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2022 Independent Environmental Audit
State Significant Development 5855
Veolia Environmental Services Australia
Banksmeadow Transfer Terminal

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We declare that:

The report contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the audit is neither false nor misleading.

Version number	Report version	Authors	Date	Reviewer	Approved for issue	Date
0	Draft for Client Review	R. Loemker, Dr M. Jackson, A. Parsons	01/06/22	A. Parsons	Dr. M. Jackson	01/06/22
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Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of Veolia Environmental Services Australia's Banksmeadow Transfer Terminal, located at 34-36 McPherson Street, Banksmeadow for the period between 29 April 2019 to 28 April 2022.

The audit was conducted by Jackson Environment and Planning Pty Ltd in May 2022, as required under Conditions 6 and 7 (Schedule 4) of the Development Consent (SSD 5855). The scope of the Audit was limited to the period since previous audit (April 2019) to April 2022 and was conducted in accordance with the Department of Planning and Environment (2020) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street; and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD 5855 Mod 1).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20581) for the same period, as this is specifically required under Schedule 4, Condition 6(c) of SSD 5855.

An assessment of the Actions recommended in the 2019 Independent Environmental Audit conducted Jackson Environment and Planning Pty Ltd was carried out during this audit and it was found that all actions have been completed.

The 2022 Independent Environmental Audit found no non-compliances against the conditions of SSD5855, and a small number of observations as follows:

- A minor leak in the leachate transfer line causing pooling leachate on the floor, with the potential for odour emissions;
- The outdoor diesel storage area with ponding rainwater within the bunding, reducing its effective capacity in the event of a spill during refueling;
- The cleaning schedule for stormwater pits and the OSD system should be reviewed to avoid buildup of sediment and debris (e.g. leaf litter or vegetative matter); and
- Some failed landscaping was present on the site. Repairs are needed to avoid the transfer of sediment into stormwater.

The 2022 Independent Environmental Audit found two non-compliances against conditions of the Environmental Protection Licence (20581), follows:

- Condition L2.1 / L2.4 – Exceedances of water quality concentrations limits.
 - There were 7 exceedances of water quality concentrations limits. Prior to the IEA, Veolia had identified potential causes of these exceedances and implemented corrective actions, including improved maintenance of the on-site detention system to avoid stormwater pollution from the site.
- Condition L4.1 – Potentially offensive odour emission.
 - Three odour complaints were received between January 2022 and February 2022. In response, Veolia undertook several corrective actions as part of the Veolia's continuous improvement and management of complaints. One of these corrective actions included replacement of the exhaust stack velocity sensor which was found to be faulty. It has been recommended that the exhaust velocity sensor is checked at the same time as maintenance is done on ducting to ensure that any faults are detected sooner.

- The odour complaint received on 11 March 2020 was due to an off-site railway incident which occurred on 7 March 2022. This incident resulted in inability to remove waste from the site, causing an uncommon amount of waste being stockpiled at the site. These circumstances were proactively communicated to the NSW EPA and neighbouring sites.
- The odour complaint received in April 2020 was attributed to a neighbouring property and not the Banksmeadow Transfer Terminal following an investigation by Veolia.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent.

This demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

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1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in May 2022. Veolia Environmental Services Australia (Veolia) commissioned JEP to conduct the Audit and assess the environmental performance of Banksmeadow Transfer Terminal (BTT) located at 34-36 McPherson Street, Banksmeadow NSW for the period 29 April 2019 to 28 April 2022.

On 3 May 2022, the Department of Planning and Environment approved the audit team to undertake the audit (refer to Appendix B).

1.1. Background

Operating under Development Consent (SSD 5855) and Environment Protection Licence (EPL) No. 20581, BTT is approved to receive up 400,000 tonnes of putrescible material and 100,000 tonnes of non-putrescible material per annum. Waste that is received at the BTT is compacted and containerised for transport by rail, for resource recovery and treatment at Veolia’s Woodlawn Bioreactor.

The Woodlawn Bioreactor, which is located 30 kilometres south of Goulburn and 240 kilometres southwest of Sydney, currently provides a solution for the management of Sydney’s putrescible waste.

The BTT consists of the following:

- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility;
- An enclosed warehouse style building for the unloading and handling of waste, with environmental controls for dust and odour;
- Two compaction units to load waste into fully sealed shipping containers;
- A container handling area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading on to trains; and
- Two rail sidings for the loading of containers onto trains for rail transport to Woodlawn Bioreactor.

1.1.1. Site changes and upgrades

An application for a development modification was made in 2016 to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD 5855 Mod 1).

1.2. Audit Team

The Audit team from Jackson Environment and Planning Pty Ltd included Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

1.3. Audit Objectives

As required under Schedule 4, Conditions 6 and 7 of Development Consent (SSD 5855), an Independent Environmental Audit report is to be submitted to the Department of Planning and Environment. Specifically, Schedule 4, Condition 6 states:

Within one (1) year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

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

- (b) include consultation with the relevant agencies;
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.

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

Schedule 4, Condition 7 states:

Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

The objective of this Audit is to obtain an independent and objective assessment of the environmental performance and compliance status of the project and comply with Conditions 6 and 7 of Development Consent (SSD 5855).

1.4. Audit scope

Three considerations relevant to the scope of this Independent Environmental Audit include that of:

- Audit period;
- Project implementation phase; and
- Spatial scope.

1.4.1. Audit period

The scope of the Audit was limited to assessing the environmental performance of BTT, in accordance the COCs of SSD 5855 for the period between 29 April 2019 to 28 April 2022.

Records reviewed fell within this period; however, some observations made by the Auditors relate to the period from 28 April 2022 until the site visit conducted on the 13 May 2022.

An assessment of the actions recommended in the 2019 Independent Environmental Audit conducted Jackson Environment and Planning Pty Ltd (report dated 20 May 2019) were also carried out during the Audit

1.4.2. Project implementation phase

In relation to project implementation phase, BTT commenced operations in September 2016, therefore, the scope of this audit includes the operational phase only.

1.4.3. Spatial scope

The BTT is located at 14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow, NSW, on the following lots (refer to Figure 1.1) which defines the spatial scope of the Audit:

- Lot 1, DP435497;
- Lot B, DP366725; and
- Lot 20, DP1231202.

Figure 1.1. Spatial scope of the 2022 Independent Environmental Audit – Banksmeadow Transfer Terminal (lot boundaries are shown in yellow; site boundaries, relevant to the audit are shown in red).



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd Strategy Infrastructure Compliance Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	 JACKSON ENVIRONMENT AND PLANNING STRATEGY INFRASTRUCTURE COMPLIANCE PROCUREMENT	Client	Veolia Environmental Services (Australia) P/L
23/05/2022	Revision A	R. Loemker	14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow			Project	Banksmeadow Transfer Terminal
16/06/2022	Revision B	R. Loemker				Title	Spatial Scope of audit
						Scale	As shown
						Source	Nearmap

2. Audit methodology

2.1. Selection and endorsement of audit team

The Audit Team from Jackson Environment and Planning Pty Ltd included: Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

In accordance with Condition 6 (Schedule 4) of the Development Consent (SSD 5855) and Section 3 of the NSW Department of Planning and Environment's *Independent Audit – Post Approval Requirements* (2020), Veolia presented the Audit Team to the Department of Planning and Environment and sought approval for the team put forward.

Approval for the independent audit team was provided to Veolia on 3 May 2022. The letter of approval is provided in Appendix B.

2.2. Independent audit scope development

The Independent Environmental Audit was conducted in accordance with the *Independent Audit – Post Approval Requirements* and ISO 19011 *Guidelines for Auditing Management Systems* (2018)¹. The Audit involved the following stages.

- **Audit initiation** – Documents relating to the Audit period between 29 April 2019 to 28 April 2022 as well as the findings of previous audit were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Veolia were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

The audit plan is shown in Appendix C.

2.3. Compliance evaluation

Compliance checklists were developed based on the Conditions of Consent for SSD 5855, the conditions of EPL 20581 and in accordance with the *Independent Audit Guideline* and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The detailed list of compliance conditions is provided in Appendix D (SSD 5855 CoCs) and Appendix E (EPL 20581 licence conditions). The compliance assessment summary is provided in the Section 3.

¹ ISO 19011:2018 *Guidelines for Auditing Management Systems* (2018) replaces ISO 14010:1996 Guidelines for environmental auditing.

2.4. Site interviews

Compliance was determined via interviews with key staff during an onsite meeting carried out on 13 May 2022. Interviewees included the following employees from Veolia Environmental Services (Australia) Pty Ltd:

- Mr Bob Manevski - Facility Manager - Banksmeadow/Port Botany;
- Ms Ramona Bachu - National Environmental Compliance Manager;
- Ms Anae Ressos - Environmental Coordinator (virtual attendance);
- Mary Wong - Environmental Officer; and
- Nicole Boukarim - Environmental Compliance Advisor (NSW/ACT).

2.5. Site inspection

The auditors carried out a site inspection on 13 May 2022 following the site interviews. Photographs taken during the site inspection are provided in Appendix F.

2.6. Consultation

As part of the audit process, JEP consulted the NSW Environment Protection Authority, Department of Planning and Environment and Bayside Council on key environmental issues which need to be considered in the Independent Environmental Audit. Letters were sent on 11 May 2022 to each agency providing an opportunity to provide feedback. Feedback was requested by 25 May 2022. The letters inviting feedback are given in Appendix G.

2.7. Compliance status descriptors

Compliance has been assessed using the *Independent Audit – Post Approval Requirements* as provided in Table 2.1.

Table 2.1. Compliance assessment criteria - Independent Audit – Post Approval Requirements.

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

3. Audit Findings

3.1. Approval and document list

The scope of the Audit was limited to assessing the environmental performance of the site in accordance the conditions of Development Consent SSD 5855 for the period between 29 April 2019 to 28 April 2022. Reviewed documentation included:

- Operation Environmental Management Plan (dated 19 December 2019);
- Annual Environmental Management Report 2018-2019 (dated 16 August 2019);
- Annual Environmental Management Report 2019-2020 (dated 23 October 2020);
- Annual Environmental Management Report 2020-2021 (dated 28 August 2021);
- Operational Environmental Management Plan (dated 25 February 2019
- Environment Protection Licence 5855;
- Emergency Response Plan (dated 4 June 2021);
- Incident register;
- Complaints register;
- 2018-2019 Annual Return;
- 2019-2020 Annual Return;
- 2020-2021 Annual Return; and
- Waste data for the years 2019, 2020, 2021 and 2022.

3.2. Operational Environmental Management

Veolia manages the environmental performance of BTT the under Operation Environmental Management Plan (OEMP)² which has been prepared in conjunction with the Environmental Protection Licence to fulfil the requirements of the development Conditions of Consent (COCs).

The OEMP includes the following management plans:

- Soil, Water and Leachate Management Plan (dated 23 June 2016);
- Waste Management Plan (dated 23 June 2016);
- Traffic Management Plan (dated 23 June 2016);
- Air Quality Management Plan (dated 23 June 2016);
- Noise and Vibration Management Plan (dated 23 June 2016);
- Landscape and Vegetation Management Plan (dated 23 June 2016); and
- Emergency Response Plan (dated 4 June 2021).

The objectives of the OEMP are to:

- Provide an overview of the BTT operations;
- Provide guidance on compliance with relevant environmental legislation, including the Conditions of Development Consent and relating to the operational phase of the BTT;
- Provide a means of implementing appropriate mitigation measures for the key environmental issues;
- Provide a working environmental management tool to follow during the operation stage of the BTT;
- Define roles and responsibilities of the operational team;

² Document Code: PLA-NSW-XXX-XXX-1 dated 23 June 2016.

- Provide a guide for the interaction with relevant government authorities and other relevant stakeholders, including the community during the operational phase of the BTT; and
- Provide a basis for monitoring, reporting and maintaining compliance with both Veolia and regulatory requirements for the BTT.

3.3. Compliance performance

Veolia has demonstrated good overall compliance with the conditions of consent of SSD 5585. During the 2022 Audit, which covers the period between 29 April 2019 to 28 April 2022, no non-compliances were identified.

Two non-compliances were identified against the conditions of EPL 20581 (refer to Section 3.9).

A number of observations have been made and are summarised below (refer to Section 3.14).

Given the high level of compliance, the three-year audit cycle is recommended to continue.

3.4. Summary of agency notices, orders, penalty notices or prosecutions

There have been no agency notices, orders, penalty notices or prosecutions issued to the facility.

3.5. Non-compliances

No non-compliances were identified against the Conditions of Consent for SSD 5585 for the Audit Period.

3.6. Previous audit recommendations

Recommended actions for the observations from the 2019 Independent Environmental Audit are documented in Table 3.1. Completion dates for these actions are also documented.

Table 3.1. Recommended actions for the observations from the 2019 Independent Environmental Audit.

Development Consent SSD5585 Condition	Observation	Corrective Action Taken	Status
Consent Condition 21	It is recommended that weed management, in accordance with the Landscape and Vegetation Management Plan, is resumed to avoid the continued growth and potential spread of weed within, and properties adjacent to the site.	A new landscape contractor was engaged in May 2019 and ongoing landscape maintenance has improved. This was confirmed during the Site Inspection on 13 May 2022.	Complete
Schedule 3 – Environmental Performance Conditions – Condition 9 and Condition 10	Increase the frequency of drain cleaning in the main tipping building and include regular inspections to ensure that the leachate is not accumulating and potentially causing odour which could migrate outside of the processing shed.	More frequent drain cleaning is carried out in the waste receive hall to minimise odour internally. This was confirmed during the Site Inspection on 13 May 2022.	Complete

3.7. Compliance with PIRMP Requirements

A Site Emergency Response Plan (dated 4 June 2021) has been prepared for the BTT which incorporates the Pollution Incident Response Management Plan. The Pollution Incident Response Management Plan complies with the requirements of Section 153D of the POEO Act (cl. 98D(1) and (2)) of General Regulation as documented in Table 3.2.

Table 3.2. POEO Act PIRMP Requirements.

