Prepared for Visy Pulp and Paper Pty Ltd

Independent Environmental Audit 2024

Visy Pulp and Paper Mill, Tumut

May 2025

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Acronyms and abbreviations

AQMP	Air Quality Management Plan
AR	Annual Return
BoM	Bureau of Meteorology
CA	Concept Approval
CAR	Corrective Action Request
CCC	Community Consultative Committee
CEMS	Continuous Emissions Monitoring System
COD	Chemical Oxygen Demand
DA	Development Approval
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE	NSW Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure (formally DPIE)
DPIE	Department of Planning, Industry and Environment (formally DPE)
ECMR	Environmental Compliance and Monitoring Report
EPA	Environment Protection Agency (NSW)
EPL	Environment Protection Licence
FEMR	Farm and Environmental Monitoring Report
IEA	Independent Environmental Audit
IAPAR	Independent Audit Post Approval Requirements (DPE 2020)
km	Kilometres
LNVMP	Landscape and Native Vegetation Management Plan
ML	Megalitres
mm	Millimetres
NMP	Noise Management Plan

NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVMP	Native Vegetation Management Plan
OEMP	Operational Environmental Management Plan
PA	Project Approval
POEO Act	*Protection of the Environment Operations Act 1997*
SMP	Soil Management Plan
SVC	Snowy Valleys Council
SWMP	Solid Waste Management Plan
TMP	Traffic Management Plan
TSC	Tumut Shire Council
WMP	Water Management Plan

1. Introduction

1.1. Background

NGH Pty Ltd (NGH) were engaged by Visy Pulp and Paper Pty Ltd (Visy) to carry out the Independent Environmental Audit for 2023 – 2024. The audit is required in accordance with Schedule 2, Condition 3.16 of the project approval MP 06_0159, as modified (the approval) for Visy's Tumut paper mill.

Stage 2, Phase 1A works were completed in 2015 as part of the modified approval including additions to one of the paper machines and an additional recycled cellulose fibre (RCF) Pulper. One major shutdown occurred during October 2023. The key achievements of 2023 – 2024 included:

- The key mill processes, including boilers, were shut down and maintained during the annual October shutdown
- Routine maintenance was carried out on CEMS analysers, as well as required part replacements. The TRS Analyser on Main Stack 1 was replaced in June 2024.
- Increased usage of wastepaper product in paper production
- The internal loop road commenced construction in the reporting period, which is a component of approved MP06_0159-Modification-6
- Majority of the electricity generated onsite is from renewable fuels. Consumption of renewable fuels is considered as carbon neutral as the amount of CO_2 emissions released is the same as that released from the natural decaying process.
- A total of 6,853 tonnes of waste was sent to the Carbon Mate composting facility, which diverted 39.5% of this product from landfill in the reporting period. This was an increase compared to the previous reporting period where 28% of the total volume was diverted from landfill.
- A total of 6,639 tonnes of waste material was sent to the Woodlawn mine and Captains Flat mine rehabilitation sites, diverting 99% of this product from landfill in the reporting period. This was an increase compared to the previous reporting period where 76% of the total volume was diverted from landfill.
- Ongoing provision of sponsorship and funding to local community events and organisations.

1.2. Audit team

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

The site inspection was completed by Nicola Smith. Nicola has over 12 years of experience across multiple environmental disciplines in New South Wales (NSW) and has worked on planning and approval projects, post-approval environmental management, and a variety of projects in the renewable energy sector, extractive industries, infrastructure, manufacturing, and waste management. Nicola has completed training as a Lead Auditor in Environmental Management Systems ISO 14001:2015 and ISO 19011:2018.

1.3. Objective

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

1.4. Audit scope

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

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

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

- Development Consent 6/98 (Stage 1) (DA)
  - Development consent modification DA6/98-Mod-4 26/03/2024 and supporting documentation
- Concept Approval 06_0159 (CA)
- Project Approval 06_0159 as modified
  - Modification MP0_0159-Mod-6 26/03/2024 and supporting documentation.

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

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

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

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

1.5. Audit period

The reporting period for the audit is 1 July 2023 – 30 June 2024 inclusive.

2. Audit methodology

2.1. Auditor approval

The Department agreed to the nomination of Natascha Arens as Lead Auditor and Nicola Smith as Auditor for the Project as evidenced through the Department's endorsement on the Project's post-approval portal (Appendix A). The Declaration of Independence for the Lead Auditor is provided in Appendix B.

2.2. Audit process

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

The Audit program was submitted to the Auditee on 12 December 2024 indicating the dates of the site audit, scope, criteria, audit details and required project representatives.

An opening meeting was held on 17 December 2024 at 9:50 am on site at the main administration building. Present at the opening meeting were:

- Matt O'Donovan, Visy – HSE Manager
- Isabella Kane, Visy – Environmental Officer
- Kubeshnie Reddy – Site Administrator
- Nicola Smith, NGH – Auditor.

A closing meeting was held on 17 December 2024 at 2.10pm at the main administration building. Present at the closing meeting were:

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

The results of the audit process are provided in Appendix C.

2.3. Site inspection

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

- Log delivery area and chipper
- Wood yard
- Site shed near wood yard with dangerous goods storage
- Recovery and power boiler
- Fibre and paper lines, including VPP9 and VPP10
- Plant control room
- Emergency shed

- Chemical storage area outside RCF Plant
- Refuelling depot
- Waste paper storage area with new remotely operated water cannons.

During the site inspection, conditions were calm with warm temperatures. The Bureau of Meteorology (BoM) weather station at Burrinjuck Dam (station 073007), approximately 45 kilometres (km) northeast of the site, recorded a maximum temperature of 35.5°C, minimum temperature of 20.4°C and no rainfall on the day of the site inspection. Total rainfall for December 2024 at the Burrinjuck Dam weather station was 123.2 millimetres (mm).

2.4. Consultation

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

- **NSW DPHI** – consultation undertaken requesting approval of the Auditor (Appendix A).
- **NSW DPHI** – consultation request made via email 16 December 2024. DPHI responded 17 December 2024 (Appendix D.1):
    - *"In addition to the consent requirements, please review the management of air quality, including odour, surface, water, groundwater and soil management."*
- **NSW EPA** – consultation request made via email 16 December 2024. No input was received from the NSW EPA.
- **NSW DCCEEW Water (formerly DPIE Water)** – consultation request made via email 16 December 2024. NSW DCCEEW Water responded 17 December 2024 with input as outlined in Appendix D.3.
- **Snowy Valleys Council (SVC)** – consultation request made via email 16 December 2024. No input was received from SVC.

Consultation inputs have been addressed in the Audit Table, refer to Appendix C.

2.5. Compliance status descriptors

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

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

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

3. Audit findings

3.1. Document list

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

- Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023
- Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023
- Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 31 July 2024
- Email from NSW EPA to Visy Tumut acknowledging contact and consultation for the updated SWMP, dated 24/07/2024
- Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023
- Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023
- Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023
- Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023
- Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023
- Pollution Incident Response Management Plan (PLANS-VPP-TUM-HSE-010-2) 15 March 2024
- EPL 10232 variation date 5/07/2023
- Annual Return 2024 for EPL10232, submitted 20/08/2024
- Annual Return 2024 for EPL 10232 submission, dated 13/08/2024
- Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2023 – 2024 (submitted 29/08/2023)
- Fire Safety Study, VISY, dated 27 May 2024
- Construction Safety Study - MOD 6, VISY, dated 29 April 2024
- Visy Environmental Compliance and Monitoring Report (ECMR) 2024
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 1 Compliance Report
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 2 CEMS Exceedance Event Details
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 3 Odour Monitoring Results
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 4 Noise Compliance Monitoring Results Summary
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 5 Noise Mitigation Action Plan
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 6 Monthly Heavy Vehicle Movement Data
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 7 Farm and Environmental Monitoring Report (McMahon Earth Science)
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 8 Five Year Groundwater Piezometer Trend Cycle
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 9 Complaints Register
- Visy Environmental Compliance and Monitoring Report 2024 – Appendix 10 Environmental Management Targets 2024/25

- Tumut Visy Corporate HSE Risk Register_V04.2_2024 spreadsheet
- Previous IEA Reports 2016 – 2023 (NGH)
- Email to DPE, EPA and SVC 19/11/2024, submitting ECMR 2024
- Email from DPHI to Visy Tumut regarding the review of the EMP pursuant to Condition 2.33A Schedule 2 of MP06_0159, dated 18 July 2024
- Visy Tumut Pulp and Paper Mill Annual Attended Noise Monitoring Report 2024 (EMM, March 2024)
- Ektimo Odour Testing Reports August 2023, February 2024
- Ektimo LDAR Testing Report August 2023, February 2024
- Ektimo Emissions Testing Reports August 2023, November 2023, February 2024, June 2024
- Visy Waste Removal Records 2023 – 2024 (.xlsx)
- Letter from EPA regarding Resource Recovery Order & Exemption for Visy Material (DOC20/532167-1) July 2020
- EPA Woodlawn PHR acid mine tailings trial order 2020
- EPA Woodlawn PHR acid mine tailings exemption 2020
- EPA The Captains Flat alkaline material trial order 2022
- EPA The Captains Flat alkaline material trial exemption 2022
- Letter from EPA regarding Captains Flat alkaline material trial order and exemption 2022 (DW22/213-3) 21 June 2022
- Hazard Audit Report for Visy Pulp and Paper Tumut, Pinnacle Risk Management December 2021
- Visy ERT (Emergency Response Team) Personnel Skills Register (.xlsx)
- Compliance Audit Report - Liquid chemical storage and handling, EPL 10232 (NSW EPA, August 2023)
- Email to WaterNSW – Visy Groundwater Data submitted 13 September 2024
- Email correspondence Visy identifying commissioning of new TRS analyser in June 2024, dated 16 December 2024
- ACOEM Calibration Report for Main Stack A, dated 27 May 2024
- Quarterly Maintenance Service Report June 2024 (Lear Siegler)
- Quarterly Maintenance Service Report November 2023 (Lear Siegler)
- Visy Tumut Lime Kiln A, Main Stack, Lime Kiln B, Power Boiler, Recovery Boiler A, Recovery Boiler B Calibration Certificates May 2024 (Group Instrumentation)
- Visy Tumut Lime Kiln A, Main Stack, Lime Kiln B, Power Boiler, Recovery Boiler A, Recovery Boiler B Calibration Certificates August 2024 (Group Instrumentation)
- Visy Tumut Lime Kiln A, Main Stack, Lime Kiln B, Power Boiler, Recovery Boiler A, Calibration Certificates January / February 2024 (Group Instrumentation)
- Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24
- Visy Complaints Audit Reports Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24
- Email submission to DPE, EPA, SVC – Quarterly Complaints Registers and Audit Reports 19/11/2024
- Visy Community Consultative Committee Meeting Minutes Aug 23, Dec 23, Feb 24, Apr 24, Jun 24
- Meeting minutes of VCCC meetings every two months for dates of 1/08/2023, 3/10/2023, 5/12/2023, 6/02/2024, 2/04/2024, 4/06/2024
- Email to EPA – Visy Tumut VCCC FY24 Meetings minutes submission 10/09/2024
- Email to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Letter to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Screenshot of DPHI audit team endorsement on Project post approval portal
- Email to DPHI, EPA and SVC providing 2023 IEA Report 11 March 2024.

3.2. Compliance performance

Across the various project approvals, EPL and consultation requirements a total of 332 conditions were examined. The Project was found to be non-compliant with nine of these (Table 3-1). Of these:

- Five are new non-compliant findings
- Four are recurring non-compliant findings.

It is noted that two of the new non-compliant findings for the reporting period are for the same administrative non-compliant finding across two of the project approvals. A full description of each non-compliant finding is provided in Table 3-2.

Table 3-1 Compliance summary for the reporting period

	Concept Approval	Development Consent	Project Approval	EPL	Consultation	Total
Number of Conditions of Approval	17	122	90	101	2	**332**
Number of triggered Conditions	3	68	54	71	2	**198**
Number of Non-compliant findings	0	1	5	3	0	**11**

3.3. Notices, orders and prosecutions

The audit found no notices, orders or prosecutions occurred during the reporting period.

3.4. Non-compliant findings

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

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
DC 6/98, Condition 91A	Within three months of: a. the submission of an incident report under condition 15; b. the approval of any modification of the conditions of this consent; or c. issue of a direction of the Director-General, the strategies, plans and programs required under this consent must be reviewed, and the Director-General must be notified in writing of the outcomes of any review.	There were no incident reports submitted under condition 15. Modification 4 was determined on 26 March 2024. The Planning Secretary was not notified within three months of the modification determination of the outcomes of the review of strategies, plans and programs.	Review strategies, plans and programs within three months following items a) to c) and inform the Planning Secretary in writing of the outcomes of any review. Review strategies, plans and programs following determination of Modification 4 and notify the Planning Secretary the review has taken place and any outcomes of the review.	**New**
PA 06_0159, Condition 2.2	The Proponent shall conduct all operations and activities on the site, including start-up and shutdown, in a manner that shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.	There were 25 odour complaints during the reporting period. This is up from 17 complaints in the previous period and well below 60+ complaints six years ago. The source of the odour was identified in most cases and minimised through action. Offensive odour is prevented	Continue to investigate methods of reducing odour.	**Recurring**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
		from leaving the boundary most of the time, however compliance with this condition is not able to be achieved while odour complaints are received. It is noted that s129 of the POEO Act indicates that a defence for this occurrence can include the identification of odour on a Project's EPL. While EPL10232 does identify the potential for multiple odorous gasses, the EPL Annual Return 2024 identifies 7 exceedances of Sulphur Dioxide, an odorous gas, at Point 1 during the reporting period. Visy commissioned Ektimo to take odour samples from the most significant odour sources to determine the odour intensities in (OU) in accordance with AS4323.3. This sampling and Leak detection and repair program was undertaken in August 2023 and February 2024.		
PA 06_0159, Condition	The Proponent shall design, construct, operate and maintain the project to ensure that for each stack discharge point, the concentration of each	Multiple exceedances identified during the reporting period - all exceedances documented in ECMR and the EPL	Continue to investigate methods and equipment that can prevent exceedances.	**Recurring**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
2.10	pollutant listed in Table 2 to Table 5 inclusive is not exceeded. This condition only applies to the operation of the project, and to avoid any doubt, does not apply during start-up or shut-down. Reference conditions for in-stack concentrations described in this condition shall be reported to the reference conditions specified within Schedule 5 Part 3 of the Protection of the Environment Operations (Clean Air) Regulation 2002, except for emissions from the Main Stack 2, Natural Gas Boiler and Multi-Fuel Boiler where the applicable reference conditions are Dry, 273 °K, 101.3 kPa, 8 % 02.	Annual Return.		
PA 06_0159, Condition 2.33	At least two months prior to the commencement of commissioning of the project the Applicant must prepare and submit for the approval of the Planning Secretary the following studies: a) an updated Emergency Plan for mill operations including the expansion project. The Plan must be prepared in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines. The plan must include detailed procedures for the safety of all people outside of the development who may be at risk from the	The Safety Management System does not meet the requirements of the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management, which includes requirements for a Safety Policy, accountabilities and responsibilities, training and awareness.	Include in the Safety Management System the requirements for a Safety Policy, accountabilities and responsibilities, training and awareness.	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
	project; and b) an updated Safety Management System, covering all operations at the site including the expansion project and any associated transport activities involving hazardous materials. The System must clearly specify all safety-related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to safety procedures. The System must be developed in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.			
PA 06_0159, Condition 2.33A	At least two months prior to the commencement of operation of the proposal associated with MP06_0159-Mod-6 or within such further period as the Planning Secretary may agree, the Applicant is to update and submit to the Planning Secretary for approval the following: a) the Emergency Plan as required in Condition 2.33a); and b) the Safety Management System as required in Condition 2.33b). Operations associated with MP06_0159-Mod-6	The audit found that the Emergency Plan had not been submitted to the Planning Secretary, and approved, as required by this condition.	The audit notes that the Emergency Plan has been updated and will be submitted and captured in the next audit period.	**New**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
	may not commence until written approval has been received from the Planning Secretary for the above documents.			
PA 06_0159, Condition 5.5	Within three months of: a) the submission of an incident report under condition 6.9; b) the approval of any modification of the conditions of this consent; or c) issue of a direction of the Planning Secretary under Condition 1.2A, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.	There were no incident reports submitted under condition 15. Modification 6 was determined on 26 March 2024. The Planning Secretary was not notified within three months of the modification determination of the outcomes of the review of strategies, plans and programs.	Review strategies, plans and programs within three months following items a) to c) and inform the Planning Secretary in writing of the outcomes of any review. Review strategies, plans and programs following determination of Modification 6 and notify the Planning Secretary the review has taken place and any outcomes of the review.	**New**
EPL 10232, Condition L2.1	The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.	The coarse particulate load is 65000 kg on the EPL. The load for coarse particulates in the reporting period was 85,750 kg, which is above the limit and an increase from 58,005 kg in the last reporting period. All other loads are compliant.	Investigate methods and equipment that can prevent coarse load exceedances.	**New**
EPL	For each monitoring/discharge point or utilisation	Various pollutant limits were exceeded at	Continue to investigate methods	**Recurring**

Condition	Requirement	Details of non-compliant finding	Recommended action	Occurrence
10232, Condition L3.1	area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	specified points during the reporting period, as detailed in the EPL Annual Return.	and equipment that can prevent exceedances.	
EPL 10232, Condition M2.2	Air monitoring requirements - For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1.	It is noted that the TRS Analyser in Main Stack 1 (Point 1) completely failed during the reporting period and attempts to repair the unit were unsuccessful. There were delays in the delivery of a new unit from overseas. 86% data capture this reporting period - TRS Analyser failed so no data for March and April 2024.	Ensure adequate spare parts are stored onsite for deployment in the event of a failure, as long delivery times were a key factor in the length of time for which the TRS Analyser was offline.	**Recurring**

3.5. Previous audit findings

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

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

Condition	Details	Comment	Occurrence
CA 06_0159, Condition 1.3	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	**Closed**
DC 6/98, Condition 33	One accidental discharge occurred to Sandy Creek during the reporting period. As detailed in EPA Clean-up Notice 3504075 issued 8/11/2022, untreated wastewater was discharged into Sandy Creek as a result of a valve left open during wastewater movement around the internal site system on 28/10/2022. A full investigation of the incident was undertaken by the NSW EPA. In response, Visy have replaced the valve that allowed	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**Closed**

Condition	Details	Comment	Occurrence
	the discharge into Sandy Creek and isolated the untreated wastewater pipes to ensure an accidental discharge would not be able to occur in future. This valve system replacement was observed during the site inspection. No intentional discharges were made during the reporting period.		
DC 6/98, Condition 68	Similarly to previous audits, toxicity testing has not been carried out. This is an ongoing non-compliance as this CoA is intended to be retired.	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	**Closed**
PA 06_0159, Condition 1.2	Minor inconsistencies have arisen due to restructuring of government departments. This ongoing non-compliant finding is expected to be addressed through the amalgamation of approvals relevant to the Project during Modification 6.	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying	**Closed**

Condition	Details	Comment	Occurrence
		reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	
PA 06_0159, Condition 2.2	There were 17 odour complaints during the reporting period. This is down from 21 complaints in the previous period and well below 60+ complaints six years ago. The source of the odour was identified and in most cases minimised through action. Offensive odour is prevented from leaving the boundary most of the time, however compliance with this condition is not able to be achieved while odour complaints are received. It is noted that s129 of the POEO Act indicates that a defence for this occurrence can include the identification of odour on a Project's EPL. While EPL10232 does identify the potential for multiple odorous gasses, the EPL Annual Return 2023 identifies 13 exceedances of Sulphur dioxide, an odorous gas, at Point 1 during the reporting period.	All complaints are investigated. VISY Visy continue to undertake quarterly odour audits. These audits are provided to EPA, Council and DPHI.	**Recurring**
PA 06_0159, Condition 2.4	A comparison of the COD levels in the clean condensate between 2007 and any time after 2010 is no longer meaningful. This is due to process changes in the production of clean condensate streams. Previous comparisons, now believed to be flawed, indicated a COD reduction in the clean condensate that was close to but less than 50%.	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying	**Closed**

Condition	Details	Comment	Occurrence
	A request has been made to DPE to remove this condition as part of Mod 6.	reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	
PA 06_0159, Condition 2.10	Multiple exceedances identified during the reporting period - all exceedances documented in ECMR and the EPL Annual Return. It is also noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a faulty electronic card.	A spare parts review was carried out by Visy to determine what spare part is and could be maintained on-site.	**Recurring**
PA 06_0159, Condition 2.17	As per **DC 6/98, Condition 33**.	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**Closed**
PA 06_0159, Condition 3.1	The tables in the consent condition have been compiled from a past EPL. Discussions with DPE regarding inconsistent consent conditions have occurred. DPE have indicated that they are willing to discuss this issue.	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not	**Closed**

Condition	Details	Comment	Occurrence
		appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	
EPL 10232, Condition L1.1	As per **DC 6/98, Condition 33**.	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**Closed**
EPL 10232, Condition L3.1	Various pollutant limits were exceeded at specified points during the reporting period, as detailed in the EPL Annual Return.	Visy will implement a 3-monthly review of exceedances. Most exceedances are due to Opacity. Action plans will be formulated and implemented following these 3-monthly reviews.	**Recurring**
EPL 10232, Condition O4.5	The release of untreated wastewater into Sandy Creek on 28/10/202 occurred due to an isolation valve from the 6ML untreated wastewater dam not being shut prior to the transfer of treated wastewater to the winter storage dam. This valve location has been re-routed and completely isolated as a result of this incident and untreated wastewater no longer has the potential to mix with treated water or be discharged from the site.	No recommended action – this incident has been fully investigated by the EPA and Visy and necessary modifications to prevent recurrence have been made.	**Closed**
EPL 10232,	It is noted that the Flow analyser in Main Stack A (Point 1) did not record data in November 2022 or between late January and May 2023 due to a	Visy reviewed the stock of critical spares for the	**Recurring**

Condition	Details	Comment	Occurrence
Condition M2.2	faulty electronic card. Monitoring is otherwise being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable. Monitoring is otherwise being carried out as required.	CEMS equipment.	

3.6. Environmental Management System

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

- Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023
- Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023
- Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 June 2023
- Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023
- Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023
- Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023
- Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023
- Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023
- Pollution Incident Response Management Plan (PLANS-VPP-TUM-HSE-010) 15 March 2024.

The following plan was viewed but not assessed in the reporting period:

- Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 31 July 2024.

The performance of the OEMP is reviewed annually through the VISY Environmental Compliance and Monitoring Report (ECMR) and the Independent Environmental Audit (IEA) (this audit). The ECMR provides a review of the environmental performance of the Mill for the reporting period and addresses the reporting requirements outlined in DC 6/98 CoA12.

Environmental management targets for the 2023/2024 reporting period and the next reporting period are provided as Appendix 10 of the ECMR (2024). The targets that have been identified are included in the OEMP and subplans for the next reporting period with the plans updated when there are significant changes in work practices. Appendix 10 also includes a description of the results against the targets for this reporting period. Of the 11 targets identified across five environmental performance areas, six targets were achieved and five were below target.

3.7. Complaints

The audit noted that there is a complaint register, which is maintained and reported on via monthly complaint audits. There were 27 complaints documented for the reporting period (Appendix 9 of ECMR). Twenty-five of these complaints were associated with odour. One compliant was associated with noise and one with air emission.

Quarterly compliant audits were sighted during the document review process. The quarterly audit reports include a review of the complaint, and the investigation result with reference to relevant data. Each complaint has been investigated and an investigation finding and corrective action reported in the complaints register.

In relation to the odour complaints, the source of the odour was generally identified followed by corrective actions. There were 12 instances where the source of the odour could not be pinpointed to the Mill.

