complaint system.	Previous records sighted (>4yrs old) in Visy internal electronic systems. All complaints are stored electronically.	Compliant	
M6.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Interview M O'Donovan	No results requested this reporting period, monitoring results observed as available.	Not triggered	
M7.1	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.	https://www.visy.com.au/env-appv-mgmt-plan/ On site observations Minutes of VCCC meetings	Details are provided on the Visy website. Details on sign at front security gate and the gate is staffed 24/7 Details included in VCCC meetings each quarter	Compliant	
M7.2	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.	https://www.visy.com.au/env-appv-mgmt-plan/ On site observations Minutes of VCCC meetings	Website states that number is specifically for complaints. Complaints process also clearly communicated through VCCC meetings.	Compliant	
M7.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Noted	Not triggered	
M8.1	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; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. POINT 9 **Frequency** / **Unit of Measure** / **Sampling Method** Continuous / kilolitres per day / Flow meter and continuous logger POINT 10 **Frequency** / **Unit of Measure** / **Sampling Method** Continuous / kilolitres per day / Other Approved Method 1	ECMR 2023 EPL Annual Return 2023	Both Points 9 and 10 were monitored as required during the reporting period. No discharge was made from Point 9 during the reporting period.	Compliant	
M8.2	Other approved method 1 means the sum of individual flow meters for all the various irrigation areas.		Noted	Not triggered	

<table>
<tr>
<td>M9.1</td>
<td>The analysis for the concentration of the specified analytes (for non-standard fuel usage) must be conducted in accordance with the documents as detailed below:

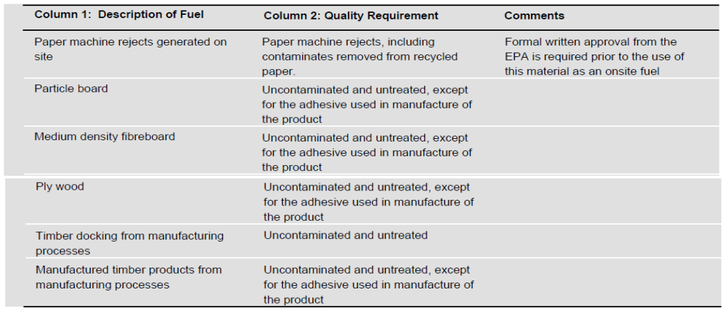
Wood Analysis

<table>
<tr><th>analyte</th><th>Sample Preparation</th><th>Analysis Method</th></tr>
<tr><td>Antimony</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Arsenic</td><td>AS 1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Beryllium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Cadmium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Chromium (VI)</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Cobalt</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Lead</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Manganese</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Mercury</td><td>USEPA3052 Acid Digestion</td><td>USEPA 7470/1 (CVAA)</td></tr>
<tr><td>Selenium</td><td>AS 1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Tin</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Vanadium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Copper</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>OP</td><td>USEPA SW846</td><td>USEPA 8081A (GC)</td></tr>
<tr><td>OC</td><td>USEPA SW846</td><td>USEPA 8141A (GC)</td></tr>
<tr><td>Calorific value</td><td>-212 um air dried sample analysed</td><td>AS1038.5 (bomb calorimetry)</td></tr>
<tr><td>Chlorine</td><td>-212 um air dried sample analysed</td><td>AS1038.10.0 & based on AS1038.14.3 (WD XRF)</td></tr>
<tr><td>Sulfur</td><td>-212 um air dried sample analysed</td><td>AS1038.6.3.3 (IR)</td></tr>
<tr><td>Fluorine</td><td>-212 um air dried sample analysed</td><td>AS1038.10.4 (ISE)</td></tr>
<tr><td>-</td><td>-</td><td></td></tr>
<tr><td>ALTERNATIVE METHOD</td><td></td><td></td></tr>
<tr><td>Antimony, Arsenic, Cadmium, Chromium (VI), Cobalt, Lead, Manganese, Mercury, Nickel, Selenium, Tin, Vanadium and Copper</td><td>Pressed Wax Disc</td><td>AS1038.10.0 & based on AS1038.14.3 (WD XRF)</td></tr>
</table>
Fly Ash, Bottom Ash and Fluidised Bed Sand Analysis