POEO Act PRIMP Requirements	Response
Full PIRMP maintained at premises	Compliant - A hard copy is kept onsite at the front entrance to the Site.
PIRMP in a prominent position on a publicly accessible website of the licensee	Compliant – an electronic version of the PIRMP is available on Veolia's website
The following information must be made publicly available:	
<ul style="list-style-type: none"> Procedures for contacting the relevant authorities including the EPA, the local council, NSW Health, SafeWork NSW, Fire and Rescue NSW and their contact details 	Compliant - refer to Section 5.7 of the PIRMP - <i>Notification of Authorities and Site Neighbours</i>
<ul style="list-style-type: none"> Procedures for contacting the owners or occupiers of premises in the vicinity 	Compliant - refer to Section 5.7 of the PIRMP - <i>Notification of Authorities and Site Neighbours</i>
<ul style="list-style-type: none"> Procedures for communicating with the community 	Compliant - refer to Section 5.7 of the PIRMP - <i>Notification of Authorities and Site Neighbours</i>
<ul style="list-style-type: none"> Mechanisms for providing early warnings and regular updates to premises in the vicinity 	Compliant - the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by a pollution incident occurring on site are detailed in the <i>Pollution Incident Response Management Manual</i> , which is accessible on the Veolia website
<ul style="list-style-type: none"> May form part of another document prepared in accordance with other legislation 	Compliant - Incorporated within the BTT Emergency Response Plan
<ul style="list-style-type: none"> May be an index document detailing the other plans that meet the requirements of the PIRMP 	Compliant - refer to Section 1 of the PIRMP - <i>Purpose & Scope</i>

3.8. Compliance with Operational Environmental Management Plan

Overall, the site is compliant with the sub management plans under the OEMP. No non-compliances were identified as summarised in Table 3.3 below.

Table 3.3. Compliance with management plan requirements.

Management Plan	Compliance
Soil, Water & Leachate Management Plan	Compliant
Waste Management Plan	Compliant
Traffic Management Plan	Compliant
Air Quality Management Plan	Compliant

Management Plan	Compliance
Noise and Vibration Management Plan	Compliant
Landscaping and Vegetation Management Plan	Compliant
Emergency Response Plan	Compliant

3.9. Compliance with Environment Protection Licence 20581

The Audit Team found that the Site is operated in accordance with the conditions of EPL 20581 for the Audit Period however, two non-compliances were identified as follows:

- Condition L2.1 / L2.4 – Exceedances of water quality concentrations limits
 - There were 7 exceedances of water quality concentrations limits. Prior to the IEA, Veolia had identified potential causes of these exceedances and implemented corrective actions, including improved maintenance of the on-site detention system to avoid stormwater pollution from the site (refer to Section 3.11).
- Condition L4.1 – Potentially offensive odour emission
 - Three odour complaints were received between January 2022 and February 2022. In response, Veolia undertook several corrective actions as part of the Veolia's continuous improvement and management of complaints. One of these corrective actions included replacement of the exhaust stack velocity sensor which was found to be faulty. It has been recommended that the exhaust velocity sensor is checked at the same time as maintenance is done on ducting to ensure that any faults are detected sooner.
 - The odour complaint received on 11 March 2020 was due to an off-site railway incident which occurred on 7 March 2022. This incident resulted in inability to remove waste from the site, causing an uncommon amount of waste being stockpiled at the site. These circumstances were proactively communicated to the NSW EPA and neighbouring sites.
 - The odour complaint received in April 2020 was attributed to a neighbouring property and not the Banksmeadow Transfer Terminal following an investigation by Veolia.

3.10. Overview of environmental performance

3.10.1. Consultation outcomes

Under Condition 6(b) of Schedule 4 of SSD Consent 5855, relevant agencies are to be consulted on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, JEP consulted the NSW EPA, Bayside Council and the NSW Department of Planning and Environment. Letters issued to the agencies on 11 May 2022 and feedback was requested by 25 May 2022. At the time of writing of the report, no feedback from agencies had been received. Should feedback be received in future, this Independent Environmental Audit report will be updated accordingly.

3.10.2. Complaints

From the period between the previous audit in 2019 and the end of 2021, the number of complaints remained relatively low, as shown in Figure 3.1.

Three odour complaints were received between January 2022 and February 2022. Veolia commissioned The Odour Unit to investigate the issue. Upon investigation, it was discovered that there was a fault in the exhaust stack velocity sensor which incorrectly displayed the stack velocity. Veolia assumed that the extraction system was working effectively, based on this sensor when actual extraction rates were lower than required to control odour. This in turn resulted in an increase in odour complaints. In response, Veolia undertook several corrective actions as part of the Veolia's continuous improvement and management of complaints. One of these corrective actions included replacement of the exhaust stack velocity sensor.

The issue has since been resolved, with the fault corrected. Fan servicing and duct cleaning is carried out by Equilibrium monthly. It has been recommended that the exhaust velocity sensor is checked at the same time as maintenance is done on ducting to ensure that any faults are detected sooner. The OEMP for the site is in the process of being updated to reflect changes to the maintenance of the exhaust stack velocity sensor.

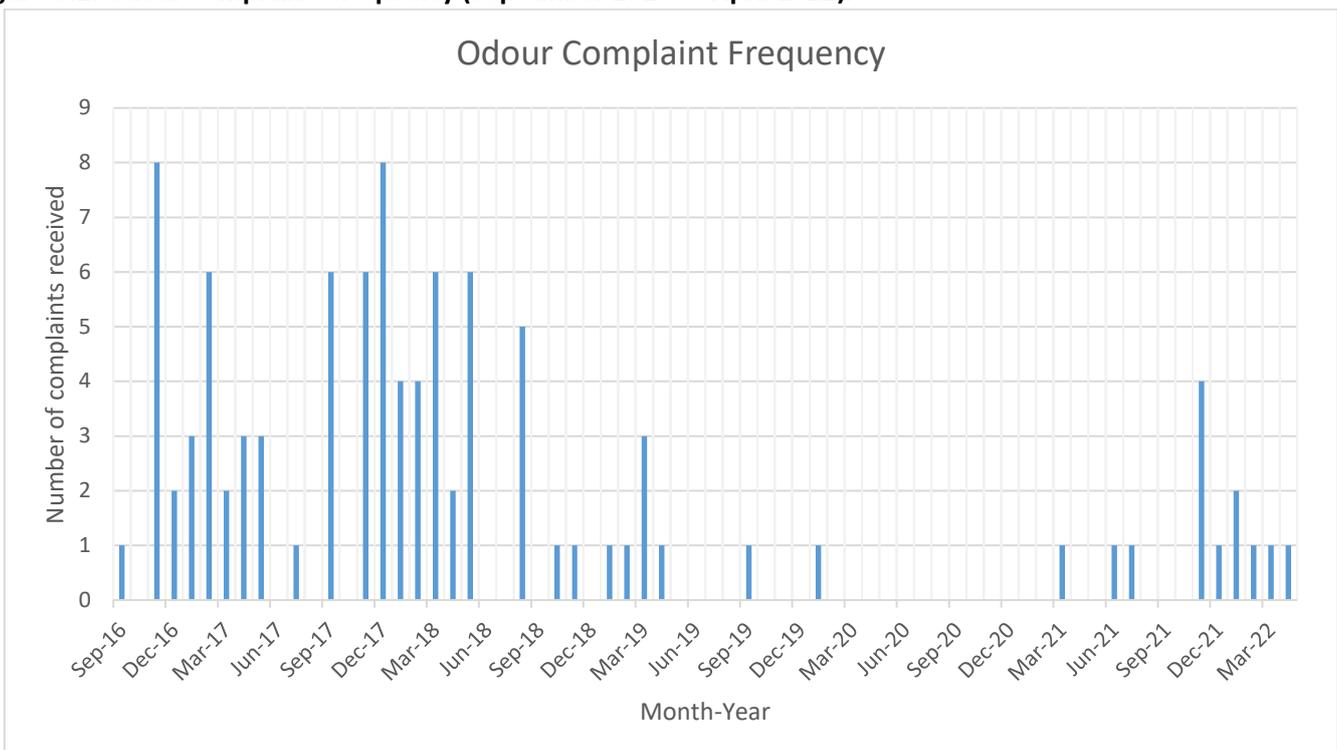
The odour complaint received on 11 March 2020 was due to an off-site railway incident which occurred on 7 March 2022. This incident resulted in inability to remove waste on site, causing an uncommon amount of waste being stockpiled at the site. These circumstances were proactively communicated to the NSW EPA and neighbouring sites.

The odour complaint received in April 2020 was attributed to a neighbouring property and not the BTT following an investigation by Veolia.

To reduce the number of odour complaints that may be incorrectly attributed to the BTT, Veolia provided training to neighbouring businesses to identify the different types of odours that may be present in the general atmosphere surrounding the industrial area. This training involved an independent consultant (The Odour Unit) visiting the business and provided advice on stockpile management to avoid odour. Veolia claim that this training has reduced the number of odour complaints it has since received at the BTT.

Additionally, the plastic flaps above the point of waste receipt hall were replaced to improve performance of negative pressure system and to minimise fugitive odour released through the entry door.

Figure 3.1. Odour complaints frequency (September 2016 to April 2022).



3.11. Incidents

There were no significant environmental incidents recorded for the period between 29 April 2019 to 28 April 2022. However, a number of notable incidents were reported in the incident register and have been summarised below.

In March 2022, due to severe weather, the Main Southern Railway was impacted by flooding and landslides. This resulted in trains not being able to return from Woodlawn. Waste present within the BTT had to be stored within the waste receival building due to the unavailability of containers. Veolia decided to self-report two potential environmental incidents as a result of the closure of the Main Southern Railway to the EPA.

The first self-report related to the amount of waste stored on site. Veolia were initially concerned that waste stored on site would exceed the approved amount of 1,500 tonnes at any one time in accordance with Schedule 3, Condition 17 of SSD 5855. To avoid excessive waste building up, Veolia made the decision to close BTT for 3 days and divert waste to Lucas Heights as a contingency. As a result, the approved amount of 1,500 tonnes at any one time was not exceeded.

Veolia were also concerned with storage of waste inside the waste receival hall due to the unavailability of containers which was likely to further decompose and cause odour issues. Veolia informed the EPA that an increase in complaints may occur however only one odour complaint was received during the shutdown period.

There were seven (7) exceedances of the stormwater concentration limits, as documented under EPL 20581 licence Condition L2.4, during the audit period:

- On 26 October 2020:
 - The surface water discharge sample collected from 7 PIT-C06 exceeded the EPA discharge concentration limit of 10 mg/L for Biochemical oxygen demand (BOD) (reported concentration was 13 mg/L).
- On 19 March 2021:
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 10 mg/L for Oil and Grease (reported concentration was 12 mg/L).
- On 5 May 2021:
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 10 mg/L for BOD (reported concentration was 17 mg/L).
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 1 mg/L for Ammonia (reported concentration was 1.71 mg/L).
- On 6 May 2021:
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 10 mg/L for BOD (reported concentration was 11 mg/L).
- On 24 August 2021:
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 1 mg/L for Ammonia (reported concentration was 1.03 mg/L).
- On 8 March 2022:
 - The surface water discharge sample collected from PIT-C06 exceeded the EPA discharge concentration limit of 10 mg/L for BOD (reported concentration was 22 mg/L).

Failed tests were retested to check for anomalies, however retested results confirmed the exceedances. The exceedances were reported to the EPA, however no feedback was received, possibly due to the exceedances being minor. It is noted under EPL Condition R2.1, *“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.”*

Veolia is currently preparing a procedure for assessment of when an exceedance may cause harm and is therefore notifiable under Condition R2.1.

3.12. Actual verses predicted environmental impacts

A summary of actual versus predicted environmental impacts in the Environmental Impact Statement (EIS) and the OEMP associated with the BTT is provided in Table 3.4.

Overall, the actual environmental impacts during the audit period were found to be within the predictions of the EIS and the OEMP.

Table 3.4. Actual versus predicted environmental impacts of operation of the BTT.

Environmental aspect or potential impact	Predicted Impact	Actual Impact
Air Quality	<p>Wilkinson Murray was engaged to undertake an air quality assessment for the Proposal, with input from The Odour Unit, based on the experiences at Veolia’s Clyde Transfer Terminal. Air impacts associated with operations of the Banksmeadow TT comprise potential for dust and odour generation. Dust generated as a result of operation would be expected to be negligible. A dust suppression system would be installed within the terminal building that would emit a fine mist during dusty activities.</p> <p>To allow for the effective control of odour from the putrescible area of the building and minimisation of fugitive odour emissions, a ventilation system would be installed within the Banksmeadow TT building. The system would be designed to replace the air within the terminal building nine times per hour. Odour modelling has shown that, with the implementation of the ventilation stack, odour emissions from the Proposal would be well below the odour emission criteria and odour impacts are not predicted at any residential areas. Additional odour mitigation and management measures would be adopted as part of the Proposal to minimise the risk of odour impacts, including regular maintenance activities, washdown and management of putrescible waste on the tipping room floor on a first-in/ first out basis.</p> <p>An Odour Management Plan would be developed as part of the OEMP and would include additional procedures for minimising odour, including routine maintenance and cleaning of waste trucks and containers would not be allowed onsite, waste delivery trucks would be required to be fully enclosed or covered, waste streams would be kept separate, the floor area of the transfer terminal would be cleaned daily and odour monitoring and reporting would be undertaken to ensure compliance.</p>	<p>A number of odour complaints were received during the audit period which mostly occurred during a fault in the ventilation system. These issues have been rectified in addition to improvements in maintenance and calibrations to the flow sensors.</p> <p>An Odour Management Plan has been developed as part of the OEMP and include additional procedures for minimising odour, including routine maintenance and cleaning of waste trucks and containers, fully enclosed or covered trucks and regular cleaning of the floor area of the BTT.</p> <p>No dust issues have been reported at the site, or complaint received. Much of the waste received is wet, putrescible waste and therefore there has been no need to activate the dust suppression system.</p>
Hydrology and flooding	<p>The majority of the Site would be paved due to the nature of the development and their intermodal transport requirements. There is potential to significantly increase the amount of runoff from the Site once it is developed due to an increase in impervious surfaces and the interception of runoff that was previously escaping the Site in an uncontrolled manner. On-site detention (OSD) would be provided to mitigate the increase in flows leaving the Site and offset the increase in run-off.</p>	<p>The on-site detention (OSD) has been maintained to mitigate the increase in flows leaving the Site and offset the increase in run-off. No issues related to stormwater management were noted during this reporting period.</p>