Examples include on the 3 May 2024 a phone call complaint regarding odour was made by an Adelong resident. Odour checks were completed with the potential source identified as an upset in the Evaporator Plant. The corrective action was that Operations had to plan a water wash of the Evaporators on 13 May 2024. On 14 December 2023, a phone call complaint was received at Visy. The source was identified to be Slightly elevated COD levels due to a methanol plant disturbance due to a pump failure, which may have caused localised odour from the cooling towers. The corrective action was that the methanol plant pump was fixed, and the area has ongoing monitoring to ensure the odour was resolved.

Visy commissioned Ektimo to carry out two odour audits in the reporting period to determine odour intensities in accordance with AS4323.3. The auditing took place in August 2023 and February 2024, with Leak Detection and Repair (LDAR) testing completed in August 2023 and February 2024.

The noise complaint occurred on 25 June 2024. An email was received from a resident at 22.58 commenting on the loudness of operations that night. The investigation could not conclude the source of the noise emission, also identifying that weather conditions favoured noise to travel in the opposite direction of the residence. Corrective action was identified as ongoing monitoring.

The air emission complaint was a phone call to the NSW EPA received on 2 November 2023 regarding a large plume of smoke coming out of the stacks at Mill. The investigation findings identified that a shear pin broke on Recovery Boiler B Electrostatic Precipitator No. 2 Rotary Feeder. This resulted in an Opacity exceedance and the plume from Main Stack 2 was visible from the highway. The corrective actions included Operations and Maintenance teams were quick to respond and were able to have the shear pin fixed and electrostatic precipitator back online shortly after the equipment failure.

3.8. Incidents

The audit found that there were no reportable incidents in the reporting period.

4. Opportunities for improvement

One opportunity for improvement was raised during this reporting period and is described in Table 4-1.

Table 4-1 Opportunities for improvement

Reference	Improvement opportunity
CA_06_0159 **Condition 4.4**	As required by this condition, the Project website should be kept up to date with a copy of all related Project approvals. Modification 6 was determined 26 March 2024. A copy / link to Modification 6 should be added to the website.
PA (Mod-6) 06_0159 **Condition 2.31**	The audit found on the day of the site inspection there were two jerry cans, and a gas bottle, stored together on the concrete outside a workshop. Ensure flammable liquid containers and gas bottles are kept separately, and the flammable liquids are stored in a bunded lockable cabinet.

4.1. Previous improvement opportunities raised

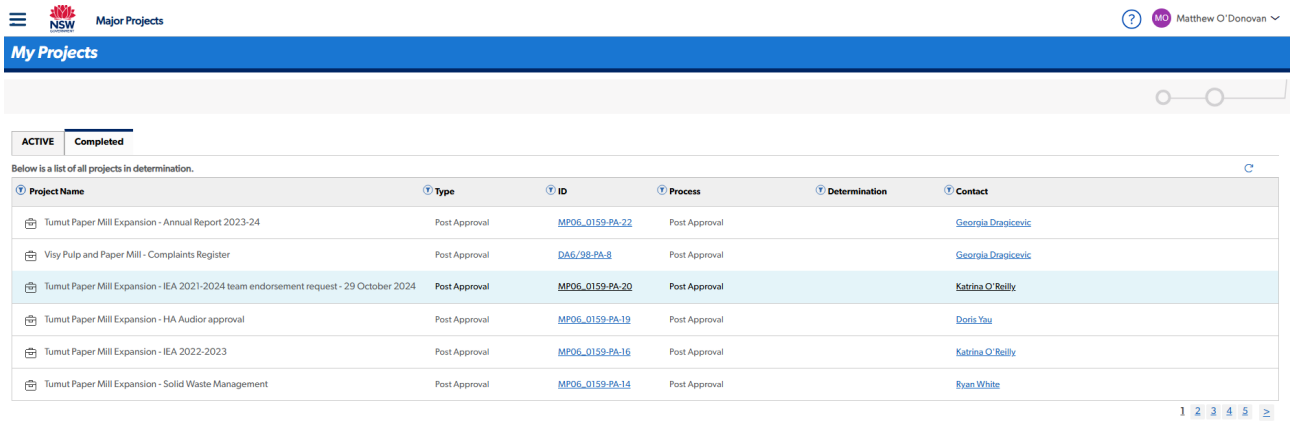
There were three opportunities for improvement raised during the last audit. The improvement opportunities and responses are described in Table 4-2.

Table 4-2 Previous opportunities for improvement

Reference	Improvement opportunity	Response
General	During the site inspection, multiple bird carcasses were observed on the wastewater pond liner at the water's edge that appeared to have died following contact with the untreated wastewater. Multiple live Australian wood ducks (*Chenonetta jubata*) were also observed within the general wastewater treatment area. All native birds are protected in NSW under the *Biodiversity Conservation Act 2016*. It is strongly recommended that Visy investigate a method of preventing fauna access to the wastewater pond, particularly following the annual shutdown period. It is noted that this observation occurred outside of the audit reporting period however has been included in this report to ensure action is able to be taken prior to the October 2024 shutdown.	Netting was not implemented over the untreated wastewater dam, which is only used during the shutdown period. The dam is typically emptied from the dam after shutdown and reused on-site after treatment.
DC 6/98 **Condition 35**	This condition specifies a requirement for consultation with the Department in the event that water table rise in the irrigation area is observed over 10cm/year over a five year period, or in the event that the irrigation area water table rises within two metres of the land surface. Both of these events have occurred within the reporting period and over the lifetime of the site as monitored since 2002. It is noted that water table rise has been previously observed to occur concurrently with increased rainfall and background bores generally follow the same fluctuations as the irrigation bores. Piezometer trend data and the annual Farm and Environmental Monitoring Reports (McMahon Earth Science) have been submitted to the Department, and now WaterNSW, on an annual basis. This is considered to satisfy	It is reported in the Farm and Environmental Monitoring Report (McMahon Earth Science) 2024 that the depths in the piezometers had progressively declined in the 2023/2024 monitoring period after a slight increase between 2020 and 2023. Above average rainfall noted for November 2023 to January 2024 is reflected with a decrease in depth from surface across all monitoring bores, indicating groundwater recharge. This was followed with increasing depth between February and April 2024. The 2024 data have been submitted to the Department and the WaterNSW. No further consultation has been undertaken.

Reference	Improvement opportunity	Response
	the intent of Condition 35 DC 6/98. However, it is recommended that Visy either undertake a formal consultation meeting with the relevant Department or confirm with the Department that the submission of annual data satisfies their requirements with respect to this Condition.	
EPL **Condition M2.4**	This condition references Special Methods to be implemented during soil and groundwater sampling. The Farm and Environmental Monitoring Report 2023 does not currently reference these Special Methods however email communication with McMahon Earth Science confirmed that the specified methods were utilised during sampling activities. It is recommended that these Special Methods are referenced in future Farm and Environmental Monitoring Reports to clearly satisfy this condition.	The Farm and Environmental Monitoring Report 2024 references that monitoring was in accordance with Special Method 1 for soil monitoring and for groundwater sampling, in accordance with Special Method 2.

Appendix A Auditor endorsement



Major Projects

Matthew O'Donovan

My Projects

ACTIVE | Completed

Below is a list of all projects in determination.

Project Name	Type	ID	Process	Determination	Contact
Tumut Paper Mill Expansion - Annual Report 2023-24	Post Approval	MP06_0159-PA-22	Post Approval		Georgia Dragicevic
Visy Pulp and Paper Mill - Complaints Register	Post Approval	DA6/98-PA-8	Post Approval		Georgia Dragicevic
Tumut Paper Mill Expansion - IEA 2021-2024 team endorsement request - 29 October 2024	Post Approval	MP06_0159-PA-20	Post Approval		Katrina O'Reilly
Tumut Paper Mill Expansion - HA Audior approval	Post Approval	MP06_0159-PA-19	Post Approval		Doris Yau
Tumut Paper Mill Expansion - IEA 2022-2023	Post Approval	MP06_0159-PA-16	Post Approval		Katrina O'Reilly
Tumut Paper Mill Expansion - Solid Waste Management	Post Approval	MP06_0159-PA-14	Post Approval		Ryan White

1 2 3 4 5 >

Appendix B Independent Audit Report Declaration

Project Name	Visy Pulp and Paper Mill Tumut
Consent No.	MP 06_0159 as modified
Description of Project	Kraft paper production
Project Address	1302 Snowy Mountains Highway, Tumut, NSW
Proponent	Visy Pulp and Paper Pty Ltd
Title of Audit	Independent Environmental Audit
Date	March 2025

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the Project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited Project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited Project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the Project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

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

Project Name	Visy Pulp and Paper Mill Tumut
Consent No.	MP 06_0159 as modified
Description of Project	Kraft paper production
Project Address	1302 Snowy Mountains Highway, Tumut, NSW
Proponent	Visy Pulp and Paper Pty Ltd
Title of Audit	Independent Environmental Audit
Date	March 2025

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the Project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited Project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited Project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the Project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

Name of Auditor	Nicola Smith
Signature	
Qualification	B. Sc. M. Phil (phys geog)
Company	NGH Pty Ltd
Company Address	35 Kincaid Street, Wagga Wagga NSW 2650

Appendix C Audit table

Concept Approval Compliance Status - December 2024

Reference	Approval or licence requirement	Evidence collected 2024	2024 Audit Finding	Compliance status
Concept Approval (CA_06_0159)				
Administrative Conditions				
1.1	The Proponent shall carry out the project generally in accordance with the: a) Major Projects Application 06_0159; b) Visy Pulp and Paper Proposed Mill Expansion, Tumut NSW, Final Environmental Assessment, prepared by Visy Pulp and Paper Pty Ltd and dated January 2007; c) Visy Pulp & Paper Proposed Mill Expansion, Tumut NSW, Submissions Report, prepared by Visy Pulp and Paper Pty Ltd and dated March 2007; d) the Statement of Commitments prepared by Visy Pulp and Paper Pty Ltd and dated 18 April 2007; e) the conditions of this approval.	ECMR 2024 Interview - M O'Donovan & Isabella Kane Site inspection	The Project has been carried out generally in accordance with the Project approvals.	Compliant
1.2	In the event of an inconsistency between: a) the conditions of this approval and any document listed from condition 1.1a) and 1.1e) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b) any document listed from condition 1.1a) and 1.1e) inclusive, and any other document listed from condition 1.1 a) and 1.1 e) inclusive, the most recent document shall prevail to the extent of the inconsistency.			*Not triggered*
1.3	If there is any inconsistency between this concept approval and any project approval granted for the project, this concept approval shall prevail to the extent of the inconsistency.	Previous audit report (NGH 2023) Interview - M O'Donovan & Isabella Kane	Inconsisitencies of Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
1.4	This concept approval shall operate from the date the approval is endorsed by the Minister.		Noted	*Not triggered*
1.5	This concept approval shall lapse five years after the date the approval is endorsed by the Minister, unless works the subject of the project approval for the Tumut Mill Expansion (excluding the multi-fuel boiler component) are physically commenced on or before that date.		Noted	*Not triggered*
2.1	The Tumut Mill Expansion, with the exception of the multi-fuel boiler (non-standard fuel) component, requires no further environmental assessment and is the subject of a separate instrument of approval.		Noted	*Not triggered*

2.2	Pursuant to section 75P(1)(a) of the Environmental Planning and Assessment Act 1979, the following environmental assessment requirements apply with respect to the multi-fuel boiler (non-standard fuel) component: a) a detailed project-specific Statement of Commitments, consistent with the Statement of Commitments prepared for the concept plan, with a clear indication of any new or amended commitments relating to the project must be provided; b) a demonstration that the project is consistent with the requirements of this approval and generally consistent with the scope and intent of the concept outlined in the documents under condition 1.1 of this approval must be included; c) a Non-standard Fuel Assessment must be undertaken in accordance with the DECC's Guidance Note: Assessment of Non-standard Fuels (2005) which shall include but not necessarily limited to: i) a comprehensive assessment of the composition and characteristics of each fuel stream; ii) chemical characterisation of all proposed non-standard fuels; iii) description of pollution control equipment with a demonstration that Best Available Techniques have been employed where possible; iv) a detailed testing regime for proposed fuels specifying testing methodology, monitoring and contaminant thresholds; and proposed quality assurance and quality control procedures related to non--standard fuels on site and at supplier sites. d) an updated Air Quality Impact Assessment, must be prepared in accordance with Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2005), reflecting the finalised design, fuel composition and fuel source ratio. The assessment must demonstrate predicted compliance with the relevant NSW statutory emission limit and where no such limit exists demonstrate at a minimum predicted compliance with the emission limits described in the EU Waste Incineration Directive (2000); and e) detailed information regarding the installation and commissioning of the multi-fuel	ECMR 2024 Interview - M O'Donovan & Isabella Kane	No non-standard fuels have been used on site during the reporting period.	*Not triggered*
3.1	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this concept approval and all related project approvals. The Program shall include, but not necessarily be limited to: a) provisions for periodic review of the compliance status of the project and its component parts; b) provisions for periodic reporting of compliance status to the relevant approval authority; c) a program for independent environmental auditing of the development, in accordance with /SO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing; d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance; e) provisions and framework that clearly demonstrate the regulatory interactions between approval instruments and licences, and those relevant to the existing mill and its operations.	ECMR 2024 Email from Visy to DPHI, NSW EPA, SVC - submission of 2024 ECMR and appendices, dated 19/11/2024 Previous audit report (NGH 2023) Annual Return 2024 for EPL10232, submitted 20/08/2024 Annual Return 2024 for EPL 10232 submission, dated 13/08/2024	Compliance tracking regularly completed by Visy as specified by this condition includes: a) periodic review using ECMR, EPL Annual Return. b) Annual EPL report and provision of EMR to relevant authorities sighted during site inspection c) Independent Auditing required and completed annually d) Non-compliances added to targets for subsequent years or immediate correction. e) EMR and management plans.	Compliant

4.1	The Proponent shall continue to participate with the Community Consultative Committee. Subject to confidentiality, the Proponent shall submit all documents required under this approval to the Community Consultative Committee and make available such documents for public inspection on request.	VCCC meeting minutes for 1/08/2023, 3/10/2023, 5/12/2023, 6/02/2024, 2/04/2024, 4/06/2024 Email correspondence Visy to NSW EPA, submission of VCCC meeting minutes for the reporting period, dated 10/09/2024.	Visy are holding CCC meetings every two months, minutes sighted for each bimonthly meeting.	Compliant
4.2	Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation): a) a telephone number on which complaints about construction and operational activities at the site may be registered; b) a postal address to which written complaints may be sent; and c) an email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans VCCC meeting minutes Site inspection	Number maintained and advertised through website, signage and in the VCCC minutes. Both a 24 hour hotline and landline number are provided.	Compliant
4.3	The Proponent shall record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the Director-General upon request.	Quarterly Complaints Registers - July 2023 - June 2024 Quarterly Complaints Audit Reports - July 2023 - June 2024 Appendix 9 of the ECMR	There were 27 compliants documented for the reporting period (Appendix 9 of ECMR). 25 of these complaints were associated with odour. One compliant was associated with noise and one with air emission. Quarterly compliant audits were sighted. Reports include review of complaints and investigation results with reference to relevant data. Each complaint has been investigated and an investigation finding and corrective action reported in the complaints register.	Compliant
4.4	The Proponent shall establish and maintain a new website, or dedicated pages within its existing website for the provision of electronic information associated with the development. The Proponent shall publish and maintain up-to-date information on this website or dedicated pages including, but not necessarily limited to: a) information on the development, each of its project components and the current implementation status of each; b) a copy of this concept approval and all related project approvals; c) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the development; d) a copy of each monitoring program and each environmental management required under this concept approval or under each relevant project approval; e) details of the outcomes of reviews and audits of the development and each of its project components undertaken in accordance with the Compliance Tracking Program referred to under condition 3.1; and f) details of a contact point(s) to which community complaints or inquiries may be directed, including a telephone number, a postal address and an email address.	https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans	The Visy Tumut web site has Project assessment documents and consents, EPL and WALs, Management Plans, annual monitoring reports, EPL compliance report and most recent independent audit report. Contact details (24h) are also available on the website. **Opportunity for improvement** - Modification 6 approval should be included on the Project's website.	Compliant

5.1	The Proponent shall develop an Operational Environmental Management System to outline the general environmental management practices and procedures to be followed during the operation of each project associated with this concept approval. The System shall be prepared in accordance with /SO14001:2004- Environmental Management Systems and shall aim to provide a single, consistent environmental management framework to be applied to each project and across projects.	OEMP (PLANS-VPP-TUM-HSE-001-5) revision 28 February 2023	OEMP (PLANS-VPP-TUM-HSE-001-5) revision 28 February 2023 identifies that the site has an EMS and is certified to ISO14001:2015 and provides an overview of the whole EMS, including additional Management Plans, refer to section 1.3.	Compliant
5.2	The Operational Environmental Management System required under condition 5.1 of this concept approval shall be supplemented with specific Operational Environmental Management Plans for each project to meet the requirements of each project approval.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023 Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 31 July 2024 Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023 Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023 Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023 Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023 Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023 Pollution Incident Response Management Plan (PLANS-VPP-TUM-HSE-010-2) 15	A suite of environmental management plans exists for the project and each document is regularly reviewed and updated. Plans include OEMP, AQMP, LNVMP, NMP, SMP, TMP, WMP, SWMP and a PIRMP.	Compliant
6.1	The Proponent shall notify the Director-General of any incident relating to a project associated with this concept approval which has actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Proponent shall provide full written details of the incident to the Director-General within seven days of the date on which the incident occurred.	Interview - M O'Donovan & Isabella Kane	The audit found no spills or inicidents wee recorded for the reporting period.	*Not triggered*

6.2	The Proponent shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 6.1 of this approval, within such period as the Director-General may require.	Interview - M O'Donovan & Isabella Kane	The audit found no spills or inicidents wee recorded for the reporting period.	*Not triggered*
6.3	The Proponent shall, throughout the life of the project, prepare and submit for the approval of the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall be for each project associated with this concept approval and be consolidated with the AEMR for the existing plant. It shall review the performance of the each project against the Operation Environmental Management Plan (refer to in the relevant project approval), the conditions of this approval and other licences and approvals relating to the projects associated with this concept approval and those relating to the existing plant. The AEMR shall include, but not necessarily be limited to: a) details of compliance with the conditions of this approval; b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how theses complaints were address and resolved; c) identification of any circumstances in which the environmental impacts and performance of the project during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition 1.1 of this approval, with details of additional mitigation measures applied to the project to address recurrence of these circumstances d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident. The Proponent shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the project. The Director-General may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Proponent shall	ECMR 2024 and appendices	ECMR 2024 was provided during audit process. Compliance report included as App 1 to the document. Complaints detailed in section 3.1 and listed in App 9. Complaints from odour exceedances noted and source identified as are corrective actions. Monitoring results and interpretations documented in ECMR and App 3, 4, 6, 7, 8, and 10. Sighted submission email from Visy to DPHI with copy of ECMR and appendices, dated 19/11/2024.	Compliant

Development Consent Compliance Status - December 2024

mod 4 - march 2024 (red) / mod 3 - 2012

Reference	Approval or licence requirement	Evidence collected 2024	2024 Audit Finding	Compliance status
Development Consent				
1	Development shall be carried out as described in: (a) Development Application (DA) No.6/98; (b) the environmental impact statement prepared by Nolan ITU Pty Ltd and dated February, 1998; (c) the SEE prepared by Nolan ITU Pty Ltd and dated March 2000; (d) modification application to permit the use of urban wood residues and compost manufacturing residues as fuel in the power boiler (MOD-45-5- 2003-i) and accompanying documents including: i. Report on Stage 1 of the Beneficial Reuse of Urban Wood Residues and Compost Manufacturing Residues dated 23 April 2003; ii. Predicting the Emissions of Certain Pollutants from the Stage One Waste Wood Burning Trial dated April 2003; iii. Air Quality Assessment: Wood Waste Trials at Visy Pulp and Paper Mill, Tumut, NSW prepared by Holmes Air Sciences and dated 13 November 2003; iv. Report on Trial Period for the Beneficial Reuse of Urban Wood Residues and Compost manufacturing Residues at Visy Pulp and Paper, Tumut dated August 2004; and v. Report on Trial Period for the Beneficial Reuse of Urban Wood Residues and Compost manufacturing Residues at Visy Pulp and Paper – Technical Appendices, dated August 2004. (e) modification application DA 06/98 MOD 3 to install a diesel refuelling facility and supporting Environmental Assessment prepared by Hazkem Pty Ltd and dated 25 July 2012; and (f) modification application DA 6/98-Mod-4 accompanied by Modification Report titled Storage, relocation of refuelling facility & consolidation of conditions DA 6/98 MOD 4, MP06_0159 MOD 6 & CP06_0159 MOD 2 Visy Pulp and Paper Pty. Ltd, prepared by GHD dated 04 July 2023 (g) in accordance with the conditions and management strategies prepared and approved under the conditions of Schedule 2.	ECMR 2024 Interview - M O'Donovan & Isabella Kane Site inspection	The Project has been carried out generally in accordance with DA 6/98. Refer CA Condition 1.1.	Compliant
2	In the event of an inconsistency between the documents listed under conditions 1(a) to (f) the most recent document shall prevail to the extent of that inconsistency. In the event of an inconsistency between these documents and the conditions of this consent, then the conditions of this consent shall prevail.	Email correspondence DPHI and Visy, dated 27/11/2024	Inconsisitencies of Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
3	Pursuant to section 91AB(2) of the Act, this consent is issued for Stage 1 of the development.	Email correspondence DPHI and Visy, dated 27/11/2025	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
4	Pursuant to section 91AB(2) of the EP&A Act, a further consent shall be obtained for Stage 2 of the development.	Email correspondence DPHI and Visy, dated 27/11/2026	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*

5	A consent granted in accordance with Condition 4 does not require a further development application under section 77 of the EP&A Act. However, any such consent will be subject to the Applicant preparing report(s) to the requirements of the Director-General on the environmental performance of Stage 1 of the development and additional information relating to Stage 2 operations. The Director-General shall consult with relevant Government authorities and the community and consider any submissions prior to the granting of a consent for Stage 2 of the development.	Email correspondence DPHI and Visy, dated 27/11/2027	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
6a	The Applicant shall meet the requirements of all public authorities having statutory responsibilities for environment protection, pollution control, and land and water conservation approvals and licences in respect of the mill and associated waste disposal streams encompassed by DA No.6/98.	ECMR 2024 Site inspection	The Project holds all relevant licences and deals with licenced premises for offsite waste disposal and processing. While some non-compliances have been noted during this reporting period, the intent of this condition, being that the Project is generally compliant with statutory approvals, holds required licences and enacts the directions of public authorities, is considered to be met.	Compliant
6b	The Applicant shall obtain from the Environment Protection Authority all necessary statutory approvals and licensing under the Protection of the Environment Operations Act 1997 and any approvals for construction under the Pollution Control Act 1970, Clean Air Act, 1970, Clean Waters Act 1970 and the Noise Control Act 1975, prior to the commencement of construction.	Email correspondence DPHI and Visy, dated 27/11/2027	Historic condition - not assessed during this reporting period.	*Not triggered*
7	The Applicant shall notify the Department, EPA, DLWC and the Council in writing of the dates of commencement of construction and of operation of the mill and of completion of commissioning.	Email correspondence DPHI and Visy, dated 27/11/2027	Historic condition - not assessed during this reporting period.	*Not triggered*
8	The Applicant shall submit for the approval of the Director-General a Conditions Compliance Report in two stages. (a) The first stage shall be submitted one month prior to the commencement of substantial construction and shall demonstrate that all conditions of consent and other regulatory requirements applicable at this stage have been complied with. (b) The second stage of the report shall be submitted 1 month prior to commencement of operations and shall demonstrate that all conditions of consent and other regulatory requirements applicable at this stage have been complied with.	Email correspondence DPHI and Visy, dated 27/11/2027	Historic condition - not assessed during this reporting period.	*Not triggered*

