

# Annual Environmental Management Review 2021 – 2022

Wetherill Park Resource Recovery Facility

1 September 2023

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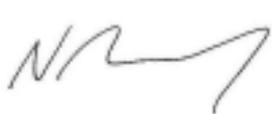
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## Signature Page

1 September 2023

# Annual Environmental Management Review 2021 – 2022

## Wetherill Park Resource Recovery Facility

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**MANAGEMENT PLANS APPENDIX E**  
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**ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022** and Recovery Pty Ltd **Environmental Protection**  
Wetherill Park Resource Recovery Facility

**Licence No.** 4548

**Name of Holder of EPA Licence** Veolia Recycling and  
Recovery Pty Ltd **Annual Review Start Date** 15 June  
2021

**Annual Review End Date** 14 June 2022

**Name of Authorised Reporting Officer** Dora  
Ambrosi-Wall

**Title of Authorised Reporting Officer** Environmental  
Advisor

## TITLE BLOCK

### Item Details

**Name of Operation** Wetherill Park Resource Recovery  
Facility **Name of Operator** Veolia Recycling and

Recovery Pty Ltd **Development Consent No.** SSD 7267

**Name of Holder of Project Approval** Veolia Recycling

TITLE BLOCK

I, Dora Ambrosi-Wall certify that this audit report is a true and accurate record of the compliance status of the Veolia Wetherill Park RRF for the period of 15 June 2021 to 14 June 2022 and that I am authorised to make this statement of behalf of Veolia Recycling and Recovery Pty Ltd.



## 1. STATEMENT OF COMPLIANCE

The purpose of the Annual Environmental Management Review (AEMR) is to undertake an assessment and review of compliance, environmental impact predictions and the effectiveness of environmental measures required under Development Consent SSD 7267.

The overall assessment of environmental performance for this reporting period demonstrated seven non-compliances with the Project Approval. A summary of the AEMR findings is presented in **Table 1, Table 2 and Table 3**. A comprehensive table with compliance status of Environmental Project Approval conditions is included in **Appendix A**.

**Table 1: Summary of Compliance**

Relevant Approval No. of	Conditions Compliant / Not Applicable	No. of Conditions/ Non Compliant No. of Conditions Not Verified
Development Consent SSD 7267	74	1

Non-compliances reported during this AEMR are summarised in Table 2.

**Table 2: Summary of Non-Compliances**

**Relevant Approval Condition Summary Where addressed in the AEMR**

Development Consent SSD 7265	A1	C11	Environmental reporting and required documents not available on Veolia website
		C14	
	Section 5.2		
Development Consent SSD 7265	B4		
Development Consent SSD 7265	B1		
	B23	Section 6.5 Section 4.6	
Development Consent SSD 7265			
Development Consent SSD 7265	B1	Section 4.12	
Development Consent SSD 7265	B36	Section 6.2 Section 4.3	

**Table 3: Summary of Not Verified**

**Relevant Approval Condition Summary Where addressed in the AEMR**

Development Consent SSD 7265	B1	Section 8.2
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**2. INTRODUCTION**

Environmental Resources Management Australia Pty Ltd (ERM) was engaged by Veolia Recycling and Recovery Pty Ltd (Veolia) to prepare the 2021-2022 Annual Environmental Management Review (AEMR) for the Veolia Wetherill Park Resource Recovery Facility (the Site). The Site is located at 20 Davis Road, Wetherill Park, New South Wales (NSW), 2164 (Lot 402, DP 603454). The Site location is presented in **Figure 1, Appendix B** and the Site layout is presented in **Figure 2, Appendix B**.

The Site was historically approved by Fairfield Council in November 1989 for the operation of a non putrescible waste transfer station. In the following years numerous development applications

were approved, including consent to accept putrescible waste and asbestos material. Site operations ceased temporarily at the facility due to damage caused from a significant fire on 26 January 2019.

An approval for redevelopment was subsequently sought from and issued by the New South Department of Planning, Industry and Environment through State Significant Development (SSD) Consent SSD 7267-MOD-2 (the DA) and under the NSW Environmental Planning and Assessment Act 1979. The DA is included in **Appendix C**. The approval allowed for operation under Stage One and Stage Two conditions. The Site is currently operating under Stage One operations and although Stage Two conditions have been approved, it is understood that operations under these conditions have not been planned for in the foreseeable future.

The modified DA (MOD-2) permits an increase in the processing capacity of the existing waste transfer station at the Site, to 230,00 tonnes per annum (tpa) of waste including 140,000 tpa of general solid waste (GSW) (putrescible) and 90,000 tpa of GSW (non-putrescible). However, despite the increased waste volumes of the DA modification, the EPL has not been varied and only permits a maximum of 70,000 tpa of GSW (putrescible), along with various other source separated non putrescible waste streams. For the purposes of the Site operation, the EPL limits are applicable as the lower of the permitted volumes. The Site accepts and sorts commercial and council wastes, including asbestos waste, and facilitates transfer to an appropriate recycling facility or landfill.

The AEMR is based on information provided by Veolia. ERM did not conduct a Site visit as part of the preparation of the AEMR and has relied on the accuracy of the information provided through correspondence with Dora Ambrosi-Wall, (Veolia Environmental Advisor).

## 2.1 Objective

The objective of this AEMR is to comply with the reporting requirements of Schedule 2, Condition C8 of the DA – Annual Reporting.

The specific reporting requirements are described in **Section 3.3** of this AEMR.

## 2.2 Scope of Works

This AEMR assesses data collected from the environmental monitoring program which is implemented at the Site to measure and monitor the Site's overall environmental performance and compliance with the DA and Environment Protection Licence (EPL) 4548. This AEMR is for the monitoring period of 15 June 2021 to 14 June 2022.

This AEMR is separate to the Independent Environmental Audit (IEA), which is completed within one year of the commencement of operation, and every three years thereafter in accordance with the DA. The AEMR is an annual self-reporting tool to assess and review environmental performance.

ERM have assisted Veolia in the compilation and review of data, but have not performed a detailed independent verification of data collected by other parties and supplied for collation in this AEMR. Further distinctions between the two processes are provided in **Section 3** and **Section 4**.

## 2.3 Environmental Management Plan

In order to maintain compliance with the Sites licences and approval documents, Veolia undertakes a monitoring program for the Site, which has been designed on an Annual timeframe.

The monitoring program incorporates the monitoring required under the Sites licences and

approvals as well as additional data collection that is viewed by Veolia as beneficial from the perspective of environmental diligence. The data collected under this program allows assessment of the Site's compliance with relevant documents and allows assessment of the Site's overall environmental performance.

The management strategies which Veolia employ to mitigate and monitor a number of environmental issues are described in the Wetherill Park Resource Recovery Facility (RRF) Operational Environmental Management Plan (OEMP). The OEMP specifies the requirements of the monitoring program (described in Section 7), which this AEMR reports on. The OEMP is included in **Appendix D**.

### **3. LICENSING AND APPROVALS 3.1**

The Site is regulated through conditions contained within DA number SSD 7276 (provided in **Appendix C**). Compliance with the DA is assessed in detail on the basis of the information presented in this AEMR in **Appendix A**. The Project Approval was issued in 2017 by the NSW Minister for Planning via the former Department of Planning and Environment (now the Department of Planning, Industry and Environment) and is subject to further approved modifications:

- MOD 1: SSD 7276 – Installation requirement of a meteorological station; and
- MOD 2: SSD 7276 – Staged construction and increase in the processing capacity of general solid waste (putrescible) from 70,000 to 140,000 tonnes annually (Stage 2 operations). The modification approval 2 was issued in April 2019.

It is noted that the DA MOD 2 increase in processing capacity exceeds the limits included in the EPL (see Section 3.2). In order to meet the DA MOD 2 capacity an EPL variation would need to be submitted following the completion of construction requirements for Stage 2 operations to align with the new DA waste processing capacities.

The DA includes a number of conditions for both the planning and operational management of the Site. The conditions specify a requirement for the development of a suite of management plans, monitoring requirements, operational guidelines and reporting requirements. The DA criteria are summarised in **Section 7** of this report and assessment of the Sites monitoring data against the DA criteria is included in **Section 8**.

Schedule 2, Condition C8 of the DA specifies that an AEMR be produced for the Site to the satisfaction of the Department of Planning, Industry and Environment. This AEMR has been produced to satisfy Schedule 2, Condition C8 of the DA. The specific requirements listed for inclusion in the AEMR are further described in **Section 3.3** below.

The DA also includes a requirement for an Independent Environmental Audit to be completed for the Site 'within one year of the commencement of operation, and every 3 years thereafter'. Most recently this was completed during the 2020-2021 reporting period by Element. Further detail regarding the IEA is described in **Section 4** of this AEMR.

## 3.2 NSW EPA Environmental Protection Licence

The Site is also regulated by the NSW Environment Protection Authority (EPA) under the Protection of the Environment Operations Act 1997 (POEO Act). The NSW EPA administers its regulation via EPL 4548. The EPL includes the minimum conditions under which the Site may operate in order to maintain compliance with the POEO Act.

The EPL contains conditions which are relevant to the AEMR which include those relating to the implementation of a monitoring program. No environmental parameters specifically requiring data collection are listed in the EPL, however it is a condition to monitor the wastes received at the Site.

No variations to the EPL were made during the reporting period. The EPL is included in **Appendix**

## E. 3.3 AEMR Reporting Requirements

This AEMR has been developed as per Schedule C8 (Modification 2, 4<sup>th</sup> April 2019) of the DA. The condition states 'Each year, the applicant must review the environmental performance of the Development to the satisfaction of the Secretary'. AEMRs have been completed at the Site as below:

- 2019/2023 – completed 23/02/2021;
- 2020/2021 – completed 25/08/2022

ERM understand from discussions with Veolia that following the divestment from SUEZ, Veolia no longer have access to previous AEMR files, as this is considered intellectual property of SUEZ.

The specific requirements of the Condition and references to the section of the AEMR are presented in **Table 4** below:

**Table 4: DA (Modification 2) Schedule 2, Condition C8**

**Requirements** Condition Requirement AEMR Section

a) describe the operations that were carried out in the previous calendar year, and the operations that are proposed to be carried out over the next year; over the previous calendar year, which includes a comparison of the results against the: Section 4.3

b) include a comprehensive review of the monitoring results and complaints records of the Development Section 5.1, Section 8, Appendixes F

(i) the relevant statutory requirements, limits or performance measures / criteria; Section 3.4 and Section 7

(ii) requirements of any plan or program required under this approval; Section 6, Appendix A, C and E.

(iii) the monitoring results of previous years; and Section 8 (iv) the relevant predictions in the EIS.

Section 3.4

(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; Section 1, Appendix A

(d) identify any trends in the monitoring data over the life of the Development; Section 8  
*EIS: Environmental Impact Statement*

(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and

**3.4 EIS (Golder Associates, 2017)**  
Section 8 Section 4.4

(f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.

As part of the planning of the Wetherill Park RRF, an Environmental Impact Statement (EIS) was completed by Golder Associates (2017). The EIS included various reviews of the potential environmental impact of the Site based on certain environmental parameters (noise, dust odour etc.). These reviews were used to make predictions as to whether the operation of the Site would have any adverse or unacceptable environmental effects.

The key predictions of the EIS were as follows:

- As the proposal is seeking to make predominantly internal amendments to an RRF within an established industrial estate, it is considered it will have a negligible impact upon flora and fauna;
- Odour levels are not predicted to exceed the EPA criterion at residential locations;
- Dust will be mitigated such that the potential impact of dust from operation of the Site is assessed as low;
- The facility operating at full capacity under neutral weather conditions will not exceed the relevant noise criteria at residences in proximity to the site;
- The Site would have a low impact upon the safety and efficiency of the surrounding road network and no additional infrastructure to ameliorate potential traffic and safety impacts are required; and
- The visual impact is considered low. The visible features of the Proposal will be commensurate with the visual character of the Wetherill Park Resource Recovery Facility site and surrounding industrial area.

The assessment criteria which has been adopted to screen the data collected during the reporting period (refer to **Section 8**) is largely aimed at verifying the key predictions made during the EIS. Exceedances of the assessment criteria may indicate that either the predictions of the EIS were not accurate, or the Site is not being operated within the requirements of the draft compilation of mitigation measures which was relied during the EIS to make predictions.

### 3.5 Independent Environmental Audit

Schedule C12 of the DA requires an Independent Environmental Audit (IEA) within one year of the date of the commencement of operations under DA SSD 7267 (9 December 2019) and every three years thereafter.

An IEA was conducted by Element that covered the period of December 2019 to October 2020. The Audit satisfied condition C12 of DA SSD 7267 and included assessment of the environmental performance and compliance status of the development against the Audit criteria. The Audit consisted of meetings, Site interviews and Site inspections. It was noted that during the site inspections no unsafe actions or activities, or activities presenting a material harm to the environment were observed and considered key strengths for the Site. The findings of the Audit included compliance with 84 of the audit criteria and non-compliance with 8 of the Audit criteria, 26 Audit criteria were not triggered. **Table 5** lists the Audit non-compliances and findings.

The next IEA is expected to occur in 2023.

## Table 5: Audit Non-Compliances and Findings

LICENSING AND APPROVALS

### Approval (ID) IEA Findings Veolia Corrective Action Status

#### A27

Requirements prior to commencement of stage 1 operations

#### A28

Prior to the commencement of stage 1 operations an occupation certificate (OC) was to be issued, this did not happen.	Obtain interim OC Interim OC was issued to Council 2
Previous consents were surrendered prior to the commencement of stage 1 operations.	Application approved for surrender of development consents. However the operations commenced
Veolia confirmed the stormwater system does not include a first flush detention tank. It was confirmed, and observed, that a keystone valve at the entrance to the property controls all stormwater discharges from the site.	Application submitted to DPIE for consent and removed from consent
The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.	OEMP and sub-plans have been approved after the commencement of stage 1
Waste was observed to be outside the premise. Resource recoverable material was being delivered outside the processing enclosure and had no physical control to mitigate movement off site.	Housekeeping recorded on daily for engaged to contain windblown litter
The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.	DPIE has approved the OEMP and the commencement of stage 1 operations
The first annual review is therefore due 11/09/2020.	Annual Review undertaken at the site
The following were missing from the website: <ul style="list-style-type: none"> <li>■ Summary of complaints register</li> <li>■ Environmental noise assessment</li> <li>■ Annual review</li> <li>■ The EIA</li> </ul>	Website updated with required data

Completed

Surrender of consents Completed

#### B5

Wastewater In progress

#### B30

Traffic and Access  
OTMP

#### B42

Litter and Pest Control Pest, Vermin and noxious weed management

**C4**  
Completed Completed

OEMP Completed

**C8**

Annual Review Completed Access to information Completed and  
Ongoing

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## **4.1 Site Description**

### SITE MANAGEMENT

## **4. SITE MANAGEMENT**

The Site is located at 20 Davis Road, Wetherill Park, within the Fairfield Local Government Area (LGA) in the Greater Western Sydney region. The Wetherill Park RRF is strategically located between the Eastern Creek and Kemps Creek landfill sites, providing processing and transfer facilities to support the operation of these sites.