<table>
<tr><th>Analyte</th><th>Sample Preparation</th><th>Analysis method</th></tr>
<tr><td>Antimony</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Arsenic</td><td>AS1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Beryllium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Cadmium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Chromium (VI)</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Cobalt</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Lead</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Manganese</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Mercury</td><td>USEPA3052 Acid Digestion</td><td>USEPA 7470/1 (CVAA)</td></tr>
<tr><td>Nickel</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Selenium</td><td>AS1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Tin</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
<tr><td>Vanadium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr>
</table>
</td>
<td>ECMR 2023
Interview M O'Donovan</td>
<td>No non-standard fuels have been used this reporting period or since 2008</td>
<td>Not triggered</td>
<td></td>
</tr>
<tr>
<td>R1.1</td>
<td>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:
1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.
At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must</td>
<td>EPL Annual Return 2023</td>
<td>The 2022/23 Annual Return included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>R1.2</td>
<td>An Annual Return must be prepared in respect of each reporting period, except as provided below.
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.</td>
<td>EPL Annual Return 2023</td>
<td>An Annual Return has been prepared for the reporting period.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>R1.3</td>
<td>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
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.
Note: An application to transfer a licence must be made in the approved form for this purpose.</td>
<td>EPL 10232</td>
<td>This EPL has not been transferred or revoked during the reporting period.</td>
<td>Not triggered</td>
<td></td>
</tr>
</table>

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 b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	EPL 10232	The EPL has not been surrendered or revoked during the reporting period.	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').	https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=10232&id=10232&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued	Annual return due by 28th August, marked as received 10th August 2023 on EPA website.	Compliant	
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	EPL Annual Return 2023	Pollutant loads were calculated for the AR and submission was made within the specified timeframe.	Not triggered	
R1.7	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.	EPL Annual Return 2023	Copy of the signed return was available at the time of the audit. Previous annual returns now stored in the EPA portal.	Compliant	
R1.8	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 b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	EPL Annual Return 2023	Certified by Anthony Pratt, Director & Robert Kaye, Company Secretary.	Compliant	
R1.9	In addition to the documents specified in Clause R1.1, the licensee must supply the following documents to the EPA : (a) A copy of the relevant environmental report/s produced in accordance with the requirements of Conditions 11 and 12 of the Development Consent; and (b) Independent Environmental Audit in accordance with Condition 71 of the Development Consent.	Email to DPE, EPA and SVC 26/09/2023, submitting ECMR 2023	The ECMR 2023 was emailed to EPA, DPE and SVC concurrently on 26/09/2023.	Compliant	
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. 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.	Interview M O'Donovan	A notification of the Sandy Creek incident was made via the Environment Line at the time of the incident.	Compliant	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	EPA Incident Report - 3/11/2022	A written report with information as specified in R3.3 was provided by Visy to the EPA on 3/11/2022. This is within 7 days of the incident occurring (28/10/2022).	Compliant	
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 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.	EPA Incident Report - 3/11/2022 Interview M O'Donovan	Visy supplied a written report to the EPA in response to the Sandy Creek incident as per R2.2. Additional documents were provided to the EPA via a legal document sharepoint during the course of the investigation.	Compliant	
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.	EPA Incident Report - 3/11/2022 Interview M O'Donovan	As per R3.1	Compliant	
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; b) the type, volume and concentration of every pollutant discharged as a result of the event; 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; 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; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	EPA Incident Report - 3/11/2022 Interview M O'Donovan	As per R3.1	Compliant	