9	In preventing or controlling any polluting emissions or discharges from the mill, the Applicant shall apply "Best Available Technology (BAT)" to the fullest extent practicable as it relates to the type of plant, in consultation with the EPA.	ECMR 2024, Appendix 2 - CEMS Exceedance Event Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023 Stack testing, Ektimo, August 2023 Stack testing, Ektimo, November 2023 Stack testing, Ektimo, February 2024 Stack testing, Ektimo, June 2024 Odour testing, Ektimo, August 2023 Odour testing, Ektimo, February 2024	Visy employs CEMS for stack emissions at multiple locations on the plant. Exception reports for exceedances that occur during each 12 hour shift, as well as weekly and monthly reports used for data validation and auditing, are produced by using variaous programs and software to analyse the data. CEMS sensors are calibrated twice per year. Stack testing is undertaken quarterly and odour monitoring was undertaken in August 2023 and February 2024. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved.	Compliant
9A	The following materials are permitted to be received at the subject land for use in the power boiler at the development, subject to meeting the requirements of this consent, and the requirements of the EPA: a) Standard Fuels; and b) Non-Standard Fuels. Note: The relationship of the conditions in this consent relating to the use of fuels in the power boiler at the development is illustrated in Attachment 1.	Interview - M O'Donovan and I Kane	The audit found non-standard fuels are not used at the facility.	Compliant
9B	The total mass of Non-Standard Fuels, excluding the sub-category of "Known Fuel Not Requiring Further Testing", used in the power boiler shall not exceed 50% by mass the total fuel used in the power boiler.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9C	Non-Standard Fuels shall not be received at the subject land or used in the power boiler at the development unless: a) they comply with the sampling, analysis and quality/ source requirements in accordance with the requirements of the EPA and they comply with the Fuel Specification; or b) the fuel and the supply source have been approved as a Known Fuel Not Requiring Further Testing in accordance with condition 9G of this consent, and the fuel complies at all times with the Fuel Specification.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9D	The maximum concentration of hazardous substances in any sample of Non- Standard Fuel (including Known Fuels Not Requiring Further Testing) shall comply at all times with the Fuel Specification as set by the EPA.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9E	All Non-Standard Fuels shall comply with the following quality assurance control requirements prior to delivery to the subject land: a) visual inspection and removal of all visible contaminants or treated pieces of wood; b) sampling and analysis shall be carried out in accordance with the Sampling Protocol and the EPA's requirements; c) records of sampling and analysis shall be maintained in accordance with the requirements of the EPA; and d) assessment of suitability for use as a fuel in accordance with the Fuel Specification.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9F	Any Non-Standard Fuel that fails to meet the Fuel Specification shall: a) not be blended with other fuels; and b) not be retested.		The audit found non-standard fuels are not used at the facility.	*Not triggered*

9G	Prior to a Known Fuel Not Requiring Further Testing being defined as such, each supply source of that fuel shall meet the following requirements: a) sampling and analysis of representative samples from three (3) separate batches of fuel in accordance with the requirements of the EPA; b) identification of all contaminants to meet the requirements of the EPA. For all such contaminants, the Applicant shall submit supporting scientific information and/or analysis that demonstrates the material will not have a significant impact on the environment when used in the power boiler; c) a report is submitted to the EPA and the Director-General detailing the information determined in a) to b) above which also includes details of the quality assurance and quality control procedures that will be implemented to ensure fuel quality will be maintained; and d) written approval has been received from the EPA and the Director-General that the fuel and the fuel source are defined as Known Fuel Not Requiring Further Testing. Approval for the use of fuel from a particular source as Known Fuel Not Requiring Further Testing may be withdrawn at any time in writing by the EPA or by the Director-General.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9H	If a Non-Standard Fuel source is assessed and classified as a Known Fuel Not Requiring Further Testing it will not require ongoing sampling and analysis unless directed by the EPA or the Director-General. Note: at the time of this consent the fuels that were considered as likely to be considered as Known Fuels Not Requiring Further Testing were paper machine rejects generated on site; particle board, medium density fibreboard and ply wood that is uncontaminated and untreated (except for adhesives used in the manufacture of the products); and uncontaminated and untreated timber docking and timber products from manufacturing processes.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
9I	Within 12 months of the commencement of the use of Non-Standard Fuels in accordance with this consent, and thereafter an annual basis or as otherwise agreed with the Director-General, the Applicant shall provide a report which details the use of Non-Standard Fuels at the development. The Annual Report shall include, but not be limited to: a) the nature, quantity and quality of the Non-Standard Fuels (including Known Fuels Not Requiring Further Testing) used in the power boiler at the development; b) details of any fuels that did not meet the Fuel Specification, including the source of the fuels and how the rejected fuels were managed or disposed of; c) details of any activities (including inspections of supplier sites, and random sampling and analysis of fuels already received) undertaken as part of the fuel quality control management procedures to be implemented by the Applicant; and d) the results of all monitoring undertaken under condition 61A and assessment of this against the concentration limits set in condition 26A and the predictions made in the modification application an accompanying documents. The Applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from, or recommended by, the Annual Report within such time as the Director-General shall agree. There is nothing which prevents the Applicant from including the annual reporting requirements detailed in condition 9I with the annual monitoring and compliance report required under condition 12.		The audit found non-standard fuels are not used at the facility.	*Not triggered*
10	Prior to commencement of construction, the Applicant shall prepare a construction specific Environmental Management Plan (EMP) to the satisfaction of the Director-General following consultation with relevant Government Agencies and Tumut Shire Council. The EMP shall be prepared in accordance with the EIS, the conditions of this approval, all relevant Acts and Regulations and accepted best practice management procedures. The EMP shall cover specific environmental management objectives and strategies for the main environmental elements and shall address but not be limited to.....		Historic condition - not assessed during this reporting period.	*Not triggered*

11	Prior to commencement of operations, the applicant shall prepare a project specific Environmental Management Plan (EMP) to the satisfaction of the Director-General following consultation with relevant Government Agencies and Tumut Shire Council. The EMP shall specifically cover the environmental management objectives, strategies and monitoring for the operation of the mill and be prepared in accordance with the EIS, the conditions of this approval, all relevant Acts and Regulations and accepted best practice management procedures. The EMP shall address but not be limited to: a) identification of the statutory and other obligations which the Applicant is required to fulfill during operation including all approvals and consultations/agreements required from authorities and other stakeholders, and key legislation and policies which control the Applicant's implementation of the project; b) definition of the role, responsibility, authority, accountability and reporting of all personnel (including sub-contractors) relevant to compliance with the EMP; c) measures to avoid the occurrence of adverse environmental impacts and measures to provide positive environmental offsets to unavoidable adverse environmental impacts; d) environmental management procedures for all operational processes which are important for the quality of the environment in respect of permanent and/or temporary works; e) monitoring, inspection and test plans for all activities and environmental qualities which are important to the environmental management of the project including performance criteria, specific tests, protocols (e.g. frequency and location) and procedures to follow including procedures for notifying all relevant authorities should non-compliance with any limits or performance standards specified in the EMP arise; f) requirements to undertake environmental audits to ensure that the EMP is working and steps the Applicant intends to take to ensure that all plans and procedures are being complied with; g) delegation of responsibility for breaches of the EMP or pertinent environmental legislation by sub-contractors regarding the receipt of any Penalty Infringement Notices issued by the EPA; and h) community consultation and notification strategy (including the local community, Council and all relevant authorities) and complaint handling procedures.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023	The OEMP has not been updated during the reporting period. Statutory obligations are included in Section 4. Roles and responsibilities documented Section 6. Management measures under the OEMP occur in various sections. Some mitigation measures are in the OEMP but most are included in the subplans. Monitoring and inspection is dealt with generically in section 16 and specific details are provided in the relevant subplans. Auditing addressed in Section 20. Community consultation is dealt with in Section 8. Map in Section 1 indicates overall site area.	Compliant
12	Both the construction and operational EMP's shall be reviewed on an annual basis by the preparation of an environmental report which analyses the results of monitoring required in the EMP's. The report shall review the performance of the plant against the relevant EMP, the conditions of this consent, and other licences and approvals relating to the construction and operation of the plant. The first construction report shall be submitted one year from the date of this consent, and subsequent reports shall be submitted on the anniversary of this date or such other period as the Director-General may agree. To enable ready comparison with the Environmental Impact Statement's predictions, diagrams and tables, the report shall include, but not be limited to, the following matters: (a) a review of the effectiveness of environmental management of the plant in terms of EPA and DLWC requirements; (b) results of environmental monitoring in respect of air, water and noise pollution, which includes interpretation and discussion by a suitably qualified person; (c) discussion on the actual performance of the mill when compared with EIS predictions; (d) a listing of any variations obtained to approvals applicable to the subject area during the previous year; (e) a record of all heavy vehicle movements (3 tonne tare or greater) into and out of the site annually from the proposed development; and (f) set out environmental management targets for the next year. The applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from, or recommended by, the environmental report within such time as the Director-General may determine.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023 ECMR 2024	OEMP remains in revision from February 2023. The Annual Environmental Compliance and Monitoring Report 2024 addresses the requirements of the Consent management plans and the EPL. The ECMR 2024 investigates the performance of the facility against the targets, Consent and EPL as required. Sufficient detail is provided to support the condition, including all heavy vehicle movements. Non conformances particularly in response to odour are investigated, described and discussed. Specialist reports or summaries are presented in the Appendices, e.g. Farm Environmental Monitoring, Odour and Emission Testing.	Compliant
13A	The Applicant shall implement the recommendations contained in the Preliminary Hazard Analyses prepared for the pulp and paper mill by Environmental Audits of Australia dated 2 January 1998, and 1 March 2000, unless otherwise modified by this consent. In the event of an inconsistency between the Preliminary Hazard Analyses, the Preliminary Hazard Analysis dated 1 March 2000 shall prevail, to the extent of the inconsistency.	Hazard Audit Dec 2021, Pinnacle Risk Management. Tumut Visy Corporate HSE Risk Register_V04.2_2024 spreadsheet	External hazard audits have been undertaken since this initial analysis with an external Hazard Audit undertaken every three years. Visy holds an annual review of the Corporate HSE Risk Register. Each risk group was reviewed between February and June 2024. The next Hazard Audit was undertaken in late 2024, which is outside the reporting period and will be assessed at the next audit.	Compliant

13	At least one month prior to the commencement of construction (except for construction of preliminary works that are outside the scope of the hazard studies) of the proposed development, or within such further period as the Director- General or her nominee may agree, the Applicant shall prepare and submit for the approval of the Director-General the following studies.....		Historic condition - not assessed during this reporting period.	*Not triggered*
14	At least two months prior to the commencement of operations of the refuelling facility (Mod 3 and DA 6/98-Mod-4), or within such further period as the DirectorGeneral may agree, the Applicant shall prepare and submit for the approval of the Director-General: a) a revised Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the proposed development. This plan should include detailed procedures for the safety of people in areas outside the development. The plan should be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. (b) a revised Safety Management System A comprehensive safety management system, covering all operations onsite and associated transport activities involving hazardous materials. The system should clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records must be kept on-site and should be available for inspection by the Director-General upon request. The Safety Management System should be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, Safety Management. (c) Prior to the commencement of operation of the refuelling facility the Applicant shall ensure that the facility is designed in accordance with the relevant Australian Standards (AS 1940-2017) and the Risk Assessment and Hazards Analysis dated July 2012. (d) Prior to the commencement of operation of the refuelling facility the Applicant shall implement the requirements of the Risk Assessment and Hazards Analysis dated July 2012. (e)The Applicant shall ensure that fuel associated with Modification 3 is not to be sold for retail purposes, and only to be used by Visy vehicles and contracted heavy vehicles transporting product to or from the site.	Interview - M O'Donovan and I Kane	The audit found that the relocation of the refuelling facility had not commenced. This condition will not be triggered until two months prior to commencement of operation of the refuelling facility in the new location.	*Not triggered*
15	Within 24 hours of any incident associated with the operation and/or transport of the proposed development and with an actual or potential significant off-site impacts on people or the biophysical environment, a report shall be supplied to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventative measures.	Interview - M O'Donovan and I Kane	The audit found there were incidents recorded for the reporting period.	Compliant
16	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and submit a report on the audit to the Director-General. This audit is to be carried out at the Applicant's expense by a duly qualified independent person or team to be approved by the Director-General. Further audits will be 7 required every three years or as may be requested by the Director-General. Hazard audits should be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.	Hazard Audit Dec 2021, Pinnacle Risk Management	Hazard audit carried out within required timeframe (Nov 2021) and reported during the period 2021 - 2022. Audit prepared in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, Hazard Audit Guidelines. Next hazard audit due December 2024.	Compliant
17	Deleted			*Not triggered*
18	All hazardous goods road tanker unloading areas shall have bunding to the size of the total quantity of the largest road tanker.	Interview - M O'Donovan and I Kane Previous audits reports (NGH 2021 / 2023)	The 2021 review indicates that there is sufficient bunding. Recommendations made regarding storage of materials and maintenance of bund integrity. No material change in volume of bunding or tank dimensions for delivery of chemicals during the reporting period.	Compliant

19	All dangerous goods vehicles delivering bulk dangerous goods to the site are to include brake interlocks or an alternative safety procedure to the satisfaction of the Director-General.	Interview - M O'Donovan and I Kane	Visy has introduced a brake interloch compliance for ALL trucks, not just chemical trucks. Upcoming process for all trucks to include either brake alarm or wheel chocks. All unloading areas in a rollover bund to rucks can't roll away.	Compliant
20a	The Applicant shall monitor all non-Applicant owned residences likely to be affected by construction or operation noise levels more than 5dB(A) LA10 above background noise levels to the satisfaction of the Environment Protection Authority from the commencement of construction and during the operation of the mill.	Visy Tumut Pulp and Paper Mill, Annual attended noise monioring report, 2024 (EMM, March 2024)	Noise monitoring was undertaken in February 2024 in accordance with EPL requirements.	Compliant
20b	The Applicant shall acoustically treat any non-Applicant owned residence affected by the construction or operation noise levels more than 5dB(A) LA10 above background noise levels under prevailing weather conditions (excluding temperature inversions) for longer than 6 months if requested by the owner to the satisfaction of the EPA.	Interview - M O'Donovan and I Kane ECMR 2024	Residences at Glengarry, Reka, Whispering Pine, Pleasant View, Brentwood, Nolte, Deep Creek and Poverty Lane are identified in the ECMR 2024 as having signed agreements. No changes made during the reporting period.	Compliant
21a	Any construction activity resulting in noise emission levels greater than 5 dB(A) above background, or resulting in tonal or impact noise likely to cause annoyance at the nearest residence shall be limited to the following hours: 7:00 a.m. to 6:00 p.m. - Monday to Friday 8:00 a.m. to 1:00 p.m. - Saturdays There should be no construction activities on Sundays and public holidays.	Interview - M O'Donovan and I Kane	Minimal construction on the waste storage area (approved under MP06-0159-Mod-6 started in the reporting period. Most of the constrcution activity for the waste storage area in the 24/25 reporting period. Reporting period construction works included a dozer and concrete trucks during daytime hours. There were no noise complaints during this pertaining to this activity.	Compliant
21b	Notwithstanding 21(a) above, construction activity resulting in noise emission levels greater than 5 dB(A) above background at the nearest residence may be permitted outside the times specified in 21(a) following; 1. written approval by the EPA; or alternatively 2. in accordance with an agreed Schedule of Works approved by the EPA following consultation with the community consultative committee.		Minimal construction on the waste storage area (approved under MP06-0159-Mod-6 started in the reporting period. Most of the constrcution activity for the waste storage area in the 24/25 reporting period. Reporting period construction works included a dozer and concrete trucks during daytime hours. There were no noise complaints during this pertaining to this activity.	*Not triggered*
22	Prior to the commencement of construction, the Applicant shall prepare in consultation with the EPA and Tumut Shire Council, and for the approval of the Director-General, a Construction Noise Management Plan. The Management Plan shall…..		Historic condition - not assessed during this reporting period.	*Not triggered*
23	The Applicant shall ensure that noise emissions from the operation of the mill shall: (a) not exceed an LA10(15minute) noise emission limit of 40 dB(A) during the day (7am to 10pm) at the nearest residential receiver; and (b) not exceed an LA10(15minute) noise emission limit of 38 dB(A) during the night (10pm to 7am) at the nearest residential receiver. The noise emission limits in both (a) and (b) apply for prevailing meteorological conditions, except under conditions of temperature inversions. Any variations to the above hours of noise limits to be subject to EPA approval.	Visy Tumut Pulp and Paper Mill, Annual attended noise monioring report, 2024 (EMM, March 2024)	Noise monitoring results from February 2024 indicate that noise emissions from the mill did not exceed the assessment criteria due to negotiated agreements. At the locations not under a negotiated agreement, the noise was inaudible during all periods.	Compliant
24	Should monitoring indicate increased levels of noise emissions due to temperature inversions, the Applicant shall: (a) document noise reports which identify increased emission levels or patterns of temperature inversions; (b) effect ameliorative measures in consultation with the EPA; and (c) amend and include the adopted ameliorative measures in the Noise Management Plan required by Condition 25 of this consent.	Visy Tumut Pulp and Paper Mill, Annual attended noise monitoring report, 2024 (EMM, March 2024)	All 24 noise measurements during attended noise monitoring were captured during weather conditions that would render noise limits applicable where relevant. Increased noise due to temperature inversions was not identified by EMM in the March monitoring report.	*Not triggered*

25	Prior to the commencement of operations, the Applicant shall prepare in consultation with the EPA and Tumut Shire Council, and for the approval of the Director-General an Operational Noise Management Plan. The Management Plan shall demonstrate that all practical design and noise mitigation methods have been incorporated to minimise operational noise emissions. The plan should be included in the EMP required by Condition 11 of this consent and include but not be limited to the following: (a) information on the measures to be undertaken to achieve the noise levels specified in Condition 23; (b) complaints handling systems, noise monitoring, reporting of complaints and response actions; and (c) measures for dealing with low frequency noise and extreme noise incidences.	Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023	The Noise Management Plan (2023) addresses: a) In Section 6 b) In Sections 6.3, 7 and 8 c) In Section 6 - incidence recorded & the cause determined. Mitigation put in place and response given to complainant. Historic timing requirement (prior to operations) was not assessed during this reporting period.	Compliant
26	In preventing or controlling polluted air emissions from the mill, the Applicant shall apply "Best Available Technology (BAT)" for this type of pulp and paper mill to achieve, at a minimum, compliance with the provisions of the USEPA's NESHAP limits (MACT I, II, and III) to the satisfaction of the EPA.	ECMR 2024 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	Visy employs CEMS for stack emissions at multiple locations on the plant. CEMS sensors are calibrated twice per year. Periodic stack testing is undertaken quarterly and odour monitoring was undertaken in August 2023 and February 2024. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant
26A	For each pollutant emitted from the power boiler (EPA Point 3), the concentration of that pollutant shall not exceed the concentration limits specified in Table 2. **Table 2: Emission Concentration Lir** Copy text Edit or format text Ask AI Assistant **Pollutant** / **Units of Mea** / **centile tion Limit** / **Averaging Period** Cadmium — mg/m³ — 06 — As per test method Mercury — mg/m³ — 06 — As per test method Dioxins and furans — ng/m³ — 1 — As per test method Solid particles — mg/m³ — 30 — 24 hour Carbon monoxide — mg/m³ — 120 — 1 hour Hazardous substances — mg/m³ — 0.6 — As per test method	Site interviews M O'Donovan and I Kane	The limits for Power Boiler 3 are only applicable when non-standard fuels are being burnt. In the reporting peroid, Total Solid Particles reported 25 mg/m_3, which is considered compliant as not using non-standard fuels.	Compliant
27	Prior to the commencement of operations, the Applicant shall prepare an Air Quality Management Plan in consultation with the EPA and Council and to the satisfaction of the Director-General. The Plan which should be incorporated into the operational EMP required by Condition 11, shall detail air quality safeguards and procedures for dealing with all emission discharges, dust control and monitoring for odour.	Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant
28	Prior to the commencement of construction, the Applicant shall prepare an Erosion and Sediment Control Plan showing detailed run-off and erosion control measures for both construction and operational phases of the development. The plan shall be prepared in consultation with the Council and the EPA and for the approval of the Department of Land and Water Conservation. The Plan shall be incorporated into the EMPs required by Conditions 10 & 11 and shall include but not be limited to the following: i) the provision and maintenance of temporary measures during construction to prevent sediment and polluted waters discharging from the site; and ii) the provision and maintenance of permanent measures during the operation of the development to prevent sediment and polluted waters discharging from the site. The Plan shall be prepared in accordance with DLWC's Technical Handbook Urban Erosion and Sediment Control by Hunt (1992) and implemented to the satisfaction of the EPA in consultation with DLWC.		Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*

29	All access roads and tracks should be constructed, designed and maintained in consultation with DLWC, and in accordance with the "Guidelines for the planning, construction and maintenance of tracks", Soil Conservation Service (1994). The Applicant shall comply with any requirements emanating from the guidelines as applicable.	Site observations Interview M O'Donovan & I Kane S96_00598 Mod-4	Constuction of the loop road occurred during the reporting period (S96_00598 Mod-4). The sealed road in in accordance with relevant guidelines.	Compliant
30	Foresty operations on the subject land must be carried out in accordance with "Forest code of practice for plantations on private lands in the South West slopes region of NSW".	Site observations Interview M O'Donovan & I Kane	No forestry operations has taken place on the subject land during the reporting period.	*Not triggered*
30A	Under the requirements of the Protection of Environment Operations Act 1997 the Applicant shall ensure that discharge of wastewater from the refuelling facility is licensed by the EPA.	EPL #10232		*Not triggered*
30A	The Applicant must ensure that runoff and stormwater from the refuelling facility is managed in accordance with Practice Note: Managing run-off from service station forecourts (EPA 2019). The management measures are to be incorporated into the Waste Water Management Plan as required by Condition 34.	S96_00598 Mod-4	The modification for the refuelling facility is approved, however, the audit found that construction had not commenced.	*Not triggered*
31	Any construction works within 40 metres of the bed or bank of Sandy Creek shall be designed and carried out to the satisfaction of DLWC.	Site observations Interview M O'Donovan & I Kane	The audit found that no construction activities we undertaken wihtin 40 m of Sandy Creek during the audit period.	*Not triggered*
32	To avoid erosion and contamination of groundwater, any earthwork structures for the storage of wastewater, diluted wastewater such as contaminated runoff from the irrigation area, and uncontaminated run-off, shall be designed, constructed and maintained to the satisfaction of DWLC.	ECMR 2024	There have been no requirements for additional water storages in the reporting period. The storages are maintained throughout the year.	Compliant
33	The Applicant shall ensure that the discharge of treated wastewater from the mill into Sandy Creek or any of its tributaries will: (a) have an average frequency of one in ten years or less; (b) be only as permitted by the EPA; and (c) will be fully recorded in terms of discharge amount, duration of discharge, and flow conditions in Sandy Creek at time of discharge.	Interview M O'Donovan & I Kane ECMR 2024 Site observations	There were no approved or accidental discharges into Sandy Creek or its tributaries in the reporting period. The wastewater pipe infrastructure had been improved and replaced following the accidental spill in FY 22/23.	Compliant
34	Prior to the commencement of operations, the Applicant shall prepare a Waste Water Management Plan in consultation with the Council, EPA, and DLWC and for the approval of the Director-General. The Plan should be incorporated into the EMP required by Condition 11 of this consent and shall detail all measures to address potential land and waste management issues which will ensure the sustainable use of land. The Plan shall identify additional land capable, as applicable, of accommodating the irrigation of effluent to the satisfaction of the Director-General. The plan should also include but not be limited to: (a) crop management; (b) irrigation scheduling; (c) nutrient budgets; (d) salinity management measures; (e) site drainage control measures; (f) comprehensive soil details of areas proposed for irrigation; and (g) measures to ensure ongoing maximisation of water recycling and/or reuse.	Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	The Visy Water Management Plan was updated in this reporting period, 18 July 2024. WWM requirements are addressed in the WMP: a) sections 4.4, 7.4 b) sections 4.4.4, 4.4.5, 6.3, Appendix 1 c) sections 4.4.5, 6.3, Appendix 2 d) sections 4.4.5.3 e) sections 4.1, 4.4.5 f) section 4.4.1, 7.4 g) sections 4.2.4	Compliant