A combined entrance and exit for both commercial and domestic vehicles off Davis Road is located in the North Eastern corner of the Site. The infrastructure at the Site comprises a weighbridge, office, parking areas and WTS. The Site layout is presented in **Figure 2, Appendix B**.

### **4.2 Site History**

According to the EIS, the Site was historically approved by Fairfield Council in November 1989 for the operation of a non-putrescible waste transfer station. In the following years numerous development applications were approved, including consent to accept putrescible waste and asbestos material.

Site operations ceased temporarily at the facility due to damage caused from a significant fire on 26<sup>th</sup> January 2019. Construction was undertaken subsequently to allow for the current operational requirements, which recommenced on 9<sup>th</sup> December 2019.

### **4.3 Site Operations Overview**

The Site is approved under the DA to receive and process the following quantities of various waste streams following staged development (described in Section 1) as follows:

Stage 1 operations:

- < 90,000 tpa of GSW (non-putrescible);
- < 70,000 tpa of GSW (putrescible); and
- < 10m<sup>3</sup> of asbestos waste per week.

Stage 2 operations:

- < 90,000 tpa of GSW (non-putrescible);

- < 140,000 tpa of GSW (putrescible); and
- < 10m<sup>3</sup> of asbestos waste per week.

Currently the Site is operating under Stage 1 operation limits. As outlined in **Section 3.2**, it is understood that an EPL variation will be submitted to align with the approved Stage 2 operations processing capacity when the Site progressed to Stage 2.

The Site is currently permitted to operate 24 hours per day Monday to Sunday (unrestricted hours) under the DA. General public access to the RRF is limited to 5am to 4.30pm Weekdays, and 6am to 1pm Saturday to Sunday. All waste transport vehicles enter the Site via the incoming weighbridge. The weighbridge operator is responsible for recording all details of the waste accepted onto the Site and directing waste streams to the correct section of the Site for processing. Within the waste transfer station, vehicles unload the waste into designated areas onto the floor, keeping putrescible and non putrescible waste separate. Small vehicles unloading are required to source separate recyclable and recoverable materials (paper/ cardboard/ plastics/ metals/ timber) into the bins provided. Asbestos is unloaded at a designated asbestos unload location outside of the waste transfer station building.

Following sorting and processing, residual waste which cannot be recovered and asbestos waste is transferred to other disposal facilities, such as the Lucas Heights Resource Recovery Park and the Elizabeth Drive Landfill.

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The Site currently maintains a stock of chemicals which are used for various purposes during routine Site operations. Of note are the quantities of chemicals which are stored above ground on the Site within bunded storage sheds, which include diesel (~2,000 litres (L)), hydraulic oil fluid (~60 L) Gear Oil (~40L), sodium hydroxide (~50 L) and Forklift Gas (50kg).

The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or approved programs. Documents listed in Condition C14, including but not limited to environmental management plans, a complaints register and current approvals are to be made available on Veolia's website. These documents were not available to be located on Veolia's website during a review on 27 February 2023.

The development proposes to prepare for transitioning to Stage 2 operations over the next year. This will require an application to modify the development consent and installation of a first flush to satisfy the requirements of the EIS.

Veolia reports that documents would be available in Veolia's Wetherill Park Resource Recovery facility mid-October 2023.

#### 4.4 Site Improvements

The Site did not go under any significant improvement or construction works during the 2021/22 reporting period.

Veolia has reported that the following measures are proposed to be implemented to improve environmental performance:

- First flush system proposed to be installed in 2023.
- New weighbridge to improve recording of waste inbound and outbound for larger vehicles. ■
- New trade waste system proposed to be installed in 2023.
- Waste is only to be accepted on site by self-tipping vehicles.
- Repairs to driveway and pit floor.

- Carry out required annual noise measurement survey by external party.

## 4.5 Leachate Management

The Site activities generate insignificant volumes of leachate through the transfer station. Fluids that may have leached through waste is captured and treated, to ensure it does not impact water sources and receptors off-site. Veolia manages leachate in accordance with the requirements set out in the OEMP and the Leachate Management Standard Operating Procedure (SOP) SOP036.

Internal sealed areas of the Site drain any leachate at the Site through a collection or separator pit, then on to be contained and treated within the trade waste treatment system. The leachate is treated such that it complies with the Site's Sydney Water Trade Waste Agreement 7976 (the TWA). Once it has been treated, the water is tested for monitoring purposes to ensure it meets the acceptance standards set out in the TWA. It is directed off-site into the sewer system. The Site's compliance with the TWA is discussed further in **Section 6.5** and **Section 7.5** of this AEMR.

## 4.6 Storm Water Management

The primary objective of water management on Site is to reduce any potential impacts of the facility to the surrounding water courses or groundwater. Veolia manages water on Site in accordance with the Water Management SOP (SOP069). It is noted that the EIS predicted that the potential 'water impacts' of the Proposal are assessed as minor'.

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Runoff from paved areas external to the waste transfer station and from roof guttering is directed to drains which direct storm water offsite. All storm water from the paved areas and roof guttering is maintained as separate from the leachate management system to prevent cross-contamination of the runoff prior to off-site discharge. The point of discharge is fitted with a key stone shut off valve which can be closed to prevent discharge in the event of a spill.

During ERMs review of DA conditions, it was noted that Condition B5 includes a requirement for a first flush system to be installed at the Site. The first flush system would capture an initial portion of rainfall as waste, rather than freely discharging all stormwater through the key stone valve. Veolia has advised that a first flush system is not in place at the Site and an application for an amendment to the DA has been submitted to remove the need for a first flush system.

## 4.7 Vegetation Management

The Site is predominately sealed by concrete and hardstands, however landscaped grassed areas with tree/shrub vegetation exists across the Site. Landscaped areas are maintained in accordance with the Veolia document Site Maintenance – Transfer Stations SOP047 and Site Maintenance – Infrastructure SOP041.

## 4.8 Odour Management

An Odour Management Plan (OMP) has been developed and is in place for the Site in accordance with the conditions B14 and B15 of the DA. The OMP is included in **Appendix D**. The objective of the OMP is to ensure that the Site is operating in a manner that does not cause or permit the emission of any offensive odour beyond the boundary of the site. The OMP identifies a number of odour sources at the Site and specifies mitigation measures to reduce the impact of these sources. The key odour mitigations at the Site are enclosed waste receipt bays, internal waste processing under negative pressure and a deodoriser system installed at key odour sources.

The OMP specifies weekly odour monitoring and inspection of control mechanisms to be conducted by Veolia, which aims to ensure that odour controls are effective. The odour monitoring program is conducted to cover the Site, and if odour is detected efforts are made to determine the specific source of odour.

## 4.9 Surrounding Land Uses and Receptors

Adjacent and sensitive land uses in the vicinity of the site are detailed in **Tables 6** and **Table 7**

below. **Table 6: Adjacent Land Use**

**Direction Distance from Site Boundary Land Use**

Adjacent
Adjacent
Adjacent
Adjacent

North Industrial Estate

East Industrial Estate

South Industrial Estate/Former Landfill

West Bushland/Power Easement

**Table 7: Nearest Sensitive Land Use**

**Direction Distance from Site Boundary Sensitive Land Use**

340m
1500m
2000m
1500m

North Bushland followed by Prospect Reservoir (>800m) South Residential – Wetherill Park

East Aspect Western Sydney School

West Residential – Wetherill Park

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## 4.10 Geology

The Penrith 1:100 000 Geological Sheet (Clark and Jones 1991) refers to the geology beneath the Site as Bringelly shale, carbonaceous claystone, claystone, laminate, fine to medium-grained lithic sandstone and rare coal and tuff.

## 4.11 Hydrogeology

There are currently no groundwater monitoring wells installed at the Site and no groundwater for the Site is available. A search of ground water bores through the Australian Groundwater Explorer (Bureau of Meteorology (BOM)) was performed during the reporting period on 22<sup>nd</sup> October 2021. The search indicated there were 15 licensed groundwater bores located within 500m of the Site. The results of the search are summarised in **Table 8** below.

### **Table 8: Summary of Groundwater Bore Information**

#### Bore ID Distance from Site Boundary Depth (m) Purpose

400m to southeast	7
450m to southeast	9
350m to southeast	10.2
300m to southeast	10
300m to southeast	5.5
330m to southeast	7.2
400m to southeast	7
400m to southeast	7.5
450m to southeast	15
350m to southeast	10.2
400m to southeast	7.2
450m to southeast	15
450m to southeast	6
400m to southeast	10.2
400m to southeast	7

GW115363 Monitoring

GW103822 Monitoring

GW115372 Monitoring

GW115373 Monitoring

GW115374 Monitoring

GW115368 Monitoring

GW115364 Monitoring

GW115369 Monitoring

GW103824 Monitoring

GW115370 Monitoring

GW115367 Monitoring

GW103823 Monitoring

GW115362 Monitoring

GW115371 Monitoring

GW115366 Monitoring

#### 4.12 Local Climate

Meteorological data for the Site was not obtained from the weather station located on site as the unit is no longer functioning, resulting in a non-compliance with DA Condition B6, however noting that a replacement unit is currently being procured by Veolia. Rainfall data recorded at the Abbotsbury (Fairfield (City Farm)) weather station, reported 1,530 mm of rainfall between June 2021 and May 2022. The highest monthly total of 535 mm was recorded in March 2022.

ERM has been informed that a new weather station was installed July 2023 and is operational.

## 5. COMPLAINTS AND ENVIRONMENTAL INCIDENTS

### 5.1 Complaints

Veolia maintains a register of all complaints received through the Veolia Interlex system. Veolia investigates and responds to complaints received in accordance with the Environmental Complaints Management SOP (SOP066). A free call telephone line through Veolia's customer Service Department operates 24 hours a day, 7 days per week. Veolia may also be referred complaints through the NSW EPA complaint line, which are also recorded in the Interlex system as required.

Veolia received one odour complaint from the EPA on 27 January 2022. Veolia provided a response to the EPA on 14 February 2022, which is included in **Appendix H**.

During the previous reporting period (2020 – 2021) there was one complaint regarding waste being dragged out of the facility by a truck. However, site security video footage was reviewed that did not identify this occurrence and a response was provided to the EPA, no reply correspondence was received.

### 5.2 Environmental Incidents

The DA refers to an incident a 'set of circumstances causing or threatening material harm to the environment, and/or an exceedance with the limits of performance criteria in this consent'. All environmental incidents are to be recorded in accordance with the Incident Reporting and Corrective Action Procedure.

Veolia maintains a register of all environmental incidents through the Veolia Interlex system. Based on information provided to ERM by Veolia and a review of the POEO register available on the NSW EPA website, the following incidents occurred at the Site or as a result of Site activities during the 2021/22 reporting period:

- The licensee was unable to remove all general solid waste within 24 hours of it being received at the premises on sixteen occurrences – EPL condition O6.3 (DA condition A6).
- The authorised amount of waste permitted on the premises exceeded 2400 tonnes at any one time – EPL condition L2.2 (DA condition A6).

In March 2022 Veolia Wetherill Park Facility chose to temporarily close due natural disaster flood events in Sydney, to facilitate safe management of the site, ensuring no actual or potential significant off site impacts on people or the biophysical environment. Veolia informs ERM that Sydney landfills had closed as a result of natural disaster flooding, restricting transfer of waste off site. There was no impact on people or the biophysical environment at the Site.

Although the non-compliances listed above are classified as incidents, it was reported that they did not result in material harm to the environment. Further detail of the site operation limits for waste acceptance is provided in Section 8.1.

### 5.3 NSW EPA Statutory Penalty Notices

According to the NSW EPA POEO register, the Site (as regulated under EPL 4548) did not receive any penalty notices during the reporting period.

## 6. MONITORING PROGRAM 6.1 Roles

**Table 9** below identifies the roles and responsibilities of all parties involved in the implementation of the environmental monitoring requirements.

**Table 9: Roles and Responsibilities**

### Role Responsible Part for Monitoring

Authority NSW DPE/

Dust Monitoring Veolia

Noise Monitoring NA

Odour Monitoring Veolia

TWA Monitoring Veolia

AEMR Preparation ERM

*TWA: Trade Waste Agreement*

Note that ERM has not been responsible for the collection of any of the monitoring data which has been included in this report. All data was provided by Veolia and therefore ERM is unable to comment on the appropriateness of sample collection, storage and transport techniques. Laboratory analysis for water samples is conducted by ALS Laboratories, which is a NATA accredited laboratory.

### 6.2 Noise

Noise limits for the Site are prescribed in the DA (SSD 7267) for locations at residential receivers. Although the DA does not specify a frequency for noise monitoring to be undertaken, the Site OEMP includes noise management strategies including that “Independent noise monitoring will be conducted annually.” Independent noise monitoring was not undertaken during the reporting period.

Note, Hibbs and Associates Pty Ltd (HIBBS) conducted an assessment of Environmental Noise Assessment at the Site during the previous reporting period. Hibbs completed direct noise measurements to validate EIS noise modelling of the Site under normal operations and found that results were below those modelled in the EIS. ERM has been informed that HIBBS are being engaged for the noise monitoring for the next reporting period (2022 – 2023).

### 6.3 Dust

The management of air quality and dust is conducted in accordance with the requirements of the Site Maintenance – Infrastructure Facilities (SOP041) and Site Maintenance – Transfer Station (SOP047) SOPs. The DA states that “the Applicant must implement all measures to minimise dust generated during construction and operation of the Development”. The DA does not include a specific

requirement for dust monitoring to be undertaken, however the effectiveness of air quality mitigation measures outlined within the DA, including dust suppression sprays, are evaluated weekly through the Wetherill Park RRF Weekly Inspection checklist (FORM26.4.47). Potential dust generation activities at the Site are controlled by maintaining the roads in good conditions, road sweeping and cleaning with a skid steer loader.

The OEMP states that Veolia will engage a 3<sup>rd</sup> party to monitor air and dust quality to demonstrate that dust is not affecting neighbours and that dust levels are appropriate for occupational health, however ERM has not been provided any evidence that a third party has been engaged.

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## 6.4 Odour

Veolia conducts the following odour monitoring program as per the OMP which forms part of the OEMP:

- Weekly checklist of controls on potential odour sources;
- Weekly assessment of the Deodoriser Dust Suppression System;
- Weekly odour monitoring of any unusual level of odour at the following specified onsite locations: - Davis Road cul-de-sac;
  - Inbound weighbridge;
  - Outbound weighbridge;
  - Trade waste shed;
  - C&I entry door;
  - General public entry door;
  - Veolia Baling Services;
  - Asbestos bin area;
  - Tipping floor exit door;
  - Tunnel entry; and
  - Truck Parking.