Environmental aspect or potential impact	Predicted Impact	Actual Impact
	<p>The area around the Site has been heavily disturbed and is a predominately industrial area; there are no permanent water resources on the Site and groundwater quality is low due to contamination from industrial activity in the area. The quality of these water resources is unlikely to be reduced further by the Proposal. The Proposal has the potential to have an impact on stormwater quality leaving the Site. This would be mitigated through the implementation of water sensitive urban design (WSUD) measures to reduce the impact on stormwater quality as result of the Proposal.</p>	<p>It is noted in Section 3.11 the water quality issues that were reported by Veolia to the NSW EPA. These exceedances are under investigation however were not considered to have caused any material harm to the environment.</p>
<p>Traffic and Access</p>	<p>A Traffic Impact Assessment was undertaken to assess the potential impacts of the project on traffic and transport once the terminal is operating at full capacity. Once operating at full capacity the Proposal would be expected to require up to 215 trucks per day for the delivery of putrescible waste and up to 140 trucks per day for the delivery of non-putrescible. The transfer of putrescible waste from the facility would be via rail, requiring one train per day, and the transfer of non-putrescible waste from the facility would be expected to require up to 16 trucks per day.</p>	<p>A total of 56,817 truck movements occurred during 2018-2019 reporting period, which is equivalent to 156 trucks per day.</p> <p>A total of 57,688 truck movements occurred during the 2019-2020 reporting period which is equivalent to 158 trucks per day.</p> <p>A total of 49,512 truck movements occurred during the 2020-2021 reporting period which is equivalent to 136 trucks per day.</p> <p>The facility currently accepts only small quantities of non-putrescible waste, and therefore truck movements are well in line with the predicted truck movements of 355 trucks per day as described in the EIS.</p>
<p>Waste Management</p>	<p>Once operational, the Proposal would be capable of processing and consolidating 400,000 t per annum of general solid (putrescible) waste for transport to the Woodlawn Eco-Project site, and 100,000 t of general solid waste (non-putrescible) for transport to various resource recovery facilities. Leachate generated at the Proposal site would be captured within the leachate drainage system, which would be separate from the stormwater system, and would be pumped out into ISO tankers for transport to the Woodlawn Eco-Project site. To minimise impacts associated with waste handling, waste received at the site would be handled on a ‘first in / first out’ basis, to minimise the residence time at the Proposal site. Procedures for identification and management of non-conforming wastes would be developed and included in the Operational Environmental Management Plan (OEMP) for the Proposal.</p>	<p>The following amounts of putrescible waste were received at the facility during the audit period:</p> <ul style="list-style-type: none"> ● 2019: 314,085.69 tonnes ● 2020: 290,516.40 tonnes ● 2021: 288,864.27 tonnes ● 2022: 98,740.62 tonnes (to April 2022) <p>The Terminal did not receive or process more than 400,000 tonnes per annum (TPA) of putrescible waste and 100,000 TPA of non-putrescible waste. No incoming non-conforming waste was recorded during this period. Since the commencement of operations the Terminal has continued to operate within annual waste limits.</p> <p>All generated leachate from the tipping floor and compactor areas, as well as</p>

Environmental aspect or potential impact	Predicted Impact	Actual Impact
		<p>wash down water was collected into two 32 kilolitre (kL) leachate storage tanks for off-site disposal.</p> <p>Leachate levels within the storage tanks were monitored by using a reference point on the containers, to determine when required to pump out and dispose.</p>
Noise and Vibration	<p>Wilkinson Murray was engaged to undertake a noise and vibration assessment for the Proposal. Operational noise emissions from the Site were expected to fully comply with the relevant <i>Industrial Noise Policy</i> (INP) derived project-specific noise levels at all identified receivers. Full compliance was predicted under both neutral and prevailing adverse meteorological conditions. The assessment also concluded that, given the existing background noise levels experienced by the closest residential receivers to the Site, operational activities would be expected to be rendered inaudible at these localities. Operational noise would not be expected to result in any material increase in cumulative noise levels experience by existing residents and predicted noise levels would be expected to be within the sleep disturbance noise limits.</p>	<p>No noise complaints were received during Operation of the BTT.</p>
Hazards and Risk	<p>A number of potential hazards to the environment and/or public health have been identified in relation to the operation of the Proposal; including the potential for spills, fires, disruption of operations, receipt of non-conforming waste, and electrical or equipment failure.</p> <p>The OEMP, and supporting specific management plans, would be developed to minimise the likelihood of an incident occurring. The operational procedures to manage the risks associated with activities on the Site and would include an Incident Response Plan, Emergency Response Plan and a Pollution Incident Response Management Plan.</p>	<p>The Site operates under an Operation Environmental Management Plan and Emergency Response Plan (including a Pollution Incident Response Management Plan) which documents operational procedures to manage the risks associated with activities on the Site.</p>

3.13. Findings from previous Annual Environmental Management Reports

3.13.1. Period 2018-2019

An Annual Environmental Management Report 2018-2019 (dated 16 August 2019) was prepared by Veolia detailing the environmental performance of the site for the period of 29 April 2018 to 28 April 2019 (2018-2019 reporting period).

A number of improvements to the environmental management of the Terminal were implemented during this reporting period. These improvements were implemented as a result of site investigations, complaints, regulatory feedback, as well as Veolia’s internal assurance program.

The Independent Environmental Audit identified no non-compliances, and it is noted that Veolia’s environmental performance had improved significantly since 2016 due to improvements in operations and physical changes to the site.

There have been continual improvements to the BTT this reporting period, which in turn has improved the stormwater and odour management on site. There has been a significant reduction in the number of odour complaints and a vast improvement of stormwater quality results this reporting period.

Recent feedback from neighbouring businesses and monitoring quality results, indicate an improvement in the overall environmental performance of the BTT in relation to stormwater and odour management.

3.13.1. Period 2019-2020

An Annual Environmental Management Report 2019-2020 (dated 23 October 2020) was prepared by Veolia detailing the environmental performance of the site for the period 29 April 2019 to 28 April 2020 (2019 - 2020 reporting period).

In this reporting period all environmental monitoring results and audits have demonstrated that all mitigation controls have consistently been effective in managing potential environmental impacts associated with air quality, noise and vibration, water quality, traffic, and pest and vermin.

Furthermore, in the previous reporting period there were a number of improvements and corrective actions to the stormwater and odour management at the BTT. These improvements have continued to be maintained in this reporting period and is reflected by the significant reduction in the number of odour complaints and continuous stable stormwater quality results.

A review of the non-compliances between the 2018 and 2019 reporting periods by the IEA along with recent feedback from neighbouring businesses and monitoring quality results, indicates the BTT has had an improvement in the overall environmental performance.

3.13.1. Period 2020-2021

An Annual Environmental Management Report 2020-2021 (dated 28 June 2021) was prepared by Veolia detailing the environmental performance of the site for the period 29 April 2020 to 28 April 2021 (2020 - 2021 reporting period).

In this reporting period, the environmental monitoring results and audits have demonstrated that implemented mitigation controls are generally effective in managing potential environmental impacts associated with air quality, noise and vibration, water quality, traffic, and pest and vermin.

Feedback from neighbouring businesses and monitoring quality results indicate that Veolia continues to implement, maintain, monitor and assess environmental initiatives at the BTT to improve its environmental performance.

3.14. Site inspection

During the site inspection on 13 May 2022, the auditors did not identify any significant environmental issues at the site. The Site was very well maintained including:

- Clean hardstand areas including the container storage areas, weighbridge and site entrances, compactor area and internal roadways;
- Leachate drains within the waste receipt hall well maintained; and
- Containerised waste was stacked neatly and there were no signs of leachate leaking from containers.

Minor issues identified during the site inspection include and recommended actions are provided in Table 3.5.

Table 3.5. Recommended Actions for the observations from the 2022 Independent Environmental Audit.

Item No.	Reference	Observation / Non-compliance	Recommended Action	Agreed Timeframe for Completion/ Implementation by Veolia	Date Completed
1	Consent Condition 10	A minor leak in the leachate transfer line causing pooling leachate on the floor, with the potential for odour emissions (refer to Figure F1 and F2 in Appendix F).	Repair the leachate transfer line and clean up leachate spill	Two weeks	Completed 1 June 2022
2	Consent Condition 15 EPL Condition O5.4	The outdoor diesel storage area with ponding rainwater within the bunding, reducing its effective capacity in the event of a spill during refuelling (refer to Figure F3 and F4 in Appendix F).	Veolia to include on the weekly checklist an inspection of the outdoor diesel storage area inspections for ponding rainwater which can then be pumped out if necessary.	Two months	
3	Consent Condition 9, 10	The cleaning schedule for stormwater pits and the OSD system should be reviewed to avoid build-up of sediment and debris (e.g. leaf litter or vegetative matter) (refer to Figure F5 and Figure F6 in Appendix F).	Increase the frequency of pit and OSD cleaning and include more frequent inspections to ensure that the sediment and debris are not accumulating and impacting water quality. A maintenance will be included in SAP project management software.	Two months	
4	Consent Condition 21	Some failed landscaping was present on the site. Repairs are needed to avoid the transfer of sediment into stormwater (refer to Figure F7 in Appendix F).	Revegetate the affected areas.	Two months	

4. Recommendations

4.1. Opportunities for improvement

Areas of improvement that have been recommended following the site audit and inspection include:

- Because the site is heavily reliant on the effective operation of the air extraction system, stricter servicing, duct cleaning and calibrations should be implemented to ensure any faults or issues are detected as soon as possible. Veolia has stated that calibrations will now be completed during every service;
- More frequent maintenance of stormwater devices should be considered to ensure the system is working and remains effective when operating at capacity. Veolia has stated that a maintenance schedule will be included in SAP project management software;
- The temporary closure of the rail line identified a number of business risks and measures have been taken by Veolia to strategically address this in the Emergency Response Plan and the Business Continuity Plan. Prior to the audit, Veolia had already identified this as an internal action and has explored alternative measures to manage operations during these type of incidents in the future, including road transport of containers to Woodlawn; and
- It is recommended that a Triggered Action Response Plan (TARP) or similar system is developed to provide clearer guidance on when to notify the NSW EPA on reporting minor exceedances of stormwater pollutant levels under the EPL conditions. Prior to the audit, Veolia had already identified this as an internal action.

5. Conclusions

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of Veolia Environmental Services Australia's Banksmeadow Transfer Terminal, located at 34-36 McPherson Street, Banksmeadow for the period between 29 April 2019 to 28 April 2022.

The audit was conducted by Jackson Environment and Planning Pty Ltd in May 2022, as required under Conditions 6 and 7 (Schedule 4) of the Development Consent (SSD 5855). The scope of the Audit was limited to the period since previous audit (April 2019) to April 2022 and was conducted in accordance with the Department of Planning and Environment (2020) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street; and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD 5855 Mod 1).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20581) for the same period, as this is specifically required under Schedule 4, Condition 6(c) of SSD 5855.

An assessment of the Actions recommended in the 2019 Independent Environmental Audit conducted Jackson Environment and Planning Pty Ltd was carried out during this audit and it was found that all actions have been completed.

The 2022 Independent Environmental Audit found no non-compliances against the conditions of SSD5855, and a small number of observations as follows:

- A minor leak in the leachate transfer line causing pooling leachate on the floor, with the potential for odour emissions;
- The outdoor diesel storage area with ponding rainwater within the bunding, reducing its effective capacity in the event of a spill during refueling;
- The cleaning schedule for stormwater pits and the OSD system should be reviewed to avoid buildup of sediment and debris (e.g. leaf litter or vegetative matter); and
- Some failed landscaping was present on the site. Repairs are needed to avoid the transfer of sediment into stormwater.

The 2022 Independent Environmental Audit found two non-compliances against conditions of the Environmental Protection Licence (20581), follows:

- Condition L2.1 / L2.4 – Exceedances of water quality concentrations limits:
 - There were 7 exceedances of water quality concentrations limits. Prior to the IEA, Veolia had identified potential causes of these exceedances and implemented corrective actions, including improved maintenance of the on-site detention system to avoid stormwater pollution from the site.
- Condition L4.1 – Potentially offensive odour emission:
 - Three odour complaints were received between January 2022 and February 2022. In response, Veolia undertook several corrective actions as part of the Veolia's continuous improvement and management of complaints. One of these corrective actions included replacement of the exhaust stack velocity sensor which was found to be faulty. It has been recommended that the exhaust velocity

sensor is checked at the same time as maintenance is done on ducting to ensure that any faults are detected sooner.

- The odour complaint received on 11 March 2020 was due to an off-site railway incident which occurred on 7 March 2022. This incident resulted in inability to remove waste on site, causing an uncommon amount of waste being stockpiled at the site. These circumstances were proactively communicated to the NSW EPA and neighbouring sites.
- The odour complaint received in April 2020 was attributed to a neighbouring property and not the BTT following an investigation by Veolia.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent.

This demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

Appendix A – Independent Audit Certification

Project Name	Banksmeadow Transfer Terminal
Consent Number	State Significant Development Consent 5855
Description of Development	The construction and operation of a waste transfer terminal
Project Address	34-36 McPherson Street, Banksmeadow NSW
Proponent	Veolia Environmental Services (Australia) Pty Ltd
Title of Audit	Po Box 171 Granville NSW 2142
Date	27/06/2022
<p>I declare that:</p> <ul style="list-style-type: none"> i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child; ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child; iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit; iv. I am not an Environmental Representative for the project; and v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so. <p>Note.</p> <ul style="list-style-type: none"> 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	Alan Parsons
Signature	
Qualification	Lead Auditor HSEQ
Company	ARP Risk Management Solutions Pty Ltd
Company Address	1 Power Place, Jindabyne NSW 2627

Appendix B – Audit Team Letter of Approval

Ms Anae Ressos
Veolia Environmental Services (Australia) Pty Ltd
ACN 051 316 584
Level 4, 65 Pirrama Road
Pyrmont NSW 2009

03/05/2022

Dear Ms Ressos

**Banksmeadow Waste Transfer Terminal – SSD 5855
Schedule 4, Condition 6 – Re-appointment of Auditors**

I refer to your request (SSD-5855-PA-4) for the Secretary's endorsement of suitably qualified persons to prepare the 2019 - 2022 Independent Environmental Audit for the Banksmeadow Waste Transfer Terminal, SSD 5855 (the consent).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary endorses the re-appointment of Jackson Environment and Planning Pty Ltd and ARP Risk Management Solutions Pty Ltd to prepare the Independent Environmental Audit.