35	Should monitoring indicate that a watertable rise in either the shallow or deep piezometers exceeds an average 10 cm per year over a five year period, and/or that the watertable under the effluent irrigation area has risen within two (2) metres of the land surface, the Applicant shall carryout investigations in consultation with DWLC to determine the cause. If the cause is found to be the irrigation scheme, the Applicant shall develop and implement methods for preventing further rises to the satisfaction of the DLWC.	ECMR Appendix 8 - Groundwater Trend Cycle Farm and Environmental Monitoring Report 2024	Groundwater trend data provided as part of ECMR Appendix 8. The trend for 2023/2024 indicates similar trend to 2022/2023. The Farm and Environmental Monitoring Report 2024 identified that background, irrigation and winter storage bore groundwater piezometric depths had progressivelyt declined in the 2023/2024 monitoring period after a slight between 2020 and 2023. Low rainfall between February and April 2024 saw depths decrease in the monitoring bores except for BH11D. Overall, bore depths have remained relatively stable with some seasonal fluctuations. This piezometer data as well as the FEMR is submitted annually to WaterNSW and as such is considered compliant with the intent of this condition.	Compliant
36	Prior to the commencement of operation, the Applicant shall, to the satisfaction of the Director-General prepare a program to monitor groundwater salinity levels in consultation with DLWC to the satisfaction of the EPA. If significant increases in salinity levels are found to be attributable to the irrigation scheme, the Applicant shall as relevant develop and implement methods for avoiding adverse impacts upon present or future beneficial uses of the area or adjoining streams to the satisfaction of the EPA and DLWC.	ECMR 2024 Farm and Environmental Monitoring Report 2024	The reporting does not indicate an increase in soil salinity or groundwater salinity in the irrigation area as a consequence of irrigation.	Compliant
37	The Applicant shall not make unavailable to receive effluent those lands identified in the EIS for irrigation of effluent, or the contingency land for irrigation of effluent identified in the Waste Management Plan without the prior written consent of the Minister or their nominee.	ECMR 2024 Farm and Environmental Monitoring Report 2024	Land identified in the EIS for irrigation is being used for irrigation. It is noted that during the 23/24 reporting period, the irrigation total for the year was 830 ML.	Compliant
38	Prior to the commencement of operations, the Applicant shall prepare in consultation with the EPA and DWLC a Surface Water Management Plan to the satisfaction of the Director-General. The plan shall be incorporated into the operational EMP required by Condition 11 and provide details of management measures to be taken during both the operation of the plant for the collection, treatment and disposal of surface water including details of: a) areas potentially subject to contaminated stormwater runoff; b) measures to prevent pollution of adjacent watercourses; c) proposed bunding for fuel, lubricants and chemical storage areas; d) total run-off detention for flood mitigation; and e) provision for the treatment of fire water on site, to prevent direct discharge to adjoining watercourses.	Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	The audit found that the WMP was updated on 18 July 2023 and addressed: a) Section 4.1 b) Section 4.1 c) Section 4.1 d) Section 4.4 e) Section 4.1	Compliant
39	The Applicant shall ensure that the fresh water storage dam and winter storages are constructed with a 600mm thick remoulded, recompacted clay liner with a permeability of less than 1 x 10-9 m/s.	Interview M O'Donovan and I Kane	Historic condition - not assessed during this reporting period. It is noted that no structural changes to any dams occurred during the reporting period.	*Not triggered*
40	The diversion drain for normal stream flow around the winter storage shall be designed and constructed to ensure that only a greater than 1 in 100 ARI flow shall discharge into the storage.	Site inspection site observations	No scouring of drainage paths was observed at the time of the audit. Drainage paths accepting overland flow were generally grassed and / or tree lined. Mulch residue was observed as acting as erosion protection within the disturbed wood yard footprint.	Compliant

41	Prior to the commencement of operations, the Applicant shall prepare a Solid Waste Management Plan in consultation with the Council and the EPA for the approval of the Director-General. The plan should be incorporated into the Operational EMP required by Condition 11 and include but not be limited to: (a) details regarding the continued viability of solid wastes returning to the pulping process; (b) details regarding ongoing analysis and monitoring for solids being disposed by landfill; (c) details of priority investigations into the beneficial reuse of purge fly ash and purge lime mud; and (d) other measures to reduce the amount of waste going to the Council's landfill sites.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 31 July 2024	The Solid Waste Management Plan (SWMP) a) Section 4.2 of the SWMP details the reuse of suitable solid waste in the pulping process as fuel and fibre sources. B) Section 3 of the SWMP details the analysis and monitoring waste and identifies the waste disposed of to landfill. C) Section 4.2 of the SWMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption. d) Section 5 of the SWMP details the landfill diversion strategy that Visy are employing. Recovery exemptions and orders currently being used have been updated in this revision of the Plan. It is noted that the WMP was updated outside of the reporting period (31 July 2024) and this updated Plan will be assessed during the next IEA.	Compliant
42	Prior to the commencement of construction, the Applicant shall provide the Council with an estimate of the quantity of construction waste expected at the Council's landfill sites. Measures for dealing with construction waste shall also be included in the Construction EMP required by Condition 10.		Historic condition - not assessed during this reporting period.	*Not triggered*
43	Prior to the commencement of construction, the Applicant shall consult with the Council regarding landfill charges for trade waste from the mill and the provision of recycling facilities.		Historic condition - not assessed during this reporting period.	*Not triggered*
44	Prior to the commencement of on-site works (except for preparatory earthworks or other works deemed necessary to enable pre-alignment or other preliminary works to be undertaken), the Applicant shall design and construct a right angled, three way intersection capable of accommodating turning movements for BDoubles funded by the State Government. The intersection design shall also incorporate adequate site distance in both directions and turning lane facilities for both in bound and out bound vehicles. The intersection shall be located on a straight section of the Snowy Mountains Highway adjoining land owned by the Applicant. The intersection (to be funded by the NSW State Government) shall be located, designed and constructed to the satisfaction of the RTA and the Director-General.		Historic condition - not assessed during this reporting period.	*Not triggered*
45A	Prior to the construction of the refuelling area and associated access road, the Applicant shall submit detailed design plans and vehicle turning paths for the access road servicing the facility, to the satisfaction of the Director-General. The plans shall: a. be prepared in consultation with Council; b. include details of any onsite traffic management signage; and c. be prepared in accordance with 2006 Austroads Design Vehicles and Turning Path Templates to accommodate 36m articulated vehicles.	Site interviews M O'Donovan and I Kane	The refuelling area and associated access roads have not been constructed.	*Not triggered*
45	Prior to the commencement of on-site works (except for preparatory earthworks or other works deemed necessary to enable pre-alignment or other preliminary works to be undertaken), the Applicant shall design and construct a bitumen sealed standard road (to be funded by the NSW State Government) linking the intersection required by Condition 44 with the mill site. The road shall be designed and constructed to accommodate the geometric and pavement requirements for B-Doubles. The road should be kept watered to keep dust down prior to sealing being completed.		No work has commenced in the construction of the refuelling area.	*Not triggered*
46	Upon completion of the intersection and access road as required in Conditions 44 and 45, all vehicular access to the site including all trucks and visitor and employee vehicles, shall be via the new intersection and access road unless in the event of an emergency.	Site inspection site observations	The upgraded intersection and access road from the Snowy Mountains Highway is the site access.	Compliant
47	The Applicant shall ensure that there will be no night time (10pm to 7am) semi-trailer or B-Double truck movements to and from the plant via the Snowy Mountains Highway through Adelong, except where, on the advice of the Director-General in consultation with the Council, such a restriction poses unacceptable impacts on alternative routes.	ECMR Appendix 6 Monthly HV Movement Data 2023/2024 Complaints Register Interview M O'Donovan and I Kane	There have been no changes to truck movements or sizes in the last reporting period. The ECMR reports nil movements through Adelong during night time hours.	Compliant

48	The Applicant shall ensure that there will be no semi-trailer or B-Double truck movements to and from the plant via MR 280 north of Adelong (except for the disposal of waste at Adelong Landfill) unless the road is upgraded and given B-Double status.	ECMR Appendix 6 Monthly HV Movement Data 2023/2024	No truck movements via Tumblong/Adelong have been recorded. No upgrade of MR280 north of Adelong has occurred.	Compliant
49	The Applicant shall ensure that the transport of waste to: (a) the Tumut landfill is restricted to the Snowy Mountains Highway (SH4) and Boonderoo Rd; and (b) the Adelong landfill is restricted to the Snowy Mountains Highway (SH4) and MR280.	Visy Waste Removal Records 2023 – 2024 (.xlsx) Interview M O'Donovan and I Kane ECMR Appendix 6 Monthly HV Movement Data 2023/2024	The Adelong landfill is not used. Tumbalong landfill is the main landfill, with a 60,000 tonne limit annually. Visy are the exclusive customer. Some waste goes to High Quality (8646.20 tonnes) and the rest to the Tumut landfill.	Compliant
50	Prior to the construction of the refuelling area, the Applicant shall prepare a revised Traffic Management Plan to the satisfaction of the Director-General. The Plan, which shall be incorporated into the Operational EMP required by Condition 11 of this consent, shall include but not be limited to: (a) records of all vehicles heavy vehicles (3 tonne tare or greater) entering and leaving the site including details of times and access routes used; (b) measures to reduce sleep disturbance impacts in built up areas including reduced speed limits, prohibition on the use of exhaust brakes, and the provision of air bag suspension to heavy vehicles; (c) measures to reduce other impacts in built up areas including restricting heavy vehicle movements to main roads through townships, limiting parking within townships, and the cleaning of trucks; (d) measures to ensure that the provisions of the Traffic Management Plan and Conditions 46-49 are implemented, ie. education of drivers and any contractual agreements with operators of heavy vehicles which regularly service the site; (e) measures to ensure drivers are aware of any provisions and restrictions associated with the utilisation of the refuelling facility (ie. Visy contracted vehicles); and (f) proposed onsite traffic management signage (ie. give-way).	Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023 ECMR 2024 Appendix 6 Monthly HV Movement Data	The site Traffic Management Plan has not been updated during the reporting period. The specified content is addressed within the following sections: a) Section 7.1 b) Section 6.2.1 c) Section 6.4 d) Section 6.1.	Compliant
51	The Applicant shall participate in the formulation of local roads maintenance requirements to ensure that funding identified for local road infrastructure associated with the operation of the mill is directed to those roads considered by Council, in consultation with the Direct-General, likely to be significantly and directly affected by the operation of the mill.	Site interviews M O'Donovan and I Kane	Roads affected by mill operations are State-managed. It is noted that the $70M upgrade to Gocup Road, finalised in 2019, involved Visy and SVC lobbying together to successfully secure State funding for the upgrade.	Compliant
52	The Applicant shall participate as required by the Director-General in any relevant committee/s established to investigate transport infrastructure initiatives in the region.	SWG website: https://murrayregionforestryhub.com.au/softwoods-working-group/ FIC website: http://forestindustrycouncil.com.au/members/	Visy is listed as a member of Softwoods Working Group (SWG) (now part of Murray Region Forestry Hub) & Forestry Industry Council (FIC) - focussed on improving the maintenance, standards & safety along the main haulage road.	Compliant
53	Within 6 months prior to the commencement of operations, the Applicant shall, in consultation with RAC, Freight Rail, potential service providers and the Council undertake joint investigations as to the feasibility of re-opening the Cootamundra to Tumut Railway Line and/or other suitable lines with a view to transporting raw material (including waste paper and timber residues from Tumut) and finished product. The outcome of the investigations shall be submitted to the Director-General for incorporation into any wider investigation of rail transport options co-ordinated by the Director-General.		Historic condition - not assessed during this reporting period.	*Not triggered*
54	The Applicant shall prepare a Landscape Plan to be integrated with the Native Vegetation Management Plan required by Condition 55 in consultation with the Council, the DLWC, NPWS and the Gilmore Landcare Group. The Plan shall be prepared by a suitably qualified and experienced professional and submitted for the approval of the Council prior to the commencement of construction. The Plan shall be incorporated into the EMP's required by Conditions 10 & 11 and include but not be limited to: (a) the existing landform of the site and the final landform when all proposed work is completed; (b) proposals for the irrigation areas and softwood plantations; (c) planting species, their purpose, maintenance requirements, irrigation requirements and illustration of typical visual character; (d) location of all hard and soft landscaping features; and (e) programs for staged work and maintenance of all landscaping and rehabilitation works. All site works shall be undertaken in accordance with the Plan and shall be supervised by a qualified	Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023	The LMP and NVMP are integrated and were reviewed and updated during the last reporting period, May 2023. Pre-existing and final landforms landforms are described. Irrigations of softwood plantations has not occurred on site. Irrigation areas fully described in the Water Management Plan. Planting species and purpose are described in section 2 and app B, maintenance in section 3 and App G+H, illustrations are shown in App D,E+F. Existing and planted vegetations is described in Appendix A, C + F. Revegetation is described in app A + F.	Compliant

55	Prior to the commencement of operations, the Applicant shall prepare a Native Vegetation Management Plan for the proposed property in consultation with and to the satisfaction of DWLC for all areas of retained vegetation, native planting, buffer areas and planted corridors. The Applicant shall ensure that: (a) retained native vegetation is appropriately fenced and signposted to exclude stock; (b) large hollow bearing trees shall be retained wherever possible; (c) native vegetation buffers are retained 50 metres to each side of Sandy Creek and 20 metres to each side of major drainage depressions; and (d) indigenous plant species shall be used in any site revegetation and any landscape planting associated with the mill site and access roads. The Plan shall be incorporated into the Operational EMP required by Condition 11.	Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023 Site inspection site observations ECMR 2024	The LMP and NVMP are integrated and were reviewed and updated during the last reporting period, May 2023. Vegetation established continues to grow taking advantage of wetter winters between 2020 - 2023. No plantings in 2023-2024. Retained vegetation is fenced with appropriate signage. Large HBT have been retained and interspersed with plantings to promote connectivity. The creeks have been fenced on both sides and the buffer generally exceeds 50m, smaller drainage depressions have been fenced and revegetated with native trees and shrubs.	Compliant
56	Prior to the commencement of construction, the Applicant shall prepare in consultation with and to the satisfaction of DLWC and NPWS, a Native Vegetation Management Plan for all areas of retained native vegetation. The plan shall outline measures to be adopted by the Applicant to protect and enhance the existing conservation value of native vegetation and to improve the long term viability of native vegetation as flora and fauna habitat. The Plan shall be incorporated into the EMP's required by Conditions 10 & 11.	Visy Landscape and Native Vegetation Management Plan (PLANS-VPP-TUM-HSE-003-4) 23 May 2023	The construction of the loop road commenced in the reporting period under Mod-4. The Visy Landscape and Native Vegetation Management Plan had already been prepared for the site.	Compliant
57	Prior to the commencement of operations, a detailed monitoring program shall be prepared in consultation with the EPA and DWLC and submitted for approval by the Director-General. The program shall cover all aspects of environmental performance (both operational and organisational), and compliance with the reporting requirements and all conditions of consent, including Conditions 58 to 70. The program shall include all measures for monitoring stack and fugitive emissions, noise, water quality and waste management. The program which should be incorporated into the operational EMP required by Condition 11 shall include but not be limited to: (a) provisions for monitoring the implementation and effectiveness of the management plans required by this consent; (b) sampling locations, sampling frequencies and parameters to be tested; (c) characteristics of the existing environment, in particular, the existing ambient air levels; and (d) timing of monitoring reports. All monitoring analysis is to be undertaken by a suitably accredited NATA registered laboratory, or as otherwise agreed by the EPA.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023 NATA certificates sighted online and in monitoring reports.	The OEMP details the need for monitoring and references the Environmental Performance, Measurement and Reporting (Procedure 205-0). The OEMP and subplans detail the location and methods for monitoring, evaluation criteria and reporting requirements. Specific environmental characteristics relevant to monitoring requirements are detailed in relevant subplans. EKTIMO NATA certification sighted at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO. McMahon NATA Certification sighted at https://nata.com.au/accredited-organisation/wagga-wagga-laboratory-3349-3342/?highlight=McMahon	Compliant
58	Prior to the commencement of construction, the Applicant shall, to the satisfaction of the EPA, install a meteorological stations/s. The number of monitoring stations and the parameters to be measured shall be developed in consultation with the EPA.		Two new meteorological monitoring stations were commissioned in mid-2014, which are located on top of the Recovery Boiler B building (Monitoring Point 23) and to the southeast of the mill site (Monitoring Point 24).	Compliant
59	Prior to the commencement of operations, the Applicant shall establish an ambient monitoring station/s to the satisfaction of the EPA. The number of monitoring stations and the parameters to be measured shall be developed in consultation with the EPA.		Historic condition - not assessed during this reporting period. It is noted that two new meteorological monitoring stations were commissioned in mid-2014, which are located on top of the Recovery Boiler B building (Monitoring Point 23) and to the southeast of the mill site (Monitoring Point 24).	*Not triggered*
60	The Applicant shall install continuous emission monitoring systems (CEMS) to monitor the combined exhaust gases from the stack. Monitoring of emissions from the recovery boiler, lime kiln and the powder boiler including oxygen, temperature, nitrogen oxides, acid gases, opacity, carbon monoxide, total reduced sulfides, sulphur oxides, and total volatile organic compounds shall be undertaken to the satisfaction of the EPA.	ECMR 2024 section 3.2.1 ECMR 2024 Appendix 2 EPL Annual Return 2024	Continuous Emissions Monitoring Systems (CEMS) have been installed to monitor exhaust gases from the stacks. There were some issues with the TRS analyser at Point 1, Main Stack 1 during the reporting period. It completely failed and attempts to repair the unit were unsuccessful. There were delays in the delivery of a new analyser from overseas.	Compliant

<table>
<tr><td>61</td><td>Within 12 months of the commencement of operations, and annually thereafter, the Applicant shall:
(a) undertake a regulatory source emission test (including emissions of TCDD) on the recovery boiler, lime kiln and the power boiler; and
(b) undertake an odour audit including a leak detection and repair (LDAR) program for all fugitive odour/VOC sources that are collected and ducted to each of the boilers.</td><td>Ektimo Stack Testing Reports August 2023, November 2023, February 2024, June 2024

Ektimo Odour Testing Reports August 2023, February 2024

Ektimo LDAR Testing Report August 2023 and February 2024</td><td>Emission testing on the recovery boiler, lime kiln & power boiler provided by CEMS. External stack testing is undertaken quarterly by Ektimo. Sensors calibrated and checked six monthly.

An odour audit is being conducted twice annually by Ektimo. The auditing took place in August 2023 and February 2024 during the reporting period, with LDAR completed August 2023 and February 2024.</td><td>Compliant</td></tr>
<tr><td></td><td>For each monitoring/ discharge point specified in Table 3 below the Applicant shall monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified. The Applicant shall use the sampling method, units of measure, and sample at the frequency specified in the table.
Table 3: Monitoring requirements
<table>
<tr><th>Monitoring Item</th><th>Pollutant</th><th>Units of Measure</th><th>Frequency [a]</th><th>Sampling Method</th></tr>
<tr><td rowspan="5">Power Boiler Discharge</td><td>Cadmium</td><td>mg/m³</td><td rowspan="4">Special Frequency 4</td><td rowspan="3">CAPER test methods 12, 13 and 14</td></tr>
<tr><td>Mercury</td><td>mg/m³</td></tr>
<tr><td>Hazardous substances</td><td>mg/m³</td></tr>
<tr><td>Chromium</td><td>mg/m³</td><td>OM-4</td></tr>
<tr><td>TCDD (equivalent)</td><td>mg/m³</td><td>Quarterly</td><td>CAPER test method 18</td></tr>
<tr><td>Power Boiler Electro-static Precipitator Fly Ash</td><td>Hazardous substances</td><td>mg/m³</td><td>Special Frequency 4</td><td>Representative sample [b]</td></tr>
<tr><td>Power Boiler Bottom Ash</td><td>Hazardous substances</td><td>mg/m³</td><td>Special Frequency 4</td><td>Representative sample [b]</td></tr>
<tr><td rowspan="8">Power Boiler Fuel</td><td>Ash</td><td>%</td><td>Special Frequency 5</td><td rowspan="8">Representative sample [b]</td></tr>
<tr><td>Chlorine</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Copper</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Fluorine</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Hazardous substances</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Organochlorine pesticides</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Organophosphate pesticides</td><td>mg/m³</td><td>Special Frequency 5</td></tr>
<tr><td>Power Boiler Discharge Duct (upstream of Electro-static Precipitator)</td><td>Hazardous substances</td><td>mg/m³</td><td>Special Frequency 4</td><td>CAPER test methods 12, 13 and 14</td></tr>
<tr><td>Power Boiler Fluidised Bed Sand</td><td>Hazardous substances</td><td>mg/m³</td><td>Special Frequency 4</td><td>Representative sample [b]</td></tr>
</table>
a. Special frequency 4 and 5 will initially be set at once every 2 months and once every month respectively. After 12 months the EPA may review these frequencies.
b. Analysis must be undertaken in accordance with the standard methods specified by the EPA.</td><td></td><td></td><td></td></tr>
<tr><td>62</td><td>Prior to the commencement of operations, the Applicant shall prepare in consultation with DLWC and the EPA and to the satisfaction of the DWLC, a groundwater monitoring strategy to assess any changes in groundwater quality and depth of both shallow and deep aquifers. The strategy shall include the installation by the Applicant of shallow and deep piezometers in areas which are representative of irrigated pasture, irrigated trees, non-irrigated buffers, and untreated areas. The piezometers shall be located following consultation with DWLC. The Applicant shall also install piezometers at off-site locations following consultation DWLC.</td><td>Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023
ECMR 2024
Farm and Environmental Monitoring Report 2024</td><td>The Water Management Plan was updated within the reporting period.