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.	EPA Incident Report - 3/11/2022 Interview M O'Donovan	As per R3.1	Compliant	
R4.1	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2022 - 2023	Report submitted 29/08/2023	Compliant	
R4.2	The Annual Waste Summary Report must be submitted to the EPA via the online Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2022 - 2023	Report submitted 22/08/2023 (due 29/08/2023)	Compliant	
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site observations Interview I Kane	An electronic and hard copy of the EPL was held on site and sighted at the time of the audit.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interview M O'Donovan	No requests made during the reporting period	Not triggered	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site observations Interview I Kane	An electronic and hard copy of the EPL was held on site and sighted at the time of the audit.	Compliant	
E1.1	Non-standard fuels must not be burnt unless: a) they comply with the sampling, analysis and quality/source requirement of this licence; or b) have been defined as a Known Fuel Not Requiring Further Testing and the supply source has been assessed in accordance with Clause E1.6.	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
E2.1	The maximum concentration of the following contaminants in any sample of Non-standard Fuel must:- i. not exceed 317 mg/kg of hazardous substances calculated in accordance with Equation 1. ii. not exceed 21 mg/kg of Cadmium; iii. not exceed 2 mg/kg of Mercury. Equation 1 is (0.2Sb + 1.09As + 1.49Cd + 2.18Pb + 16.16Hg + Be + 1.4Cr + 0.73Co + 1.07Mn + 1.18Ni + Se + 0.82Sn + 0.09V) Where: Sb is the concentration of Antinomy in the sample in mg/kg; As is the concentration of Arsenic in the sample in mg/kg; Cd is the concentration of Cadmium in the sample in mg/kg; Pb is the concentration of Lead in the sample in mg/kg; Hg is the concentration of Mercury in the sample in mg/kg; Be is the concentration of Beryllium in the sample in mg/kg; Cr is the concentration of Chromium in the sample in mg/kg; Co is the concentration of Cobalt in the sample in mg/kg; Mn is the concentration of Manganese in the sample in mg/kg; Ni is the concentration of Nickel in the sample in mg/kg; Se is the concentration of Selenium in the sample in mg/kg; Sn is the concentration of Tin in the sample in mg/kg; V is the concentration of Vanadium in the sample in mg/kg; and 0.09V is 0.9 times the concentration of Antimony in the sample in mg/kg	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
E3.1	a) The frequency and sampling collection methodology for Non-standard Fuels must be in accordance with Sampling Protocol, except as noted below. b) If a Non-standard Fuel source is assessed and classified as a Known Fuel Not Requiring Further Testing, it will not require ongoing sampling and analysis unless requested by the EPA. This request may be made either orally or in writing. If a sample is requested, it must be obtained in accordance with Sampling Protocol	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
E4.1	a) All samples of Non-standard Fuels must be analysed for the following parameters: - Hazardous substances - Ash - Copper - Chlorine - Fluorine - Calorific Value b) The first set of samples of Non-standard Fuel from any new supply source must also be analysed for the following contaminants. - Organochlorine Pesticides - Organophosphate Pesticides c) The sample preparation and analytic method shall be in accordance with the requirements of	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	