In accordance with Schedule 4, Condition 6 of the consent, the Secretary has agreed to endorse the following audit team:

- Mr Alan Parsons, Lead Auditor, ARP Risk Management Solutions,
- Dr Mark Jackson, Auditor, Jackson Environment and Planning; and
- Mr Rylan Loemker, Auditor, Jackson Environment and Planning.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of Schedule 4, Conditions 6 and 7 of the consent, and as noted in your cover letter, the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

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

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

Should you wish to discuss the matter further, please contact Samuel Condon on (02) 8275 1169 or email compliance@planning.nsw.gov.au

Department of Planning and Environment



Yours sincerely

A handwritten signature in black ink, appearing to read "Julia Pope".

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix C – Audit Plan



SSD Independent Environmental Audit: Audit Plan and Agenda
Veolia Environmental Services (Australia) Pty Ltd
Banksmeadow Transfer Terminal
Site address: 34-36 McPherson Street, Banksmeadow
Date: Friday 13th May 2022
Time: 9am to 1pm

Introduction to the audit:

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd (Veolia) to undertake an Independent Environmental Audit (Audit) of the Banksmeadow Transfer Terminal (the Site), located at 34-36 McPherson Street, Banksmeadow. This audit is required under Condition 6 and 7 (Schedule 4) of the Development Consent (SSD 5855), which states:

6. Within one (1) year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

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

7. Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site for the period since the previous audit, carried out by Jackson Environment and Planning in 2019. Under Condition 6 of the consent, an Audit is required every three years, therefore the Audit will cover the period between 29 April 2019 to 28 April 2022.

The Audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition 6.

The Audit will be performed in accordance with the NSW Department of Planning and Environment's *Independent Audit – Post Approval Requirements* June 2020 and *AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems* (2018).

Audit team

The audit team is outlined below, including site representatives from Veolia. It is noted that Mr Alan Parsons from ARP Risk Management Solutions Pty Ltd will be supporting the audit team as the lead auditor. The Department of Planning and Environment approved the audit team on 3rd May 2022.

Dr Mark Jackson	Director	Jackson Environment and Planning Pty Ltd
Mr Rylan Loemker	Senior Consultant	Jackson Environment and Planning Pty Ltd
Mr Alan Parsons	Director	ARP Risk Management Solutions Pty Ltd
Bob Manevski	Facility Manager - Banksmeadow / Port Botany	Veolia Environmental Services (Australia) Pty Ltd
Nicole Boukarim	Environmental Compliance Advisor - NSW/ACT	Veolia Environmental Services (Australia) Pty Ltd
Ramona Bachu	National Environmental Compliance Manager	Veolia Environmental Services (Australia) Pty Ltd
Anae Ressos	Environmental Coordinator	Veolia Environmental Services (Australia) Pty Ltd
Mary Wong	Environmental Officer	Veolia Environmental Services (Australia) Pty Ltd

Audit plan

The audit process outlined in ISO 19011 *Guidelines for Auditing Management Systems* (2018) has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1. Audit activities to be performed on site on 13th May 2022 are noted.

Audit Scope and Objectives

Three considerations relevant to the scope of this Independent Environmental Audit include that of:

- Project implementation phase;
- Documentation; and
- Spatial Scope.

Project phase

In relation to project phase, the audit will cover the operational phase of the development for the period between 29 April 2019 to 28 April 2022.

Documentation

The scope of the Audit will be limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 5855 for the period between 29 April 2019 to 28 April 2022.

The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit was conducted in accordance with the Department of Planning and Environment (2020) *Independent Audit – Post Approval Requirements*.

The Audit also included environmental performance requirements under Environmental Protection Licence (20581) for the same period, however this is not specifically required under Condition 6 of SSD 5855.

Spatial Scope

The Banksmeadow Transfer Terminal is located at 34-36 McPherson Street, Banksmeadow.

Table 1. Summary of the audit methodology and the audit plan.

Status	Audit plan task
Completed	Letter seeking audit team approval – In accordance with the NSW Department of Planning and <i>Environment’s Independent Audit Post Approval Requirements</i> June 2018, a letter was prepared seeking DPIE approval for the audit team.
Completed	Develop the Audit Plan – An audit plan will be developed outlining what will be audited, who will do the auditing, when it will happen and who will be audited, and how much time will be dedicated to each process in the audit. Work will also be assigned to auditors. The audit working papers will also be prepared to identify what the auditors wants to verify, what questions to ask, and what they expect as evidence. The Audit Plan will also include the audit sequence. We will also allow time for consultation with relevant agencies, including NSW EPA, Department of Planning and Environment and Bayside Council in accordance with your consent and the <i>Independent Audit Post Approval Requirements</i> .
Completed	Conduct the opening meeting – The onsite audit begins with an opening meeting. This is to introduce the auditors, confirm the scope and extent of the audit and discuss the schedule.
	Review documents – After the meeting, any documents immediately presented by Veolia will be reviewed to gather relevant information that might not have been available before.
	Carry out the audit – The auditors will commence the audit by interviews and collecting the records and observations that will demonstrate if the processes meet the Development Consent conditions and EPL requirements. We will also write to NSW EPA, Department of Planning, Industry and Environment and Bayside Council and seek any feedback on the environmental performance of the development.
	Generate findings and conclusions – JEP will generate the audit findings and prepare any audit conclusions to be presented at the closing meeting.
To be delivered within 3 months of commissioning this audit.	Conduct the closing meeting – The onsite audit finishes with a closing meeting. This is to present the audit findings and provide Veolia with the opportunity to discuss and ask questions about the audit and findings.
	Formalise audit findings in a report – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the remote audit on 13th May 2022 is given in Table 2.

Table 2. Agenda for the on-site audit scheduled for 13th May 2022.

Agenda item	Item description
1.	0900 - 0930: Introductions
2.	0930 - 1000: Confirm scope of the audit
3.	1000 - 1100: Overview of the Audit Plan: <ul style="list-style-type: none"> • Documents reviewed as part of the desktop audit • Review of gaps in audit data / evidence needed • Complaints data • Timeline for providing audit data • Review of non-compliance findings from previous audit and actions to date • Site inductions and familiarisation walk through • Detailed site inspection of operations • Post walk through discussion and additional evidence to be provided • Timeline for preparation of draft and final report for submission to DPE
4.	1100 - 1200: Desktop audit of operations: <ul style="list-style-type: none"> • Environmental monitoring and reporting • Community liaison and complaints handling • Training, induction, communications and roles / responsibilities under the OEMP • Waste Management and waste handling • Odour management • Dust management • Traffic management • Stormwater management • Vermin and pest control • Site contamination management • Incident response • Noise management
5.	1200 - 1230: Review of audit findings and additional evidence required to complete audit. Scheduling of the site inspection.
6.	1230 - 1300: Questions and close

Appendix D – Development Consent Compliance Table

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
Obligation to Minimise Harm to The Environment				
1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the development.	The findings from this audit	None	Compliant
Terms of Consent				
2	The Applicant shall carry out the development generally in accordance with the: (a) EIS; (b) RAP; (c) RTS; (d) management and mitigation measures (Appendix A); (e) site layout plans and drawings in the EIS (see Appendix B); and (f) conditions of this Consent.	The findings from this audit	None	Compliant
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this Consent shall prevail to the extent of any inconsistency.	None	None	Not Triggered
4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of: (a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this Consent; and (b) the implementation of any actions or measures	None	None	Not Triggered
Limits of Consent				
5	The Applicant shall not receive or process more than: (a) 400,000 tonnes per annum of putrescible material; and (b) 100,000 tonnes per annum of non-putrescible material at the site.	Waste summary reports	None	Compliant
6	The Applicant shall only receive, store, handle or dispose of General Solid Waste or other classes of waste that are authorised for receipt on site by an EPL.	Waste summary reports	None	Compliant
Statutory Requirements				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	The findings from this audit	Veolia has obtained the relevant licences, permits and approvals required to undertake the operational activities, including: <ul style="list-style-type: none"> - Environment Protection Licence (EPL 20581). - Approval of the Operational Environmental Management Plan and sub-plans 	Compliant
Structural Adequacy				
8	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.	None	This condition is not relevant to the current Audit period.	Not Triggered
Demolition				
9	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	None	This condition is not relevant to the current Audit period.	Not Triggered
Operation of Plant and Equipment				
10	The Applicant shall ensure that all plant and equipment used for the development is: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	The Auditors observed plant and equipment operated and maintained in a proper and efficient manner as far as could be practically reviewed during the Audit.	None	Compliant
Staged Submission of Plans or Programs				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
11	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	None	None	Not Triggered
12	Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall continue to implement existing strategies, plans or programs for operations on site that have been approved by previous consents or approvals. Notes: <ul style="list-style-type: none"> • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program; and • There must be a clear relationship between the strategy, plan or program that are to be combined. 	None	None	Not Triggered
13	The Applicant shall submit detailed design plans of the terminal building that are generally in accordance with the plans in the EIS (Appendix B) to the Secretary for approval prior to the issue of a construction certificate.	None	This condition is not relevant to the current Audit period.	Not Triggered
Protection of Public Infrastructure				
14	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	None	None	Not Triggered
Dispute Resolution				
15	In the event that a dispute arises between the Applicant and a public authority other than the Department, in relation to a specification or requirement applicable under this approval, the matter shall be referred by either party to the Secretary, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding to all parties. For the purposes of this condition, 'public authority' has the same meaning as provided under Section 4 of the EP&A Act.	None	None	Not Triggered
Development Contribution				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
16	<p>Prior to the commencement of operation of the development, the Applicant shall pay development contributions to the City of Botany Bay Council of \$495,992.00, or an amount otherwise agreed with Council.</p> <p>Note: This contribution is subject to indexation to reflect quarterly variations in the Consumer Price Index All Group Index Number for Sydney, as published by the Australian Bureau of Statistics.</p>	Evidence of compliance was documented in the 2019 Independent Environmental Audit.	None	Compliant
SCHEDULE 3 – ENVIRONMENTAL PERFORMANCE CONDITIONS				
Remediation				
	Remedial Action Plan			
1	The Applicant shall remediate the site in accordance with the approved RAP prior to the commencement of operation. Amendments to the approved RAP required as a result of further site investigations must be prepared by a suitably qualified and experienced expert and approved by the site auditor.	None	This condition is not relevant to the current Audit period.	Not Triggered
2	Prior to the commencement of remediation, the Applicant shall demonstrate to the satisfaction of the Secretary that the RAP has been certified by an accredited site auditor.	None	This condition is not relevant to the current Audit period.	Not Triggered
3	Prior to the commencement of any construction or remediation works, the Proponent shall engage a Site Auditor accredited by the EPA under Part 4 of the <i>Contaminated Land Management Act 1997</i> to provide advice and statutory site audits throughout the remediation project and on completion of the project	None	This condition is not relevant to the current Audit period.	Not Triggered
4	Contaminated material encountered during construction work intended for off-site disposal at an appropriate EPA licensed facility shall be segregated and stored in a dedicated area on site until removal, to the satisfaction of the EPA.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Completion of Work			
5	Upon completion of remediation works, the Applicant shall demonstrate to the satisfaction of the Secretary that the accredited site auditor has prepared a site audit statement and a site audit report which demonstrate that the site is suitable for its intended use(s).	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6	<p>Within 3 months of the completion of the reinstatement of the site the Applicant shall prepare, in consultation with the EPA, and submit a Site Validation Report, to the satisfaction of the Secretary. The report shall be prepared in accordance with the NSW EPA (1997) Guidelines for Consultants Reporting on Contaminated Sites and include but not be limited to:</p> <ul style="list-style-type: none"> (a) comments on the extent and nature of the remediation undertaken; (b) sampling and analysis plan and sampling methodology; (c) results/interpretation and discussion of results; (d) results of any validation sampling, compared to relevant guidelines; (e) discussion of the suitability the remediated areas for intended land use; 	None	This condition is not relevant to the current Audit period.	Not Triggered
Contamination				
	Groundwater Treatment			
7	<p>The Applicant shall prepare and implement a Groundwater Monitoring and Treatment Program for the project, to be approved by the Secretary and Site Auditor prior to the commencement of construction. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and NOW; (b) detail baseline data on groundwater levels and quality; (c) include: <ul style="list-style-type: none"> • groundwater treatment criteria; • a program to monitor groundwater levels, flows and quality; • maintenance program for the facility to ensure the on-going effectiveness of the groundwater treatment process; • a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater treatment criteria; • contingency measures to address exceedances and issues with groundwater treatment, including an investigation of alternative remediation treatment options; and • mechanisms to report results to relevant agencies. 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Human Health			
8	The Proponent shall ensure that all works are carried out in accordance with <i>NSW Work Health and Safety Regulation 2011</i> and the requirements of WorkCover NSW.	This condition is not relevant to the Audit scope however the Auditors observed staff operating in a safe and proper manner as far as could be practically reviewed during the Audit.	None	Not Triggered

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Soil, Water and Leachate				
	<i>Stormwater Management</i>			
9	The Applicant shall: <ul style="list-style-type: none"> (a) design and install the stormwater management and collection system in consultation with the City of Botany Bay Council, generally in accordance with the conceptual design in the EIS and applicable Australian Standards and to the satisfaction of the Secretary; (b) ensure that the system capacity has been designed in accordance with the Blue Book Volumes 1 and 2B; (c) divert existing clean surface water around operational areas of the site; (d) direct all sediment laden water in overland flow away from the leachate management system; and (e) prevent cross-contamination of clean and sediment or leachate laden water. 	Evidence of compliance was documented in the 2019 Independent Environmental Audit.	None	Compliant
	<i>Soil, Water and Leachate Management Plan</i>			