A groundwater strategy has been developed and is described in the Water Management Plan July 2023. It includes shallow and deep piezometers in irrigated and non-irrigated areas. The results are reported in the ECMR 2024.</td><td>Compliant</td></tr>
<tr><td>63</td><td>Prior to the commencement of operations, the Applicant shall install piezometers in the vicinity of the winter storages as directed by DWLC to monitor for any groundwater mounding as a result of leakage from the storages. If significant leakage is found to occur the applicant shall immediately prepare and implement measures to prevent further leakage to the satisfaction of DWLC.</td><td>Farm and Environmental Monitoring Report 2024, McMahon Earth Science</td><td>Piezometers have been installed in the vicinity of the winter storage facility. Groundwater chemistry and standing water levels do not indicate leakage. No leakage or runoff identified in the Farm and Environmental Monitoring Report 2024.</td><td>Compliant</td></tr>
<tr><td>64</td><td>Following installation, the Applicant shall provide DWLC with details of the location, depth, construction method and materials, and strata encountered of all piezometers for inclusion in the State Groundwater Data System under existing Bore Licence 40BL186472.</td><td>Site interviews M O'Donovan and I Kane</td><td>There have been no new piezos installed during the reporting period.</td><td>Compliant</td></tr>
<tr><td>65</td><td>Within 12 months of the commencement of operations, and annually thereafter, the Applicant shall submit to DLWC an interpreted report on the groundwater monitoring program. The report shall contain copies of all raw data collected. The Applicant shall comply with all reasonable requirements of DWLC should it be deemed necessary to revise the groundwater monitoring strategy.</td><td>Submission email to WaterNSW dated 13/09/2024</td><td>Email sighted from Visy to WaterNSW dated 13/09/2024 included groundwater data submission.</td><td>Compliant</td></tr>
</table>

66	The Applicant shall undertake an annual soils monitoring program in all areas used for effluent irrigation to the satisfaction of DWLC. The following tests shall be made in accordance with standards outlined in the NSW Agriculture publication Abbott, T.S. (ed) “Soil Testing Service - Methods and Interpretation”. The program shall include but not be limited to the following tests: (a) pH (CaCl2) salinity as Ece 1:5; (b) exchangeable cations; (c) total nitrogen; (d) organic carbon; (e) available phosporous and phosphorus sorption; (f) exchangeable sodium percentage; and (g) emersion aggregate tests (EAT). The monitoring parameters set out in (a) to (g) shall be reviewed through consultation between the Applicant and DLWC two years following commissioning and, on the basis of good performance, the monitoring interval may, on the advice of DLWC, be increased.	Farm and Environmental Monitoring Report 2024, McMahon Earth Science (ECMR 2024)	A soils monitoring program for the irrigation areas is being completed annually and all required parameters are being assessed. It is noted that the McMahon report reports that "Overall soil health appears to be good with adequate humus levels and an abundance of earthworms in the topsoil." The report goes on to note that organic carbon has increased in the reporting period.	Compliant
67	If the soil monitoring program indicates that effluent irrigation is having an adverse impact on the sustainablity of soils within the irrigation area, then the Applicant shall prepare an amended plan of effluent disposal to the satisfaction of the DWLC.	Farm and Environmental Monitoring Report 2024, McMahon Earth Science (ECMR 2024)	Soil nutrient levels reported in the ECMR 2024 and attributes are typical of local soil conditions, with soil macronutrients improvements noted over the last 20 years due to a comprehensive fertiliser program.	Compliant
68	From the commencement of operations, and for such further periods as agreed necessary by the Applicant and the EPA, the Applicant shall undertake to the satisfaction of the EPA: (a) toxicity testing of irrigation re-use water; and (b) event based surface water monitoring, particularly during direct discharges from effluent ponds to Sandy Creek.		Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
69	All monitoring results arising from these conditions of consent shall be submitted annually to the EPA, DLWC, the Council and the Community Consultative Committee established under Condition 72.	Email to DPHI, EPA and SVC 19/11/2024, submitting ECMR 2024	Results observed as being sent to appropriate departments on 19/11/2024.	Compliant
70	Upon request, the Applicant shall make available to the Director-General all monitoring results arising from these conditions of consent.	Site interviews M O'Donovan and I Kane	No results requested this reporting period, monitoring results observed as available.	Compliant
71	Twelve months after the approved commissioning period, the Applicant shall make arrangements for and bear the total cost of an independent and comprehensive environmental audit for the development. The environmental audit is to be carried out by a duly qualified independent person or team to be approved and appointed by the Director-General in consultation with the Council, DWLC and EPA. Further independent audits are to be conducted every twelve months or as directed by the Director-General. The independent environmental audit shall be undertaken to the requirements of the Director-General in consultation with EPA and Council and cover all aspects of monitoring and environmental performance, both operational and organisational, and compliance with reporting requirements and all conditions of this consent. The audit report shall be made available to the Director-General, Council and the Community Consultative Committee. The Applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from or recommended by the independent environmental audit and within such time as the Director-General shall agree.	Past environmental reports for 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 Screenshot of Audit team endorsement on the Project's post approval portal. Email to DPHI, EPA and SVC providing 2023 IEA Report, dated 11/03/2024	Sighted screenshot of audit team endorsement on the Project's post approval portal and a screenshot of the email to submission of the 2023 audit report to DPHI, EPA and SVC.	Compliant

71A	Within 12 months of the receipt of the first load of Non-Standard Fuels or Known Fuels Not Requiring Further Testing under this consent, the Applicant shall make the arrangements for and bear the full cost of an independent and comprehensive audit of the of the use of Non-Standard Fuels (including Known Fuels Not Requiring Further Testing) at the development. The Audit is to be carried out by a duly qualified and independent person or team to be approved by the DirectorGeneral. Further Audits are to be conducted every 12 months, or as directed by the Director-General. The Audit shall cover all aspects of the use of NonStandard Fuels at the development, including, but not limited to: a) being carried out in accordance with ISO 14010 - Guidelines and General Principles for Environmental Auditing and ISO 14011 - Procedures for Environmental Auditing; b) an assessment of compliance with the requirements of this consent, and other licences and approvals that apply to the use of Non Standard Fuels at the development; c) a review of quality control and quality assurance measures in the sampling and analysis of Non-Standard Fuels; and d) a review of the fuel quality control management procedures proposed to be implemented by the Applicant – which include random sampling of fuels, inspections of suppliers, chain of custody controls and maintenance of records by the Applicant. The Applicant shall comply with all reasonable requirements of the Director- General in respect of any measures arising from, or recommended by, the independent audit within such time as the Director-General shall agree. There is nothing which prevents the Applicant from combining the annual auditing requirements provided in conditions 71 and 71A.		Non-standard Fuels were not used within the reporting period.	*Not triggered*
72	Prior to the commencement of construction, the Applicant shall establish a Community Consultative Committee. The Committee should include representatives of the Council and the local community and monitor compliance with conditions of this consent during the term of the development. Upon request, representatives of Government agencies will attend. The Chairperson and procedures for the Committee including frequency of meetings shall be determined by the Committee.	VCCC meeting minutes: - 1 August 2023 - 5 December 2023 - 6 February 2024 - 2 April 2024 - 4 June 2024	Meetings held every two months with local reps, Chamber of Commerce, Landcare, Visy reps. Plant operation and additional information, responses to enquiries and complaints.	Compliant
73	Prior to the commencement of construction, the Applicant shall establish, operate, maintain and promote a telephone service that allows members of the public to directly contact nominated employees to report incidents of unacceptable noise or air quality impacts.	https://www.visy.com.au/env-appv-mgmt-plan/	Number maintained and advertised through web site, signage, minutes of CCC.	Compliant
74	From the commencement of construction, the Applicant shall maintain a complaints register which shall be used to record details of all complaints received from members of the public and actions taken by the Applicant in response to such complaints to the requirements of the Director-General.	Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24	A complaint register is being maintained and electronically managed in Vault (document management software). It has sufficient detail to record track and manage complaints.	Compliant
75	The Applicant shall audit the effectiveness of the service and the degree of public satisfaction with the complaints service to the requirements of the Director-General.	Visy Complaints Audit Reports Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24	Direct feedback from the public is not sought with each complaint. However, complainants have offered thanks for responses during previous reporting periods. The internal audit reports found the system was generally compliant.	Compliant
76	The Applicant shall provide the Council and EPA with a copy of the complaints register every 3 months from the commencement of construction and within seven days of the end of each 3 month period. The data for each quarter shall be accompanied by an internal audit report of the system.	Email submission to DPHI, EPA, SVC – Quarterly Complaints Registers and Audit Reports 19/11/2024	Complaints for the quarter forwarded with summation and analysis of the type and probable cause of complaint.	Compliant
77	The Applicant shall ensure that all the recommendations of the Cultural Heritage Assessment described in Supplementary Report 3-3 of the EIS are implemented to the satisfaction of the Director-General.	Site interviews M O'Donovan and I Kane Site inspection site observations	Construction works during the reporting period occurred in an already distrubed and used area.	Compliant
78	Prior to construction, and in consultation with the Tumut/ Brungle LALC and NPWS, the Applicant shall submit to the satisfaction of NPWS, (i) measures to ensure that all scarred trees and campsites identified (Supplementary Report 3-3 of the EIS, Recommendation A2) as being outside the mill site but within the subject land, are not disturbed; and (ii) further consideration of (Supplementary Report 3-3 of the EIS, Recommendation A4) the need to have all scarred trees fenced and protected.		Historic condition - not assessed during this reporting period.	*Not triggered*

79	Prior to the construction of the water supply pipeline, the Applicant shall undertake an archaeological and ecological assessment of the route in consultation with and for the approval of NPWS and the Director-General.		Historic condition - not assessed during this reporting period.	*Not triggered*
79A	79A. Prior to the construction of the freshwater storage facility, the Applicant shall undertake an archaeological assessment of the site of the freshwater storage facility in consultation with and for the approval of NPWS and the Director-General.		Historic condition - not assessed during this reporting period.	*Not triggered*
80	In the event that Aboriginal artefacts are identified on the site during development through earthworks, construction or operation of the mill, the Applicant shall contact the NPWS and cease work in the relevant location pending investigation and assessment of their heritage value.	Interview M O'Donovan & I Kane	No Aboriginal artefacts have been uncovered or reported during the reporting period.	*Not triggered*
81	The Applicant shall ensure that any supplementary investigation of Aboriginal sites are undertaken by a qualified archaeologist.		Noted	*Not triggered*
82	Within 3 months of on site construction works commencing, the Applicant shall maintain a Category 1, four wheel drive Fire Tanker with 3,600 litre water carrying capacity on site. The tanker shall have the ability to provide high water flow and pressure to standard fire hose lines.	Site interviews M O'Donovan and I Kane Site inspection site observations	Sighted fire tanker on site. The audit found there is one Category 1 fire tanker and one smaller fire tanker. Isuzu Fire tanker available on site. Estimated volume 3600L. Additional 1500L tanker purchased Dec 2021 for use in log yard as initial response. No changes made to equipment setup during the reporting period.	Compliant
83	For the purposes of local fire control, the Applicant shall make available the tanker required by Condition 82 to the Gilmore Bush Fire Brigade should it be required.	Site interviews M O'Donovan and I Kane	The tanker is no longer required. It was listed as an asset but has now been removed and is no longer registered. It's now under Visy's register and insurance.	*Not triggered*
84	Within 6 months after the commencement of operations, the Applicant shall ensure: (a) that a minimum of ten staff that have received Rural Fire Service basic fire fighter (BF) standard training are available should they be required; and (b) that a minimum of one staff member with advanced fire fighting (AF) standard competency training is available should he/she be required.	Site interviews M O'Donovan and I Kane	The tanker is no longer required. It was listed as an asset but has now been removed and is no longer registered. It's now under Visy's register and insurance.	*Not triggered*
85	The Applicant shall ensure the maintenance of bush fire fighting equipment at all times in accordance with current bush fire control and safety practice and in consultation with Tumut Shire Council's Fire Control Officer.	Site interviews M O'Donovan and I Kane ERT Meeting Minutes, dated 7 March 2024	Visy participate in the Emergency Control Committee, SVC draft minutes for LEMC - local Emergency management committee, which meet every 3 months. Emergency Response Team (ERT) - frequent meetings, hoses are checked frequently (twice a month). Safety Coordinator tests the PIRMP. Sighted the records of the ERT meeting, dated 7 March 2024, was PIRMP test and simulation of chemical spill from tanker piercing. And ERP - prior to being updated. SDS' - locations around site. eg chem store.	Compliant
86	The Applicant shall liaise with the Council to monitor local housing demand during the construction stage of the mill, and in the event of shortage of rental accommodation, provide additional temporary accommodation facilities for use by its construction workforce.		Historic condition - not assessed during this reporting period.	*Not triggered*
87	Prior to the commencement of any on-site works, the Applicant shall consult with NSW Fisheries to ensure that any road, causeway or pipe crossings of waterways span the entire waterway to prevent increases in stream velocities and blockages of fish passages.		Historic condition - not assessed during this reporting period.	*Not triggered*
88	The Applicant shall appoint Officer responsible for environmental management and reporting whose qualifications are acceptable to the Director-General to be responsible for ensuring that all environmental safeguards proposed for the development in the EIS and as required by this consent and other statutory approvals, are enforced and monitored from the commencement of construction.	Site interviews M O'Donovan and I Kane	Matthew O'Donovan is the HSE manager.	Compliant
89	The Applicant shall design all lighting, roadworks and carparking to ensure that the site lighting is positioned to minimise reflectivity and light spill and that lights of vehicles are contained within the site as far as practicable to the satisfaction of the Council.	Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24	No lighting complaints were received during the reporting period.	Compliant

90	The construction and operation of the proposed cooling tower must comply with Australian Standard AS 3666 - 1995 and with the microbial control provisions of the Public Health Act, 1991 and Regulation.			Compliant
91	The premises shall comply with the requirements of the Dangerous Goods Act 1975, as administered by WorkCover Authority and the EPA, and if necessary be licensed under this Act.	Interview M O'Donovan and I Kane Hazard Audit, Pinnacle Risk Management, dated December 2021	None in reporting period - refer to 2021 document.	Compliant
91A	Within three months of: a. the submission of an incident report under condition 15; b. the approval of any modification of the conditions of this consent; or c. issue of a direction of the Director-General, the strategies, plans and programs required under this consent must be reviewed, and the Director-General must be notified in writing of the outcomes of any review.		There were no incident reports submitted under condition 15. Modification 4 was determined on 26/03/2024. The Planning Secretary was not notified within 3 months of the modification determination of the outcomes of the review of strategies, plans and programs.	Non Compliant
91B	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Director-General. Where revisions are required, the revised document must be submitted to the Director-General for approval within six weeks of the review required under condition 5.5, or such other timing as agreed by the Director-General. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	Interview M O'Donovan and I Kane	The audit found there were no directions received from the Planning Secretary.	Compliant
92	In the event that the Applicant and the Council or a Government agency, other than the Department of Urban Affairs and Planning, cannot agree on the specification or requirements applicable under this consent, the matter shall be referred by either party to the Director-General or if not resolved, to the Minister for Urban Affairs and Planning, whose determination of the disagreement shall be final and binding on the parties.	Interview M O'Donovan and I Kane	Noted	*Not triggered*
93	The Applicant shall treat windows and consider appropriate acoustic barriers at the residences of Mr and Mrs Beale (Lot 4, DP 57228) and Mr F Dutton (Lot 1, DP 744422) if requested by the owners after commissioning of the pulp and paper mill to reduce traffic noise affects generated by the mill to the satisfaction of the EPA.	Interview M O'Donovan and I Kane	There have been no advancements on the results of the last audit (NGH 2023).	*Not triggered*
94	The Applicant shall give public notice of any impending wastewater discharge from its wastewater storages as well as notifying all persons downstream of the site to the Tumut River who use water from Sandy or Gilmore Creeks for domestic purposes.	EPL Annual Return 2024 Winter Storage Dam records	Nil intended discharges during the reporting period.	*Not triggered*
95	The Applicant shall prior to commencing operations at the pulp and paper mill submit to the Director-General an assessment of the measures to be taken to minimise night time truck movements to and from the mill in a Truck Scheduling Report and shall incorporate such of the measures as required by the Director-General into the Traffic Management Plan required by Condition 50. The Scheduling Report shall be reviewed each 2 years or such longer period as determined by the Director-General.	ECMR 2024 ECMR Appendix 6 - Monthly HV Movement Data 2024	Heavy vehicle movements submitted to DPHI on an annual basis in the ECMR. Figures are reviewed annually as part of the ECMR preparation. In 2021, Visy Logistics commenced running A-Double trucks between Visy and Wagga Wagga to mitigate against increase truck numbers with increases in production and container loads. Introduction of A-doubles have decreased HV movement numbers for exported product and vehicles though Adelong. 74% of truck movements occur during daytime period (7 am to 10 pm) compared to the night period. The main HV night time movements from 10 pm to 7 am are due to pulp log, sawmill chip and finished paper.	Compliant

96	The Applicant shall report on a review of process water use in the mill two years after commencement of operation of the mill to the requirements of the Director-General. The review is to include consideration of improved recycling rates and reduced generation of wastewater. The Applicant shall then report each 3 years or at such longer period as determined by the Director-General.	Visy Process Water Review 23/12/2021 Interview - M O'Donovan and I Kane	The Visy Process Water Review will be undertaken in December 2024, not within this audit period.	Compliant
97	If any landowner (as at the date of this consent) who is specified in the schedule hereunder so requests, the Applicant shall negotiate an option to purchase those properties at a price to be determined as provided in Conditions 98 -101. **Note: Refer to Consent for Schedule and requirements b) - f) if relevant during reporting period.**	Interview - M O'Donovan and I Kane	No land purchases have occurred during the reporting period.	*Not triggered*
98	In respect of a request purchase land arising under Condition 97, the Applicant shall pay the owner the acquisition price which shall take into account and provide payment for: (i) a sum not less than the current market value of the owner's interest in the land used for its existing use at the date of this consent and all improvements thereon at this date as if the land was unaffected by the development proposal. (ii) the owner's reasonable compensation for disturbance allowance and relocation costs within the Tumut, Tumbarumba and Gundagai Local Government Areas. (iii) the owner's reasonable costs for obtaining legal advice and expert witnesses for the purposes of determining the acquisition price of the land and the terms upon which it is to be acquired.	Interview - M O'Donovan and I Kane	No land purchases have occurred during the reporting period.	*Not triggered*
99	In the event that the Applicant and any owner referred to in Condition 97 cannot agree within the time limit upon the acquisition price of the land and/or the terms upon which it is to be acquired, then: (i) either party may refer the matter to the Director-General or his/her nominee, who shall request the President of the Australian Institute of Valuers and Land Economists to appoint a qualified independent valuer, suitably qualified in compensation issues, who shall determine, after consideration of any submissions from the land owner and the Applicant, the acquisition price. (ii) in the event that the independent valuer requires guidance on any contentious legal, planning or other issues, the independent valuer shall refer the matter to the Director-General or his/her nominee, who if satisfied that there is need for a qualified panel, shall arrange for the constitution of the panel. The panel shall consist of: 1) the appointed independent valuer, 2) the Director-General, or his/her nominee, and/or 3) the President of the Law Society of NSW or his/her nominee. The qualified panel shall, on the advice of the valuer, determine the issue referred to it and advise the valuer.	Interview - M O'Donovan and I Kane	No land purchases have occurred during the reporting period.	*Not triggered*
100	The Applicant shall bear the costs of any valuation or survey assessment requested by the Director-General in accordance with Condition 99.	Interview - M O'Donovan and I Kane	No requests for valuation or survey have occurred during the reporting period.	*Not triggered*
101	Nothing in this consent precludes the Applicant from negotiating with any landowner the acquisition of property necessary for the operation of the mill.	Interview - M O'Donovan and I Kane	Noted	*Not triggered*

Project Approval Compliance Status - December 2024

Reference	Approval or licence requirement	Evidence collected 2024	2024 Audit Finding	Compliance status
Project Approval 06_0159				
Administrative Conditions				
1.1	The Applicant must carry out the project generally in accordance with the: a) Major Projects Application 06_0159; b) Visy Pulp and Paper Proposed Mill Expansion, Tumut NSW, Final Environmental Assessment, prepared by Visy Pulp and Paper Ply Ltd and dated January 2007; c) Visy Pulp & Paper Proposed Mill Expansion, Tumut NSW, Submissions Report, prepared by Visy Pulp and Paper Ply Ltd and dated March 2007; d) the concept approval granted with respect to the Visy Tumut Mill Expansion (06_0159); e) the Statement of Commitments prepared by Visy Pulp and Paper Ply Ltd dated 18 April 2007 f) Modification 1; g) Modification 2: h) Modification 3; i) Modification 4; j) Modification 5; and k) Modification 6.	Site inspection site observations Site interviews M O'Donovan and I Kane ECMR 2024	The Project has been carried out generally in accordance with the specified approvals. Refer CA Condition 1.1. Production for the period was 685,051 tonnes, which is under the 800,000 t/a limit approved in 2017. Modification 6 was determined on the 26/03/2024. This modification will include an expansion to the waste yard, construction of a clothing storage shed, construction of a wastewater spare parts shed and construction of a refuelling facility adjacent to the site gatehouse (originally approved under Mod 3).	Compliant
1.2	If there is any inconsistency between the documents listed in Condition 1.1, the more recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Environment Protection Licence Water Access Licences Resource Recovery Exemption Resource Recovery Order ECMR 2024	Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
1.3	Notwithstanding condition 1.2, if there is any inconsistency between this project approval and the concept approval for the Visy Tumut Mill Expansion, the concept approval must prevail to the extent of the inconsistency.	Site interviews M O'Donovan and I Kane	Noted	*Not triggered*
1.4	The Applicant must comply with any reasonable requirement(s) of the Planning Secretary arising from the Department's assessment of: a) any reports, plans or correspondence that are submitted in accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans or correspondence.	Site interviews M O'Donovan and I Kane	Noted	*Not triggered*
1.5	The Applicant must ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals. The Applicant must ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	Site interviews M O'Donovan and I Kane Environment Protection Licence Water Access Licences Resource Recovery Exemption Resource Recovery Order ECMR 2024	Refer to Condition 91 Development Consent EPL10232 updated 5/07/2023 WAL 40AL405643 WAL 40AL405644 NDG035066 (Dangerous Goods) Woodlawn PHR acid mine tailings trial order 2020 Woodlawn PHR acid mine tailings trial exemption 2020	Compliant

1.5A	Prior to the occupation of the storage shed that was approved under MP06_0159-Mod- 2 and retrospectively amended under MP06_0159-Mod-5, the Applicant is to obtain an Occupation Certificate from the Certifying Authority and provide a copy to the Planning Secretary.	Occupation Cerificate No. 211856/02, McKenzie Group Site interviews M O'Donovan and I Kane	Retrospective approval was sought for the actual size of the shed. It was constructed in 2019. Sighted the Occupation Certificate No. 211856/02 for the construction of a new workshop building adjacent to the existing workshop	
1.5B	Prior to the occupation of the storage sheds approved under MP06_0159-Mod-6 the Applicant is to obtain an Occupation Certificate from the Certifying Authority and provide a copy to the Planning Secretary.	Site interviews M O'Donovan and I Kane	The audit found that construction of the storage shed, approved under MP06_0159-Mod-6, has not commenced.	*Not triggered*
2.1	The Applicant must construct the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site must be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Applicnt must identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	Site inspection site observations Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24	Minor dust observed on site at the time of the site inspection, which was being generated by heavy vehicle use of unsealed road within the site. No dust complaints received during the reporting period. Main access roads onsite are sealed. Water carts are available on site for dust suppression if required. Refer to site photographs - Photo 4.	Compliant
2.2	The Applicant must conduct all operations and activities on the site, including start-up and shut-down, in a manner that must not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.	ECMR 2024 Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24 Annual Return 2024 for EPL10232, submitted 20/08/2024	There were 25 odour complaints during the reporting period. This is up from 17 complaints in the previous period and well below 60+ complaints six years ago. The source of the odour was identified in most cases and minimised through action. Offensive odour is prevented from leaving the boundary most of the time, however compliance with this condition is not able to be achieved while odour complaints are received. It is noted that s129 of the POEO Act indicates that a defence for this occurrence can include the identification of odour on a Project's EPL. While EPL10232 does identify the potential for multiple odorous gasses, the EPL Annual Return 2024 identifies 7 exceedances of Sulphur Dioxide, an odorous gas, at Point 1 during the reporting period. Visy commissioned Ektimo to take odour samples from the most significant odour sources to determine the odour intensities in (OU) in accordance with AS4323.3. This sampling and Leak detection and repair program was undertaken in August 2023 and February 2024.	Not compliant
2.3	The Applicant must install and operate odour collection and reduction systems for all relevant new plant. This must include incorporating new plant into the existing NCG Collection System and Condensate Treatment System.	Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	The capture and management of gasses causing odour is a key aspect of existing and new plant. Air Quality Management Plan (April 2023) details the sources and management of emissions. Reference to the odour complaint system identifies the sources of most odour complaints. This indicates that Visy staff are aware of the various odour sources producing complaints. Annual plant shutdowns will typically include modifications to the plant and in subsequent years this has focused on odour management. Repairs to the liquor tank 102 roof have decreased fugitive emissions by improving the operation of the HVLC system. Increased focus on process control has also decreased odour generation. This represents evidence of ongoing improvement in odour management.	Compliant