The OMP is included in **Appendix D**.

## 6.5 Trade Waste

Leachate and runoff from waste storage areas that is captured within the waste transfer station is considered potentially contaminated and is directed to and captured within the trade waste treatment system. The wastewater is treated and discharged to the sewer under the Trade Waste Agreement (7976) with Sydney Water. The treated waste water is sampled for quality monitoring purposes. Waste water samples are analysed for pH, temperature, suspended solids, sulfate (as SO<sub>4</sub>), aluminium, iron, zinc, ammonia, biochemical oxygen demand (BOD) and oil and grease.

## 7.1 Site Operation Limits – Waste Acceptance

ASSESSMENT CRITERIA

## 7. ASSESSMENT CRITERIA

The Site is licenced under the DA to receive and process the following quantities of various waste streams Stage 1 operations as follows:

- < 90,000 tpa of GSW (non-putrescible);
- < 70,000 tpa of GSW (putrescible); and
- < 10m<sup>3</sup> of Asbestos waste per week.

The Applicant must not store on site more than 573m<sup>3</sup> or 402.5 tonnes of GSW (putrescible) at any given time without prior approval from the Planning Secretary in consultation with the EPA. The authorised amount of waste permitted on the premises cannot exceed 2,400 tonnes at any one time. In addition, GSW (putrescible) must not be stored at the Site for more than 24 hour from the time of receipt.

### 7.2 Noise Limits

Noise limits for the Site are set out in the DA, which states that noise generated at the Site during operation does not exceed the noise limits summarised below in **Table 10**.

**Table 10: Noise Limits for Wetherill Park RRF**

Location Day Evening Night

LAeq (15 minute) dB (A)	LAeq (15 minute) dB (A)	LAeq (1 minute) dB (A)
35	35	

All Residential Receivers 45

### 7.3 Dust

Both the DA and EPL do not specify any specific dust assessment criteria and required monitoring

frequency, however the DA states that “the Applicant must implement all measures to minimise dust generated during construction and operation of the Development”.

Mitigation measures include the use of dust suppression sprays over the vehicle entry and exit, and where waste is being tipped and processed. The Wetherill Park RRF Weekly Inspection checklist is completed weekly to ensure dust suppression systems and dust measures are working effectively.

## 7.4 Odour

The DA and EPL do not specify any specific odour assessment criteria, however both refer to Section 129 of the POEO Act 1997, that the Site must not cause or permit the emission of any offensive odour. The EPL goes on to state that the emission of an offensive odour is defensible if the odour was emitted in accordance with the conditions of a licence directed at minimising odour. The weekly checklist of potential odour source controls at the Site as well as odour sources included in the OMP are designed to ensure that the required odour minimisation controls are in place and effective. The OMP does not specify any specific thresholds, rather actions to be taken under the following conditions:

- If during the weekly checklist for inspections of controls are not in place as required by the OMP, then the controls are to be reinstated as soon as practicable;
- If an unusual level of odour is detected during the weekly inspections, the Site Manager should be notified so that the source can be determined and repaired; and
- External odour monitoring to be completed proactively, during adverse weather conditions or in response to an odour complaint.

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## 7.5 Leachate

Wastewater, under the Trade Waste Agreement, is continuously discharged via the trade waste treatment system into the sewer with regular monitoring is undertaken for water quality purposes. Acceptance standards for industrial customers are summarised below in **Table 11**.

**Table 11: Trade wastewater acceptance standards**

Parameter Unit Acceptable Standard

	mg/L
	pH Units

Suspended Solids 600 Sulfate 2000 Aluminium 100 Iron 50

Zinc 5 Ammonia 100 Oil and Grease 110 Biochemical Oxygen Demand - pH 7-10

## 8.1 Site Operation Limits – Waste Acceptance

RESULTS

## 8. RESULTS

Veolia has provided data for the material accepted by the Site under various waste streams. The annual data provided to ERM by Veolia is included in **Table 12** below.

**Table 12: Production Summary**

**DA)** **(actual)**  
**Material Approved Limit (EPL and Previous Reporting Period)** **This Reporting Period (Actual)**

<90,000 tpa	72,351.42 t
<70,000 tpa	69,600.63 t
<10m <sup>3</sup> /week	Max Weekly Intake 9.64 t

Weekly totals of asbestos waste for the reporting period were provided, however were recorded in tonnes. Although the weekly asbestos waste was not reported in the required m<sup>3</sup>, it is considered unlikely that the maximum asbestos weekly intake of 9.08 t would convert to greater than the waste acceptance limit of 10 m<sup>3</sup>, and thus is considered compliant.

The Site reported the following non-compliances with DA condition A6, which is associated with waste management requirements specified within the Site's EPL:

- The licensee was unable to remove all general solid waste within 24 hours of it being received at the premises on sixteen occurrences – EPL condition O6.3 (DA condition A6).
- The authorised amount of waste permitted on the premises exceeded 2400 tonnes at any one time – EPL condition L2.2 (DA condition A6).

A temporary site closure came into effect 2 March 2022, to enable clearing of waste and reinstate safe operating conditions and environmental management. Landfill waste acceptance and tipping during the wet weather saw increased waiting times in excess of two hours, resulting in increased transport network turnaround times servicing the Site. Veolia has reported that the site was non-compliant with the above conditions between 2 to 22 March 2022.

During this reporting period the Site received less non-putrescible compared to the previous reporting period, and zero putrescible waste compared to 69,600 t.

## 8.2 Noise

No noise assessment was conducted during the reporting period. Veolia have confirmed that they are arranging a noise assessment to be conducted at the Site. Veolia has received no noise complaints during the reporting period.

## 8.3 Dust

As discussed in **Section 7.3**, both the DA and EPL do not specify any specific dust assessment criteria and required monitoring frequency. However, Veolia confirmed that dust mitigation measures are undertaken at the Site including the operation of a dust suppression spray system and six-monthly brush down of interior walls. Veolia reports that the required installations of the DA in relation to dust management, have been completed, as detailed required by the DA. Veolia did not receive any dust complaints in the reporting period.

Dust mitigation measures are checked on a weekly basis via the Transfer Station Weekly checklists.

Potential dust nuisance from the waste streams is controlled through simultaneous dust and odour misting system that automatically runs in the transfer shed. The misting system drops mist from the ceiling of shed either in auto or manual mode. The site also has access to water and hoses to wet down waste on the hard stand if necessary. This system can also be used manually when required. Dust created from road use is controlled by maintaining the roads in good conditions, road sweeping and cleaning with bob cat.

Management of air and dust are conducted in accordance with the requirements of the Site Maintenance Infrastructure Facilities, water is sprayed from a watercart twice a week.

## 8.4 Odour

Generally, the site was operated in accordance with the OMP, noting that 32 odour control checklists were recorded by Veolia operatives during 27 weeks of the annual reporting period. A register of odour inspections completed at the site during the reporting period is included in **Appendix G**. Veolia have indicated that required controls were generally in place and effective during the entire reporting period.

Veolia received one odour complaint from the EPA on 27 January 2022. It is noted that no weekly odour control checklist was available for this period. Refer to Appendix H for the Site's response to the complaint. There were zero odour complaints reported during the previous reporting period.

Veolia reports that there has been no significant increase of odour sources associated with the development in comparison to the previous reporting period. A comparison of odour monitoring results will be included in the 2023 AEMR.

## 8.5 Trade Waste

Three samples of wastewater from within the wastewater treatment system were taken on 2 February 2022, 15 February 2022, and 28 May 2022 prior to discharge to trade waste. Exceedances were reported for the sample collected on 2 February 2022, for sulfate and pH. Laboratory reports were provided from Veolia and are included in **Appendix F** with the reported results.

The results were reported to Sydney Water, a comparison of Trade Waste results for the reporting period and results for previous years will be included in the 2022/233 AEMR. The Trade Waste treatment system was emptied, cleaned thoroughly, and flushed out.

## 9. CONCLUSIONS

This AEMR has assessed all available data collected from the environmental monitoring program during the reporting period and assessed the Site's overall environmental performance and compliance with the EPL and the DA. The available data has been collected to satisfy EPL and PA requirements and is generally sufficient to satisfy the DA and EPL requirements for the reporting period.

Based on the data reviewed, the following conclusions have been drawn regarding the 2021/22 reporting period:

- One odour complaint was received regarding operations at the Site; ■

No regulatory notices were received by the Site;

- The Site recorded the following environmental incidents:

- Veolia was unable to remove all general solid waste within 24 hours of it being received at the Site;
- The authorised amount of waste permitted on the Site exceeded 2400 tonnes at any one time;
- The Site was temporarily closed in March 2022 due to unsafe operating conditions;
- The Site generally received waste within the Stage One approved limits noting the above exception;
- An Environmental Noise Assessment was not completed during the reporting period in accordance with the OEMP;
- Dust was not monitored at the Site during the reporting period, however Veolia plan to commence monitoring in the next reporting period. There was no indication that dust was being generated at the Site based on information provided by Veolia;
- A weather station is installed at the Site however, it is currently not functioning. Veolia are in the progress of replacing the unit;
- Trade waste was appropriately monitored and one occurrence of exceedances of discharge limits was reported;
- The Veolia website does not display the required environmental documents and plans for public access;
- Generally, the site was operated in accordance with the OMP, noting that 27 weekly odour control checklists were recorded by Veolia operatives; and
- The EIS and DA require a first flush detention tank to be installed at the Site, however a key stone value is currently in place, further to this an application has been submitted to the DPIE to amend the conditions requiring the first flush system.

Schedule 2, Condition C8 of the DA – Annual Reporting for the 2021-2022 reporting period (15<sup>th</sup> June 2021 to 14<sup>th</sup> June 2022).

Based on information provided by Veolia, the Site is generally compliant with the DA and EPL, with non-compliances reported against conditions B4, B5 and B23(b), relating to an exceedance of Trade Waste 7976 and the stormwater system design. An application to remove the requirements for a first flush from the DA has been submitted to DPIE. DA condition A6 was reported as non-compliance which related to EPL conditions on waste management requirements. DA condition B7 was reported as a non-compliance as the Site recorded an odour complaint from the EPA.

Non-compliances were also reported for B6 relating to the non-functioning meteorological monitoring station, B36(d) for the absence of a noise monitoring event and C11 and C14 relating to available environmental records on the Veolia website. Veolia has reported to ERM that the data is in the process of being updated to the website, noting the transfer from the former website. Condition B35 was not able to be verified, which relates to ensuring operational noise is below noise limits.

Veolia has reported that the following measures are proposed to be implemented to improve environmental performance:

- First flush system proposed to be installed in 2023.
- New weighbridge to improve recording of waste for larger vehicles.
- New trade waste system proposed to be installed in 2023.
- Repairs to driveway and pit floor.

## **10. STATEMENT OF LIMITATIONS**

1. This report is based solely on the scope of work described in the Specification and ERM proposal P0619460 and performed by ERM for Veolia Recycling and Recovery Pty Ltd (the Client). The Scope of Work was governed by a contract between ERM and the Client.
2. No limitation, qualification or caveat set out below is intended to derogate from the rights and obligations of ERM and the Client under the Contract.
3. The findings of this report are solely based on, and the information provided in this report is strictly limited to that required by, the Scope of Work. Except to the extent stated otherwise, in preparing this report ERM has not considered any question, nor provides any information, beyond that required by the Scope of Work.
4. This report was prepared between November 2022 and June 2023 and is based on information

reviewed at the time of preparation. The report does not, and cannot, take into account changes in law, factual circumstances, applicable regulatory instruments or any other future matter. ERM does not, and will not, provide any on-going advice on the impact of any future matters unless it has agreed with the Client to amend the Scope of Work or has entered into a new engagement to provide a further report.

5. Unless this report expressly states to the contrary, ERM's Scope of Work was limited strictly to identifying typical environmental conditions associated with the subject site(s) and does not evaluate the condition of any structure on the subject site nor any other issues. Although normal standards of professional practice have been applied, the absence of any identified hazardous or toxic materials or any identified impacted soil or groundwater on the site(s) should not be interpreted as a guarantee that such materials or impacts do not exist.
6. This report is based on correspondence with the client conducted by ERM personnel, the sampling and analyses described in the report, and information provided by the Client or third parties (including regulatory agencies). All conclusions and recommendations made in the report are the professional opinions of the ERM personnel involved. Whilst normal checking of data accuracy was undertaken, except to the extent expressly set out in this report ERM:
  - a. Did not, nor was able to, make further enquiries to assess the reliability of the information or independently verify information provided by; and
  - b. Assumes no responsibility or liability for errors in data obtained from, the Client, any third parties or external sources (including regulatory agencies).
7. Although the data that has been used in compiling this report is generally based on actual circumstances, if the report refers to hypothetical examples those examples may, or may not, represent actual existing circumstances.
8. Only the environmental conditions and or potential contaminants specifically referred to in this report have been considered. To the extent permitted by law and except as is specifically stated in this report, ERM makes no warranty or representation about:
  - a. The suitability of the site(s) for any purpose or the permissibility of any use;
  - b. The presence, absence or otherwise of any environmental conditions or contaminants at the site(s) or elsewhere; or
  - c. The presence, absence or otherwise of asbestos, asbestos containing materials or any hazardous materials on the site(s).
9. Use of the site for any purpose may require planning and other approvals and, in some cases, environmental regulator and accredited site auditor approvals. ERM offers no opinion as to the likelihood of obtaining any such approvals, or the conditions and obligations which such approvals may impose, which may include the requirement for additional environment works.

10. The ongoing use of the site or use of the Site for a different purpose may require the management of or remediation of site conditions, such as contamination and other conditions, including but not limited to conditions referred to in this report.
11. This report should be read in full and no excerpts are to be taken as representative of the whole report. To ensure its contextual integrity, the report is not to be copied, distributed or referred to in part only. No responsibility or liability is accepted by ERM for use of any part of this report in any other context.
12. Except to the extent that ERM has agreed otherwise with the Client in the Scope of Work or the Contract, this report:
  - a. Has been prepared and is intended only for the exclusive use of the Client; b. Must not be relied upon or used by any other party;
  - c. Has not been prepared nor is intended for the purpose of advertising, sales, promoting or

endorsing any Client interests including raising investment capital, recommending investment decisions, or other publicity purposes;

- d. Does not purport to recommend or induce a decision to make (or not make) any purchase, disposal, investment, divestment, financial commitment or otherwise in or in relation to the site(s); and,
- e. Does not purport to provide, nor should be construed as, legal advice.