E5.1	a) All Non-standard Fuels must comply with the following quality assurance control requirements prior to delivery to Visy Pulp and Paper, Tumut; I. Visual inspection and removal of all visible contaminants or treated pieces of wood; II. Sampling and analysis in accordance with the Sampling Protocol, and the conditions E1.3 and E1.4 of this licence, and; III. Assessment of suitability for use as a fuel in accordance with the Fuel Specification. b) Any Non-standard Fuel, which fails to meet the Fuel Specification must:- I. not be blended with any other fuel; II. not be retested. c) Records must be maintained for a period of not less than four (4) years for each of the following:- - the date time and location of each sample of Non-standard Fuel; - the analysis results for each sample taken of Non-standard Fuel; - the approximate volume and mass of each stockpile of Non-standard Fuel sampled; and, - for each stockpile that fails to meet the Fuel Specification, the date and location of its disposal. d) Only Non-standard Fuel that has been sampled, analysed, and complies with the Fuel Specification may be received at the premise.	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
E6.1	a) The materials that can be considered for classification under the category of Known Fuel Not Requiring Further Testing are detailed in Column 1 of Schedule VF1. b) Unless noted otherwise, each supply source of a fuel intended to be used as a Known Fuel Not Requiring Further Testing must comply with the following requirements before it is used: 1. Sampling and analysis of representative samples from three (3) separate batches in accordance with the procedures detailed in this licence; 2. Identification of all contaminants other than those listed in Column 2 of Schedule VF1. For all such contaminants, the licensee must submit supporting scientific information and/or analysis that demonstrates the material will not have a significant impact on the environment if burnt; 3. Details of the quality assurance and quality control procedures that will be implemented to ensure the fuel quality will be maintained; 4. The results of the above assessment and quality systems must be forward to EPA for review; Written confirmation is received from the EPA that a particular source may be used. This consent may be withdrawn at any time in writing by the EPA. c) All fuels classified as Known Fuels Not Requiring Further Testing must comply at all times with the Fuel Specification. d) The licensee may make application to EPA to burn other types of homogenous wood or wood fibre material where there is a low risk of contamination in addition to those already listed in Column 1 of Schedule VF1. The application to the EPA must be in accordance with the requirements as detailed in Paragraph b) above.	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
		Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	
E7.1	At the completion of 12 months from the date of commencement of authorisation to burn up to 50% Non-standard Fuels, the licensee must prepare a report that reviews the Fuel Specification, based on the results of the testing requirements as detailed in Clause M2. The report shall establish; a) individual partitioning factors for each Hazardous Substance (i.e. relative percentage in the bottom ash, fly and air emissions); b) Assess the accuracy of the assumptions and simplifications contained in the initial fuel specification; c) Develop a revised fuel specification equation. This report must be submitted to the EPA within 60 days from the end of the initial 12-month operational period detailed above.	Interview M O'Donovan ECMR 2023 Annual Return 2023	No non-standard fuels have been used during this reporting period or since 2008	Not triggered	

E8.1	Sludge from the Wastewater Treatment Plant may be disposed on site in accordance with the current reviewed Wastewater Treatment Plant Sludge Disposal By Land Application On Site procedure, as subsequently updated and approved in writing by the EPA.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023	Sludge is being disposed of as per procedure, as referenced in the updated Solid Waste Management Plan. The sludge is sampled and tested monthly, with unusually high results across multiple parameters observed in June 2023.	Compliant	
E9.1	Standard Fuel - Natural gas; and untreated and uncontaminated timber, timber off-cuts and residues from sawmills and forestry operations. Non-Standard Fuel - Any wood or plant based fuel that does not meet the criteria for Standard Fuel. Known Fuel Not Requiring Further Testing - A sub-category of Non-Standard Fuel that on account of being homogenous wood or wood fibre material from a verifiable source with controls over its lifecycle, are considered to present a low risk of contamination.		Noted	Not triggered	

Consultation Compliance Status - November 2023

Reference	Approval or licence requirement	Evidence collected 2023	Audit Finding	Compliance status	Action Reference
Consultation					
DPE	In addition to the consent condition requirements, please consider odour management, in particular.	Could be in relation to Tumut Landfill issues - ongoing	Odour management has been considered during the audit. Refer to PA 2.2 and 2.3.	Compliant	
EPA	The EPA would like to request that the audit of Visy Pulp and Paper Tumut address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used or required in relation to any waste generated at the premises.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023 ECMR 2023	Dregs and Grits, Fly Ash and Boiler Sand waste was taken to both Captains Flat and Woodlawn sites until 19th February 2023, after which only Woodlawn was utilised. A total of 8,651t was sent to these sites during the reporting period. Recovery exemptions and orders currently being used have been updated in this revision of the Solid Waste Management Plan (SWMP) and Section 4.2 of the SWMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption.	Compliant	
DPE Water	The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope: - The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan. - The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting. - Water supply availability is clearly defined for the project. - Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. - Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. - Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. - Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.	Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023 (not assessed during this reporting period) ECMR 2023	The Project holds a Water Management Plan, updated in July 2023 (outside of the reporting period). The WMP details water supply, water licences held by the project, the site's water treatment plant, annual external groundwater, surface water and soil monitoiring and all contextual information relating to the Project's water requirements. No TARPs have been specified for the Project however WQ objectives have been set and are reported upon annually in the Project ECMR and associated appendices.	Compliant	