2.4	The Applicant must install and operate vapour compression evaporators for both new and existing plant to reduce the level of chemical oxygen demand in clean condensate. The vapour compression evaporators must be operated such that chemical oxygen demand in the clear condensate is reduced to 50 % of existing levels.	Site interviews M O'Donovan and I Kane	Refer to response of previous audits. This is now a redundant condition. Redundant Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).	*Not triggered*
2.5	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Planning Secretary, a detailed report on the proposed use of vapour compression evaporators. The report must be prepared in consultation with the DECC and must demonstrate how the vapour compression evaporator system will reduce chemical oxygen demand in clean condensate to at least 50% of existing levels.		Historic condition - not assessed during this reporting period.	*Not triggered*
2.6	Prior to the commencement of operation, the Applicant must submit to the satisfaction of the Planning Secretary, a detailed report on all feasible and reasonable mitigation measures to reduce adverse odour impacts arising from startup and shutdown activities. The report is to be prepared in consultation with the DECC and must include but not necessarily be limited to: a) investigations into the timing and sequencing of plant activities such that adverse odour impacts are minimised; and b) the effect of prevailing weather conditions on plant activities in regard to adverse odour impacts.		Historic condition - not assessed during this reporting period.	*Not triggered*
2.7	The Applicant must utilise Best Available Techniques in accordance with the European Commission Reference Document On Best Available Techniques in the Pulp and Paper Industry (2001) for all combustion sources and air emission control equipment associated with the project.	Site inspection site observations ECMR 2024 Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	The operation of the plant is managed through continuous monitoring of process inputs and outputs and conditions. Odour sources are routinely monitored by certified external parties. Inclusion of advanced controllers on lime kilns during previous reporting periods has improved overall controls. Detailed information on employed technology systems is included in the updated AQMP (April 2023).	Compliant
2.8	Prior to the installation of any equipment associated with the project that discharges to air, the Applicant must submit manufacturer's performance guarantees for that equipment to the DECC. The documentation must demonstrate to the DECC's satisfaction that the equipment, when operating at design load will comply with the air discharge limits specified under condition 2.10 of this approval.		Historic condition - not assessed during this reporting period.	*Not triggered*

<table>
<tr>
<td>2.9</td>
<td>For the purposes of this approval, air monitoring/ air discharge points must be identified as provided in Table 1 below.
Table 1 - Identification of Air Monitoring and Discharge Points
<table>
<tr><th>Monitoring / Discharge Point</th><th>Monitoring/ Discharge Point Location</th></tr>
<tr><td>Main Stack 2</td><td>Main Stack 2</td></tr>
<tr><td>Recovery Boiler 2</td><td>In the discharge duct downstream of Recovery Boiler 2 and before the junction with Main Stack 2</td></tr>
<tr><td>Natural Gas Boiler</td><td>In the discharge duct downstream of Natural Gas Boiler Electro-static Precipitator and before the junction with Main Stack 2</td></tr>
<tr><td>Multi-fuel Boiler</td><td>In the discharge duct downstream of the Multi-Fuel Boiler after the fabric filters and before the junction with the Main Stack</td></tr>
<tr><td>Lime Kiln 2</td><td>Lime Kiln 2 discharge duct before the junction with the Main Stack</td></tr>
<tr><td>Gas Turbine</td><td>In the discharge stack from the Gas Turbine</td></tr>
</table></td>
<td>ECMR 2024</td>
<td>A Continuous Emissions Monitoring System (CEMS) is installed and monitors at Stack 1 and Stack 2, with multiple combustion units discharging through these locations. Locations identified in s3.2.1 of the 2024 ECMR against EPL and PA Condition 2.9 requirements.</td>
<td>Compliant</td>
</tr>
<tr>
<td>2.10</td>
<td>The Applicant must design, construct, operate and maintain the project to ensure that for each stack discharge point, the concentration of each pollutant listed in Table 2 to Table 5 inclusive is not exceeded. This condition only applies to the operation of the project, and to avoid any doubt, does not apply during start-up or shut-down. Reference conditions for in-stack concentrations described in this condition must be reported to the reference conditions specified within Schedule 5 Part 3 of the Protection of the Environment Operations (Clean Air) Regulation 2002, except for emissions from the Main Stack 2, Natural Gas Boiler and Multi-Fuel Boiler where the applicable reference conditions are Dry, 273 °K, 101.3 kPa, 8 % 02.
Table 2 - Maximum Allowable Discharge Concentration Limits (Main Stack 2)
<table>
<tr><th>Pollutant</th><th>100 Percentile limit (mgm^{-3})</th></tr>
<tr><td>Cadmium</td><td>0.5</td></tr>
<tr><td>Chlorine</td><td>100</td></tr>
<tr><td>Mercury</td><td>0.5</td></tr>
<tr><td>Nitrogen Oxides</td><td>400</td></tr>
<tr><td>Hydrogen Chloride**</td><td>50</td></tr>
<tr><td>Sulfur Dioxide**</td><td>250</td></tr>
<tr><td>Total Solid Particulates</td><td>50</td></tr>
<tr><td>Sulfuric acid mist and sulfur trioxide (as SO_3)</td><td>20</td></tr>
<tr><td>Opacity*</td><td>20</td></tr>
<tr><td>TCDD (equivalent)*</td><td>0.1</td></tr>
<tr><td>Hydrogen Fluoride</td><td>20</td></tr>
<tr><td>Type 1 and Type 2 Substances (in aggregate)</td><td>1</td></tr>
<tr><td>TRS (as H_2S)</td><td>2***</td></tr>
</table>
* Note: The unit of measure for Opacity is %Opacity and for TCDD (equivalent) it is ngm^{-3}.
** Note: Is the maximum allowable discharge concentration limit for the multi-fuel boiler operating on standard fuels only.
*** Note: The TRS limit is 2 mgm^{-3}, except for phase 1a operation of Main Stack 2 where the limit is 3.6 mgm^{-3}. Phase 1a is as described in the document listed under condition 1.10).
Table 3A – Minimum Exit Velocity (Main Stack 2)
<table>
<tr><th>Phase**</th><th>Equipment Discharging to Stack 2</th><th>Minimum Exit Velocity (ms^{-1} at 750 tdsday^{-1})</th><th>Minimum Exit Velocity (ms^{-1} at 900 tdsday^{-1})</th></tr>
<tr><td>1a</td><td>New Recovery Boiler</td><td>18.4</td><td>22.1</td></tr>
<tr><td>1b</td><td>New Recovery Boiler and New Natural Gas Boiler</td><td>33.7*</td><td>37.4*</td></tr>
<tr><td>2</td><td>New Recovery Boiler and New Natural Gas Boiler and New Multi-Fuel Boiler</td><td>33.7*</td><td>37.4*</td></tr>
</table>
Note: The unit of measure tdsday^{-1} is tonnes dry solids per day for the New Recover Boiler.
* Note: These limits may require additional acoustic controls for Stack 2.
** Note: Phases are as described in the document listed under condition 1.10).</td>
<td>ECMR 2024
EPL Annual Return 2024</td>
<td>Multiple exceedances identified during the reporting period - all exceedances documented in ECMR and the EPL Annual Return.</td>
<td>Not compliant</td>
</tr>
<tr>
<td></td>
<td>Note: Discharge limits for HCl and SO_2 will be subject to review as part of the project application for the multi-fuel boiler (non-standard fuels) component.
Table 4 - Maximum Allowable Discharge Concentration Limits (Natural Gas Boiler)
<table>
<tr><th>Pollutant</th><th>100 Percentile limit (mgm^{-3})</th></tr>
<tr><td>Nitrogen Oxides</td><td>100</td></tr>
<tr><td>Solid Particulates</td><td>30</td></tr>
<tr><td>Carbon Monoxide</td><td>120</td></tr>
<tr><td>Type 1 and Type 2 Substances (in aggregate)</td><td>0.5</td></tr>
</table></td>
<td></td>
<td></td>
<td></td>
</tr>
</table>

	Table 5 - Maximum Allowable Discharge Concentration Limits (Multi-fuel Boiler) **Pollutant** / **100 Percentile limit (mgm^{-3})** Cadmium: 0.06 Mercury: 0.06 Hydrogen Chloride: 90 Dioxins & Furnans*: 0.1 Nitrogen Oxides: 300 Solid Particulates: 26 Carbon Monoxide: 120 Type 1 and Type 2 Substances (in aggregate): 1 * Note: The unit of measure for Dioxins & Furans is ng/m^3. **Table 6 - Maximum Allowable Discharge Concentration Limits (Gas Turbine)** **Pollutant** / **100 Percentile limit (mgm^{-3})** Nitrogen Oxides: 70 Solid Particulates: 10 Carbon Monoxide: 20			
2.11	Averaging periods applicable for pollutants emitted from the discharge points described in condition 2.9 are listed in Table 6 unless otherwise specified by the DECC. **Table 7 – Averaging Periods** **Pollutant** / **Averaging Period** TRS (as H_2S): 1 hour SO2: 1 hour HCl: 1 hour Nitrogen Oxides (as NO_2): 1 hour Opacity: 6 minutes All other pollutants: As per test methods specified in condition 3.1	Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2024	Averaging periods for each pollutant are specified in the AQMP (April 2023) as described in Table 6.	Compliant
2.12	The Applicant must ensure that the vibration resulting from construction and operation of the project does not exceed the evaluation criteria presented in British Standard BS6472 for low probability of adverse comment, at any affected residential dwelling. **Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings** **Place and time** / **Low probability of adverse comment** $m \cdot s^{-1.75}$ 1) / **Adverse comment possible** $m \cdot s^{-1.75}$ / **Adverse comment probable** $m \cdot s^{-1.75}$ 2) Residential buildings 16 h day: 0.2 to 0.4 / 0.4 to 0.8 / 0.8 to 1.6 Residential buildings 8 h night: 0.1 to 0.2 / 0.2 to 0.4 / 0.4 to 0.8	Site inspection observations Interview M O'Donovan and I Kane	No vibration monitoring completed. No vibratory works (blasting, rock breaking, piling, compaction etc) carried out during the reporting period. No residences within close proximity to the site.	*Not triggered*
2.13	The Applicant must only undertake construction activities associated with the project that would generate an audible noise at any residential premises during the following hours: a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays.	Site inspection observations Interview M O'Donovan and I Kane	Construction of the loop road around the waste storage area commenced in the reporting period. Construction occurred in daytime hours only.	Compliant
2.14	The hours of construction activities specified under condition 2.13 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction specified under condition 2.13 must be: a) considered on a case-by-case basis; b) accompanied by details of the nature and need for activities to be conducted during the varied construction hours; and c) accompanied by written evidence of the DECC's agreement with the proposed variation in construction times, after providing any information necessary for the DECC to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic		Historic condition - not assessed during this reporting period.	*Not triggered*

<table>
<tr>
<td>2.15</td>
<td>The Applicant must design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 7, at those locations and during those periods indicated. The maximum allowable noise contributions apply under wind speeds up to 3 ms·' (measured at 1 0 metres above ground level), and under temperature inversion conditions of up to 3 °C/ 100 metres and wind speeds up to 2ms·1.
Table 8 - Maximum Allowable Noise Contribution
<table>
<tr><th rowspan="2">Location</th><th>Day
7:00am to 6:00pm Mondays to Saturdays
8:00am to 6:00pm Sundays and public holidays</th><th>Evening
6:00pm to 10:00pm on any day</th><th colspan="2">Night
10:00pm to 7:00am Mondays to Saturdays
10:00pm to 8:00am Sundays and public holidays</th></tr>
<tr><th>$L_{Aeq(15\ minute)}$</th><th>$L_{Aeq(15\ minute)}$</th><th>$L_{Aeq(15\ minute)}$</th><th>L_{Amax}</th></tr>
<tr><td>Pleasant View*</td><td>40</td><td>40</td><td>40</td><td>45</td></tr>
<tr><td>Deep Creek*</td><td>39</td><td>39</td><td>39</td><td>45</td></tr>
<tr><td>Reka* & Glengarry*</td><td>36</td><td>36</td><td>36</td><td>45</td></tr>
<tr><td>Any other residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr>
</table>
* Note: Residence names are those described in Appendix N of the EA.</td>
<td>ECMR 2024</td>
<td>The attended noise monitoring data indicated that noise from the site was inaudible during 11 out of 24 measurements. In general, considering estabished noise agreements are in place with eight residences adjacent the Project site (Mod-4, August 2020), the site is compliant.</td>
<td>Compliant</td>
</tr>
<tr>
<td>2.16</td>
<td>For the purpose of assessment of noise contributions specified under condition 2.15 of this approval, noise from the project must be:
a) at any point within the residential boundary, or at any point within 30 metres of the dwelling where the dwelling is more than
b) 30 metres from the boundary; and
c) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.

Notwithstanding, should direct measurement of noise from the project be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)). Details of such an alternative noise assessment method accepted by the EPA must be submitted to the Planning Secretary prior to the implementation of the assessment method.</td>
<td>EMM Annual Attended Noise Monitoring Report, March 2024</td>
<td>Noise monitoring conducted at the appropriate locations during the reporting period, with suitable alternative locations determined by EMM as required and in accordance with the Noise Policy for Industry (NSW EPA, 2017).</td>
<td>Compliant</td>
</tr>
<tr>
<td>2.16A</td>
<td>Notwithstanding condition 2.15 of this consent, the noise limits specified under that condition do not apply to any residence where a noise agreement is in place between the Applicant and the owner(s) of those residences in relation to noise impacts and/ or noise limits.</td>
<td></td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>2.17</td>
<td>Except as may be expressively provided by an Environment Protection Licence for the project, the Applicant must comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.</td>
<td>ECMR 2024

Site interviews M O'Donovan and I Kane</td>
<td>The audit found that s120 of the POEO Act was complied with during the reporting period with no accidental spills, incidents or clean up notices in the last reporting period.</td>
<td>Compliant</td>
</tr>
<tr>
<td>2.18</td>
<td>The project must be designed and employ surface water management techniques such that existing run-off volumes along creeks and drainage lines from the site are maintained at similar levels post-construction.</td>
<td>Site inspection observations

Interview M O'Donovan and I Kane

Water Management Plan (PLANS-VPP-TUM-HSE-007-5), dated 18 July 2024</td>
<td>Wastewater is managed and treated on site, and used in the boiler.

All clean stormwater runoff is directed to controlled water quality treatment ponds prior to release off site. It is noted that the Water Management Plan (PLANS-VPP-TUM-HSE-007-5) for the site was updated on 18 July 2024, beyond the reporting period.</td>
<td>Compliant</td>
</tr>
</table>

2.18A	All rainwater from the structures approved under MP06_0159—Mod-5 and MP06_0159-Mod-6 is to be collected and integrated into the existing stormwater management system within the site.	Site inspection observations Interview M O'Donovan and I Kane	Only the shed in Mod-5 has been constructed. The audit found that the rainwater is collected from the shed and integrated into the existing stormwater management system. A swale drain collects rainwater from the new loop road (approved under Mod-6), which is connected to the stormwater management system. No other components of Mod-6 have been constructed.	Compliant
2.19	Soil and water management controls must be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities, in accordance with Landcom's Managing Urban Stormwater: Soils and Conservation.		Construction of the loop road around the waste storage area commenced in the reporting period. Construction occurred on an existing track that was formalised and sealed. Appropriate controls used and stormwater runoff directed into runoff management system.	Compliant
2.20	Prior to the commencement of site preparation works, the Applicant must undertake acid sulfate soil testing for areas of the site to be disturbed during site preparation and construction. Acid sulfate soil testing must be consistent with the DECC's Environmental Guideline Assessing and Managing Acid Sulfate Soil and the Acid Sulfate Soil Management Advisory Committee (ASSMAC) document Acid Sulfate Soil Manual. Should testing indicate that any potential or actual acid sulfate soils may be disturbed during site preparation works or the construction of the project, the Applicant must prepare an Acid Sulfate Soil Management Plan (refer to condition 5.2).		Historic condition - not assessed during this reporting period.	*Not triggered*
2.21	All waste materials removed from the site must only be directed to a waste management facility lawfully permitted to accept the materials.	ECMR 2024 Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 July 2024	The Solid Waste Management Plan was updated in the reporting period, dated July 2024. During the reporting period, waste was sent to four differerent landfills, Visy's CoGen plant, Woodlawn mine and Captains Flat mine rehabilitation sites. Waste is directed to waste facilities at: > Hi Quality EPL 10398 Goulburn > Tumbalong Landfill (commenced January 2021) EPL 21440 > Belette's Landfill EPL 20596 > Woodlawn EPL 20476 Goulburn. > Captains Flat EPL 21721. Dregs and Grits, Fly Ash and Boiler Sand waste was taken to both Captains Flat and Woodlawn sites. During the reporting period, a total of 6,639 tonnes was sent to the Woodlawn mine and Captains Flat mine rehabilitation sites. During the reporting period, a total of 6,853 tonnes was sent to the Carbon Mate composting facility.	Compliant
2.22	The Applicant must maximise the treatment, reuse and/ or recycling on the site of any waste oils, excavated soils, slurries, dusts and sludges associated with the project, to minimise the need for treatment or disposal of those materials outside the mill facility.	ECMR 2024 Interview M O'Donovan and I Kane	Oils taken by contractor Cleanaway contractors. Excavated soils are stored at the rear of the plant and used on site for earthworks. Organic dusts are fed to the boiler. Slurries and sludges are processed in the waste water treatment system and irrigated on site. Resource recovery exemption now in place for the reuse of Dregs and grits, fly ash and boiler sand at Woodlawn Mine and Captains Flat Mine rehabilitation sites. A total of 6,639 tonnes was sent to these sites during the reporting period. Clean plastics are sent to Visy's Cogen plant in Melbourne as plastic to energy.	Compliant

2.23	The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 July 2024 ECMR 2024	In accordance with EPL condition L5.1, Visy accepted 251,066.45 tonnes of waste paper and 1,864,517.52 tonnes of wood product as a raw fibre source during the reporting period. Visy also powered the boilers on site with waste generated on site and received from off site in the form of timber residues.	Compliant
2.24	The Applicant must ensure that all liquid and / or non-liquid waste generated and / or stored on the site is assessed and classified in accordance with Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (DECC, 2004), or any future guideline that may supersede that document.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 July 2024	Waste is being classified using the NSW EPA (2014) 'Waste Classification Guidelines Part 1: Classifying Waste'	Compliant
2.25	The Applicant must undertake effluent irrigation on the existing and expanded areas identified in the EA in a manner that ensures the long term sustainability of this activity. Mitigation and management practices are to be determined in consultation with DPI and must include, but not be limited to: a) the use of crops that will reduce soil salinity levels; b) measures to maintain crop biodiversity such as cropping patterns based on 1, 2, 3 and 4 years of Lucerne rotation under different paddocks; c) the provision of subsurface drainage under low-lying areas which receive effluent; and d) the use of best practise ameliorative measures where soil improvement is determined to be necessary.	Farm and Environmental Monitoring Report 2024 ECMR 2024 Visy Water Management Plan (MPL-TUM-ENV-007-3) 18 July 2023	Mitigation and management measures are outlined in the WMP and discussed in the Farm and Environmental Monitoring Report. Management measures are being deemed generally effective as can be seen in the monitoring results for the reporting period. Waste water testing is routinely carried out. Soil and plant analysis of crops/pastures is completed for the monitoring period on the Gadara Park Farm. Nutrient balances are calculated to ensure net accumulation of nutrients is managed. Soils are limed to manage soil pH. Crops are rotated between rye, lucerne, clover and millet for the summer season and rye, clover, lucerne, brassica during the winter cropping period.	Compliant
2.26	The Applicant must not make unavailable to receive effluent those lands identified in the EA for the purpose of contingency land for the irrigation of effluent.	Farm and Environmental Monitoring Report 2024 ECMR 2024	All farm land identified in the EA is available for irrigation. It is noted that during the 23/24 reporting period, the irrigation level was recorded as 830 ML.	Compliant
2.27	The winter storage dam extension must be constructed with a 600 mm thick remoulded, recompacted clay liner with a permeability of less than 1 x 10Â·9 m/s and must not exceed a total water volume of approximately 900ML.	Site inspection observations Interview M O'Donovan and I Kane	No extension of the winter storage dam occurred in the reporting period.	*Not triggered*
2.28	Discharge of treated wastewater from the project into Sandy Creek or any of its tributaries must only occur as permitted by the DECC and in accordance with the DECC's Environmental Guidelines: Use of Effluent by Irrigation (2004). Discharge information must be recorded to the satisfaction of the DECC and must include discharge volume, duration of discharge and flow conditions of Sandy Creek or any of its tributaries at the time of discharge.	ECMR 2024	No treated wastewater was intentionally discharged from site during the reporting period.	*Not triggered*
2.29	The Applicant must demolish all relevant structures strictly in accordance with AS 2601-1991: The Demolition of Structures, as in force at 1 July 1993.		No demolition has occurred during the reporting period.	*Not triggered*
2.30	Prior to the commencement of construction, the Applicant must consult with the Civil Aviation Safety Authority in relation to any modifications to instruments or procedures required at the Tumut Aerodrome, or other airports where relevant, as a result of any air plume associated with the project. At the request of the Civil Aviation Safety Authority, the Applicant must fund any such modifications to the satisfaction of the Planning Secretary.		Historic condition - not assessed during this reporting period.	*Not triggered*

2.31	The Applicant must store and handle all dangerous goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with: a) all relevant Australian Standards; b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) the EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management. In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.	Compliance Audit Report - Liquid chemical storage and handling, EPL 10232 (NSW EPA, August 2023) Site inspection observations	It is noted that the EPA undertook a Compliance Audit - Liquid chemical storage and handling (August 2023) in the reporting period. The findings of the audit identified several requirements not complied with. These findings were either Code Blue (administrative) or Code Yellow (low risk). The audit notes a Hazard Audit was undertaken in December 2024 and will be assessed in the next audit period. The audit found on the day of the site inspection there were two jerry cans and a gas bottle stored together on the concrete outside a workshop, refer to site photographs - Photo 2. **Opportunity for improvement** - Ensure flammable liquid containers and gas bottles are kept separately, and the flammable liquids are stored in a bunded lockable cabinet.	Compliant
2.32	At least one month prior to the commencement of construction of the project, the Applicant must prepare and submit for the approval of the Planning Secretary, the following studies: a) an updated Fire Safety Study for the mill site including the expansion project, covering all aspects detailed in the Department's publication Hazardous Industry Planning Advisory Paper No. 2 - Fire Safety Guidelines and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The Study must include a strict maintenance schedule for essential services and other safety measures. The Study must be submitted for approval to the Commissioner of the NSW Rural Fire Service prior to submission to the Planning Secretary; and b) a Construction Safety Study for the project, prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 - Construction Safety Study Guidelines. Specific consideration must be given to the interaction of construction work with existing plant and operations. The commissioning portion of the Study may be submitted two months prior to commissioning the project. At least one month prior to the commencement of construction of the works approved by Modification 2, the above Fire Safety Study must be updated to incorporate any changes due to the modification. This study must cover the relevant aspects of the Department of Planning's Hazardous Industry Planning Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'. The Study must also be submitted for approval, to the NSW Fire Brigades.		Historic condition - not assessed during this reporting period.	*Not triggered*
2.32A	At least one month prior to the commencement of construction of the proposal associated with MP06_0159-Mod-6 or within such further period as the Planning Secretary may agree, the Applicant is to update and submit to the Planning Secretary for approval the following: i. the Fire Safety Study as required in Condition 2.32a); and ii. the Construction Safety Study as required in Condition 2.32b). Construction (other than preliminary works) associated with MP06_0159-Mod-6 may not commence until written approval has been received from the Planning Secretary for the above documents.	Site interviews M O'Donovan and I Kane Fire Safety Study MOD 6, VISY, dated 27 May 2024 Construction Safety Study - MOD 6, VISY, dated 29/04/2024 Email from RFS to Visy, dated 11/12/2024	Sighted during the audit was the response email from RFS to Visy with the Fire Safety Stufy for consultation.	Compliant