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## **APPENDIX A TABLE OF COMPLIANCE**

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## TABLE A1 TABLE OF COMPLIANCE

### Specific Environmental Conditions

#### Condition No. Condition/Requirement Compliance Status Comment

<p>In addition to meeting the specific performance criteria established under the consent, the applicant must implement all measures to prevent and/or minimise any harm to the environment that may result from the Development</p>	<p>NA</p>
<p>The Applicant, in acting on this consent, must carry out the Development in accordance with the:</p> <ul style="list-style-type: none"> <li>a) State significant development application SSD 7267;</li> <li>b) EIS and RTS;</li> <li>c) Conditions in schedule 2;             <ul style="list-style-type: none"> <li>a. SSD 7267 MOD1;</li> <li>b. SSD 7267 MOD2;</li> </ul> </li> <li>d) Development layout plans and drawings listed in Appendix A (of the Development Consent); and,</li> <li>e) The Management and Mitigation Measures as identified in Appendix B (of the Development Consent).</li> </ul>	<p>NA</p>
<p>The Applicant must not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, or disposal on the site, except as expressly permitted by an EPL</p>	<p>Non-compliant</p>
<p>The Applicant must not receive or process on site more than: a) 140,000 tpa of general solid waste (putrescible); b) 90,000 tpa of general solid waste (non-putrescible); and c) 10m<sup>3</sup> of asbestos waste per week.</p>	<p>Compliant</p>
<p>The Applicant must not store on site more than 573m<sup>3</sup> or 402.5 tonnes of general solid waste (putrescible) at any given time without prior approval from the Planning Secretary in consultation with the EPA.</p>	<p>NA</p>
<p>The Applicant must not store general solid waste (putrescible) at the site for more than 24 hour from the time of receipt.</p>	<p>NA</p>

#### APPENDIX A COMPLIANCE TABLE

**A1** This AEMR assess the operational phase of the development

**A2** This AEMR assess the operational phase of the development

**A6** The authorised amount of waste permitted on the premises exceeded 2400 tonnes at any one time (EPL condition L2.2).

The licensee was unable to remove all general solid waste within 24 hours of it being received at the premises on sixteen occurrences – EPL condition O6.3

**A7** Veolia received the following waste volumes during the reporting period:

- Putrescible GSW : 0 t
- Non-putrescible GSW: 31,277.86 t
- Asbestos waste: 306.4 t annual, Veolia reports 9.08 t maximum weekly total.

**A8** No putrescible waste was received at the Site during the reporting period.

**A9** No putrescible waste was received at the site during the reporting period.

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**STAGED SUBMISSION OF PLANS OR PROGRAMS**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>With the approval of Secretary, the Applicant may;</p> <p>(a) Submit any strategy, plan or program required by this consent on a progressive basis; and /or</p> <p>(b) Combine any strategy, plan or program required by this consent.</p>	<p>Compliant</p>
<p>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program.</p> <p>A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.</p>	<p>Compliant</p>
<p>The Applicant must retain all weighbridge records as required by the POEO(Waste) regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA</p>	<p>Compliant</p>
<p>The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The classification records must be made immediately available on request by the EPA and/or the Secretary</p>	<p>Compliant</p>
<p>Where consultation with any public authority is required by the conditions of this consent, the applicant must:</p> <p>(a) Consult with the relevant public authority prior to submitting the required documentation to the secretary or the PCA for approval.</p> <p>(b) Submit evidence of such consultation as part of the relevant documentation required by the conditions of this consent. (c) Describe how matters raised by the public authority have been addressed and identify matters that have not been resolved and, (d) Include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the applicant</p>	<p>Compliant</p>

**APPENDIX A  
COMPLIANCE TABLE**

**A10** All Plans required by the consent have been submitted.

**A11** The Stage of the development is clearly stated in the plans submitted.

**A12** Veolia reports all weighbridge transactions are recorded through Mandalay Software system, and can be immediately made available to the Secretary or EPA upon request.

**A13** Veolia reports all waste classification records for all wastes received on the site and waste disposed from the site are recorded through Mandalay software and retained for the life of the development. The classification records can be made immediately available on request by the EPA and/or the Secretary

**A14** Consultation with public authorities required under this condition have taken place and evidence submitted as part of any Modification undertaken.

## STAGED SUBMISSION OF PLANS OR PROGRAMS

### Condition No. Condition/Requirement Compliance Status Comment

The applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained 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.	Compliant
The Applicant must ensure that all demolition associated with the Development is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011	NA
The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.	NA
Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.	NA
Prior to the construction of any utility works associated with the Development, the applicant must obtain relevant approvals from service providers	NA

Prior to the commencement of stage 1 construction and stage 2 construction, Approved Plans must be submitted to the Sydney water "tap in" service to determine if the development will have any impacts on Sydney Water assets	Compliant
Prior to the commencement of Stage 1 operations, the applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Compliant

**APPENDIX A  
COMPLIANCE TABLE**

**A15** All licences, permits and approval/consents have obtained as required by law and are maintained as required throughout the life of the Development. EPL 4548  
Trade Waste agreement 12318 .  
SSD 7267.

**A16** No demolition has been undertaken during the reporting period.

**A17** No new building or structures have been erected during the reporting period.

**A18** Not triggered during the reporting period.

**A19** No utility works undertaken during the reporting period. **A20** Plans submitted prior to Stage 1 construction.

**A21** Plans submitted prior to Stage 1 construction.

**STAGED SUBMISSION OF PLANS OR PROGRAMS**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>Prior to the commencement of construction, the Applicant must:</p> <p>a). Consult with the relevant owner and /or provider of services that are likely to be affected by the Development to make suitable arrangements to access to diversion, protection, and/or support of the affected infrastructure.</p> <p>Check with Sydney water about the increase in tonnage ie impacting the trade waste agreement</p> <p>(b) Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the of the site (including roads, gutters and footpaths ); and</p> <p>( c ) submit a copy of the report to the Secretary and Council</p>	Compliant
<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) Repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and</p> <p>(b) Relocate or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development</p>	NA
<p>The Applicant must ensure that all plant and equipment used for the Development is:</p> <p>(a) Maintained in a proper and efficient condition, and</p> <p>(b) Operated in a proper and efficient manner.</p>	Compliant
<p>The Applicant must ensure that employees, contractors, and sub contractors are aware of, and comply with the conditions of this consent relevant to their respective activities.</p>	Compliant
<p>Prior to the issue of a Construction Certificate for any part of the Development, the Applicant must pay \$32,795.06 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011</p>	NA

**APPENDIX A  
COMPLIANCE TABLE**

**A22** Condition satisfied prior to commencement of construction. Consultation undertaken with utility providers where required.

A dilapidation report was carried out by ACSES ENGINEERS

1 December 2017

**A23** No public infrastructure was damaged during the development

**A24** All Plant and equipment used in the development are maintained and operated in a proper manner.as per site SOP (Site operational Procedure)

**A25** Managers, Supervisor are Trained in the Development Conditions requirements.

**A26** Condition precedes current owner.

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Wetherill Park Resource Recovery Facility

## STAGED SUBMISSION OF PLANS OR PROGRAMS

### Condition No. Condition/Requirement Compliance Status Comment

Prior to the commencement of Stage 1 operations, the Applicant must ensure a Final Occupation Certificate, or a Compliance Certificate has been issued for the following: (a) Additional pavement and hardstand areas. b) Stormwater system. (c) Fire safety system upgrade; and (d) Temporary perimeter access road	Compliant
Prior to the commencement of Stage 2 operations, the applicant must ensure a Final Occupation Certificate, or a Compliance Certificate has been issued for the following: (a) Permanent access ring road. (b) The construction of an additional exit from the main transfer building to improve internal traffic flow; and (c) Roller shutter within the existing waste transfer building	NA
In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation,	Compliant

## APPENDIX A COMPLIANCE TABLE

**A27** Final Occupation Certificate was issued for the mentioned items on Condition A27 prior to the commencement of

Stage 1 operations

**A27A** Site is operating under Stage 1.

**A28** Notice to Surrender sent to Fairfield City Council 16 June 2020

ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022  
**Wetherill Park Resource Recovery Facility**

**STAGED SUBMISSION OF PLANS OR PROGRAMS**

**Condition No. Condition/Requirement Compliance Status Comment**

	<p>Surrender the development consents described in Table 1 Table1 prior to the commencement of stages 1 operations</p>																									
<p><b>Table 1: Consents to be Surrendered</b></p> <table border="1"> <thead> <tr> <th>Determination Date</th> <th>DA Number</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>22 November 1990</td> <td>483A/90</td> <td>Construction and operation of a non-petroleum waste transfer station.</td> </tr> <tr> <td>23 March 2004</td> <td>2102/0303</td> <td>Establishment of a timber stockpile for recycling of timber and timber by-products and the construction of a partially enclosed awning.</td> </tr> <tr> <td>28 October 2005</td> <td>8160/2005</td> <td>Extension of awning for the purposes of the recycling of cardboard and paper products as part of the operation of the non-petroleum waste transfer station.</td> </tr> <tr> <td>10 November 2005</td> <td>3160/2005</td> <td>Extension of existing awning for the purposes of recycling cardboard and paper products as part of the operation of the non-petroleum waste transfer station.</td> </tr> <tr> <td>27 September 2007</td> <td>1553/06</td> <td>Use of existing recycling facility and waste transfer facility for acceptance, temporary storage and transfer of sorted asbestos material.</td> </tr> <tr> <td>23 December 2009</td> <td>426.1/0909</td> <td>Acceptance of petroleum waste and other wastes at an existing waste recycling and transfer facility.</td> </tr> <tr> <td>2 December 2010</td> <td>1826.1/0816</td> <td>Reframing of compost material.</td> </tr> </tbody> </table>			Determination Date	DA Number	Details	22 November 1990	483A/90	Construction and operation of a non-petroleum waste transfer station.	23 March 2004	2102/0303	Establishment of a timber stockpile for recycling of timber and timber by-products and the construction of a partially enclosed awning.	28 October 2005	8160/2005	Extension of awning for the purposes of the recycling of cardboard and paper products as part of the operation of the non-petroleum waste transfer station.	10 November 2005	3160/2005	Extension of existing awning for the purposes of recycling cardboard and paper products as part of the operation of the non-petroleum waste transfer station.	27 September 2007	1553/06	Use of existing recycling facility and waste transfer facility for acceptance, temporary storage and transfer of sorted asbestos material.	23 December 2009	426.1/0909	Acceptance of petroleum waste and other wastes at an existing waste recycling and transfer facility.	2 December 2010	1826.1/0816	Reframing of compost material.
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**Waste Management**

**Condition No. Condition/Requirement Compliance Status Comment Receipt, Storage and Handling of Waste**

**APPENDIX A  
 COMPLIANCE TABLE**

**B1** The Applicant shall only receive waste on site that is authorised for receipt by an EPL.  
Compliant Wastes received were recorded and in accordance with EPL.

The Applicant shall ensure any waste generated on site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept it.	NA
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**B2** This AEMR assesses the operational phase of the development.

## Waste Management

### Condition No. Condition/Requirement Compliance Status Comment

<p>The Applicant shall</p> <ul style="list-style-type: none"> <li>a) Implement auditable procedures to: <ul style="list-style-type: none"> <li>i. Ensure the site does not accept wastes that are prohibited;</li> <li>ii. Screen incoming waste loads; and</li> </ul> </li> <li>b) Ensure that: <ul style="list-style-type: none"> <li>i. All waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site;</li> <li>ii. All waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation;</li> <li>iii. Details of the quantity, type of source waste received on the site must be provided to the EPA and the Secretary when requested;</li> <li>iv. Staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste; and</li> <li>v. The asbestos storage area is maintained to not impact vehicle manoeuvrability on the temporary perimeter access road and permanent access ring road.</li> </ul> </li> </ul>	<p>Compliant</p>
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**APPENDIX A  
COMPLIANCE TABLE**

**B3** Training is provided by Veolia to the weighbridge operators, recycling and on-site supervisors to enable them to recognise and manage unacceptable wastes (SOP017 – Hazardous chemicals including dangerous goods).

**Wastewater**

**B4** The Applicant shall ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water.  
Non-compliant Trade Waste Agreement 7976 – 3 discharge events during annual period. 1 reported exceedance of criteria on 2/02/2022.

<p>The Applicant must ensure the first flush detention tank is banded in accordance with:</p> <ul style="list-style-type: none"> <li>a) All relevant Australasian Standards;</li> <li>b) For liquids, a minimum bund volume requirement of 110% of the largest single stored volume within the bund; and</li> </ul>	<p>Non-compliant</p>
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**B5** First flush detention tank is not installed at the Site. Wastewater is captured prior to discharge to sewer, stormwater is discharge via key stone valve.

A Fist flash system is proposed to be installed during 2023

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**Waste Management**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>c) The Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA, 1997). In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	
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**Air Quality**

**Condition No. Condition/Requirement Compliance Status Comment Meteorological Station**

**APPENDIX A  
COMPLIANCE TABLE**

**B6** Prior to the commencement of any works on-site, the Applicant must install a suitable meteorological station on the site that complies with the requirements in the EPA's Approved Methods for Sampling of Air Pollutants in New South Wales.

**Odour Management**

**B7** The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).

Non-compliant A suitable meteorological station was installed on the site, however, was non-functioning at the time of reporting.

(A Meteorological Station was installed on site after the reporting period and is functioning.)

Compliant One odour complaint received from the EPA in the reporting period, however there was no further substantiation of offensive odour being emitted. According to Veolia all appropriate odour controls were in place throughout the reporting period.

<p>Prior to the commencement of Stage 1 operations and to the satisfaction of the EPA, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) Install deodorising sprays over the vehicle entrance and exits; and</li> <li>b) Apply a sealant to the concrete working floor in the receival hall to prevent the absorption of leachate into the tipping floor.</li> </ul>	Compliant
<p>During operations, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) Conduct a weekly wash-down of any tipping area contaminated with general solid waste (putrescible); b) Conduct annual wash down of interior walls and surfaces; c) Ensure that all trucks and trailers parked at the site are cleaned fortnightly; and</li> </ul>	Compliant

**B8** Confirmed during previous AEMR.

**B9** a) NA no general solid waste (putrescible). b) – d) compliant and recorded during inspections.

### Air Quality

#### Condition No. Condition/Requirement Compliance Status Comment

d) Ensure that deodorising sprays are operational at all times.	
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### Dust Management

#### APPENDIX A COMPLIANCE TABLE

**B10** The Applicant must implement all measures to minimise dust generated during construction and operation of the Development.

Compliant A weekly inspection is conducted which satisfies this condition.

A deodoriser/ dust spray has been installed to prevent dust emissions from leaving the site.

All staff are trained to former SUEZ Standard Operating Procedure (SOP047).