10	<p>The Applicant shall prepare and implement a Soil, Water and Leachate Management Plan for the development in consultation with the City of Botany Bay Council, NOW and the EPA and to the satisfaction of the Secretary. This plan must be prepared and implemented by a suitably qualified and experienced person and be submitted for approval prior to commencement of construction. The plan must include:</p> <p>(a) a site water balance that:</p> <ul style="list-style-type: none"> • identifies the source of all water collected or stored on site, including rainfall, stormwater and groundwater; • includes details of all water use on site and any discharges; and • describes the measures that will be implemented to minimise water use on site. <p>(b) an erosion and sediment control plan that:</p> <ul style="list-style-type: none"> • is consistent with the requirements in the latest version of the Blue Book Volume 1 and Volume 2B; • identifies the activities on site that could cause soil erosion and generate sediment; and • describe the measures that will be implemented to: <ul style="list-style-type: none"> ○ minimise soil erosion and the transport of sediment to downstream waters, including the location, function and capacity of any erosion and sediment control structures and maintain these structures over time; ○ ensure that any topsoil stockpiles on site are suitably managed to ensure that the topsoil in these stockpiles can be beneficially used in the proposed revegetation and rehabilitation of the site. <p>(c) a leachate management plan that:</p> <ul style="list-style-type: none"> • includes final detailed design specifications of the leachate management and collection system on site. <p>(d) a stormwater management plan that:</p> <ul style="list-style-type: none"> • is consistent with the guidance in the latest version of the Blue Book Volume 1 and Volume 2B; • includes final detailed design specifications for the stormwater management and collection system; and • demonstrates how the requirements of Condition 9 of this schedule has been addressed. <p>(e) a surface water, groundwater and leachate monitoring program that includes:</p> <ul style="list-style-type: none"> • baseline data; • details of the proposed monitoring network; and • the parameters for testing and respective trigger levels for action under the surface water, groundwater and leachate response plan <p>(f) a surface water, groundwater and leachate response plan that:</p> <ul style="list-style-type: none"> • includes a protocol for the investigation, notification and mitigation of any 	<p>The Auditors sighted the <i>Soil, Water and Leachate Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant
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Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>exceedances of the respective trigger levels; and</p> <ul style="list-style-type: none"> describes the measures that could be implemented to respond to any surface or groundwater contamination that may be caused by any development. 			
	Water			
11	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.	Evidence of compliance was documented in the 2019 Independent Environmental Audit.	None	Compliant
	Discharge of Water			
12	The development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	The table contained in Appendix B summarises the audit results against the requirements of the EPL.	None	Compliant
	Groundwater Interception and Extraction			
13	The Applicant shall obtain the necessary water related approvals from NOW in the event that groundwater is likely to be intercepted or extracted during construction.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Acid Sulphate Soils Management Plan			
14	<p>Prior to the commencement of any site preparation or construction works on the site, the Applicant shall prepare and implement an Acid Sulfate Soils Management Plan for the development to the satisfaction of the Secretary. This Plan must:</p> <ol style="list-style-type: none"> be prepared in consultation with the EPA and NOW by a suitably qualified and experienced expert; be approved by the Secretary prior to the commencement of any site preparation or construction works; outline the preliminary investigations that have been undertaken to test for the presence of ASS in accordance with the NSW State Government's Acid Sulphate Soils Manual (ASSMAC 1998); detail the protocols to be put in place and followed in the event that ASS is encountered; detail how the ASS will be tested, handled and stockpiled; detail measures to prevent erosion and sedimentation of ASS; and, if necessary outline how the ASS will be disposed of off-site (e.g. at a licensed facility). 	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	Bunding			
15	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).	<p>A double skinned above ground tank for bulk diesel storage was also observed by the Auditors. The equipment refueling and tanker unloading area had adequate containment / spill controls as observed during the site visit.</p> <p>The auditors observed a small quantity of rainwater ponding within the bunded area due to recent rainfall (refer to Figure F3 and F4 in Appendix F). Although the bulk diesel storage tank is double skinned, the bunding is intended for spill containment. The presence of this rainwater reduces the capacity of the bunding and increases the likelihood of rainwater entering the stormwater system.</p>	Refer to Table 3.5 for recommended actions	Compliant
Waste				
	Waste Storage and Processing			
16	All uncontainerised waste shall be stored within the building at the premises and all waste processing activities shall be conducted within the building at all times.	During the site visit, the Auditors sighted that all uncontainerised waste was stored within the building and all waste processing activities were conducted within the building at all times.	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
17	To prevent unmanageable waste storage, the Applicant shall ensure that: <ul style="list-style-type: none"> (a) the storage of waste within the building shall not exceed more than 1,500 tonnes at any one time; (b) waste stockpiles within the building shall not exceed 4.5m in height; and (c) the container stacking height shall not exceed 3 loaded containers. 	<p>The Auditors sighted the <i>Waste Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p> <p>Waste stockpiles and container stacking heights were observed during the site visit.</p>	The Operational Contingency Control Measures note the limit on the amount of waste permitted on the premises and includes measures, such as diverting waste to other facilities, in the event that the site cannot process waste and remain under the limit (e.g. due to an interruption to rail services).	Compliant
	Restrictions of the Receipt, Storage, Handling and Disposal of Waste			
18	The development shall ensure that any waste generated on the site during construction is classified in accordance with the EPA's <i>Waste Classification Guidelines</i> and disposed of to a facility that may lawfully accept the waste.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Waste Management			
19	The Applicant shall prepare and implement a Waste Monitoring Program for the development to the satisfaction of Secretary. This program must: <ul style="list-style-type: none"> (a) be prepared in consultation with EPA by a suitably qualified and experienced expert; and (b) include a suitable program to monitor the: <ul style="list-style-type: none"> • quantity, type and source of waste received on site; and • quantity, type and quality of the outputs produced on site. (c) ensure that: <ul style="list-style-type: none"> • all waste that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and • staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos 	<p>The Auditors sighted the <i>Waste Monitoring Program</i> within the <i>Waste Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
20	<p>The Applicant shall prepare and implement a Waste Management Plan for the development, in consultation with the EPA and to the satisfaction of the Secretary. The plan shall:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert; (b) be submitted for approval by the Secretary prior to the commencement of construction; (c) include an asbestos risk assessment for demolition work prior to the removal of any asbestos from the site; (d) include final details of the waste management system implemented at the site; (e) ensure that appropriate waste storage facilities are included in the final design of the waste management system; (f) detail the type and quantity of waste to be generated by the construction and operation of the development; (g) detail the quality of waste to be received on site; (h) detail the materials to be reused or recycled, either on or off site; (i) detail the procedures for handling, storage, collection of recycling and disposal of all waste in accordance with best practice industry standards and guidelines; (j) detail the procedures for the management of waste material, excluding recyclable waste, to ensure: <ul style="list-style-type: none"> • the waste material is regularly removed from the site to an appropriately licensed facility; and • any stockpiles of waste material are stored on sealed areas. (k) if deemed necessary, outline reasonable and feasible measures that may be required to improve waste management at the site and prioritise recommendations for implementation. 	<p>The Auditors sighted the <i>Waste Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant
	<i>Pest, Vermin & Noxious Weed Management</i>			
21	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on-site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in surrounding area. <p>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the <i>Noxious Weed Act 1993</i>.</p>	<p>The Auditors sighted <i>Landscape and Vegetation Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p> <p>Pests and vermin were not observed during the site visit.</p>	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Traffic and Access				
	Access and Road Upgrade Work			
22	Prior to the commencement of operations, the Applicant must obtain approval for rail access from the Australian Rail Track Corporation.	None	This condition is not relevant to the current Audit period.	Not Triggered
23	Within six months of the commencement of limited operations in accordance with Condition 234 the Applicant must complete the road upgrade works at the intersection of Beauchamp Road and Perry Street and the left turn deceleration lane into the site, in consultation with City of Botany Bay Council and Randwick City Council, and to the satisfaction of RMS and the Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered
23A	The Applicant may commence operations prior to the completion of the road upgrade works referred to in Condition 23 above provided the Applicant does not receive or process more than 18,000 tonnes per month in the period prior to the completion of the road works upgrades.	None	This condition is not relevant to the current Audit period.	Not Triggered
23B	During the reduced operation phase specified in condition 23A above, records of hourly truck numbers and their capacity shall be kept and provided to the City of Botany Bay Council when requested.	None	This condition is not relevant to the current Audit period.	Not Triggered
24	Detail design plans for the intersection works referred to in condition 23 above, including Traffic Control Signal plans, must be prepared by a suitably qualified person in consultation with City of Botany Bay Council and Randwick City Council and submitted to the RMS for review and endorsement prior to the commencement of construction of the road upgrade works. The Applicant will be required to enter into a Works Authorisation Deed (WAD) with RMS for the works. The WAD will need to be executed prior to the RMS's assessment of the detailed design plans.	None	This condition is not relevant to the current Audit period.	Not Triggered
25	The Applicant must be responsible for all public utility adjustment/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents	None	This condition is not relevant to the current Audit period.	Not Triggered
26	All works/regulatory signposting associated with the development are to be at no cost to the RMS.	None	This condition is not relevant to the current Audit period.	Not Triggered
Traffic Monitoring				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
27	The Applicant shall: (a) keep accurate records of the volume of waste transported to the site; (b) nominate a haulage route to be used by heavy vehicles accessing the site; and (c) make these records available in its Annual Review	The Auditors sighted the Traffic Management Plan (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016. The Auditors sighted the following documents: - Annual Environment Management Report – BTT 2018-2019 (dated 16 August 2019). - Annual Environment Management Report – BTT 2019-2020 (dated 23 October 2020). - Annual Environment Management Report – BTT 2020-2021 (dated 28 June 2021).	None	Compliant
	Operating Conditions			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
28	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2; (b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTRROADS Guide to Road Design; (c) the development does not result in any vehicles queuing on the public road network; (d) a right turn restriction into the site from Beauchamp Road shall be implemented between 6am – 8pm; (e) heavy vehicles do not use Perry Street to travel to/from the site; (f) heavy vehicles and bins associated with the development do not park or stand on local roads or footpaths in the vicinity of the site; (g) all vehicles are wholly contained on site before being required to stop; (h) all loading and unloading of materials is carried out on site; (i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; (j) all trucks entering or leaving the site with loads have their loads covered; and (k) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads. 	Site visit on 13 May 2022	None	Compliant
	Waste Transportation			
28A	The Applicant shall ensure that all waste containers are designed, constructed and maintained to prevent the emission of offensive odour and be water-tight to prevent the leakage of leachate during transport and handling activities.	Site visit on 13 May 2022	None	Compliant
	Traffic Management Plan			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
29	<p>The Applicant shall prepare and implement a Traffic Management Plan for the development, to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with RMS, City of Botany Bay Council and Randwick City Council; (b) be approved by the Secretary prior to the commencement of construction; (c) include construction traffic management measures detailing: <ul style="list-style-type: none"> • access and parking arrangements for the site during construction; • measures to ensure that the local road network is not utilised by vehicles during construction; • measures to control traffic movements from site during construction; • procedures for notifying residents of construction traffic routes and potential disruptions to routes and access; and • the impact of the development on the road network, where temporary road closures are required during construction. (d) include a plan showing the designated haulage route/s to be used by heavy vehicles during operation; (e) include a driver’s code of conduct; (f) describe the measures that will be implemented to ensure: <ul style="list-style-type: none"> • the nominated haulage routes are used; • drivers adhere to the right turn restriction into the site from Beauchamp Road between 6am-10am and 3pm-7pm, as required by Condition 28(d); • conflicts with other road users are minimised; • drivers adhere to the code of conduct including; • road noise impacts are minimised through measures such as limiting truck compression braking; and • compliance with the relevant conditions of this consent. (g) <u>include</u> a program to monitor the effectiveness of these measures. 	<p>The Auditors sighted the <i>Traffic Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p>	<p>None</p>	<p>Compliant</p>
<p>Hazard and Risk</p>				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
30	<p>At least one month prior to the commencement of construction of the proposed development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare and submit a Fire Safety Study and a Hazard and Operability Study to the Secretary.</p> <p>(a) <u>Fire Safety Study</u> A Fire Safety Study for the proposed development. This study shall cover the relevant aspects of the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study Guidelines’ and the New South Wales Government’s ‘Best Practice Guidelines for Contaminated Water Retention and Treatment Systems’. The study shall be prepared in consultation with Fire and Rescue NSW and submitted to the Secretary.</p> <p>(b) <u>Hazard and Operability Study</u> A Hazard and Operability Study for the proposed development, chaired by a qualified person, independent of the development, whose appointment has been endorsed by the Secretary prior to the commencement of the study. The study shall be consistent with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 8, ‘HAZOP Guidelines’. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.</p>	None	This condition is not relevant to the current Audit period.	Not Triggered
31	<p>Dangerous Goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).</p> <p>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.</p>	Site visit on 13 May 2022.	None	Compliant
	Emergency Response			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
32	The Applicant shall maintain and implement an emergency response plan for the site. The emergency response plan shall: <ul style="list-style-type: none"> (a) be submitted to the Secretary prior to the commencement of operation; (b) be kept on-site at all times; (c) include a risk assessment of likely incidents that could occur on-site (e.g. spills, explosion, fire) based on the activities being undertaken, site risks and consequence to the receiving environment; and (d) document the systems and procedures to deal with the types of incidents identified including relevant incident notification procedures. 	The Auditors sighted the Site Emergency Response Plan - Banksmeadow Transfer Terminal (incorporating the Pollution Incident Response Management Plan) (Document Code: MAN-5174-1) dated 4 June 2021.	None.	Compliant
Air Quality				
	Odour			
33	The Applicant shall ensure the development does not cause or permit the emission of any offensive odour (as defined by the POEO Act).	Complaints summary. Site visit on 13 May 2022.	Refer to Section 3.10 of body of report.	Compliant
	Odour Management Plan			
34	The Applicant shall prepare and implement an Odour Management Plan to the satisfaction of the Secretary. This plan must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the EPA and City of Botany Bay Council; (b) be approved by the Secretary prior to the commencement of operations; (c) describe the measures that would be implemented on site to minimise the odour impacts of the development; (d) identify triggers for contingency action; and (e) include a program for monitoring the odour impacts of the development. 	The Auditors sighted the <i>Air Quality Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.	None.	Compliant
	Dust Management			
35	The premises shall be maintained in a condition which minimises or prevents the emission of dust from the premises	Site visit on 13 May 2022.	None.	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
36	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement best management practice, including all reasonable and feasible dust and odour mitigation measures to prevent and minimise dust emissions from operations; (b) prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; (c) regularly assess air quality monitoring data and relocate, modify, and/or stop operations to ensure compliance with the relevant conditions of this consent; (d) minimise any visible off-site air pollution; and (e) minimise surface disturbance of the site, other than as permitted under this consent. 	The Auditors sighted the <i>Air Quality Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.	None.	Compliant
37	<p>During construction, the Applicant shall ensure that:</p> <ul style="list-style-type: none"> (a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; (b) all loaded vehicles entering or leaving the site have their loads covered; and (c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads. 	None.	This condition is not relevant to the current Audit period.	Not Triggered
	<i>Air Quality Management Plan</i>			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
38	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. The Plan must:</p> <p>(a) be prepared by a suitably qualified and experienced expert in consultation with the EPA,</p> <p>(b) be approved by the Secretary prior to the commencement of construction;</p> <p>(c) describe the measures that would be implemented to:</p> <ul style="list-style-type: none"> • minimise the fugitive emissions from excavating, handling and treating contamination hot spots including details on methods for dealing with soil contamination variability; • include well-defined triggers for additional air quality measures for excessive fugitive emissions including stop-work during adverse weather; • ensure all reasonable and feasible dust and odour mitigation measures are employed to prevent and minimise dust and odour emissions from construction and operation of the development; • ensure compliance with the relevant conditions of this consent and the EPL; and • prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; <p>(d) include a cleaning protocol which:</p> <ul style="list-style-type: none"> • details the procedures to be undertaken to routinely manage, maintain and clean the internal surfaces of the premises to ensure operating conditions inside the facility minimise the potential to generate odour, dust and the carriage of waste outside the facility; and • describes how all external surfaces would be routinely managed and maintained so as to be kept free of dust, waste material and other contaminants; and <p>(e) include a protocol for determining any exceedances of the relevant conditions of approval and criteria in the EPL and responding to complaints.</p>	<p>The Auditors sighted the <i>Air Quality Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p>	<p>None.</p>	<p>Compliant</p>
Noise				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal																	
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status													
39	<p>The Applicant shall comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Secretary.</p> <table border="1"> <caption>Table 1: Operating Hours</caption> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday - Friday</td> <td>7:00am – 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am – 1:00pm</td> </tr> <tr> <td>Sunday & Public Holidays</td> <td>Nil</td> </tr> <tr> <td>Operations</td> <td colspan="2">24 hours</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7:00am – 6:00pm	Saturday	8:00am – 1:00pm	Sunday & Public Holidays	Nil	Operations	24 hours		Site visit on 13 May 2022.	None.	Compliant
Activity	Day	Hours															
Construction	Monday - Friday	7:00am – 6:00pm															
	Saturday	8:00am – 1:00pm															
	Sunday & Public Holidays	Nil															
Operations	24 hours																
	Operating Conditions																
40	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development; (b) minimise the noise impacts of the development during adverse meteorological conditions when noise criteria do not apply; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent 	<p>Site visit on 13 May 2022</p> <p>The Auditors also sighted the <i>Noise and Vibration Management Plan</i> Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.</p>	None.	Compliant													
	Noise and Vibration Management Plan																