Appendix B DPE Auditor approval

Department of Planning and Environment

Our ref: MP06_0159-PA-13

Mr Matt O'Donovan

HSE Manager

1302 Snowy Mountains Highway

TUMUT NSW 2720

10/11/2023

Sent via the Major Projects Portal only

Dear Mr O'Donovan

Visy Pulp and Paper Tumut Mill (MP 06_0159)

Independent Auditor 2023

I refer to your letter of 2 November 2023 seeking approval of Ms Natasha Arens, Ms Whitney Heiniger and Ms Nicola Smith of NGH Environmental (the audit team) as the audit team for the upcoming Independent Environmental Audit of Visy Pulp and Paper Tumut Mill (the development), in accordance with Schedule 2, Condition 3.16 of the project approval MP 06_0159, as modified (the consent).

Having considered the qualifications and experience of the audit team, the Planning Secretary endorses the appointment of the audit team to undertake the audit in accordance with Schedule 2, Condition 3.16 of the consent. This approval is conditional on the audit team being independent of the development and maintaining certification as lead or principal auditor with a relevant industry body.

Please ensure this correspondence, including the independent audit declaration form are appended to the Independent Audit Report.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may wish to have regard to the Independent Audit Post Approval Requirements (Department 2020 or as updated). A copy of this guideline can be located at http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of consent and any relevant EPL;

3. not use the term “partial compliance”;
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and

identify opportunities for improved environmental management and performance.

Within one month of the completion of the audit, Visy is to submit a copy of the audit report to the Planning Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Planning Secretary, it is recommended that Visy review the report to ensure it complies with the relevant consent condition.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

Appendix C Consultation

C.1 Department of Planning and Environment

A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request

Reply | Reply All | Forward

Whitney Heiniger
To DPE PSVC Compliance Mailbox
Bcc 64a1fafa-7b3e-4f8e-808a-c6367bcd1e37.metaPublish@nghconsultingmx.deltekpim.com

Mon 20/11/2023 11:06 AM

Good morning,

I am part of the audit team (currently pending DPE approval) for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut (Project Approval MP 06_0159 as modified). We have an Independent Environmental Audit of the site scheduled for 29th November 2023.

In accordance with the DPE Independent Audit Post Approval Requirements (2020), I am engaging with DPE to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2023 audit scope.

Thank you,

Whitney Heiniger
Senior Environmental Consultant - Environmental Management
m:
e. [redacted]
a.
w. nghconsulting.com.au | Our commitment to reconciliation

RE: A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request

Reply | Reply All | Forward

Georgia Dragicevic <[redacted]>
To Whitney Heiniger
Cc Katrina O'Reilly

Fri 24/11/2023 8:28 AM

You replied to this message on 24/11/2023 2:44 PM.

Hi Whitney,

Thank you for consulting the department on the upcoming IEA for Visy Tumut Pulp and Paper Mill. In addition to the consent condition requirements, please consider odour management, in particular.

Kind Regards,
Georgia

C.2 Environment Protection Agency

A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request

Whitney Heiniger
To EPA.Westopsregional@epa.nsw.gov.au
Bcc 9bed3ec9-9ae7-444e-a904-9150f6358f83.metaPublish@nghconsultingmx.deltekpim.com

Reply | Reply All | Forward
Mon 20/11/2023 11:06 AM

Good morning,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut (EPL 10232). We have an Independent Environmental Audit of the site scheduled for 29th November 2023.

In accordance with the DPE Independent Audit Post Approval Requirements (2020), I am engaging with the EPA to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2023 audit scope.