<p>During construction, the Applicant must ensure that: a) Exposed surfaces and stockpiles are suppressed by regular watering; b) All trucks entering or leaving the site with loads have their loads covered; c) Trucks associated with the Development do not track dirt onto the public road network; and</p>	NA
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d) Public roads used by these trucks are kept clean.	
Prior to the commencement of Stage 2 operations, the Applicant must: a) Install dust suppression sprays over the vehicle entry and exit; and b) Install interior liner panels to facilitate wash down.	NA
During operations, the Applicant must: a) Conduct a weekly clean of surge pit and tipping area where interior walls have been contaminated with putrescible waste; b) Conduct a six-monthly brush down of interior walls and; and c) Ensure that dust suppression sprays are operational where waste is being tipped and processed.	Compliant

**B11** This AEMR assesses the operational phase of the development.

**B12** Stage 2 operations not commenced

**B13** a) NA - no general solid waste (putrescible). b) Veolia confirmed completed.  
c) Compliant and recorded during inspections.

### Odour Management Plan

**B14** Prior to the commence of Stage 1 operations and Stage 2 operations, the applicant must prepare an Odour Management Plan (OMP) to the satisfaction of the EPA and Secretary. The Compliant Odour Management Plan developed and is in use for the Site. Addressed during previous AEMR

### Air Quality

#### Condition No. Condition/Requirement Compliance Status Comment

<p>OMP must form part of the OEMP required by condition C4 and be prepared in accordance with condition C6. The OMP must: a) Be prepared by a suitably qualified and experience person (s) in consultation with the EPA;</p> <p>b) Describe the measures that would be implemented on site to ensure:</p> <ul style="list-style-type: none"> <li>i. Odour emissions are minimised, including details of the air pollution control devices and all other operational odour mitigation measures;</li> <li>ii. Compliance with the relevant conditions of this consent;</li> <li>iii. Compliance if adverse odour emissions occur or appear likely to occur;</li> </ul> <p>c) Include an ongoing monitoring program;</p> <p>d) Include well defined triggers for the deployment of odour mitigation and contingency measures; and</p> <p>e) Include a protocol which includes contingency measures for system failures.</p>	
<p>The Applicant shall ensure that the OMP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.</p>	<p>Compliant</p>

**APPENDIX A  
COMPLIANCE TABLE**

**B15** The OMP has been developed and is in use for the Site. Noted that only 27 weekly odour inspections were reported.

**Odour Audit**

**B16** The Applicant must carry out an Odour Audit of the Development no later than six months after the commencement of Stage 2 operations. Division 2B of Part 6 of the EP&A Act applies to this audit which is for the purpose of validating the odour data used in the EIS. The audit must:

- a) Be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Secretary;
  - b) Audit the Development in full operation;
  - c) Include a summary of odour complaints and any actions that were carried out to address the complaints;
  - d) Validate the Development against odour impact predictions in the EIS and RTS;
- NA Odour Audit conducted by ERM on 20 & 21 February 2020 (Report 15 May 2020). Addressed during previous AEMR

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**Air Quality**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>e) Review the design and management practices in the Development against industry best practice for odour management;</p> <p>f) Identify suitable odour mitigation options and controls, including but necessarily limited to:</p> <ul style="list-style-type: none"> <li>i. Mechanical ventilation;</li> <li>ii. Operation of the building under negative pressure to minimise fugitive emissions; and</li> <li>iii. Odour capture and control options.</li> </ul> <p>g) Include an action plan</p> <p>h) that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.</p> <p>Note: The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</p>	
<p>Within two months of commissioning the Odour Audit required by Condition B16, or as otherwise agreed by the Secretary, the applicant must submit a copy of the Odour Audit report to the satisfaction of the EPA and Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.</p>	<p>NA</p>
<p>The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of the Odour Audit report required by Condition B17.</p>	<p>NA</p>

**APPENDIX A  
COMPLIANCE TABLE**

**B17** Submitted 20 May 2020, and all recommendations from the Odour Audit report have been implemented. Addressed during previous AEMR.

**B18** No requirements received following submission of the Odour Audit report. Addressed during previous AEMR

**Soils, Water Quality and Hydrology**

**Condition No. Condition/Requirement Compliance Status Comment**

**Discharge Limits**

**B19** The Development must comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.

**Flood Management**

Compliant No water pollution events were recorded in the reporting period

**Soils, Water Quality and Hydrology**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan (FERP) for the Development in consultation with council and to the satisfaction of the Secretary. The plan must form part of the CEMP and OEMP required by Conditions C1 and C4 and must:</p> <ul style="list-style-type: none"> <li>a) Be prepared by a suitably qualified and experienced person (s);</li> <li>b) Address the provisions of the Floodplain Risk Management Guidelines (OEH 2007);</li> <li>c) Include details of: <ul style="list-style-type: none"> <li>i. The flood emergency responses for both construction and operation phases of the Development;</li> <li>ii. Predicted flood levels;</li> <li>iii. Flood warning time and flood notification;</li> <li>iv. Assembly points and evacuation routes;</li> <li>v. Evacuation and refuge protocols; and</li> <li>vi. Awareness training for employees and contractors.</li> </ul> </li> </ul>	<p>Compliant</p>
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The Applicant shall ensure the FERP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.	Compliant
During construction and operation of the Development, the Applicant must not use driveways modelled as high hazard in the FIA as an evacuation route during times of flooding.	Compliant

**APPENDIX A  
COMPLIANCE TABLE**

**B20** Flood Emergency Response Plan (FERP) is in place dated November 2008.

**B21** Flood Emergency Response Plan (FERP) is in place dated November 2008.

**B22** Veolia reports complied with this condition. **Stormwater Management System**

**B23** The Applicant must design, install and operate a stormwater management system for the Development. The system must:

a) Be designed by a suitably qualified and experienced person(s);

b) Be generally in accordance with the conceptual design in the EIS and applicable Australian Standards;

c) Ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff

a) Compliant b) Non

Compliant c) Compliant d) Compliant e) Compliant f) Compliant g) Compliant

Stormwater system has been designed and installed by suitably qualified and experienced persons as part of the Site design and construction and clean and dirty areas are separated. However EIS states "As there is a risk of oil and waste material spillage on the new pavements, provision for first flush will be required". A First flush detention tank is not installed at the Site. Wastewater is captured prior to discharge to sewer, stormwater is discharge via key stone valve.

**Soils, Water Quality and Hydrology**

**Condition No. Condition/Requirement Compliance Status Comment**

<p>(Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997);</p> <p>d) Divert existing clean surface water around operational areas of the site;</p> <p>e) Prevent firewater and contaminated water from entering the stormwater management system;</p> <p>f) Direct all sediment laden water in overland flow away from the leachate management system; and</p> <p>g) Prevent cross-contamination of clean and sediment or leachate laden water.</p>	
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## Chemical Spills and Fire Water Containment

### APPENDIX A COMPLIANCE TABLE

**B24** To ensure that chemical spills and firewater are contained on-site, prior to the commencement of Stage 1 operations and to the satisfaction of FRNSW, the Applicant must ensure:

- a) The stormwater isolation valve is automatically initiated upon either sprinkler activation and/or alternatively via activation of any Manual Call Point installed within the site;
- b) The stormwater isolation valve functionality should include a fail-safe function on power failure which automatically closes the valve. The stormwater isolation valve must remain in the closed position until a manual over-ride function is initiated upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste; and
- c) The location of the stormwater isolation valve and any associated controls must be clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan.

#### Sprinkler and Fire Hydrant System

**B25** Prior to the commencement of expanded operations and to the satisfaction of FRNSW, the Applicant must ensure:

- a) The sprinkler system has extended coverage across the surge pit and load-out chutes; and
- Compliant All required spill prevention and fire prevention systems are in place at the Site.

Compliant The Fire hydrant and sprinkler system have been installed in accordance with the FRNSW requirements with the system upgraded in 2019.

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Soils, Water Quality and Hydrology

Condition No. Condition/Requirement Compliance Status Comment

APPENDIX A  
COMPLIANCE TABLE

The sprinkler system has extended coverage across the surge pit and load-out chutes; and the fire hydrant system is designed, installed and commissioned in accordance with AS 2419.1-2005.

Imported Soil

<p>b) The fire hydrant system is designed, installed and commissioned in accordance with AS 2419.1-2005.</p>	
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**B26** The Applicant must:

- a) Ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;
- b) Keep accurate records of the volume and type of fill to be used; and
- c) Make these records available to the Department upon request.

**Erosion and Sediment Control**

**B27** Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guidelines and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.

**Traffic and Access**

NA No fill material was imported to the site during the reporting period.

NA Construction completed prior to the commencement of the AEMR reporting period.

#### Condition No. Condition/Requirement Compliance Status Comment Parking

**B28** Prior to the commencement of Stage 1 operations, the Applicant must provide 21 on-site parking spaces for visitors and staff

(including one accessible parking space) and 8 on-site parking spaces for heavy vehicles to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities. Parking areas must be constructed in accordance with the latest version of AS 2890.

Compliant The required parking facilities are in place at the Site.

#### Traffic and Access

#### Condition No. Condition/Requirement Compliance Status Comment Operating Conditions

##### APPENDIX A COMPLIANCE TABLE

**B29** The Applicant must ensure:

- a) Internal roads, driveways, and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest version of AS 290.1 and AS 2890.2;
- b) The swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;
- c) The Development does not result in any vehicles queuing on the public road network;
- d) Heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site;
- e) All vehicles are wholly contained on site before being required to be stopped;
- f) All loading and unloading of materials is carried within the waste transfer station building;
- g) All trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network;

h) The weighbridge stop line is moved 7 m to the west to prevent queuing on David Road;

i) The proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and

j) The temporary perimeter access road is sealed.

### Operational Traffic Management Plan

**B30** Prior to the commencement of Stage 1 operations and Stage 2 operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Secretary. The plan must form part of the OEMP required by Condition C4 and prepared in accordance with Condition C6 and must: Compliant All conditions with B29 have been met. Regarding Condition B29(g), the OEMP. Section 4.2 Acceptance of Waste includes the following to ensure trucks are managed appropriately: "Trucks must stop at the tarping gantry prior to proceeding to the weighbridge to inspect and remove any debris caught externally to the vehicle following loading."

Compliant OTMP is in place at the Site dated November 2019. Refer Appendix E.

## Traffic and Access

### Condition No. Condition/Requirement Compliance Status Comment

<p>a) Be prepared by a suitably qualified and experienced person(s);</p> <p>b) Be prepared in consultation with Council;</p> <p>c) Details the measures that are to be implemented to ensure road safety and network efficiency including restricting queuing or parking of vehicles on Davis Road;</p> <p>d) Detail heavy vehicle routes, access and parking arrangements;</p> <p>e) Include a Driver Code of Conduct to:</p> <ul style="list-style-type: none"><li>i. Minimise the impacts on the local and regional road network;</li><li>ii. Minimise conflicts with other road users;</li><li>iii. Minimise road traffic noise;</li><li>iv. Ensure truck drivers use specified routes; and</li><li>v. Include a program to monitor the effectiveness of these measures.</li></ul>	
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The Applicant shall ensure the OTMP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.	Compliant
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**APPENDIX A  
COMPLIANCE TABLE**

**B31** OTMP is in place at the Site dated November 2019. Refer Appendix E.

**Noise**

**Condition No. Condition/Requirement Compliance Status Comment**

**Hours of Work**

**B32** The Applicant must comply with the hours detailed in **Table 2. Table 2: Hours of Work**

Activity	Day	Time
Earthworks and Construction	Monday – Friday Saturday	7am to 6pm 8am to 1pm
Operation	Monday - Sunday	24 hours

Compliant Unrestricted hours for operational phase.

Works outside of the hours identified in Condition B32 may be undertaken in the following circumstances: a) Works that are inaudible at the nearest sensitive receivers;	Compliant
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**B33** Unrestricted hours for operational phase.

**Noise**

**Condition No. Condition/Requirement Compliance Status Comment**

<ul style="list-style-type: none"> <li>b) Works agreed to in writing by the Secretary;</li> <li>c) For the delivery of materials required outside these hours by the NSW Police Force or other authorities for safe reasons;</li> <li>d) Where it is required in an emergency to avoid the loss of lives, property and/or prevent environmental harm.</li> </ul>	
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**Operational Noise Limits**

**APPENDIX A  
COMPLIANCE TABLE**

**B35** The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in **Table 3**.

Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.

**Table 3: Noise Limits dB(A)**

Location	Day LAeq (15min)	Evening LAeq (15min)	Night LAeq (15min)	Night LA1 (1min)
All residential receivers	35	35	35	45

**Noise Mitigation**

Not - verified Environmental and Occupational Noise Assessments were not completed during reporting period.

**B36** The Applicant must:

- a) Implement best practice, including all noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;
- b) Minimise the noise impacts of the development during adverse meteorological conditions;
- c) Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant and equipment is not being used operationally until fully repaired; and
- d) Regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.

- a) Compliant
- b) Compliant
- c) Compliant
- d) Non-compliant

Site is operated in accordance with OEMP (Appendix E). Environmental and Occupational Noise Assessments were not completed during reporting period.

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Wetherill Park Resource Recovery Facility

Noise

Condition No. Condition/Requirement Compliance Status Comment Construction and Operational Noise Management

APPENDIX A COMPLIANCE TABLE

**B37** The Applicant must ensure that all its vehicles are fitted with a broadband reversing alarm.

Hazards and Risk

Compliant Broadband reversing alarms are installed in all vehicles.

Condition No. Condition/Requirement Compliance Status Comment

**B39** The Applicant must store all chemicals, fuels and oils used on-site in accordance with:

- a) The requirements of all relevant Australian Standards;
- b) The NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids.

Dangerous Goods

**B40** The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Application Guidelines - Applying SEPP 33 at all times.

Compliant All chemicals/ fuels and oils are stored in accordance with conditions B39 a) & b).

Compliant Quantities of dangerous goods stored onsite are below the threshold therefore not required to be identified in the PIRMP.

Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: a) All relevant Australian Standards; b) For all liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) The Environmental Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA, 1997).	Compliant
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**B41** Dangerous goods are stored and handled in accordance with condition 41 a), b) and c). SOP017 has been updated and implemented to ensure all dangerous goods onsite were stored and handled in accordance with the Environmental Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA, 1997).

**Litter and Pest Control**

**Condition No. Condition/Requirement Compliance Status Comment**

**Pests, Vermin and Noxious Weed Management**

**B42** The Applicant must: Compliant Veolia confirms all trucks are covered prior to leaving site with tarps which drivers inspect. Housekeeping schedule

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**ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022**

**Wetherill Park Resource Recovery Facility**

**Litter and Pest Control**

**Condition No. Condition/Requirement Compliance Status Comment**

**APPENDIX A  
COMPLIANCE TABLE**

<p>a) Ensure all waste loads are covered unless within the waste transfer station building; and b) Maintain the site in a clean and tidy state at all times.</p>	
<p>The Applicant must: a) Implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and b) Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.</p>	<p>Compliant</p>

and records of cleaning schedule captured in FORM026 inspections. Litter nets engaged to contain windblown litter.