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
41	<p>The Applicant shall prepare and implement a Noise and Vibration Management Plan for the development in consultation with the EPA and to the satisfaction of the Secretary. The plan must:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced person in consultation with the City of Botany Bay Council, Randwick City Council and the EPA; (b) be approved by the Secretary prior to the commencement of construction; (c) describe the measures that will be implemented to ensure: <ul style="list-style-type: none"> • best management practice is being employed on site; and • the noise and vibration impacts of the development are minimised during any meteorological conditions; and • compliance with the relevant conditions of this consent. (d) describe the noise management system; (e) include a noise and vibration monitoring program that: <ul style="list-style-type: none"> • is capable of evaluating the performance of the development; • includes a protocol for determining compliance with the predictions in the EIS and RTS; • adequately supports the noise management system; and • evaluates and reports on the effectiveness of the noise management system; and (f) include details of short term vibration trials of construction equipment that are conducted in consultation with the surrounding landowners. 	The Auditors sighted the <i>Noise and Vibration Management Plan</i> (Document Code: PLANSW-XXX-XXX-1) dated 23 June 2016.	None.	Compliant
Energy Efficiency				
42	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement all reasonable and feasible measures to minimise energy use and greenhouse gas emissions during construction and operation; and (b) ensure the development will continue to operate at industry best practice over time. 	None.	None.	Compliant
Visual Amenity				
	Lighting			
43	<p>The Applicant shall ensure that the lighting associated with the development:</p> <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282(INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i>; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 	The auditors sighted the Complaints Register.	No complaints have been received regarding lighting at the Site.	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	Signage			
44	The Applicant shall install all signs in consultation with City of Botany Bay Council. Note: This condition does not apply to any signage identified as exempt or complying development in <i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2008</i>	None.	This condition is not relevant to the current Audit period.	Not Triggered
	Landscaping and Vegetation Management			
45	The Applicant shall prepare and implement a Landscaping and Vegetation Management Plan for the development in consultation with City of Botany Council and to the satisfaction of the Secretary. The plan shall: <ul style="list-style-type: none"> (a) be approved by the Secretary prior to the commencement of construction; (b) detail any trees that are proposed to be removed, ringbarked, cut, topped or lopped; (c) detail any revegetation works at the site, with particular attention to minimizing the visibility of the site from residences and public vantage points, minimizing bushfire risk and the use of indigenous species; (d) ensure that any clearing or trimming of vegetation on the western side of McPherson Street, at the intersection with Beauchamp Road, is undertaken in consultation with City of Botany Bay Council; and (e) describe the on-going measures (e.g. weed control and regular pruning) that would be implemented to maintain landscaping and vegetation on the site for the life of the development. 	The Auditors sighted the <i>Landscaping and Vegetation Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.	None.	Compliant
Aviation Safety				
46	At least 35 days prior to the commencement of construction of the project, the Applicant must obtain all necessary approvals from the Sydney Airports Corporation for the erection of any temporary structure or construction equipment.	None.	This condition is not relevant to the current Audit period.	Not Triggered
Heritage				
47	The development shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until approval in writing from the NSW Police and/or the OEH has been obtained.	Site visit on 13 May 2022.	None.	Compliant
Security				
48	The Applicant shall ensure that: <ul style="list-style-type: none"> (a) the site is secured by a perimeter fence and security gates; and (b) the security gates on site are patrolled at all times. 	Site visit on 13 May 2022.	None.	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal			
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations
SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING			
Environmental Management			
	Construction Environmental Management Plan		
1	<p>The Applicant shall prepare and implement a Construction Environmental Management Plan for the development to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval no later than two weeks prior to the commencement of construction or demolition or within such period otherwise agreed by the Secretary; (b) identify the statutory approvals that apply to the development; (c) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (d) outline all environmental management practices and procedures to be followed during construction and demolition works associated with the development; (e) describe all activities to be undertaken on the site during construction of the development, including a clear indication of construction stages; (f) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; (g) describe the roles and responsibilities for all relevant employees involved in construction and demolition works associated with the development; (h) include arrangements for community consultation and complaints handling procedures during construction and demolition; and (i) include copies of the various strategies and plans that are required under the conditions of this Consent once they have been approved. <p>Note:</p> <ol style="list-style-type: none"> 1. Construction of the Development shall not commence until written approval of this plan has been received from the Secretary. 2. The City of Botany Bay Council shall be provided with a copy of the approved Construction Environmental Management Plan within 7 days of the date of its approval. 	None.	This condition is not relevant to the current Audit period.
	Operational Environmental Management Plan		

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
2	<p>The Applicant shall prepare and implement an Operational Environmental Management Plan to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval prior to commencement of operations; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the development; (d) identify the statutory requirements that apply to the development; (e) consolidate all relevant environmental management plans and monitoring programs required in the conditions of this consent and committed to in the EIS; (f) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development. (g) describe in general how the environmental performance of the development would be monitored and managed; and (h) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the development; • respond to any non-compliances; and • respond to emergencies. 	<p>The Auditors sighted the Operational Environmental Management Plan (Document Code: PLANSW- XXX-XXX-1) dated 23 June 2016.</p>	<p>None.</p>	<p>Compliant</p>
	Management Plan Requirements			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	
3	<p>The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> • the relevant statutory requirements (including any relevant approval, licence or lease conditions); • any relevant limits or performance measures/criteria; and • the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures that will be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: <ul style="list-style-type: none"> • impacts and environmental performance of the development; and • effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. <p>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>The Auditors sighted the Operational Environmental Management Plan (Document Code: PLANSW- XXX-XXX-1) dated 23 June 2016.</p>	<p>None.</p>	<p>Compliant</p>
Reporting				
	<i>Incident Reporting</i>			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
4	The Applicant shall notify the Secretary, City of Botany Bay Council and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of this incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.	Site visit on 13 May 2022.	None.	Compliant
	Regular Reporting			
5	The Applicant shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	The Auditors sighted the following documents: <ul style="list-style-type: none"> - Annual Environment Management Report – BTT 2018-2019 (dated 16 August 2019). - Annual Environment Management Report – BTT 2019-2020 (dated 23 October 2020). - Annual Environment Management Report – BTT 2020-2021 (dated 28 June 2021). 	None.	Compliant

Independent Environmental Audit

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6	<p>Within one (1) year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under these approvals; and (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals. <p>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</p>	<p>Evidence of compliance was sighted in the 2019 Independent Environmental Audit. The 2019 IEA prepared by Jackson Environment and Planning satisfied the first audit required 3 years after the first audit (2016 Independent Environmental Audit conducted by Ramboll Australia Pty Ltd report dated 28 July 2016).</p> <p>This audit satisfies the requirement to conduct an audit every 3 years thereafter.</p>	None.	Compliant
7	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	Site visit on 13 May 2022.	None.	Compliant
	Annual Review			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
8	<p>Within one (1) year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> (a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year; (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against: <ul style="list-style-type: none"> • the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions in the EIS; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the development; (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development. 	<p>The Auditors sighted the following documents:</p> <ul style="list-style-type: none"> - Annual Environment Management Report – BTT 2018-2019 (dated 16 August 2019). - Annual Environment Management Report – BTT 2019-2020 (dated 23 October 2020). - Annual Environment Management Report – BTT 2020-2021 (dated 28 June 2021). 	None.	Compliant
	Revision of Strategies, Plans & Programs			
9	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> (a) annual review under Condition D8 of this schedule; (b) incident report under Condition D4 of this schedule; (c) audit report under Condition D6 of this schedule; and (d) any modifications to this consent, <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	None	None	Not Triggered
Access to Information				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
10	The Applicant shall: <ul style="list-style-type: none"> (a) make the following information publicly available on its website: <ul style="list-style-type: none"> • the EIS; • current statutory approvals for the development; • approved strategies, environmental management plans or programs; • a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and • any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary. 	The Auditors sighted the required documents on the Veolia website.	None.	Compliant

Appendix E – Environment Protection Licence Compliance Table

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal													
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status									
1 – ADMINISTRATIVE CONDITIONS													
A1	<i>What the licence authorises and regulates</i>												
A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of the Veolia Banksmeadow Waste Transfer Terminal	None.	This audit was carried out during the operational phase following completion of construction works.	Compliant									
A1.2	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 border="1" data-bbox="280 813 1030 933"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of general waste</td> <td>Any annual processing capacity</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Site visit on 13 May 2022.	None.	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity											
Waste storage	Waste storage - other types of waste	Any other types of waste stored											
A2	<i>Premises or plant to which this licence applies</i>												
A2.1	The licence applies to the following premises: <i>BANKSMEADOW TRANSFER TERMINAL</i> <i>34-36 MCPHERSON STREET</i> <i>BANKSMEADOW</i> <i>NSW 2019</i> <i>LOTS A & B DP.366725, LOT 1 DP.435497, AND PART LOT 2 DP.1006865</i>	Site visit on 13 May 2022.	None.	Compliant									
A3	<i>Information supplied to the EPA</i>												

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status												
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the <i>Protection of the Environment Operations (Savings and Transitional) Regulation 1998</i>; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Site visit on 13 May 2022.	None.	Compliant												
2 – DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND																
P1	Location of monitoring/discharge points and areas															
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="273 810 1070 938"> <thead> <tr> <th colspan="4">Water and land</th> </tr> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water quality monitoring point</td> <td></td> <td>Adjacent to site entry point on MacPherson Road Banksmeadow.</td> </tr> </tbody> </table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Water quality monitoring point		Adjacent to site entry point on MacPherson Road Banksmeadow.	None.	Water quality sampling point is identified in P1.1. Condition M2.2 specifies required action and L2.4 specifies the Concentration Limits.	Compliant
Water and land																
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description													
1	Water quality monitoring point		Adjacent to site entry point on MacPherson Road Banksmeadow.													
3 – LIMIT CONDITIONS																
L1	Pollution of waters															
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	The findings of this audit.	None.	Compliant												
L2	Concentration Limits															
L2.1	For each monitoring/discharge point or utilisation area specified in the table 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.	<p>The auditors sighted the Water quality sampling summary sheet.</p> <p>Site visit on 13 May 2022.</p>	There were 7 exceedances of the water quality concentration limit (refer to Section 3.11 of this report).	Non-Compliant												
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.															