2.33	At least two months prior to the commencement of commissioning of the project the Applicant must prepare and submit for the approval of the Planning Secretary the following studies: a) an updated Emergency Plan for mill operations including the expansion project. The Plan must be prepared in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines. The plan must include detailed procedures for the safety of all people outside of the development who may be at risk from the project; and b) an updated Safety Management System, covering all operations at the site including the expansion project and any associated transport activities involving hazardous materials. The System must clearly specify all safety-related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to safety procedures. The System must be developed in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.	Emergency Response Plan (PLAN-VPP-TUM-ER-001-11), VISY, dated 21/06/2024 Email correspondence Visy to Department, dated 25/06/2024	Department provided email receipt of Plan (25/06/2024). The Safety System is identified in the Construction Safety Study, dated 29/04/2024. Site safety is covered in Section 4 of the Construction Safety Plan. The safety system addresses all safety related methods and procedures applied to all operations on site. The safety system includes procedures addressing: o Safe work procedures, standard hazard & risk assessment techniques and the method and application of job safety and environment analysis (JSEAs) o Plant isolation, lockout and tagging procedures o Access and high risk work permits including excavation and roof access o Confines spaces entry o Hot work o Personnel consultation and Issue resolution o Incident reporting, investigation, corrective action and injury management o Site inspections o Site rules o Use of personal protective clothing and equipment The Safety Management System does not fully meet the requirements of the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management, which includes requirements for a Safety Policy, accountabilities and responsibilities, training and awareness.	Not compliant
2.33A	At least two months prior to the commencement of operation of the proposal associated with MP06_0159-Mod-6 or within such further period as the Planning Secretary may agree, the Applicant is to update and submit to the Planning Secretary for approval the following: a) the Emergency Plan as required in Condition 2.33a); and b) the Safety Management System as required in Condition 2.33b). Operations associated with MP06_0159-Mod-6 may not commence until written approval has been received from the Planning Secretary for the above documents.	Site interviews M O'Donovan and I Kane Site inspection observations Emergency Response Plan (PLAN-VPP-TUM-ER-001-11), VISY, dated 21/06/2024 Email from DPHI to Visy Tumut regarding the review of the EMP pursuant to Condition 2.33A Schedule 2 of MP06_0159, dated 18 July 2024 Evidence that the Construction Safety Study was submitted to the Planning Secretary, no date (from the portal)	Planning Secretary responded to the submission of the Emergency Repsonse Plan (21/06/2024) was given on 18 July 2024 and requested additional information. Updates and further correspondence regarding the plan fall within the next audit period. The loop road was operating prior to plan approval. The audit found that the Construction Safety Stud, which is part of the Safety Management System was submitted to the Planning Secretary through the major projects portal as required by this condition.	Not compliant
2.34	The Applicant must ensure that the sweep path of the largest vehicle entering and exiting the site and manoeuvrability through the site is accordance with AS 2890.2-2002 Parking facilities - Off-street commercial vehicle facilities and to the satisfaction of Council.	Site interviews M O'Donovan and I Kane Site inspection observations	Swept path analysis for the internal loop road is provided Appendix B of the Mod-6 Report, which would have gone out for consultation with Council.	Compliant

2.35	The Applicant must install traffic calming measures on internal roads and ensure that all internal roads are appropriately marked and signposted so as to assist safe vehicular movement throughout the plant.	Site interviews M O'Donovan and I Kane Site inspection observations	Multiple traffic-calming measures including clear signage and frequent speed bumps were observed during the site inspection.	Compliant
2.36	The Applicant must maximise the use of B-doubles and backloading, and where possible the use of super b-doubles, so as to reduce the number of heavy vehicle movements from site.	ECMR 2024	General truck configurations have remained the same for the past few years, including the reporting period. General configurations include maximising the use of B-doubles and A-doubles as well as backloading. General configuration includes: Logs ave. 94% B doubles and 6% semi-trailers, ave. log truck load B double = 39t, semi-trailer = 28t. Sawmill chip 52% B doubles and 48% semi-trailers, ave. load 37t B double and 29t semi-trailer. Paper domestic was 20% A-Double, 70% B doubles and 5% semi-trailers, ave. load 36t B double and 24t semi-trailer. Paper export 100% A-Double 50t/load	Compliant
2.37	The Applicant must ensure that there will be no night-time (10pm to 7am) semi-trailer, super B-Double or B-Double movements to and from the plant via the Snowy Mountains Highway through Adelong or to and from the plant via MR 280 north of Adelong.	ECMR Appendix 6 Monthly HV Movement Data 2024 Complaints Register 2023/2024	No night time truck movements via Tumblong/Adelong have been recorded during the reporting period and no complaints regarding out of hours movements have been received during the reporting period.	Compliant
2.38	The Applicant must, subject to appropriate road safety, ensure that all trucks associated with the project must: a) utilise air bag suspension; b) minimise the use of exhaust brakes at night in residential areas; and c) be operated in a manner so as to reduce adverse noise impacts.	Site interviews M O'Donovan and I Kane Complaints Register 2023/2024	Drivers and employees at Visy site are inducted and trained, with all Visy Logistics drivers trained by Visy Logistics during a separate onboarding process. A toolbox talk developed February 2015 and has been used to train new and existing staff. No complaints have been received from the public regarding airbrake noise for the reporting period.	Compliant
2.39	Prior to the commencement of construction, the Applicant must discuss the implementation of the road safety measures such as road speed reductions, driveway traffic vision mirrors and increased signage with Council. The Applicant must supply any relevant information as required by Council to determine the need and suitability of such measures. Council may then make representation of such matters to the Local Traffic Committee to recommend consideration by the RMS.		Historic condition - not assessed during this reporting period. There was no construction outside the site during the reporting period.	*Not triggered*
2.40	The Applicant must stagger start and finish times for construction teams as far as practicable such that the traffic impact on the intersection of Snowy Mountain Highway and Bachelor's Valley Way is minimised.		Historic condition - not assessed during this reporting period. There was no construction outside the site during the reporting period.	*Not triggered*
2.41	Prior to the commencement of construction the Applicant must prepare and implement a Workforce Housing Strategy. The Strategy is to be developed in consultation with the Department of Housing and Council and must be submitted to the Planning Secretary for approval. The Strategy must include, but is not necessarily limited to a program for monitoring the supply and affordability of rental accommodation during the construction stage and contingency measures to be implemented in the event of a shortfall in affordable rental accommodation.		Historic condition - not assessed during this reporting period. There was no construction outside the site during the reporting period.	*Not triggered*

<table>
<tr><td>2.42</td><td>The Applicant must ensure that all external lighting associated with the project is mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway. The lighting must be the minimum level of illumination necessary and must comply with AS 4282(/NT) 1997 -Control of Obtrusive Effects of Outdoor Lighting.</td><td>Visy Complaints Registers Jul 23 – Sept 23, Oct 23 – Dec 23, Jan 24 – Mar 24, Apr 24 – Jun 24</td><td>Plant lighting at the time of the audit was observed to be fixed and directed toward the plant. Lights face towards work areas, no light complaints recorded. Solar lights are installed at Gadara Road intersection for queueing trucks.</td><td>Compliant</td></tr>
<tr><td>2.43</td><td>The Applicant must, at the request of the landowner for the land listed as Lot 4 DP 793196, negotiate an option to purchase this land.</td><td>Site interviews M O'Donovan and I Kane</td><td>No land purchase requests have occurred during the reporting period.</td><td>Not triggered</td></tr>
<tr><td>2.44</td><td>Independent valuation of the land must commence at the request of the landowner. The landowner may request up to three independent valuations which must be funded by the Proponent.</td><td>Site interviews M O'Donovan and I Kane</td><td>No land purchase requests have occurred during the reporting period.</td><td>Not triggered</td></tr>
<tr><td>2.45</td><td>The acquisition price must take into account and provide payment for:
a) the current market value of the land as if it was unaffected by the existing mill and this project;
b) reasonable compensation to the landowner for disturbance allowance and relocation costs within the Gundagai, Tumbarumba or Gundagai local government areas;
c) the landowner's reasonable costs for obtaining legal advice and expert opinion for the purposes of determining the acquisition price of the land and the terms upon which it is to be acquired.</td><td>Site interviews M O'Donovan and I Kane</td><td>No land purchase requests have occurred during the reporting period.</td><td>Not triggered</td></tr>
<tr><td>2.46</td><td>The landowner and the Applicant must negotiate the terms of any option to purchase in good faith within six months of the offer to purchase being received by the landowner or, alternatively, any other form of agreement acceptable to both parties. In the event of a dispute over the valuation or terms of purchase of the landowner's property which is unresolved after twelve months of the offer being received, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's determination of any such dispute must be final and binding on the parties. Any valuation or survey assessment required by the Planning Secretary to resolve this matter must be funded by the Proponent.</td><td>Site interviews M O'Donovan and I Kane</td><td>No land purchase requests have occurred during the reporting period.</td><td>Not triggered</td></tr>
<tr><td>3.1</td><td>The Applicant must determine the pollutant concentrations and emission parameters specified in Table 8 to Table 13 inclusive below, at each of the discharge points (established in strict accordance with the requirements of test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007)). Monitoring must be undertaken during operation of the project, at the frequency indicated in the tables, unless otherwise agreed by the DECC.

Table 9 – Periodic Pollutant and Parameter Monitoring (Main Stack 2)
<table><tr><th>Pollutant/ Parameter</th><th>Units of Measure</th><th>Method</th><th>Frequency</th></tr><tr><td>Cadmium</td><td>mgm^{-3}</td><td>TM-12, TM-13, TM-14</td><td>Annually</td></tr><tr><td>Chlorine</td><td>mgm^{-3}</td><td>TM-7, TM-8</td><td>Annually</td></tr><tr><td>Chromium</td><td>mgm^{-3}</td><td>OM-4</td><td>Annually</td></tr><tr><td>Flow</td><td>Nm^3/s</td><td>CEM-6</td><td>Continuous</td></tr><tr><td>Hazardous substances</td><td>mgm^{-3}</td><td>TM-12, TM-13, TM-14</td><td>Annually</td></tr><tr><td>Hydrogen chloride</td><td>mgm^{-3}</td><td>TM-8</td><td>Continuous</td></tr><tr><td>Hydrogen fluoride</td><td>mgm^{-3}</td><td>TM-9</td><td>Annually</td></tr><tr><td>Mercury</td><td>mgm^{-3}</td><td>TM-12, TM-13, TM-14</td><td>Annually</td></tr><tr><td>Moisture</td><td>%</td><td>TM-22</td><td>Continuous</td></tr><tr><td>Nitrogen oxides</td><td>mgm^{-3}</td><td>CEM-2</td><td>Continuous</td></tr><tr><td>Opacity</td><td>% Opacity</td><td>CEM-1</td><td>Continuous</td></tr><tr><td>Oxygen (O2)</td><td>%</td><td>CEM-3</td><td>Continuous</td></tr><tr><td>Sulfuric acid mist and sulfuric trioxide (as SO3)</td><td>mgm^{-3}</td><td>TM-3</td><td>Annually</td></tr><tr><td>Sulphur dioxide</td><td>mgm^{-3}</td><td>CEM-2</td><td>Continuous</td></tr><tr><td>TCDD (equivalent)</td><td>ngm^{-3}</td><td>TM-18</td><td>Annually</td></tr><tr><td>TRS (as H2S)</td><td>mgm^{-3}</td><td>CEM-5</td><td>Continuous</td></tr><tr><td>Temperature</td><td>°C</td><td>TM-2</td><td>Continuous</td></tr><tr><td>Total Solid Particles</td><td>mgm^{-3}</td><td>TM-15</td><td>Quarterly</td></tr></table></td><td>ECMR 2024
Annual Return 2024</td><td>The tables in the consent condition have been compiled from a past EPL versions. Due to the redundancy of these tables, the compliance status of this condition will be marked based on the results of compliance against the EPL version 5 July 2024.

Inconsisitencies of Consent Conditions were raised with the submission of Modification 6 to the Planning Secretary. Mod-6 (MP06_0159) was determined on 26 March 2024. Response from the Department regarding the amalgamation of conditions was received on 27/11/2024 identifying reasons why the amalgamation was not appropriate. The Department notes that it is appropriate to detail any inconsistencies / legislation changes / acknowledgment of the changing status within the relevant management plan/s and future audit reports (in accordance with the IAPAR 2020).</td><td>Not triggered</td></tr>
</table>

Table 10 – Periodic Pollutant and Parameter Monitoring (Recovery Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm^{-3}	CEM-4	Continuous
Flow	Nm^3/s	CEM-6	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm^{-3}	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O_2)	%	CEM-3	Continuous
Temperature	ºC	TM-2	Continuous
Total Solid Particles	mgm^{-3}	TM-15	Quarterly
Volatile Organic Compounds	mgm^{-3}	CEM-8	Continuous

Table 11 – Periodic Pollutant and Parameter Monitoring (Natural Gas Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm^{-3}	CEM-4	Continuous
Flow	Nm^3/s	CEM-6	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm^{-3}	CEM-2	Continuous
Oxygen (O_2)	%	CEM-3	Continuous
Temperature	ºC	Other approved method 1	Continuous
Total Solid Particles	mgm^{-3}	TM-15	Quarterly

Table 12 – Periodic Pollutant and Parameter Monitoring (Multi-Fuel Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Cadmium	mgm^{-3}	TM-12, TM-13, TM-14	Quarterly
Carbon Monoxide	mgm^{-3}	CEM-4	Continuous
Chromium	mgm^{-3}	OM-4	Quarterly
Flow	Nm^3/s	CEM-6	Continuous
Hazardous substances	mgm^{-3}	TM-12, TM-13, TM-14	Quarterly
Mercury	mgm^{-3}	TM-12, TM-13, TM-14	Quarterly
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm^{-3}	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O_2)	%	CEM-3	Continuous
TCDD (equivalent)	mgm^{-3}	TM-18	Quarterly
Temperature	ºC	Other approved method 1	Continuous
Total Solid Particles	mgm^{-3}	TM-15	Quarterly

Table 13 – Periodic Pollutant and Parameter Monitoring (Lime Kiln 2)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm^{-3}	CEM-4	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm^{-3}	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O_2)	%	CEM-3	Continuous
Temperature	ºC	TM-2	Continuous
Total Solid Particles	mgm^{-3}	TM-15	Quarterly

	Table 14 – Periodic Pollutant and Parameter Monitoring (Gas Turbine) **Pollutant/ Parameter** / **Units of Measure** / **Method** / **Frequency** Carbon Monoxide / mgm^{-3} / TM-32 / Quarterly Moisture / % / TM-22 / Quarterly Nitrogen oxides / mgm^{-3} / TM-11 / Quarterly Oxygen (O_2) / % / TM-25 / Quarterly Temperature / °C / TM-2 / Continuous Total Solid Particles / mgm^{-3} / TM-15 / Quarterly			
3.2	Within 90 days of the commencement of each phase of the project, or as may be agreed by the Planning Secretary, and during a period in which the project is operating under design loads and normal operating conditions, the Applicant must undertake a program to confirm the air emission performance of the project. The program must include, but not necessarily be limited to: a) point source emission sampling and analysis subject to the requirements listed under condition 3.1; b) a comprehensive air quality impact assessment, using actual air emIsslon data collected under a). The assessment must be undertaken strictly in accordance with the methods outlined in Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA. 2005); c) a comparison of the results of the air quality impact assessment required under b) above, and the predicted air quality impacts detailed in the documents listed under condition 1.1 of this approval; d) a comparison of the results of the air quality impact assessment required under b) above, and the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007); and e) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to air quality impacts. A report providing the results of the program must be submitted to the Planning Secretary and DECC within 28 days of completion of the testing required under a).	Site interviews M O'Donovan and I Kane	No new phases have occurred during the reporting period.	*Not triggered*
3.3	In the event that the program undertaken to satisfy condition 3.2 of this approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to: a) greater point source emissions or ground-level concentrations of air pollutants than predicted in the documents listed under condition 1.1 of this approval; or b) greater point source emissions or ground-level concentrations of air pollutants than the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007); then the Applicant must provide details of remedial measures to be implemented to reduce point source emissions or ground-level concentrations of air pollutants to no greater than that predicted in the documents listed under condition 1.1 of this approval and to meet the impact assessment criteria detailed in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECC, 2007). Details of the remedial measures and a timetable for implementation must be submitted to the Planning Secretary for approval within such period as the Planning Secretary may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.	Site interviews M O'Donovan and I Kane	No new phases have occurred during the reporting period.	*Not triggered*

3.4	Within 90 days of the commencement of each phase of the project and every year thereafter, or as may be agreed by the Planning Secretary, the Applicant must commission an independent, qualified person or team to undertake odour performance monitoring. The independent person or team must be approved by the Planning Secretary prior to the commencement of monitoring. The monitoring program must occur during a period in which the project is operating under design loads and normal operating conditions. The program must include, but not necessarily be limited to: a) point and area source emission sampling and analysis subject to the requirements listed under condition 3.1; b) a comprehensive odour assessment, using actual air emission data collected under a). The assessment must be undertaken strictly in accordance with the methods outlined in Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2005) and Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (EPA, 2006); c) a comparison of the results of the odour impact assessment required under b) above, with the predicted odour impacts detailed in the documents listed under condition 1.1 of this approval and previous odour performance assessments undertaken to satisfy this condition; d) a comparison of the results of the odour assessment required under b) above, and the impact assessment criteria detailed in Technical Framework -Assessment and Management of Odour from Stationary Sources in NSW (DECC, 2006) and Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (EPA, 2006); and e) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to odour impacts. A report providing the results of the program must be submitted to the Planning Secretary and DECC within 28 days of completion of the testing required under a).	Ektimo LDAR Testing Report August 2023 and February 2024	An odour audit is being conducted twice annually by Ektimo. The auditing took place in August 2023 and February 2024 during the reporting period, with LDAR completed August 2023 and February 2024.	Compliant
3.5	In the event that the program undertaken to satisfy condition 3.4 of the approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to greater odour impacts than that predicted in the documentation listed under condition 1.1 of this approval, then the Applicant must provide details of remedial measures to be implemented to reduce odour impacts to levels required by that condition. Details of the remedial measures and a timetable for implementation must be submitted to the Director-General for approval within such period as the Planning Secretary may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.		Noted	*Not triggered*
3.6	Within 12 months of the commencement of operation of each phase of the project, the Applicant must undertake a revised Human Health Impact Assessment using actual air emission data collected. Specific attention must be given to emissions of nitrogen dioxide, sulphur dioxide and chlorine gas. Emissions of PAHs must be included in this assessment unless it can be demonstrated that PAH emission levels are below detection limits. The revised Human Health Impact Assessment must be submitted to the Planning Secretary and NSW Health within three months of commencement of emission data collection.	Site interviews M O'Donovan and I Kane	No new phases have occurred during the reporting period.	*Not triggered*

3.7	Within 90 days of the commencement of each phase of the project, or as may be agreed by the Planning Secretary, and during a period in which the project is operating under design loads and normal operating conditions, the Applicant must undertake a program the Planning Secretary, and during a period in which the project is operating under design loads and normal operating conditions, the Applicant must undertake a program to confirm the noise emission performance of the project. The program must meet the requirements of the DECC, and must include, but not necessarily be limited to: a) noise monitoring, consistent with the guidelines provided in the New South Wates Industrial Noise Policy (EPA, 2000), to assess compliance with condition 2.15 of this approval; b) methodologies, locations and frequencies for noise monitoring (including at sites assessed in the EA); c) identification of monitoring sites at which pre- and post-project noise levels can be ascertained; and d) details of any entries in the Complaints Register (condition 4.3 of this approval) relating to noise impacts. A report providing the results of the program must be submitted to the Planning Secretary and the DECC with 28 days of completion of the testing required under a).	Site interviews M O'Donovan and I Kane	No new phases have occurred during the reporting period.	*Not triggered*
3.8	In the event that the program undertaken to satisfy condition 3. 7 of the approval indicates that the operation of the project, under design loads and normal operating conditions, will lead to greater noise impacts than permitted under condition 2.15 of this approval, then the Applicant must provide details of remedial measures to be implemented to reduce noise impacts to levels required by that condition. Details of the remedial measures and a timetable for implementation must be submitted to the Planning Secretary for approval within such period as the Planning Secretary may require, and be accompanied by evidence that the DECC is satisfied that the remedial measures are acceptable.		Noted	*Not triggered*
3.8A	The Applicant must undertake a Noise Verification Study to the satisfaction of the Planning Secretary within the winter period (June, July, August). The Study must: a) be undertaken by a suitably qualified acoustic expert; b) validate the predictions made in the documents submitted in support of MP06_0159-Mod-4; c) demonstrate compliance with the noise limits in condition 2.15; and d) describe the contingencies that would be implemented, and the timing for implementation, should any non-compliance be detected.			*Not triggered*
3.9	Within 12 months of commencement of operation of the first phase of the project, the Proponent will have conducted four quarterly noise monitoring assessments at all the locations identified in Appendix O of the EA. Traffic noise monitoring results will be compared with the predicted traffic noise impacts detailed in the documents listed under condition 1.1 and the DECC's Environmental Criteria for Road and Traffic Noise (1999). In the event that the monitoring program indicates that the traffic noise associated with the project will lead to an exceedance of traffic noise criteria and greater noise impacts than that predicted in the documentation listed under condition 1.1, then the Applicant must provide details of mitigation measures to be implemented to reduce traffic noise impacts. Details of the mitigation measures and a timetable for implementation must be submitted to the Director-General for approval within such period as the Planning Secretary may require, and be accompanied by evidence that the DECC is satisfied that the mitigation measures are acceptable. A report providing the results of the traffic noise monitoring must be submitted to the Director-General and the DECC with 28 days of completion of the testing.		Historic condition - not assessed during this reporting period.	*Not triggered*