Thank you,

Whitney Heiniger
Senior Environmental Consultant - Environmental Management

m: [redacted]
e.
a.
w. nghconsulting.com.au | Our commitment to reconciliation

Visy Annual 2023 Environmental Audit - Consultation Request

BS Briohny Seaman <[redacted]>
To Whitney Heiniger

Reply | Reply All | Forward
Fri 24/11/2023 2:13 PM

You replied to this message on 24/11/2023 2:45 PM.

Hi Whitney,

Thank you for the email.

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

Regards,

Briohny

Briohny Seaman
A/Unit Head
Regulatory Operations
NSW Environment Protection Authority
[redacted]

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.3 DPE Water

A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request

Whitney Heiniger
To waterlicensing.servicedesk@dpie.nsw.gov.au
Bcc a822e218-0c89-4f52-bc24-22b8621a7d6c.metaPublish@nghconsultingmx.deltekpim.com

Reply | Reply All | Forward
Thu 23/11/2023 5:17 PM

Good afternoon,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut. We have an Independent Environmental Audit of the site scheduled for 29th November 2023.

In accordance with the DPE Independent Audit Post Approval Requirements (2020), I am engaging with DPE Water (formerly NRAR) to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2023 audit scope.

Thank you,

Whitney Heiniger
Senior Environmental Consultant - Environmental Management
m:
e. [redacted]
a.
w. nghconsulting.com.au | Our commitment to reconciliation

Fw: A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request CRM:0122341

DW Patricia Borges <[redacted]> on behalf of DPIE Water Assessments Mailbox <water.assessments@
To Whitney Heiniger

Reply | Reply All | Forward
Thu 21/12/2023 10:50 AM

You forwarded this message on 3/01/2024 12:55 PM.
If there are problems with how this message is displayed, click here to view it in a web browser.

Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut - 06_0159 - IEA.PDF
372 KB

Hi Whitney,

Thank you for your email.

Please find DPE Water response attached.

Kind Regards,

Patricia Borges
Assistant Projects Officer

Water Group | Department of Planning and Environment
E [redacted]

dpie.nsw.gov.au

Our Vision: Together, we create thriving environments, communities and economics.

Department of Planning and Environment

Our ref: OUT23/20774

Whitney Heiniger

NGH Consulting

Email: [redacted]

Date: 20 December 2023

Subject: Visy Tumut Pulp and Paper Mill (06_0159) -Independent Environment Audit

Dear Whitney,

I refer to your request seeking advice from the Department of Planning and Environment – Water (the department) on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

The department understands that the scope of the audit as outlined under the development consent and the reference guideline, "*Independent Audit Post Approval Requirements* (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
    - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
    - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
www.dpie.nsw.gov.au

Department of Planning and Environment

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

Tim Baker
Senior Project Officer
Water Assessments
Department of Planning and Environment – Water

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
www.dpie.nsw.gov.au

C.4 Snowy Valleys Council

A230680.00 - Visy Annual 2023 Environmental Audit - Consultation Request

Whitney Heiniger
To info@svc.nsw.gov.au
Bcc 1da7fb35-d057-4739-9472-61e42ed13135.metaPublish@nghconsultingmx.deltekpim.com

Reply | Reply All | Forward

Mon 20/11/2023 11:06 AM

Good morning,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut. We have an Independent Environmental Audit of the site scheduled for 29th November 2023.

In accordance with the DPE Independent Audit Post Approval Requirements (2020), I am engaging with SVC to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2023 audit scope.