**B43** Pest control is completed quarterly. Vegetation management is completed fortnightly. FORM026 site inspection is utilised by supervisor.

**Visual Amenity**

**Condition No. Condition/Requirement Compliance Status Comment**

**Lighting**

**B55** The Applicant must ensure the lighting associated with the Development:

- a) Complies with the latest version of AS 4282 (INT) - Control of Obstructive Effects on Outdoor Lighting; and
- b) Is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

Compliant Lighting was installed as per requirements. Veolia has received no complaints in relation to nuisance lighting.

**Condition No. Condition/Requirement Compliance Status**

**Operational Management Plan  
Comment**

**C1** The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary. The CEMP must:  
Compliant A CEMP was prepared and submitted to the secretary,

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

**Condition No. Condition/Requirement Compliance Status**

<p>(a) be prepared to the satisfaction of the Secretary prior to the commencement of construction.</p> <p>(b) identify the statutory approvals that apply to the Development;</p> <p>(c) outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>) (d) explain the controls that would be implemented to minimise dust emissions during construction of the Development;</p> <p>) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages.</p> <p>(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;</p> <p>) (g) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and include the management plans required under Condition C2 of this consent.</p>	
<p>As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following:</p> <p>a) FERP (see Condition B20); and</p> <p>(b) Erosion and Sediment Control Plan (see Condition B27).</p>	<p>Compliant</p>

As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following:	Compliant
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**APPENDIX A  
COMPLIANCE TABLE**

**Comment**

**C2** The FERP and Erosion and Sediment Control Plan; are a sub plan in the CEMP.

**C3** The FERP and Erosion and Sediment Control Plan; are a sub plan in the CEMP.

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**ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022  
Wetherill Park Resource Recovery Facility**

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

**Condition No. Condition/Requirement Compliance Status**

a) FERP (see Condition B20); and (b) Erosion and Sediment Control Plan (see Condition B27).	
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<p>The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Secretary. The OEMP must:</p> <ul style="list-style-type: none"> <li>a) Be prepared to the satisfaction of the Secretary prior to the commencement of the expanded operation;</li> <li>b) Be prepared by a suitably qualified and experienced expert;</li> <li>c) Provide the strategic framework for environmental management of the Development;</li> <li>d) Identify the statutory approvals that apply to the Development;</li> <li>e) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</li> <li>f) Describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>i. Keep the local community and relevant agencies informed about the operation and environmental performance of the Development</li> <li>ii. Receive, handle, respond to, and record complaints</li> <li>iii. Resolve and disputes that may arise</li> <li>iv. Respond to any non-compliance</li> <li>v. Respond to emergencies</li> </ul> </li> <li>g) Include the following environmental management plans: <ul style="list-style-type: none"> <li>i. Odour Management Plan</li> <li>ii. Flood Emergency Response Plan</li> <li>iii. Operational Traffic Management Plan.</li> </ul> </li> </ul>	Compliant
<p>The Applicant must operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	Compliant

**APPENDIX A  
COMPLIANCE TABLE**

**Comment**

**C4** OEMP dated November 2019 is in place at the Site. Refer to Appendix D.

**C5** Development was operated in accordance with Secretary approved OEMP.

**Management Plan Requirements**

**C6** The Applicant must ensure that the environmental management plans required under Condition C1 and Condition C4 of this consent Compliant All required plans have been developed and are in place at the Site and have been submitted to the Department.

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**Wetherill Park Resource Recovery Facility**

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

**Condition No. Condition/Requirement Compliance Status**

<p>are prepared by a suitably qualified person or persons in accordance with best practice and include:</p> <ul style="list-style-type: none"> <li>a) Detailed baseline data</li> <li>b) A description of: <ul style="list-style-type: none"> <li>i. The relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>ii. Any relevant performance criteria; and</li> <li>iii. The specific performance indicators the are proposed to be used to judge the performance of, or guide the implementation of, the Department or any management measures;</li> </ul> </li> <li>c) A description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria</li> <li>d) A program to monitor and report on the: <ul style="list-style-type: none"> <li>i. Impacts and environmental performance of the development; and</li> <li>ii. Effectiveness of any management measures (see (c) above)</li> </ul> </li> <li>e) A contingency plan to manage any unpredicted impacts and their consequences;</li> <li>f) A program to investigate and implement ways to improve the environmental performance of the Development over time;</li> <li>g) A protocol for managing and reporting any <ul style="list-style-type: none"> <li>i. Incidents</li> <li>ii. Complaints</li> <li>iii. Non-compliances with statutory requirements; and</li> <li>iv. Exceedances of the impact assessment criteria and/or performance criteria</li> </ul> </li> <li>h) A protocol for periodic review of the plan.</li> </ul>	
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**Revision of Strategies, Plans and Programs**

**APPENDIX A**  
**COMPLIANCE TABLE**

**Comment**

ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022

Wetherill Park Resource Recovery Facility

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

**Condition No. Condition/Requirement Compliance Status**

Within three months of a) Approval of modification; b) Approval of an annual review under condign C8; c) Submission of an incident report under Condition C9; or d) Completion of an audit under Condition C12, e) The Applicant must review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.	Compliant
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**APPENDIX A  
COMPLIANCE TABLE**

**Comment**

**C7** All Plans, strategies and programs were reviewed during previous AEMR period. It is noted that MOD 2 has not commenced at the site.

**Annual Review**

**C8** Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Secretary. This review must:

- a) Describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;
- b) Include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the:
  - i. The relevant statutory requirements, limits or performance measures/criteria;
  - ii. The requirements of any plan or program required under this consent;
  - iii. The monitoring results of the previous years; and
  - iv. 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

Compliant Condition satisfied by the completion of this AEMR.

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

**Condition No. Condition/Requirement Compliance Status**

f) Describe what measures will be implemented over the next year to improve the environmental performance of the Development.	
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## Reporting

### Condition No. Condition/Requirement Compliance Status

#### Incident Reporting

##### APPENDIX A COMPLIANCE TABLE

#### Comment

#### Comment

**C9** Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report shall be supplied to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventative measures. The report must be submitted to the Secretary no later than 14 days after the incident or potential incident.

Compliant All incidents or potential incidents are reported to the Department in accordance with C9.

The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the Independent Hazard Auditor and the Department.	Compliant
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**C10** Veolia maintains a register of all incidents, accidents and complaints which are available for inspection.

#### Regular Reporting

**C11** The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.

#### Auditing

Non-compliant No environmental reporting was provided on the Veolia website during the reporting period. Noted the transitioning of data to Veolia website was reported to be in progress.

### Condition No. Condition/Requirement Compliance Status

#### Independent Environmental Audit

##### Comment

**C12** Within one year of the commencement of operation, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6B  
Compliant IEA conducted during the period of December 2019 – October 2020.

The next IEA at the Site is due October 2023

#### Auditing

### Condition No. Condition/Requirement Compliance Status

<p>of the EP&amp;A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:</p> <ul style="list-style-type: none"> <li>a) Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</li> <li>b) Include consultation with relevant agencies;</li> <li>c) Assess the environmental performance of the Development and assess whether its complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan and program required under these approvals);</li> <li>d) Review the adequacy of the any approved strategy, plan or program required under the above mentioned consents; and e) Recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.</li> </ul>	
<p>Within three months of commission this audit, or otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timeline for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Secretary.</p>	Compliant

**APPENDIX A  
COMPLIANCE TABLE**

**Comment**

**C13** The IEA was updated following initial submission to the Secretary and was resubmitted once updates were made.  
All recommendations were addressed.

**Access to Information**

**Condition No. Condition/Requirement Compliance Status**

<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>a) Make copies of the following publicly available on its website: <ul style="list-style-type: none"> <li>i. The documents referred to in condition A2;</li> <li>ii. All current statutory approvals for the Development; iii. All approved strategies, plans and programs required under this consent;</li> </ul> </li> </ul>	Non-compliant
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## Comment

**C14** The listed documents were not provided on the Veolia website during the reporting period. Noted the transitioning of data to Veolia website was reported to be in progress.

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- iv. A comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- v. A complaint register updated on a monthly basis;
- vi. The annual reviews of the Department;
- vii. Any independent environment audit of the Development and the Applicant's response to the recommendations in any audit;
- viii. Any other matter required by the Secretary; and
- ix. Keep this information up to date, to the satisfaction of the Secretary.

**APPENDIX A  
COMPLIANCE TABLE**

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Wetherill Park Resource Recovery Facility

## **APPENDIX B FIGURES**

### **SITE**

Drawing No:  
0619460b\_AEMR\_G001\_R0.mxd  
**2021/2022 AEMR - Wetherill Park RRF**

**Legend**

Date: Drawing Size: 23/11/2021

A4

**20 Davis Rd, Wetherill Park NSW**

**Data Source:**

Drawn By:

GC/FS TC Reviewed By:

Client: Veolia Recycling and Recovery Pty Ltd

Site Boundary Lot\_Fairfield

NSW DCDB/DTDB 2020 Nearmap Imagery October 2020 Inset: Esri OpenStreetMap 2020

Coordinate System: GDA 1994 MGA Zone 56

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This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.

**Waste  
Receival  
Hall**

**Baling  
Facility**

Site  
Offices

Drawing No:  
0619460b\_AEMR\_G002\_R0.mxd  
**2021/2022 AEMR - Wetherill Park RRF**

**Legend**

Date: Drawing Size: 23/11/2021

A4

**20 Davis Rd, Wetherill Park NSW**

**Data Source:**

Drawn By:

GC/FS TC Reviewed By:

Client: Veolia Recycling and Recovery Pty Ltd

Site Boundary Lot\_Fairfield

NSW DCDB/DTDB 2020 Nearmap Imagery October 2020

Coordinate System: GDA 1994 MGA Zone 56

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This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.

**ANNUAL ENVIRONMENTAL MANAGEMENT REVIEW 2021 – 2022**

Wetherill Park Resource Recovery Facility

## **APPENDIX C DEVELOPMENT APPROVAL**

# Modification of Development Consent

Section 4.33(1A) of the Environmental Planning and Assessment Act 1979

As delegate for the Minister for Planning, under delegation executed on 11 October 2017, I approve the modification of the development consent referred to in Schedule 1, subject to the conditions outlined in Schedule 2.



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addition  
transfer

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Supporting documentation titled 'Increase - Modification to Condition Pty Ltd and dated 5 December 2017

Ca  
Rec

**Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979***

As delegate for the Minister for Planning, under delegation executed on 11 October 2017, I approve the modification of the development consent referred to in Schedule 1, subject to the conditions outlined in Schedule 2.

Chris Ritchie  
Director  
Industry Assessments

2019

File: EF18/45114

**SCHEDULE 1**

<b>Application No:</b>	SSD 7267
<b>Applicant:</b>	SUEZ RECYCLING & RECOVERY PTY LTD
<b>Consent Authority:</b>	Minister for Planning
<b>Development:</b>	Alterations and s to and an increase in the processing capacity of an existing waste station to 230,000 tonnes per annum (tpa) pf waste including 140,000 tpa of general solid waste (putrescible) and 90,000 tpa of general solid waste (non-putrescible)
<b>Date of Original Consent:</b>	11 September 2017
<b>Modification:</b>	SSD 7267 MOD 2 – staged construction and increase in the processing capacity of general solid waste (putrescible) and amendment to site layout.

**SCHEDULE 2**

This consent is modified as follows:

**IN DEFINITIONS:**

- Delete the definition for expanded operations and Secretary and insert the following definitions in alphabetical order:

**Modification Assessments** The document assessing the environmental impact of a proposed modification of this consent submitted and other information submitted with the following modification applications made under the EP&A Act:

**Planning Secretary** Secretary of the Department of Planning and Environment, or nominee

SSD 7267 MOD 1 *Wetherill Park Transfer Station B6* prepared by SUEZ Recycling &

area  
purpose

Stage  
development

planning  
direction

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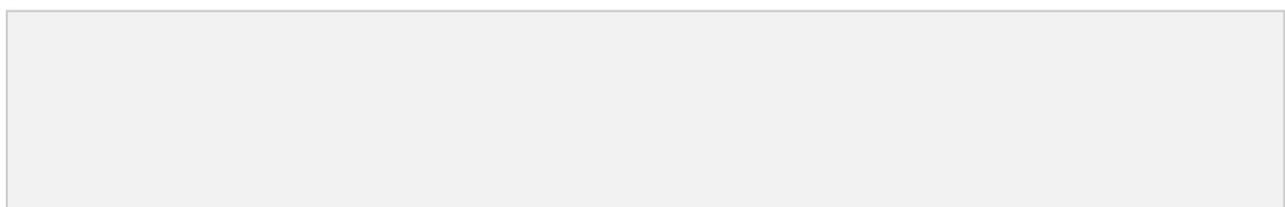
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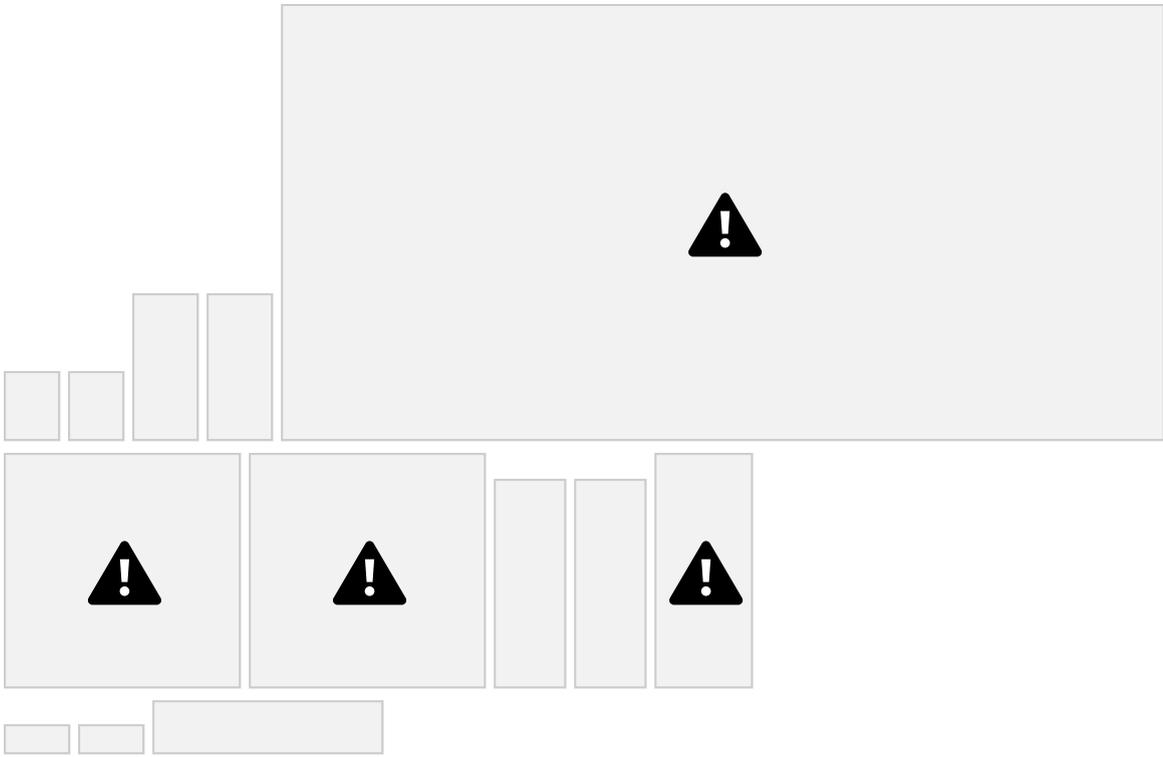