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																																														
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																										
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.																																													
L2.4	<p>Water and/or Land Concentration Limits</p> <table border="1"> <thead> <tr> <th colspan="6">POINT 1</th> </tr> <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> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>1</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6 - 8.5</td> </tr> <tr> <td>TSS</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table>	POINT 1						Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	BOD	milligrams per litre				10	Nitrogen (ammonia)	milligrams per litre				1	Oil and Grease	milligrams per litre				10	pH	pH				6 - 8.5	TSS	milligrams per litre				50	<p>The auditors sighted the Water quality sampling summary sheet.</p> <p>Site visit on 13 May 2022.</p>	<p>There were 7 exceedances of the water quality concentration limit (refer to Section 3.11 of this report).</p>	Non-Compliant
POINT 1																																														
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																																									
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TSS	milligrams per litre				50																																									
L3	Waste																																													
L3.1	<p>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.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td></td> <td></td> <td>100,000t per annum</td> </tr> <tr> <td>NA</td> <td>General solid waste (putrescible)</td> <td></td> <td></td> <td>400,000t per annum</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (non-putrescible)			100,000t per annum	NA	General solid waste (putrescible)			400,000t per annum	<p>The auditors sighted the Waste Summary Reports.</p>	<p>None.</p>	<p>Compliant</p>																											
Code	Waste	Description	Activity	Other Limits																																										
NA	General solid waste (non-putrescible)			100,000t per annum																																										
NA	General solid waste (putrescible)			400,000t per annum																																										
L3.2	The authorised amount of waste permitted on the premises cannot exceed 6,225 tonnes at any one time.	Site visit on 13 May 2022.	None.	Compliant																																										
L4	Potentially offensive odour																																													

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L4.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	<p>Site visit on 13 May 2022.</p> <p>The auditors sighted the Complaints Register.</p>	<p>A series of odour complaints then received during the early months of 2022. It was discovered that there was a fault in the exhaust stack velocity sensor which incorrectly displayed the stack velocity. Veolia assumed that the extraction system was working effectively, based on this sensor when actual extraction rates were lower than required to control odour. This in turn resulted in an increase in odour complaints. The issue has since been resolved, with the fault corrected. Fan servicing and duct cleaning is carried out by Equilibrium monthly. It has been recommended that the exhaust velocity sensor is checked at the same time as maintenance is done on ducting (refer to Section 3.10.2 of this report).</p>	<p>Non-Compliant</p>
4 – OPERATING CONDITIONS				
O1	<i>Activities must be carried out in a competent manner</i>			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	During the Site visit on 13 May 2022, the Auditors observed waste handling activities being undertaken in a proper manner as far as could be practically reviewed during the Audit.	None.	Compliant
O2	Maintenance of plant and equipment			
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.	During the Site visit on 13 May 2022, the Auditors observed waste handling activities being undertaken in a proper manner as far as could be practically reviewed during the Audit.	None.	Compliant
O3	Dust			
O3.1	A dust suppression system must be operated and maintained within the transfer building to effectively suppress all dust emissions.	During the Site visit on 13 May 2022, the Auditors observed waste handling activities being undertaken in a proper manner as far as could be practically reviewed during the Audit.	None.	Compliant
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will prevent the emission of dust from the premise.	During the Site visit on 13 May 2022, the Auditors observed waste handling activities being undertaken in a proper manner as far as could be practically reviewed during the Audit.	None.	Compliant
O4	Emergency Response			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	The Auditors sighted the Site Emergency Response Plan - Banksmeadow Transfer Terminal (Document Code: MAN-5174-1) dated 4 June 2021.	None.	Compliant
O4.2	The licensee must have adequate fire prevention measures in place and ensure that facility personnel are able to access fire-fighting equipment and manage fire outbreaks at any part of the premises.	The Auditors sighted the Fire Safety Statement dated 16 th November 2018 (assessment date 2 nd October 2018).	None.	Compliant
O5	Processes and management			
O5.1	(non-putrescible) received for storage or recovery or processing at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	The Auditors sighted the Waste Management Plan (Document Code: LANSW- XXX-XXX-1) dated 23 June 2016.	None.	Compliant
O5.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately.	Site visit on 13 May 2022.	None	Compliant
O5.3	No maintenance or cleaning of waste vehicles or waste containers shall be conducted at the Premises.	Site visit on 13 May 2022.	None.	Compliant
O5.4	All servicing, maintenance and re-fueling activities must be conducted in a covered area that excludes all stormwater, is constructed of sealed hardstand and to contain all spills within. This condition commences and continues to be in effect from 14 November 2016.	Site visit on 13 May 2022.	None.	Compliant
O6	Waste Management			
O6.1	All waste processing activities shall be conducted within the transfer building	Site visit on 13 May 2022	None	Compliant
O6.2	No waste shall be stored outside the transfer building except when containerised for the purpose of transport to the Woodlawn Eco-Project Site	Site visit on 13 May 2022	None	Compliant
O6.3	Waste shall be processed on a first in, first out basis.	Site visit on 13 May 2022	None	Compliant
O6.4	Vehicles leaving the waste processing areas must not track materials outside the transfer building	Site visit on 13 May 2022	None	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O6.5	All areas that involve the handling of waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed	Site visit on 13 May 2022	None	Compliant
O6.6	All waste containers shall be maintained so as to contain all waste, liquid and odour	Site visit on 13 May 2022	None	Compliant
O6.7	Stormwater from all external areas used for waste activities must drain via the stormwater monitoring point. This condition commences and continues to be in effect from 14 November 2016	Site visit on 13 May 2022	None	Compliant
O6.8	The Licensee must operate a stormwater isolation valve that: <ol style="list-style-type: none"> 1. Is located prior to the point of stormwater egress from the Premises; 2. Discharges via the stormwater monitoring point; 3. Is closed whenever a spill occurs at the Premises on surfaces that drain stormwater; and 4. Is installed and maintained to be effective from 14 November 2016. 	Site visit on 13 May 2022	None	Compliant
O7	Other operating conditions			
O7.1	The mechanical ventilation system must be operated and maintained to ensure the putrescible waste and compactor areas are maintained under negative pressure and can only discharge to atmosphere via the stack.	Site visit on 13 May 2022	None	Compliant
5 – Monitoring and Recording Conditions				
M1	Monitoring records			
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.	The Auditors sighted Annual Environmental Management Reports	None	Compliant
M1.2	All records required to be kept by this licence must be: <ol style="list-style-type: none"> (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. 	The Auditors sighted various records from the commencement of the operations however, which is greater than 4 years.	None	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ol style="list-style-type: none"> (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. 	The Auditors sighted Annual Environmental Management Reports	None	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																												
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																								
M2	Requirement to monitor concentration of pollutants discharged																											
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:	The Auditors sighted Annual Environmental Management Reports	None	Compliant																								
M2.2	Water and/ or Land Monitoring Requirements POINT 1 <table border="1" data-bbox="280 558 1052 805"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>TSS</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	BOD	milligrams per litre	Daily during any discharge	Other Approved Method 1	Nitrogen (ammonia)	milligrams per litre	Daily during any discharge	Other Approved Method 1	Oil and Grease	milligrams per litre	Daily during any discharge	Other Approved Method 1	pH	pH	Daily during any discharge	Other Approved Method 1	TSS	milligrams per litre	Daily during any discharge	Other Approved Method 1	Site visit on 13 May 2022. The auditors sighted the Complaints Register.	Water quality sampling point is identified in P1.1. Condition M2.2 specifies required action and L2.4 specifies the Concentration Limits.	Compliant
Pollutant	Units of measure	Frequency	Sampling Method																									
BOD	milligrams per litre	Daily during any discharge	Other Approved Method 1																									
Nitrogen (ammonia)	milligrams per litre	Daily during any discharge	Other Approved Method 1																									
Oil and Grease	milligrams per litre	Daily during any discharge	Other Approved Method 1																									
pH	pH	Daily during any discharge	Other Approved Method 1																									
TSS	milligrams per litre	Daily during any discharge	Other Approved Method 1																									
M3	Testing methods - concentration limits																											
M3.1	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	None	None	Compliant																								
M4	Recording of pollution complaints																											
M4.1	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.	The auditors sighted the Complaints Register	None	Compliant																								
M4.2	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.	The auditors sighted the Complaints Register	None	Compliant																								

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The auditors sighted the Complaints Register	None	Compliant
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	None	None	Not Triggered
M4	Telephone complaints line			
M5.1	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.	Site visit on 13 May 2022	None	Compliant
M5.2	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.	Site visit on 13 May 2022	None	Compliant
M5.3	The preceding two conditions do not apply until 2 July 2015 the date of the issue of this licence.	None	None	Compliant
6 – REPORTING CONDITIONS				
R1	Annual return documents			
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 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. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	The Auditors sighted the Annual Return documentation for the audit period.	None.	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>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.</p>	The Auditors sighted the Annual Return documentation for the audit period.	None.	Compliant
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <p>(g) 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</p> <p>(h) 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.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose</p>	None.	None.	Not Triggered
R1.4	<p>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:</p> <p>(a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>(b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	None.	None.	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').	The Auditors sighted the Annual Return documentation for the audit period.	None.	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	The Auditors sighted the Annual Return documentation for the audit period.	None.	Compliant
R1.7	<p>Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>	The Auditors sighted the Annual Return documentation for the audit period.	None.	Compliant
R2	Notification of environmental harm			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>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.</p>	None.	None.	Not Triggered
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.	None.	None.	Not Triggered
R3	Written report			
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>(a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>(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</p>	None.	None.	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	None.	None.	Not Triggered
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>(a) the cause, time and duration of the event;</p> <p>(b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>(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;</p> <p>(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;</p> <p>(e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>(f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>(g) any other relevant matters</p>	None.	None.	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	None.	None.	Not Triggered
7 – GENERAL CONDITIONS				
G1	<i>Copy of licence kept at the premises or plant</i>			
G1.1	A copy of this licence must be kept at the premises to which the licence applies	Site visit on 13 May 2022.	A copy of the licence is kept at the premises and the licence is also available electronically at the site	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Site visit on 13 May 2022.	A copy of the licence is kept at the premises and the licence is also available electronically at the site	Not Triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site visit on 13 May 2022.	A copy of the licence is kept at the premises and the licence is also available electronically at the site	Compliant
8 – SPECIAL CONDITIONS				
E1	<i>Financial assurance</i>			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.1	<p>(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to issuing this licence. The financial assurance must be in favour of the EPA in the amount of one hundred thousand dollars (\$100,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 June 2017. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. Note that this total financial assurance is inclusive of that required in E1.1a).</p> <p>(c) The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority (APRA).</p>	Evidence of compliance was sighted in the 2019 Independent Environmental Audit.	None.	Compliant
E1.2	The financial assurance must be maintained during the operation of the premises and thereafter until such time as the EPA is satisfied the premises are environmentally secure.	None.	None.	Not Triggered
E1.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None.	None.	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	None.	None.	Not Triggered
E1.5	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: (a) the financial assurance required by condition E1.1; or (b) the adjusted financial assurance as required by condition E1.3 and E1.4.	None.	None.	Not Triggered
E2	Environment Obligations of Licensee (Works and Programs)			
E2.1	While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must: (a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents. (b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	Site visit on 13 May 2022.	None.	Not Triggered
E2.2	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must: (a) Make all efforts to contain all firewater on the licensee’s premises; (b) Make all efforts to control air pollution from the licensee’s premises; (c) Make all efforts to contain any discharge, spill or run-off from the licensee’s premises; (d) Make all efforts to prevent flood water entering the licensee’s premises; (e) Remediate and rehabilitate any exposed areas of soil and/or waste; (f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; (g) At the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises; (h) At the request of the EPA monitor surface water leaving the licensee’s premises; and (i) Ensure the licensee’s premises is secure.	None.	None.	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.3	After the licensee’s premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: <ul style="list-style-type: none"> (a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; (b) rehabilitate the site, including assessment and if required remediation of any site contamination. 	None	None	Not Triggered
E3	<i>EPA May Claim on a Financial Assurance</i>			
E3.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None	None	Not Triggered

Appendix F – Site inspection photographs (taken on 13 May 2022)

Figure F1. A small leak in the leachate transfer line causing pooling leachate on the floor, with the potential for odour emissions.



Figure F2. Poorly repaired and leaking leachate transfer line.

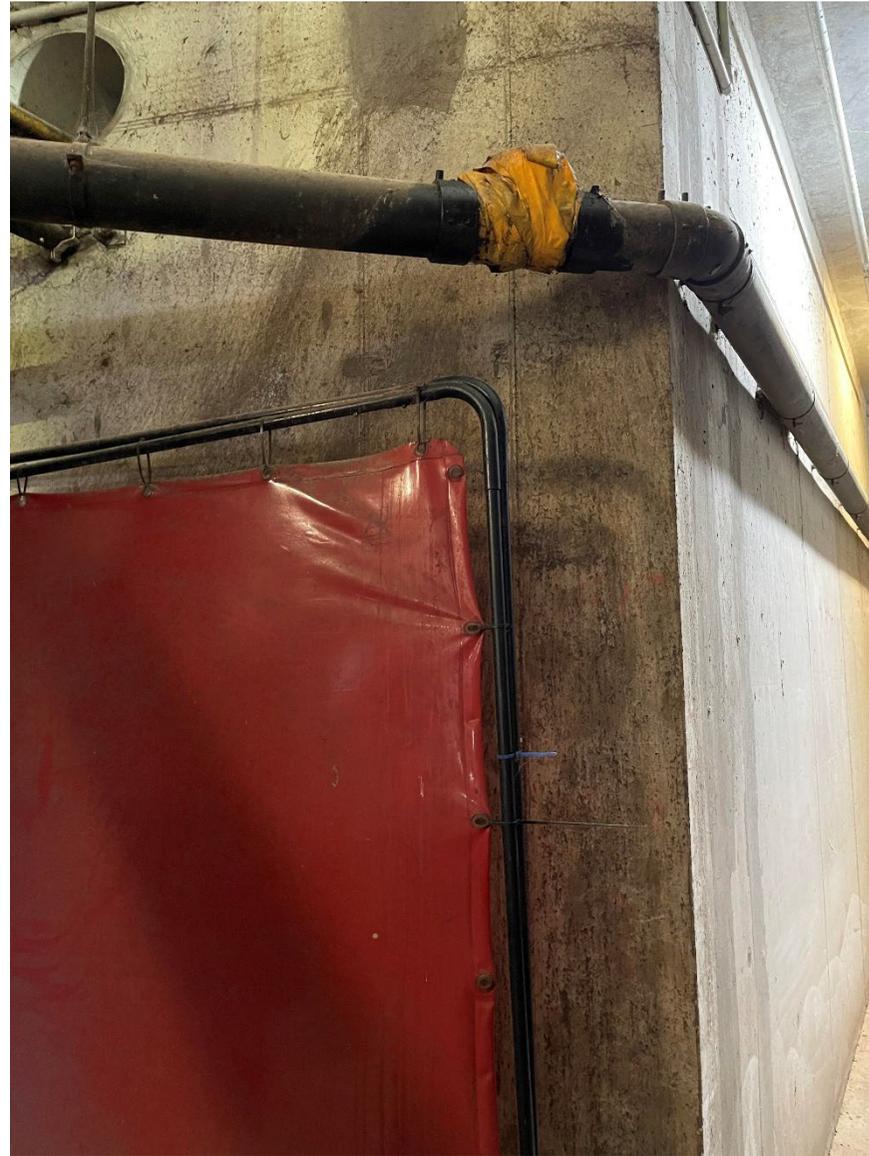


Figure F3. Outdoor diesel storage with rainwater ingress in bunding.