Thank you,

Whitney Heiniger
Senior Environmental Consultant - Environmental Management

m: [redacted]
e.
a.
w. nghconsulting.com.au | Our commitment to reconciliation

Appendix D Independent Auditor Declaration

Project Name	Visy Pulp and Paper Mill Tumut
Consent No.	MP 06_0159 as modified
Description of Project	Kraft paper production
Project Address	1302 Snowy Mountains Highway, Tumut, NSW
Proponent	Visy Pulp and Paper Pty Ltd
Title of Audit	Independent Environmental Audit
Date	February 2024

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- 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
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the Project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

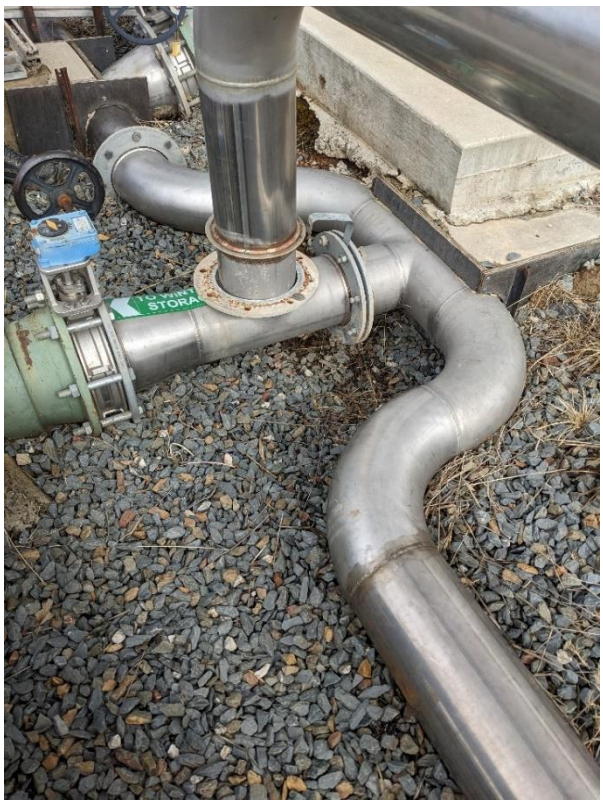
a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved Project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and

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

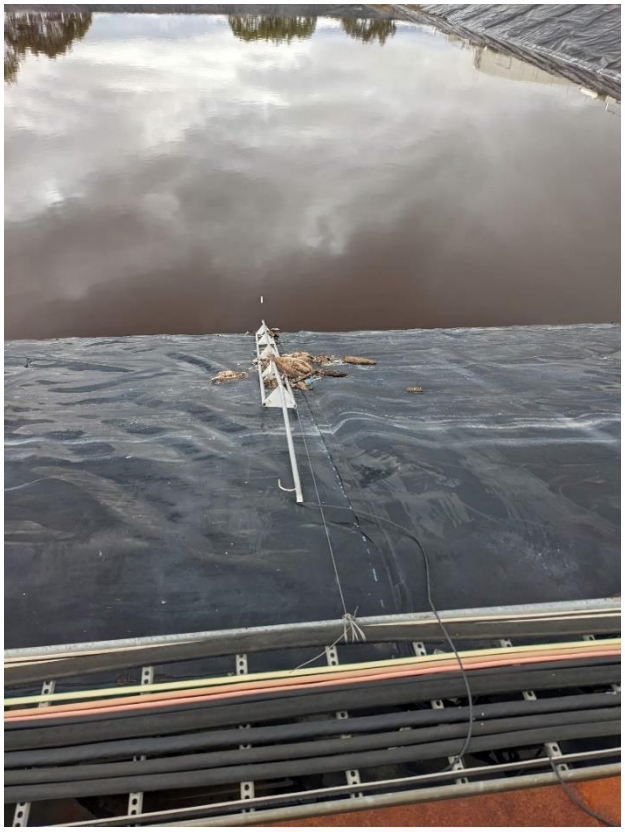
Name of Auditor	Natascha Arens
Signature	
Qualification	BAppSc, MEBM, Exemplar Global Lead auditor
Company	NGH Pty Ltd
Company Address	Unit 17, Level 3, 21 Mary Street, Surry Hills NSW 2010