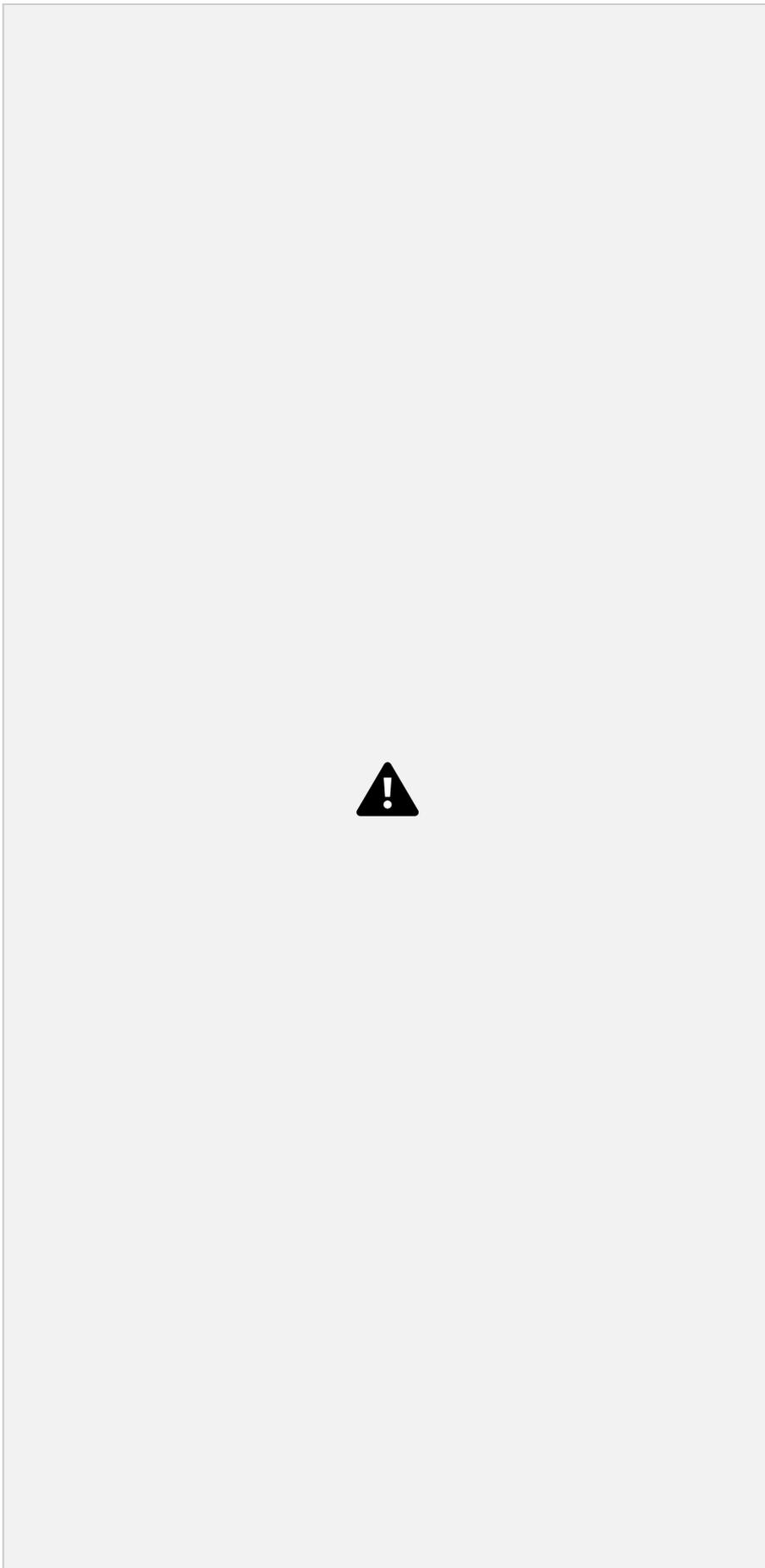








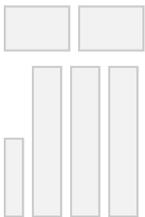


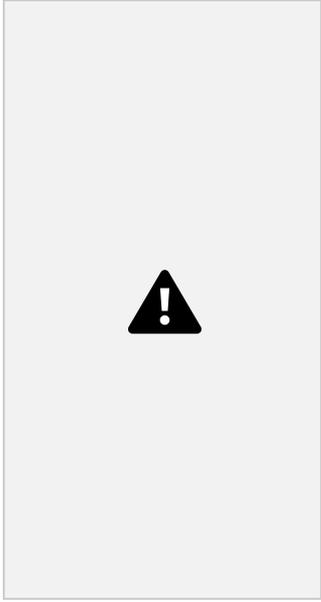


















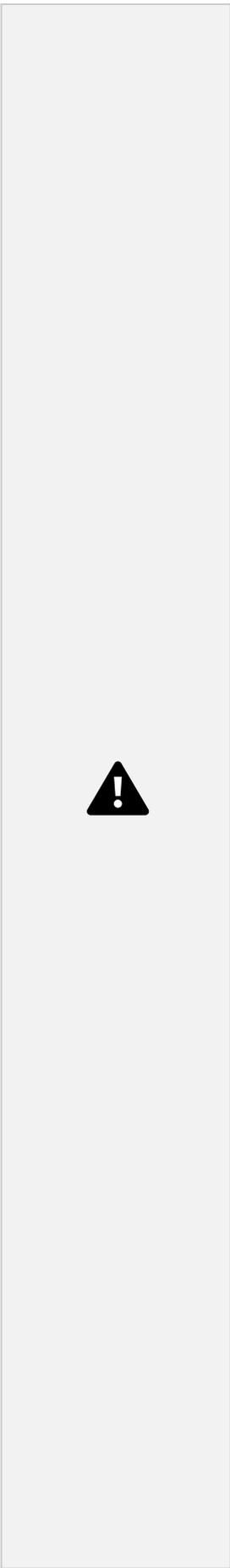
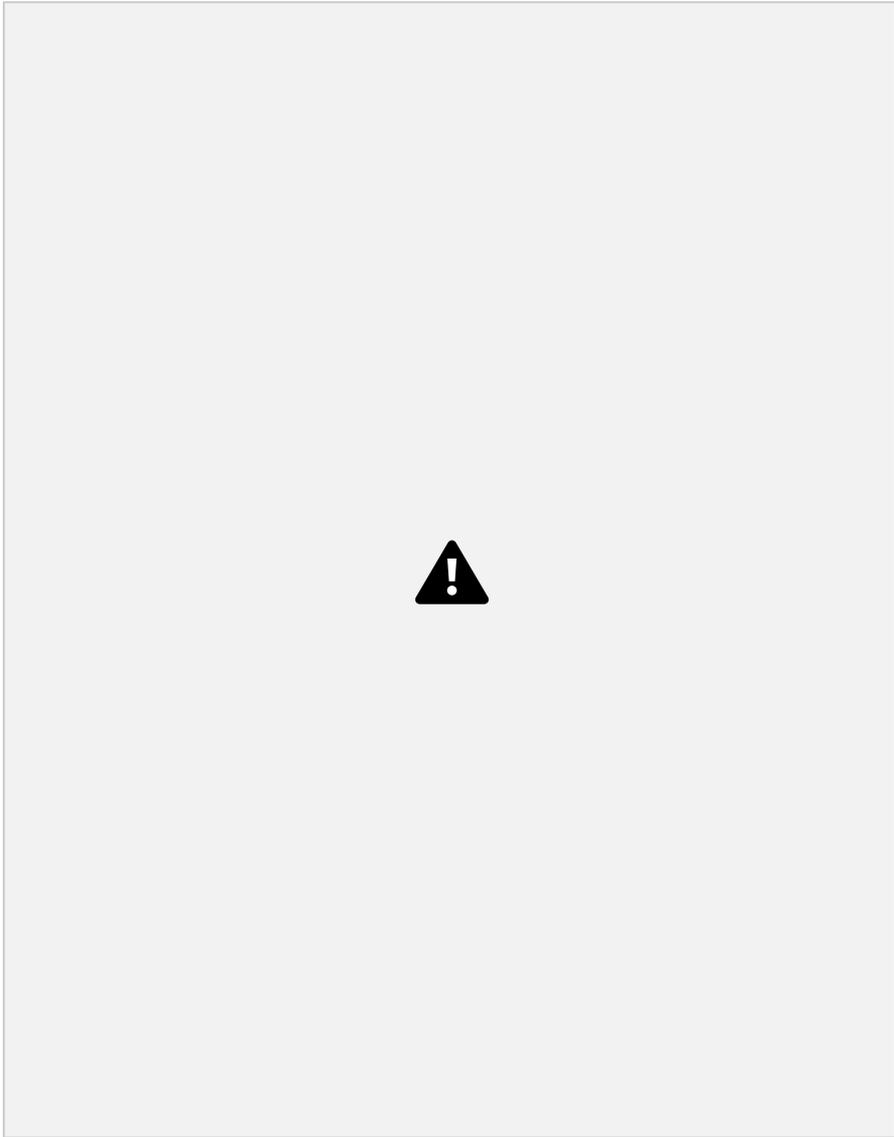




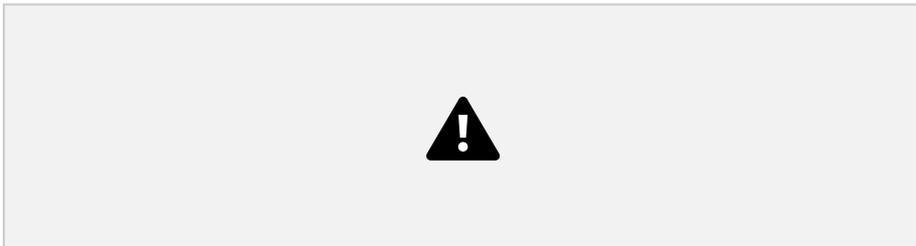
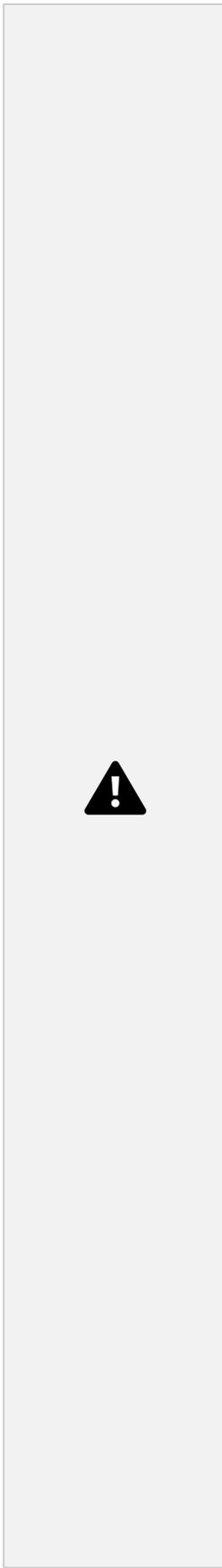
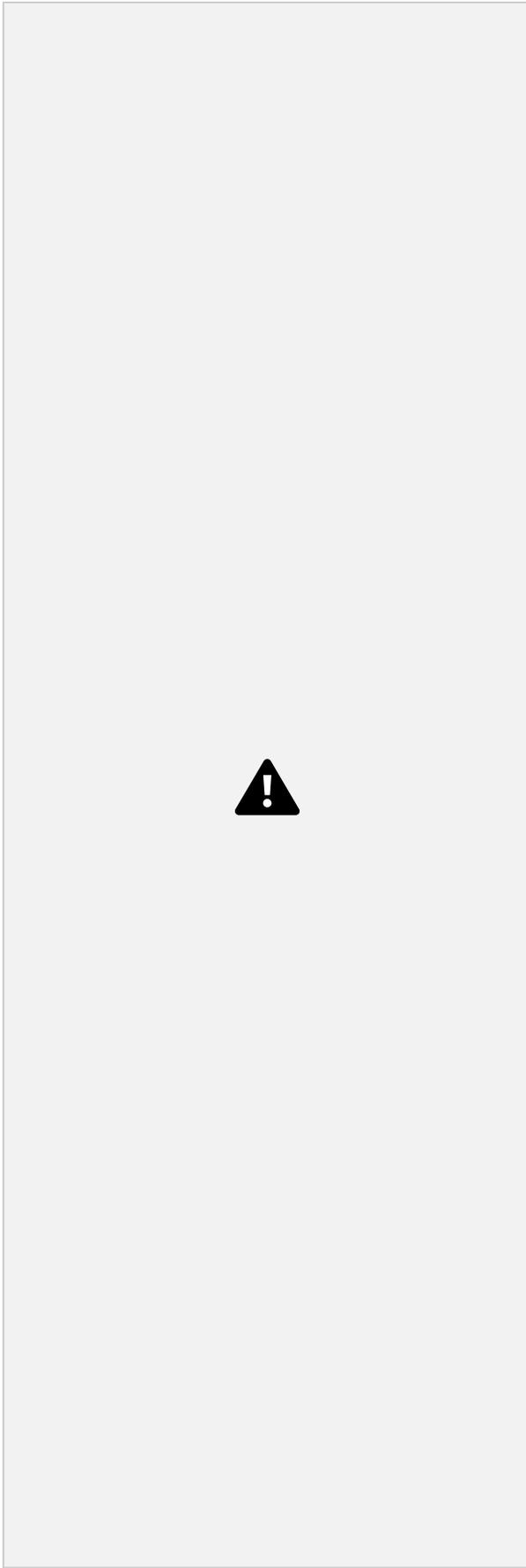














