

**Applicant's Response to Audit Recommendations
Independent Environmental Audit, Woodlawn Bioreactor and IMF**

**Final
15/07/2025**

| Independent Audit Recommendation | Applicant's Proposed Action / Action taken / Response (as applicable) | Proposed Action Due Date |
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| <p>If deemed valuable in informing and supporting odour mitigation strategies at the Woodlawn Facility, the H₂S data collected as part of the NSW EPA and Veolia monitoring program should continue to be contextualised with prevailing wind conditions, the date and time of detection across different locations, and correlated with biogas and leachate extraction rates to enhance data interpretation and in response to the investigation of odour complaints. Additionally, potential interference from other local sources of H₂S should continue to be actively evaluated to improve confidence in the data and determine whether H₂S can be reliably used as a sole tracer gas for odour emissions from the Woodlawn Facility.</p> | <p>Veolia will continue to contextualise the weather and H₂S monitoring data. Veolia will continue to engage The Odour Unit on this task.</p> | <p>Ongoing</p> |
| <p>Given the elevated odour emissions measured from the Maturation Pad, the 12th IOA recommends that Veolia investigate to determine the root cause as part of an odour mitigation strategy at the MBT Facility. Specifically, this investigation should focus on identifying potential issues related to the quality of the compost material and assessing the upstream composting conditions that may be contributing to the persistence of odorous compounds following placement on the Maturation Pad.</p> | <p>Veolia have reviewed the MBT process. Veolia have engaged The Odour Unit to undertake resampling to verify the status of stockpiles.</p> | <p>August 2025</p> |
| <p>The 12th IOA continues to recommend a heightened awareness of the operability and maintenance of the biofilter-based odour control system at the MBT Facility, which should be consistent with the Biofilter Manual to ensure optimal and sustained odour removal performance. It is recommended that the MBT Facility improve its overall management of biofilter bed moisture to ensure optimum odour removal performance. This can be achieved by an intensification of the surface drip irrigation system and/or optimisation of the current spray humidification system, with a preference for the latter to achieve an outcome that is sustainable and optimises water usage and leachate generation rates from the biofilter system.</p> | <p>Veolia notes that previous humidification improvements were implemented but has engaged TOU to undertake a preliminary design option for the further humidification as described in this recommendation.</p> | <p>October 2025</p> |
| <p>It is recommended that opportunities to increase leachate storage capacity at the MBT should be investigated and implemented in the mid-to-long term so that the biofilter system performance is not impacted in the future, particularly given that the refurbishment of all biofilter beds at the MBT Facility had been completed in early-2023 and prior to the IOA</p> | <p>Veolia have constructed a new leachate storage dam at the MBT facility, which was commissioned in October 2024.</p> | <p>Completed</p> |
| <p>The performance goals outlined in the WIP 2020 and AQGGMP should continue to be pursued and progressively materialised.</p> | <p>Veolia continues to pursue the performance goals in the WIP 2020 and AQGGMP</p> | <p>Ongoing</p> |
| <p>Maximising and optimising leachate extraction from the Bioreactor to meet the design treatment capacity and capability of the existing infrastructure;</p> | <p>Veolia continues to maximise the extraction of leachate from the void in line with the operational capacities of the LTR. Several leachate management measures to ensure continued extraction during sustained wet weather events remain under Planning approval assessments</p> | <p>Ongoing</p> |
| <p>Minimising leachate generation by: <ul style="list-style-type: none"> o Continuation of the existing stormwater diversion program at the Woodlawn Facility; and o For high rainfall events, develop acceptable limits for which contaminated, but highly diluted stormwater can be rapidly diverted to stormwater storage, minimising leachate generation and pooling in the Void surface.. </p> | <p>Veolia continues to divert clean stormwater from the void. The Soil and Water management plan defines acceptable criteria for the transfer of liquid from the Bioreactor to ED3S and this measure remains ongoing.</p> | <p>Ongoing</p> |

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| <p>Continue to optimise and maximise the volume reduction protocols for ED3N, ED3S, and ED1 Cofferd Dam as far as reasonably practicable. The water quality in ED3N, ED3S, and ED1 Cofferd Dam remains suitable for mechanical/natural evaporation, given the findings of the LOM testing that indicated that the emission release from the pond surfaces appears to be related to a pathway/mechanism other than mechanical/natural evaporation (refer to Section 6.1.8).</p> | <p>Veolia has increased mechanical evaporation in all dams. Veolia is currently seeking regulatory approval for volume reduction activities including the construction and implementation of a reverse osmosis facility.</p> | <p>Ongoing</p> |
| <p>Veolia should continue its mission of enhancing and accelerating its improvement to biogas capture from the Bioreactor as reasonably practicable.</p> | <p>Veolia continues to increase gas capture performance. This has been evidenced by positive surface gas monitoring results for 2025.</p> | <p>Ongoing</p> |
| <p>Development of a strategy and engineering design that focuses on reducing leachate generation by diverting and extracting stormwater.</p> | <p>The submitted 2025 Water Balance model and strategies document describes several improvements, including the expansion of contaminated waters management and storage.</p> <p>Within the void itself, stormwater is diverted to approved containment dams on an ongoing basis, and there is no ongoing challenges to this measure.</p> | |
| <p>Veolia should continue to develop strategies for minimising the exposed ATF surface area.</p> | <p>Veolia has commenced a trial to reduce the exposed ATF surface area utilizing tarp covers.</p> | <p>Completed</p> |
| <p>The IOA recommends that Veolia continues with its community engagement and liaison process.</p> | <p>Veolia continues to engage the community through the following:</p> <ul style="list-style-type: none"> * Community Liaison Committee; * Stalls and engagement at community events/fairs; and * Complaints line with call back options * Dedicated community liaison officer engaging with the community, in particular adjacent landholders | <p>Ongoing</p> |
| <p>Veolia should continue to log and monitor odour complaints in the current odour complaints register. In addition, it may be beneficial to review the characterisation of odours as reported by complainants.</p> | <p>Veolia continues to log and monitor odour complaints, which also includes the publishing of the complaints register and Odour Complaint Report.</p> | <p>30 September 2025</p> |

Veolia to provide education at the next Community Liaison Committee on odour characteristics to increase odour characterisation and description accuracy within odour complaints.

Non-Mandatory Recommendations

The IOA suggests that Veolia continue to maintain a practical and measured degree of situational awareness to the waste transport activities supporting the operations at the Woodlawn Facility, with the view of identifying opportunities for improvement if required (noting that these are transient and minor sources of odour that could lead to localised impact).

Veolia continues to seek improvements in all aspects of the waste transport operation. Veolia continues to undertake the waste container maintenance procedure, which includes the ongoing review and replacement of carbon filters on the vents of containers as required.

Ongoing