Appendix E Site inspection photos

New stacker reclaimer in operation



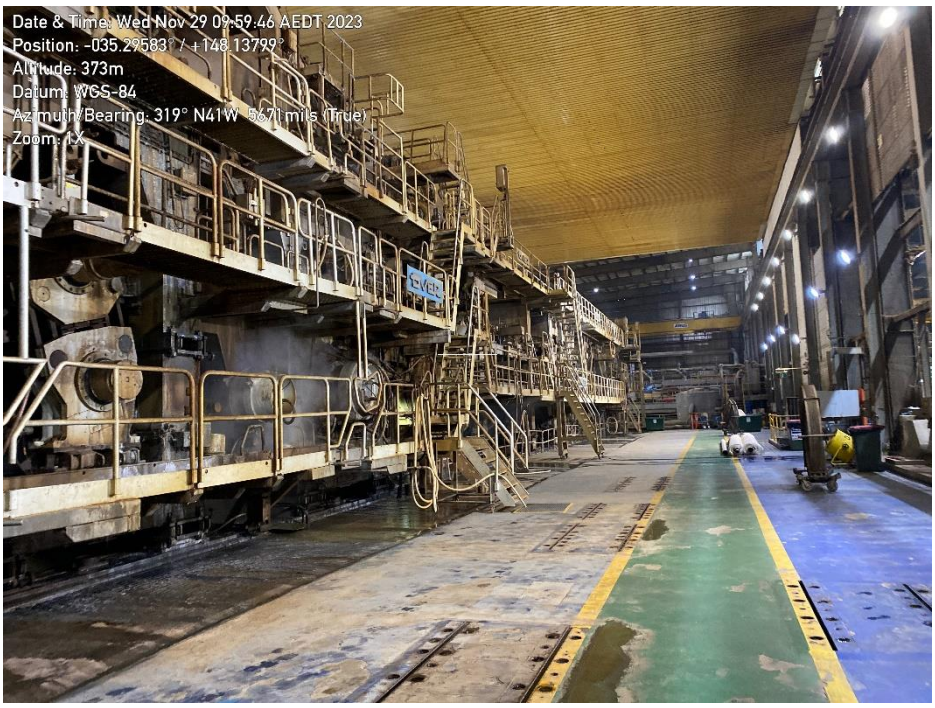
The modified valve system that prevents discharge of untreated wastewater from site following the Sandy Creek incident in October 2022



Deceased birds observed in the untreated wastewater pond

Woodchip residue providing effective erosion control within the Wood Yard

Evaporation area adjacent the site control room



Operating machinery within the paper line

NGH Pty Ltd

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: ngh@nghconsulting.com.au

GOLD COAST

2B 34 Tallebudgera Creek Road
Burleigh Heads QLD 4220
(PO Box 424 West Burleigh QLD 4219)

T. (07) 3129 7633

SYDNEY REGION

Unit 17, 21 Mary Street
Surry Hills NSW 2010

T. (02) 8202 8333

BEGA

Suite 11, 89-91 Auckland Street
(PO Box 470)
Bega NSW 2550

T. (02) 6492 8333

MELBOURNE

Level 14, 10-16 Queen Street
Melbourne VIC 3000

T: (03) 7031 9123

TOWNSVILLE

Level 4, 67-75 Denham Street
Townsville QLD 4810

T. (07) 4410 9000

BRISBANE

T3, Level 7, 348 Edward Street
Brisbane QLD 4000

T. (07) 3129 7633

NEWCASTLE - HUNTER & NORTH COAST

Level 1, 31-33 Beaumont Street
Hamilton NSW 2303

T. (02) 4929 2301

WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

T. (02) 6971 9696

CANBERRA

Unit 8, 27 Yallourn Street
(PO Box 62)
Fyshwick ACT 2609

T. (02) 6280 5053

SUNSHINE COAST

Suite 101, Level 2/30 Main Drive
Birtinya QLD 4575

(07) 4410 9000

WODONGA

Unit 2, 83 Hume Street
(PO Box 506)
Wodonga VIC 3690

T. (02) 6067 2533