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28 R\*0 :0-4+7 K+G U 2G 3+ V :G +5 L+5728 3+ =23,-7289 257 W 2G 3+ +5 =,5728. 257 C,M14< X+14728.  
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C1255456 257 ?5B4-+5G053 0B01+:G053 R\*0 70B01+:G053 2. 70.<-4M07 45 3\*0 ?Y= 257 /R=9 257 2. 60  
70:4<307 45 ;::0574Z ;  
Y= ?5B4-+5G05321 YG:2<3 =3230G053 343107 [j^`a`b`c`d`e`]bfg hi^ jkf^\_ n`af\_ `f n\_fo\_`bmm j`^p q\_aik^]  
q\_jir\_`g s`]bmbfg :-0:2-07 M8  
;..+<4230. 72307 L2-<\* (ONV  
uL ?Z<2B2307 u23,-21 L230-421  
C; u=v ?5B4-+5G053 C-+30<34+5 ;;3\*+-438 CA; ;<3 w\rb^i\X\_`f m jm`\b\c `y zaa\_aax\_`f z]f NPUP CA;  
/06,1234+5 w\rb^i\X\_`f m jm`\b\c `y zaa\_aax\_`f q\_ckm`fb\i (OOO CD ?5B4-+5G053 C-+30<34+5 D4<05<0  
4...07 M8 3\*0 ?C; ,570- 3\*0 C{? B05456 R\*0 :0-4+7 K+G V :G 3+ NO :G Z:25707 {0-234+5. R\*0 :+453 23  
H\*4<\* .430 3\*-,6\*:,3 +K 6050-21 .+147 H2.30 E:;3-0 0Z<007. NO9000 3:2  
Y; T1++7 YG:2<3 ;..0..G053 343107 |keem\_x\_`f^g smiij [xe`]f zaa\_a fi }ey`f\_ fo\_ n\_fo\_`bmm j`^p w[] :-0:2-07  
M8 t+170- ;..+<4230. C  
72307 NN {<3+M0- (ONV  
/u=v T4-0 257 /0.<.0 u=v  
050-21 .+147 H2.30 E:;3-0.<4M10F ;. 70K4507 45 C2-3 ~ =<\*07,10 N +K 3\*0 C{?{ ;<3 050-21 .+147 H2.30  
E5+50;3-0.<4M10F ;. 70K4507 45 C2-3 ~ =<\*07,10 N +K 3\*0 C{?{ ;<3 02B8 B0\*4<10 ;58 B0\*4<10 H43\* 2  
6-+.. B0\*4<10 G2.. +K K4B0 3+550. +- G+-0 <47053 ;.03 +K <4-<,G.325<0. <2,.456 +- 3\*-02305456 G230-421  
\*2-G 05B4-+5G0539 257 +- 25 0Z<00725<0 +K 3\*0 14G43. +- :0-K+-G25<0 <-4  
3\*4. <+5.053  
257 Y5 6050-219 3\*0 70K45434+5 +K 1257 4. <+5.4.3053 H43\* 3\*0 70K45434+5 ?CA; ;<3  
25260G053 A L4346234+5 L02.,-0. R\*0 ;::14<253 . G25260G053 257 G4346234+5 G02.,-0. <+5324507  
?Y= /R= 257 45<1,707 45 ;::0574Z I  
230-421 \*2-G 3+ 3\*0 05B4-+5G053 X2-G 3+ 3\*0 05B4-+5G053 4. G230-421 4K 43 45B+1B0. 2<3,21 +-  
:+305342 3+ 3\*0 \*0213\* +- .2K038 +K \*,G25 M0456. +- 3+ 0<+.8.30G. 3\*23 4. 5+  
454.30- L454.30- K+- C1255456 E+- 70106230F 4346234+5 ;<34B4340. 2..+<42307 H43\* -07,<456 3\*0  
4G:2<3. +K 3\*0 70B01+:G053 ; +- 7,-456 3\*+.0 4G:2<3. +<<,-456  
+543+456 ;58 G+543+456 -0,,4-07 ,570- 3\*4. <+5.053 G,3 M0 ,570-32 2<<+-725<0 H43\* .0<34+5 N((J +K  
3\*0 ?CA; ;<3  
46\*3 R\*0 :0-4+7 K+G NO :G 3+ U 2G +5 L+5728 3+ =23,-7289 257 NO : 2G +5 =,5728. 257 C,M14< X+14728.  
?LC {0-234+521 ?5B4-+5G05321 L25260G053 C125 :0-234+5 R\*0 -0<04:39 .+34569 .0:2-234569 :-+<0..456  
257 -0G+B21 +K H2.30 J; C-45<4:21 J0-34K8456 ;;3\*+-438 2,3\*+-4.07 ,570- .0<34+5 NOPQ +K 3\*0 ;<3  
{?{ ;<3 j^if\_]fb\i ih fo\_ w\rb^i\X\_`f fe\_`fb\i a z]f NPPU {?{ Ev2.30F /06,1234+5 j^if\_]fb\i ih fo\_ w\rb^i\X\_`f ..n`af\_...  
q\_ckm`fb\i (ON) R= /0.:+5.0 3+ =,MG4..4+5. 343107 [j^`a\_`d`e`]bfg hi^ jkf^\_ a]blm\_ `f n\_fo\_`bmm j`^p  
q\_aik^]\_ q\_jir\_`g s`]bmbfg :-0:2-07 M8  
;..+<4230. 72307 NN {<3+M0- (ONV 257 sk^fo\_`^ q\_aei\ a fi |klxb  
:-0:2-07 M8 3\*0 =YR; ;..3-2142 C38 D37 72307 W Q0<0GM0- (ONV  
0<-032-8 =0<-032-8 +K 3\*0 Q0:2-3G053 E+- 5+G4500F

3.!!+\$"74 #(/,+4 /,#0\$%-+4 ,88\$(! ,) 069+\$( )(!)!-%\$,"-+ -)!-  
\$%! :/! +-"3 +\$#%#3 \$" (/!36+! ; =>? <\$)7\$" =@(-&-%!3 >-%6)-+ ?-%!)\$-+ # 3!8\$"!3 \$" %/! AB=B \*(% -#%! \*# 3!8\$"!3 \$" %/! AB=B \*(%  
!\$7/9)\$37! \* .!\$7/9)\$37! %/--% \$# &!)\$8\$!3 \$" -((,3-"(! .\$/ / %/! DEFGHIEJ KL PQF ;RST

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89;;;<=<>9=>?@@=<9A=B@CD@E<F<ED@GF>G?:9E@EG<=@G<:@C=:HI<CB@;J9;@G=B<CE>9C@9=K=  
B@5DDI<E:  
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!.2P"20!\$0,

RB@5DDI<E:9=K<9:E=<9A>9=B<CE>9C@9=K?JC=E:GGN>J==B@O@L@!>D?@9=<9:EE>G;:9E@S<=B=B

@T U:VW:=<@C<A9<F<E:9=@L@I>D?>@9=:DDI<E:=<9WVOXQYXZ  
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UEVE>9;<=<>9C<9WEB@;JI@QZ  
U;V;@L@I>D?>@9=:N>J=DI:9C:9;G:S<9ACI<C=@;<95DD@9;<]5Z:9;  
U@V=B@^:9:A@?>@9=:9;^<=<A:=<9^@:CJG@C:C;<@9=<F<@;<95DD@9;<]\_7

8F=B@G@<C:9N<9E>9C<C=@9ENH@=S@>@9=B@:H>L@;>EJ?>@9=CK=B@?>C=G@E@9=;>EJ?>@9=CB:II  
DG@L:<I=>=B  
>F=B@<9E>9C<C=@9EN7a>S@L@GK=B@E>9;<=<>9C>F=B<CE>9C@9=CB:IIDG@L:<I=>=B@@]=@9=>F:  
9N<9E>9C<C

RB@5DDI<E:9=?JC=E>?DINS<=B:IIISG<==@9G@cJ<G@?>@9=UCV>F=B@W@EG@=:GN:G<C<9AFG>?>B  
@O@D: :CC@CC?>@9=>FT  
U:V:9NC=G:=@A<@CKDI:9CKDG>AG:?CKG@L<@SCK:J;<=CKG@D>G=C>GE>GG@CD>9;@9E@=B:=:G@  
CJH? :EE>G;:9E@S<=B=B<CE>9C@9=Z  
UHV:9NG@L<@SCKG@D>G=C>G:J;<=CJ9;@G=:e@9>GE>??<CC<>9@;HN=B@O@D:G=?>@9=G@A:G;<9A  
E>?DI< :B@E>9C@9=Z:9;  
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RB<CE>9C@9=:DC@CF<L@N@:GC:F=@G=B@;:=@FG>?SB<EB<=>D@G:=@CKJ9I@CC=B@O@L@I>D?  
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E>??>@9E@;>9=B@I:9;=>SB<EB=B@E>9C@9=:DDI<@CH@F>G@=B@;:=@>9SB<EB=B@E>9C@9=S>JI;>  
= I:DC@J9;@GC@E=<=>9gf>F=B@[hi55E=7

RB@5DDI<E:9=?JC=9>=E:JC@KD@G?<=>G:II>S:9N?:=@G<:IC>GS:C=@A@9@G:=@;>J=C<;@=B@C<=@  
=>H@G  
:=B@C<=@F>GC=>G:A@KJC@K=G@:=?>@9=KDG>E@CC<9AKG@DG>E@CC<9AK>G;<CD>C:I>9=B@C  
<=@K@JE@D=:C@ D@G?<==@;HN:9[hj7

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UHVgkKkkk=D:>FA@9@G:IC>I<;S:C=@U9>9IDJ=G@CE<HI@VZ:9;  
UEV6k? >F:CH@C=>CS:C=@D@GS@>e7

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RB@5DDI<E:9=?JC=9>=C=>G@A@9@G:IC>I<;S:C=@UDJ=G@CE<HI@V:=B@C<=@F>G?>G@=B:9QbB>  
JGCFG>? >FG@E@<L:I7

\$(!&3.!!/202P)\*0!2+)+24+\*!.!

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8F=B@CJH?<CC<>9>F:9NC=G:=@ANKDI:9>GDG>AG:?<C=>H@C=:A@;K=B@9=B@G@I@L:9=C=G:=@AN  
KDI:9>GD  
?JC=EI@:GIN;@CEG<H@=B@CD@E<F<EC=:A@=>SB<EB=B@C=G:=@ANKDI:9>GDG>AG?:DDI<@CK=B  
@G@I:=<=>9CB  
C=:A@=>:9NFJ=JG@C=:A@C:9;=B@=G<AA@GF>GJD;=<9A=B@C=G:=@ANKDI:9>GDG>AG?:75EI@:GG  
@I: H@=S@>@9=B@C=G:=@ANKDI:9>GDG>AG?:=B:=<C=>H@E>?H<9@;?JC=H@;@?>9C=G:=@;7

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!)S!'&S')\$#T%+%(')

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HAJ5864;A2912A29754<BL78DB;9<978A58?5<<;2<=75<2A@D912=242M7893;@4567;91B=59D78A782Z3478  
A5<7?>22:289@29>22878D3;@4567;91B=59D78A912,33456789/

#%' [ !"#( !\*)%\$

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:75897582A7<=2C;5=2A91=B;?1B;991245L2BL912]2M24B3:289/^B6B8A595B8BL915<6B8<289=2:B  
B@45?795B8LB=912,334567899BB@9758V=282>B=6B:34D>591<;614562862<V32=:59<B=733=BM74O6B8<289

T(%)

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BL912IB=ab2749178AN7L29DK2?;4795B8V.`-/

#S%# +T+R!"#+S[+]RS! %(&(S+%(')

012,33456789;:<928<;=274482>@;54A58?<78A<9=;69;=2<V78A78D7492=795B8<B=7AA595B8<9B2Z5<958?@  
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>792=78A<2>2=7?258L=7<9=;69;=2<2=M5658?BL912<592;8A2=<2695B8cPBL912 I

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#!S%(')&o#pT(S()& +\$% #S%# !

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9B:7a2<;597@427==78?2:289<LB=7662<<9BVA5M2=<5B8V3=B92695B8V78AOB=<;33B=9BL912 58L=7<9=;69;=2Y  
H@J3=237=27A54735A795B8=23B=95A2895LD58?9126B8A595B8BL7443;@45658L=7<9=;69;=258912M565859DBL  
H5864;A58?=B7A<V?;992=<78ALBB93791<JY78A  
H6J<;@:5976B3DBL915<=23B=99B912N26=297=D78AXB;8654/

;/<4(,/-4834,/5\*+(=2".3\*)/))3.-/\*(07-\*+4(,/-4-&6/&5,21'-.&=4/)\*42.\*24(\*+/\*-)0/9/6(0 >(?'3,9(&\*@/&0  
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DEFGAHAIBJEHFEHKCLMGBNCHF

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;/<9/-&\*!-&(0-&/,43,(4/&0(==.-(&\*3&0-\*3&@/&0  
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.3&0-\*3&3=\*+-.3&)(&\*4('/?/&\*3\*+(-44),(.\*-?(/.\*-?-())\$

CJABNCHFRAHFDGVMFGAHW

Y4-34\*3\*+(-)2(3=/Z3&)\*42.\*-3&Z(4\*=-./\*(=34/&5,/4\*3=\*+(>?'3,9(&\*8\*+(!,',-./&\*9  
[#8]S\$^X\*3Z32&.-'&/..340/&.(7-\*+\*+(\_/-4=-('OZ-\*5Z32&.-'"&0-4(. \*;a(. \*-3&]O!<>( ?( Z3&\*4-12\*-3&)Y'/'^"bb\$

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MGDCNCHFWDGADFARANNCHRNCHFAICvBEHKCKABCDEFGHIW

Y4-34\*3\*+(.399(&.(9(&\*3=(w,/ &0(03,(4/\*-3&)8\*+(!,',-./&\*92)\*(&)24(/\_-&/'x..2,/\*-3&Z( 34/Z39,'-/&.(Z(4\*-=-./\*(+!)1((&-))2(0=34\*+(=3"37-&6:  
;/</00-\*3&/'/?(9(&\*/&0+/40)\*&0/4(/)@  
;1<)\*3497/\*(4)5)\*9@  
;.<\*(.3&)\*42.\*-3&3=/&/00-\*3&/(w-\*=439\*+(9/-&\*4/&)=(412-'0-&6\*3-9,43?(-&\*(4&/'\*4/=-.-='37  
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.3&='-.)7-\*+\*+-.3&)(&\*8\*+(!,',-./&\*92)\*&0-&\*+(9/&&(4,4().4-1(015.'/2)(\3=\*+(  
)62/'-3&8)244(&0(4\*+(0(?('3,9(&\*3&)(&\*)0().4-1(0-&F~□ ,4-34\*3\*+(.399(&.(9(&\*3=(w 3,(4/\*-3&)\$



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@mDTDEFDG@`H` H`@J]HN@`H` nDRVU[UPdBYTBEXBQREVRDG

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678938.;<=4>?<@AB6@=:C2<D84

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