Figure F4. Stormwater ingress into fuel storage bund area.



Figure F5. Stormwater pit requires cleaning.



Figure F6. Stormwater treatment pond requiring general maintenance.



Figure F7. Failed landscaping needing repair.



Figure F8. Well maintained waste in stockpiles in waste receive hall.

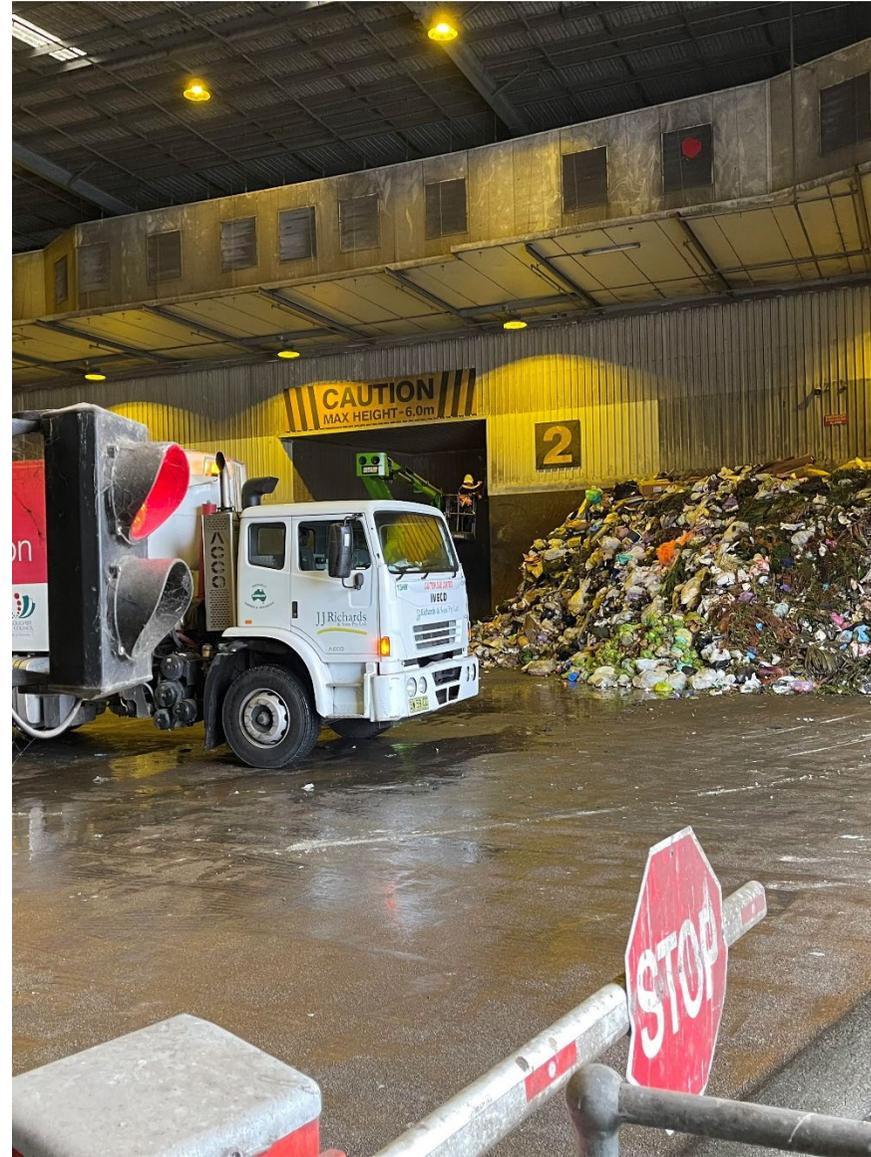


Figure F9. Plastic flaps above the point of entry to the waste receive hall used to optimise negative pressure and control odour emissions.



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Figure F10. Clean container loading rail siding.

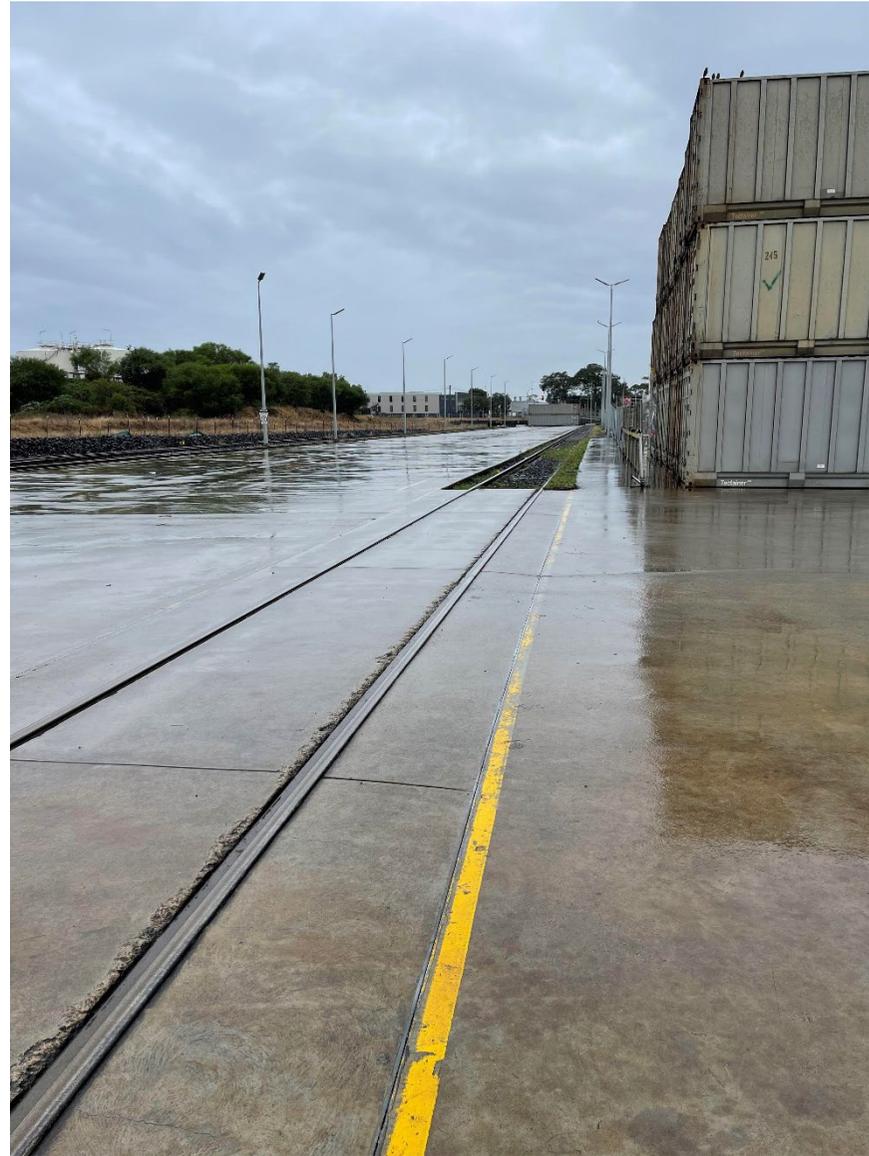


Figure F11. Clean container loading rail siding.



Figure F12. Clean hardstand area.

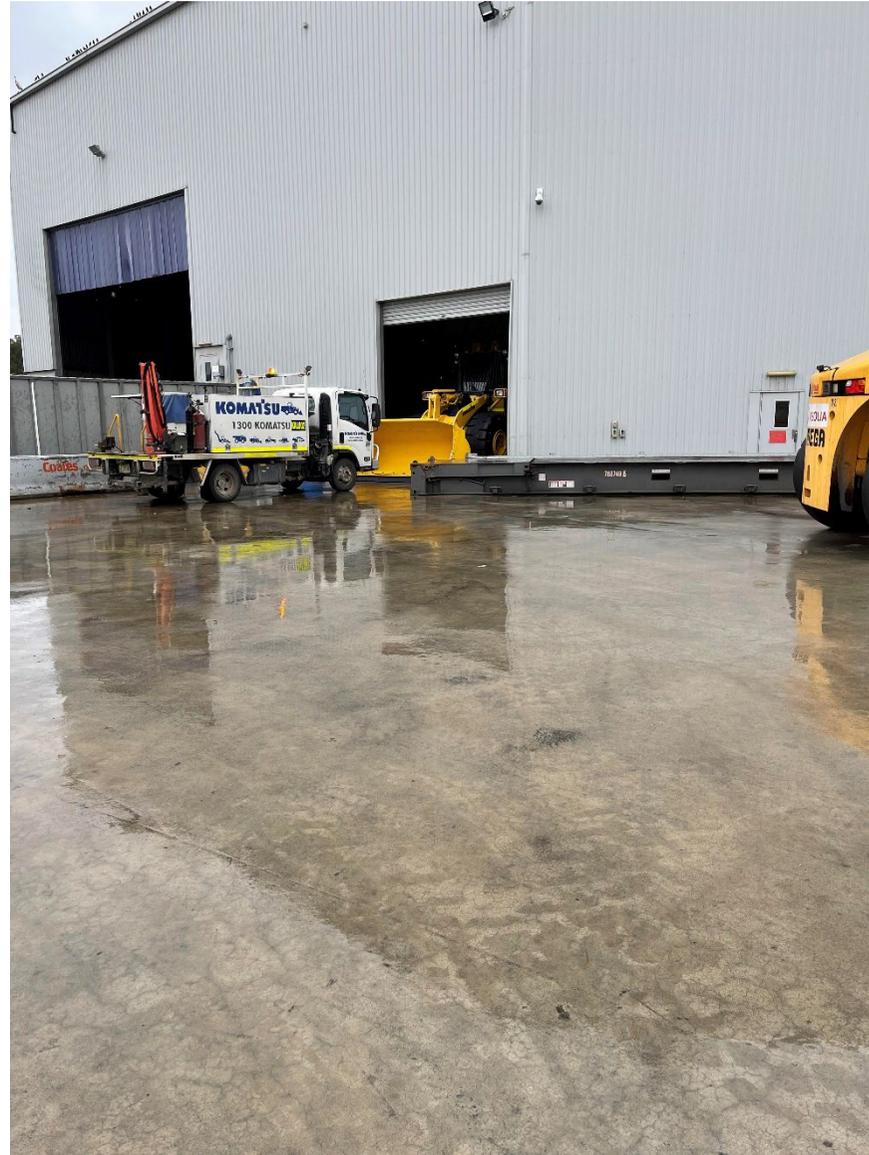


Figure F13. Secure leachate storage tank.



Figure F14. Clean hardstand area.



Appendix G – Agency Consultation



11th May 2022

Ms Meredith Wallace
General Manager
Bayside Council
PO Box 21
Rockdale NSW 2216

By email to: council@bayside.nsw.gov.au

Dear Ms Wallace,

Re: Agency Consultation – 2022 Independent Environmental Audit – Veolia’s Banksmeadow Transfer Terminal

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd to undertake an Independent Environmental Audit of the Banksmeadow Waste Transfer Terminal (the Site), located at 34-36 McPherson Street, Banksmeadow NSW. This audit is required under Condition required under Schedule 4, Condition 6 and 7 of the Development Consent (SSD5855). The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is also required under Condition 6 and 7.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site for the period between 29 April 2019 to 28 April 2022. The independent audit will be performed according to the requirements of the NSW Department of Planning and Environment’s *Independent Audit Post Approval Requirements (2020)* and *ISO 19011 Guidelines for Auditing Management Systems (2018)*.

Our audit team for this project was approved by the Department of Planning and Environment on 3 May 2022.

Under Condition 6(b) of Schedule 4 of SSD Consent 5855, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the NSW EPA, Bayside Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present Bayside Council with the opportunity to comment on the environmental performance of the Banksmeadow Transfer Terminal, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071)

Director

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au



11th May 2022

Mr Samuel Condon
Compliance – Metro Compliance
NSW Department of Planning and Environment
Locked Bay 5022
Parramatta NSW 2124

By email to: compliance@planning.nsw.gov.au

Dear Mr Condon,

Re: Agency Consultation – 2022 Independent Environmental Audit – Veolia’s Banksmeadow Transfer Terminal

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd to undertake an Independent Environmental Audit of the Banksmeadow Waste Transfer Terminal (the Site), located at 34-36 McPherson Street, Banksmeadow NSW. This audit is required under Condition required under Schedule 4, Condition 6 and 7 of the Development Consent (SSD5855). The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is also required under Condition 6 and 7.

As you are aware, the audit team approval was provided by the Department on 3 May 2022.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site for the period between 29 April 2019 to 28 April 2022. The independent audit will be performed according to the requirements of the NSW Department of Planning and Environment’s *Independent Audit Post Approval Requirements (2020)* and *ISO 19011 Guidelines for Auditing Management Systems (2018)*.

Under Condition 6(b) of Schedule 4 of SSD Consent 5855, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the NSW EPA, Bayside Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present the Department with the opportunity to comment on the environmental performance of the Banksmeadow Transfer Terminal, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071)

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W: www.jacksonenvironment.com.au



11th May 2022

NSW Environment Protection Authority
Locked Bag 5022
Parramatta NSW 2124

By email to: info@epa.nsw.gov.au

Dear Sir / Madam,

Re: Agency Consultation – 2022 Independent Environmental Audit – Veolia’s Banksmeadow Transfer Terminal

Jackson Environment and Planning Pty Ltd has been engaged by Veolia Environmental Services (Australia) Pty Ltd to undertake an Independent Environmental Audit of the Banksmeadow Waste Transfer Terminal (the Site), located at 34-36 McPherson Street, Banksmeadow NSW. This audit is required under Condition required under Schedule 4, Condition 6 and 7 of the Development Consent (SSD5855). The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is also required under Condition 6 and 7.

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Our audit team for this project was approved by the Department of Planning and Environment on 3 May 2022.

Under Condition 6(b) of Schedule 4 of SSD Consent 5855, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the NSW EPA, Bayside Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present NSW EPA with the opportunity to comment on the environmental performance of the Banksmeadow Transfer Terminal, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071)

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