3.10	Prior to the commencement of the first phase of the project, the Applicant must prepare and implement a Soil Monitoring Program to monitor the soil health of areas affected by effluent irrigation. The soil monitoring program must be undertaken to the satisfaction of DPI and must be conducted within 12 months of operation and every 12 months thereafter, unless otherwise agreed to by the Planning Secretary. The soil monitoring program must include, but not necessarily limited to: a) installation of soil moisture probes for daily soil moisture monitoring; b) calibration of existing soil moisture probes to ensure spatial coverage of hydrogeological conditions of effluent irrigation areas; c) determination of appropriate soil sampling locations in new irrigation areas ensuring spatial coverage of hydrogeological conditions; and d) soil sampling consistent with the DECC's Environmental Guidelines for the Utilisation of Treated Effluent by Irrigation (2004) undertaken twice a year, before and after the irrigation season.	ECMR 2024 Farm and Environmental Monitoring Report 2024	As outlined in the Farm and Environmental Monitoring Report: a) soil moisture probes are installed under the irrigation areas and are used to monitor and schedule irrigation. b) The probes are calibrated c) Soil sample locations recorded d) Soil sampling is biannually, before & after irrigation season as specified in the CoA. However, the Farm and Environmental Monitoring Report 2024 provided the following recommendations: * Most of the thirty additional groundwater monitoring bores that were installed in 2005/06 have been damaged or destroyed in 2022/23 and 2023/24 monitoring periods when the pivots and paddocks were cultivated. An audit of the condition of these bores is recommended and bores that can glean useful information are recommended to be repaired or replaced. * Soil moisture probes located in the pivots alongside the groundwater monitoring bores were also damaged or destroyed in the 2022/2023 period. An audit of the condition of these probes is recommended and probes that can glean useful information are recommended to be repaired or replaced.	Compliant
3.11	In the event that the soil monitoring program described in condition 3.10 indicates that effluent irrigation is having an adverse impact on the sustainable use of soils within the irrigation area, then the Proponent must undertake soil amelioration measures in consultation with DPI such that the adverse impacts are effectively mitigated.	ECMR 2024 Farm and Environmental Monitoring Report 2024	The soil and groundwater monitoring results from 2023/2024 do not indicate changing soil parameters of an adverse nature.	*Not triggered*
3.12	Prior to the commencement of the first phase of the project, the Applicant must prepare and implement a Surface and Groundwater Monitoring Program. The program must be undertaken to the satisfaction of DECC and must include but not necessarily be limited to the identification of monitoring locations, frequency and parameters for the monitoring of groundwater impacts associated with effluent irrigation. The program will give consideration to the positioning of groundwater monitoring locations adjacent to the drainage line downstream of the irrigation areas specified in the EA and between the irrigation areas referred to in the EA as CP6, CP7 and CP8.	Water Management Plan MPL-TUM-ENV-007-5 18 July 2023 ECMR 2024 Farm and Environmental Monitoring Report 2024	A surface water and groundwater monitoring program is being implemented. The 2024 Farm and Environmental Monitoring Report (McMahon) includes monitoring locations, frequencies, parameters to be monitored, results of the monitoring and comparisons of those results to previous years.	Compliant
3.13	Within 90 days of the commencement of operation of each phase of the project, or as may be agreed by the Planning Secretary, the Applicant must submit a report detailing compliance with conditions 2.32 and 2.33 of this approval. The report must include, but not necessarily be limited to: a) dates of study, plan or system completion, and commencement of construction and commissioning; b) actions taken or proposed to implement recommendations made in the studies, plans or systems; and c) responses to each requirement that may be requested by the Planning Secretary in respect to the implementation of any measures arising from recommendations of the studies or reports described by conditions 2.32 and 2.33.	Site interviews M O'Donovan and I Kane	No new phases have occurred during the reporting period.	*Not triggered*

3.14	Twelve months after the commencement of operation of the first phase of the project, or within such period otherwise agreed by the Planning Secretary, the Applicant must commission an independent, qualified person or team to undertake a Hazard Audit of the project. The independent person or team must be approved by the Planning Secretary prior to the commencement of the Audit. A Hazard Audit Report must be submitted for the approval of the Planning Secretary no later than one month after the completion of the Audit. Further Hazard Audit of the expansion must be included in the Hazard Audit required of the existing plant, or as otherwise agreed or required by the Planning Secretary. Hazard Audits must be carried out in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 5 - Hazard Audit Guidelines. The hazard audit report must be accompanied by a program for the implementation of all recommendations made in the hazard audit report. It the Proponent intends to defer the implementation of a recommendation, justification must be included.	Refer to DA Condition 16	Hazard audit carried out within required timeframe (Nov 2021) and reported during the period 2021 - 2022. Audit prepared in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, Hazard Audit Guidelines. Next hazard audit due December 2024.	Compliant
3.15	Within 12 months of the commencement of the first phase of the project, the Applicant must undertake an Odour Audit of the project. The Odour Audit must include a leak detection and repair program, as outlined in the USEPA Maximum Achievable Control Technology Rules, for the entire foul gas and foul condensate collection systems. The Odour Audit Report must be submitted to the satisfaction of the DECC no later than one month after the completion of the Audit. Further Odour Audits must include the existing plant and must be undertaken annually, or as otherwise agreed or required by the Planning Secretary.	Refer to DA Condition 61	An odour audit is being conducted twice annually by Ektimo. The auditing took place in August 2023 and February 2024 during the reporting period, with LDAR completed August 2023 and February 2024.	Compliant
3.16	Twelve months after the commencement of operation of the first phase of the project, and every three years thereafter, or as otherwise agreed or required by the Planning Secretary, the Applicant must commission an independent, qualified person or team to undertake an Environmental Audit of the project. The independent person or team must be approved by the Planning Secretary prior to the commencement of the Audit. An Environmental Audit Report must be submitted for the approval of the Planning Secretary within one month of the completion of the Audit. The Audit must: a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing; b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project; c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works. The Planning Secretary may require the Proponent to undertake works to address the findings or recommendations presented in the Report. Any such works must be completed within such time as the Planning Secretary may require. The Environmental Audit Report must be made available for public inspection on request. Further Environmental Audit Reports of the project must be included in the Environmental Audit Reports for the existing plant. If the preparation and submission of a Hazard Audit Report and an Environmental Audit Report are required at the same time, the requirements of condition 3.14 and 3.16 of this approval may be satisfied with a single report prepared by a single independent person or team approved by the Planning Secretary.	Refer to DA Condition 71		Compliant
4.1	The Applicant must continue to participate with the Community Consultative Committee. Subject to confidentiality, the Applicant must submit all documents required under this approval to the Community Consultative Committee and make available such documents for public inspection on request.	Refer to CA Condition 4.1	Visy are holding CCC meetings every two months, minutes sighted for each bimonthly meeting.	Compliant

4.2	Prior to the commencement of construction of the project, the Applicant must ensure that the following are available for community complaints for the life of the project (including construction and operation): a) a telephone number on which complaints about construction and operational activities at the site may be registered; b) a postal address to which written complaints may be sent; and c) an email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address must be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	Refer to CA Condition 4.2	Number maintained and advertised through website, signage and in the VCCC minutes. Both a 24 hour hotline and landline number are provided.	Compliant
4.3	The Applicant must record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register must record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register must be made available for inspection by the Planning Secretary upon request.	Refer to CA Condition 4.3	There were 27 complaints documented for the reporting period (Appendix 9 of ECMR). 25 of these complaints were associated with odour. One complaint was associated with noise and one with air emission. Quarterly compliant audits were sighted. Reports include review of complaints and investigation results with reference to relevant data. Each complaint has been investigated and an investigation finding and corrective action reported in the complaints register.	Compliant
5.1	The Applicant must prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during construction of the project. The Plan must be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and must include, but not necessarily be limited to.....	Site interviews M O'Donovan and I Kane	The audit found that a CEMP was not required for the construction of the loop road.	*Not triggered*
5.2	As part of the Construction Environmental Management Plan for the project, required under condition 5.1 of this approval, the Applicant must prepare and implement the following…..		As above	*Not triggered*

5.3	The Applicant must update the existing Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the project and existing plant. The Plan must be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and must include, but not necessarily be limited to: a) identification of all statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all approvals, licences, approvals and consultations; b) a description of the roles and responsibilities for all relevant employees involved in the operation of the project; c) overall environmental policies and principles to be applied to the operation of the project; d) standards and performance measures to be applied to the project, and a means by which environmental performance can be periodically reviewed and improved, where appropriate; e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; f) the additional studies listed under condition 5.4 of this approval; and g) the environmental monitoring requirements outlined under conditions 3.1 to 3.16 of this approval, inclusive. The Plan must be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Planning Secretary. Operation must not commence until written approval has been received from the Planning Secretary.	Visy Operational Environmental Management Plan (PLANS-VPP-TUM-HSE-001-5) 28 February 2023	The OEMP has been updated during the reporting period. These requirements have been addressed as follows: a) Section 4 of the OEMP describes and lists relevant approvals and legislation. b) Section 6 of the OEMP describes roles & responsibilities c) Sections 1 and 2 of the OEMP describes the role of the environmental policy and procedures employed by Visy. d) Sections 16 - 21 describe monitoring, management review and improvement. e) Section 5 of the OEMP describes the objectives targets and management of the OEMP. f) Sections 1 and 9 describe the additional air quality actions required. Specific management plans support the OEMP in this respect. g) Section 16 of the OEMP and the Management Subplans describes monitoring for the Visy operation. The OEMP and most subplans have been updated within the reporting period, as reflected in relevant condition evidence.	Compliant
5.4	As part of the Operation Environmental Management Plan for the project, required under condition 5.3 of this approval, the Applicant must prepare and implement the following Management Plans:	Conditions 5.4 a) to f).	All management plans have been prepared as specified.	Compliant
5.4a	a) an updated Air Quality Management Plan to outline measures to minimise impacts from the project and existing plant on local and regional air quality. The Plan must include, but not necessarily be limited to: i) identification of all major sources of particulate and gaseous air pollutants that may be emitted from the project, being both point-source and diffuse emissions, including identification of the major components and quantities of these emissions; ii) monitoring for gaseous and particulate emissions from the project, in accordance with any requirements of the DECC; iii) procedures for the minimisation of gaseous and particulate emissions from the project; iv) pro-active and reactive management and response mechanisms for particulates, odour and gaseous emissions, with specific reference to measures to be implemented and actions to be taken to minimise and prevent potential elevated air quality and odour impacts on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project at any time; v) specific procedures for the management of generating efficiency and the minimisation of greenhouse gas emissions per unit of electricity generated; vi) procedures aimed at maximising the efficiency of the start-up and shut-down cycles for the project; vii) provision for regular review of air quality monitoring data, with comparison of monitoring data with that assumed and predicted in the documents listed under condition 1.1 of this approval, including verification of air quality modelling and predictions, as may be relevant; viii) Plans for regular maintenance of process equipment to minimise the potential for leaks and fugitive emissions; and ix) a contingency plan should an incident, process upset or other initiating factor lead to elevated air quality impacts, whether above normal operating conditions or environmental performance goals/ limits.	Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023	The updated AQMP (April 2023) addresses these requirements as follows: i) In section 4.1 ii) In section 7 iii) In section 6 iv) In section 6 v) In section 6.6 and app J vi) In section 6.3 vii) In sections 8 and 9 viii) In section 6.3.2 ix) In section 6.4.	Compliant

5.4b	b) an updated Water Management Plan to outline measures that will be employed to manage water on the site, to minimise soil erosion and the discharge of sediments and other pollutants to lands and/ or waters throughout the life of the project. The Plan must consolidate the existing Surface Water Management Plan, Wastewater Management Plan and the Groundwater Monitoring Plan. The Plan must be based on best environmental practice and must address the requirements of the Department, DECC and Council. The Plan must include, but not necessarily be limited to: i) consideration of all reasonable and feasible options to avoid discharge to ground and/or ambient waters including methods to minimise the volume of contaminated water and effluent generated, recycling and reusing water and effluent; ii) identification of clean and dirty water areas on site maps for different stages of the project and identification of criteria for nomination of areas as clean or dirty; iii) details of water management measures to be implemented for clean and dirty waters; iv) calculations for a water balance for all waters generated on the site including potential volumes of groundwater, stormwater and process water for treatment on-site or off-site, proposed discharges, recycling or reuse; v) details of the remedial actions to be taken by the Proponent and site operators in response to an exceedance of concentration limits or other performance criteria for the on-site or ambient water management controls; vi) characterisation of wastewater qualities and quantities for reuse on-site must be characterised and irrigation management practices specified; vii) specification of wastewater reuse areas must be specified on site maps for the existing plant and the project, including contingency land; viii) contingency plans in the event that that areas of land used for effluent irrigation become unavailable; ix) specific details must be provided in relation to the times, locations, volumes and qualities of water to be irrigated, including how the quality of water to be used for irrigation will be assessed; x) specific details regarding the groundwater monitoring program including monitoring procedures, locations, frequency and parameters; xi) a detailed description of measures to mitigate adverse groundwater impacts and trigger conditions for	Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023	The WMP addresses the requirements of: i) In section 4 ii) In section 4 iii) In section 4 iv) In section 4 v) In section 4 vi) In section 4 vii) In section 4 viii) In section 4 ix) In section 4 x) In section 4 xi) In section 4.	Compliant
5.4c	c) an updated Noise Management Plan to detail measures to mitigate and manage noise during the operation of the existing plant and the project. The Plan must be formed in consultation with the DECC and must include, but not necessarily be limited to: i) procedures to ensure that best management practice and best available technology economically achievable is being considered and implemented; ii) procedures to generate suitable documentation for annual environmental auditing, that demonstrates that the noise limits and noise goals specified under this approval are being met; iii) identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits and noise goals specified under this approval; iv) identification of activities that will be carried out in relation to the project and the associated noise sources; v) procedures for periodic consideration of noise impacts at the relevant receivers against the noise limits and noise goals specified under this approval; vi) details of all management methods and procedures that will be implemented to control individual and overall noise emissions from the site during operation; vii) reactive and pro-active strategies for dealing promptly with any noise complaints, including documentation of a fast response (eg within one hour), the completed action on a complaint, and feedback from the complainant (eg within 24 hours); and viii) noise monitoring and reporting procedures.	Visy Noise Management Plan (PLANS-VPP-TUM-HSE-004-4) 17 March 2023	The updated NMP (March 2023) addresses these requirements as follows: i) In sections 1, 2 and 6 ii) In Section 9 iii) In Section 4 iv) In Section 4.1 v) In Section 8 vi) In Section 6 vii) In Sections 6.3 and 8.2 viii) In Sections 7 and 8.	Compliant

5.4d	d) an updated Traffic Management Plan to detail measures to mitigate and manage traffic impacts during the operation of the existing plant and project. The Plan must meet the requirements of the RTA and Council and must include, but not necessarily be limited to: i) a driver education program to ensure that noisy heavy vehicle practises are not unnecessarily used near sensitive receivers and that route curfews are respected; ii) best noise practise in the selection and maintenance of heavy vehicle fleets; iii) movement scheduling where practicable to reduce impacts during sensitive time periods; iv) specific measures for ensuring that all heavy vehicle operators associated with the existing plant and project implement the Traffic Management Plan, including the use of penalties for breaches of the Plan; v) specific measures for minimising noise impacts at identified sensitive areas, including a program for the implementation of all feasible and reasonable mitigation measures at the Steunkal and Beale residences; vi) a system for identifying and ensuring conformance with the Plan, including conformance monitoring, procedures for implementing and monitoring corrective and preventative action, and penalties for breaches of the Plan; and vii) a continual improvement process for assessing Plan effectiveness and implementing improvements to the Plan.	Visy Traffic Management Plan (PLANS-VPP-TUM-HSE-006-4) 3 March 2023	The updated TMP (March 2023) addresses these requirements as follows: i) In section 6 ii) In sections 4.3 and 6.2 iii) In section 6 iv) In section 6 v) In section 6 and in the NMP vi) In sections 7, 8 and 9 vii) In section 1 and 9	Compliant
5.4e)	e) a Soil Management Plan to detail measures to mitigate and manage adverse impacts on soil in areas affected by effluent irrigation associated with the project, including the existing plant. The Plan must be based on best environmental practice and must be developed in consultation with the DPI. The plan must include, but not necessarily be limited to: i) a detailed identification of soil types and properties within each irrigation area ; ii) a monitoring regime for assessing soil health; iii) a detailed description of conditions that would trigger the implementation of soil amelioration measures; and iv) methodologies for soil improvement that are considered feasible and reasonable.	Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023	The updated SMP (April 2023) addresses these requirements as follows: i) In section 4 ii) In section 6 iii) In section 3, 6 and 7 iv) In section 4.7	Compliant
5.4f	An updated Solid Waste Management Plan for the existing plant (DA 6/98) and the project (06_0159), as modified, in consultation with the EPA, and to the satisfaction of the Secretary. The Plan must: i) describe the type, quantity, handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); ii) describe how waste is managed in accordance with the EPA's waste hierarchy for the life of the existing plant and project; iii) include a landfill diversion strategy that: a) investigates reuse and recycling opportunities and identifies the approvals required for these activities; b) details timeframes for the implementation of reuse and recycling activities; c) includes a monitoring program to measure the volume and composition of waste captured by the reuse and recycling activities and the waste sent to landfill; iv) and detail the contingency measures to ensure suitable management and disposal of waste.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 13 July 2024	The SWMP (July 2024) was revised outside the reporting period. The SWMP includes: i) Section 3.13 ii) Section 4.2 iii) Section 5.0 a) Section 5.1 b) Section 5.2 c) Section 5.3 iv) Section 7.0 The submission of the plan to the satisfaction of the Planning Secretary will be addressed in the next reporting period.	Compliant

5.5	Within three months of: a) the submission of an incident report under condition 6.9; b) the approval of any modification of the conditions of this consent; or c) issue of a direction of the Planning Secretary under Condition 1.2A, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.		Modification 6 was determined on 26/03/2024. The Planning Secretary was not notified within 3 months of the modification determination the outcomes of the review of strategies, plans and programs.	Not compliant
5.6	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under Condition 5.5, or such other timing as agreed by the Planning Secretary. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.		There were no plans requiring review following the determination of Mod-6 .	*Not triggered*

EPL Compliance Status - December 2024

<table>
<tr><th>Reference</th><th>Approval or licence requirement</th><th>Evidence collected 2024</th><th>Audit Finding</th><th>Compliance status</th></tr>
<tr><td colspan="5">EPL 10232 - 5th July 2023</td></tr>
<tr><td>A1.1</td><td>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.
Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.
<table>
<tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr>
<tr><td>Paper or pulp production</td><td>Paper or pulp production</td><td>> 150000 T annual production capacity</td></tr>
</table></td><td>ECMR 2024</td><td>Production for the period was 685,050.63 tonnes. EPL allows for production over 150,000t.</td><td>Compliant</td></tr>
<tr><td>A2.1</td><td>The licence applies to the following premises:
<table>
<tr><th>Premises Details</th></tr>
<tr><td>VISY PULP & PAPER PTY LTD</td></tr>
<tr><td>1302 SNOWY MOUNTAINS HIGHWAY</td></tr>
<tr><td>TUMUT</td></tr>
<tr><td>NSW 2720</td></tr>
<tr><td>LOT 1 DP 45454, LOT 2 DP 45454, LOT 8 DP 113036, LOT 9 DP 113036, LOT 1 DP 120724, LOT 1 DP 134634, LOT 2 DP 134634, LOT 3 DP 134634, LOT 4 DP 256920, LOT 1 DP 403328, LOT 1 DP 415843, LOT 2 DP 415843, LOT 2 DP 531481, LOT 2 DP 598661, LOT 9 DP 668538, LOT 173 DP 729525, LOT 100 DP 757220, LOT 101 DP 757220, LOT 102 DP 757220, LOT 109 DP 757220, LOT 112 DP 757220, LOT 113 DP 757220, LOT 114 DP 757220, LOT 115 DP 757220, LOT 116 DP 757220, LOT 117 DP 757220, LOT 118 DP 757220, LOT 119 DP 757220, LOT 130 DP 757220, LOT 131 DP 757220, LOT 132 DP 757220, LOT 159 DP 757220, LOT 203 DP 757220, LOT 204 DP 757220, LOT 209 DP 757220, LOT 224 DP 757220, LOT 225 DP 757220, LOT 255 DP 757220, LOT 278 DP 757220, LOT 5 DP 757228, LOT 12 DP 757228, LOT 14 DP 757228, LOT 19 DP 757228, LOT 42 DP 757228, LOT 57 DP 757228, LOT 61 DP 757228, LOT 62 DP 757228, LOT 63 DP 757228, LOT 64 DP 757228, LOT 76 DP 757228, LOT 84 DP 757228, LOT 91 DP 757228, LOT 92 DP 757228, LOT 93 DP 757228, LOT 94 DP 757228, LOT 103 DP 757228, LOT 105 DP 757228, LOT 106 DP 757228, LOT 107 DP 757228, LOT 109 DP 757228, LOT 115 DP 757228, LOT 116 DP 757228, LOT 117 DP 757228, LOT 118 DP 757228, LOT 119 DP 757228, LOT 138 DP 757228, LOT 172 DP 757228, LOT 211 DP 757252, LOT 219 DP 757252, LOT 220 DP 757252, LOT 221 DP 757252, LOT 222 DP 757252, LOT 223 DP 757252, LOT 224 DP 757252, LOT 229 DP 757252, LOT 230 DP 757252, LOT 235 DP 757252, LOT 4 DP 793196, LOT 1 DP 832090, LOT 4 DP 1004478, LOT 102 DP 1035564, LOT 103 DP 1035564, LOT 15 DP 1035849, LOT 1 DP 1082770</td></tr>
</table></td><td>Site observations
Interview M O'Donovan and I Kane
EPL verison July 2023</td><td>The premises and activities are located as per the EPL. This licence condition was updated to reflect previously missing lots on the EPL folowing purchases of land in 2007/2008.</td><td>Compliant</td></tr>
<tr><td>A3.1</td><td>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.
In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</td><td>ECMR 2024</td><td>Works and activities carried out on site are in accordance with the proposed intent of the Licence.</td><td>Compliant</td></tr>
</table>

<table>
<tr>
<td>P1.1</td>
<td>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Air
<table><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>1</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Main Stack 1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>2</td><td>Discharge to Air</td><td></td><td>Recovery Boiler A as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>3</td><td>Discharge to Air</td><td></td><td>Power Boiler as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>4</td><td>Discharge to Air</td><td></td><td>Lime Kiln A as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>16</td><td>Fly Ash Quality Monitoring</td><td></td><td>Power Boiler - Fly Ash discharge as outlined in DOC22/252324 on 30 March 2022</td></tr><tr><td>17</td><td>Bottom Ash Quality Monitoring</td><td></td><td>Power Boiler - Bottom ash discharge as outlined in DOC22/252324 to the EPA on 30 March 2022</td></tr><tr><td>18</td><td>Fuel Quality Monitoring</td><td></td><td>Power Boiler - Fuel Bins as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>19</td><td>Discharge to Air</td><td></td><td>Power Boiler - Discharge duct as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>20</td><td>Fluidized Bed Sand Quality Monitoring</td><td></td><td>Fluidised bed sand storage bin - as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>21</td><td>Discharge to Air</td><td></td><td>Lime Kiln B as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>22</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Main Stack 2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>Monitoring points were generally monitored during the reporting period.</td>
<td>Compliant</td>
</tr>
<tr>
<td>P1.2</td>
<td>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>The discharge points nominated in P1.2 are being monitored as per the EPL.</td>
<td>Compliant</td>
</tr>
<tr>
<td>P1.3</td>
<td>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

Water and land
<table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>9</td><td>Wet weather discharge Volume Monitoring</td><td>Wet weather discharge Volume Monitoring</td><td>Outlet pipe from the 480 ML storage pond into Sandy Creek as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>10</td><td>Effluent quality monitoring Volume Monitoring</td><td>Effluent quality monitoring Volume Monitoring</td><td>Decant line from the sequencing batch reactor as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>11</td><td>Water quality monitoring</td><td></td><td>Sandy Creek, upstream of overflow discharge point as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>12</td><td>Water quality monitoring</td><td></td><td>Sandy Creek, downstream of overflow discharge point as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>25</td><td>Soil quality monitoring</td><td></td><td>SMS 1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>26</td><td>Soil quality monitoring</td><td></td><td>SMS 2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>27</td><td>Soil quality monitoring</td><td></td><td>SMS 3 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>28</td><td>Soil quality monitoring</td><td></td><td>SMS 4 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>29</td><td>Soil quality monitoring</td><td></td><td>SMS 5 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>30</td><td>Soil quality monitoring</td><td></td><td>SMS 6 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>31</td><td>Soil quality monitoring</td><td></td><td>SMS 7 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>32</td><td>Groundwater quality monitoring</td><td></td><td>BH2 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>33</td><td>Groundwater quality monitoring</td><td></td><td>BH3 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>34</td><td>Groundwater quality monitoring</td><td></td><td>BH7S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>35</td><td>Groundwater quality monitoring</td><td></td><td>BH7D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>36</td><td>Groundwater quality monitoring</td><td></td><td>BH8S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>37</td><td>Groundwater quality monitoring</td><td></td><td>BH8D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>38</td><td>Groundwater quality monitoring</td><td></td><td>BH9 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>39</td><td>Groundwater quality monitoring</td><td></td><td>BH10D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>40</td><td>Groundwater quality monitoring</td><td></td><td>BH11S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>41</td><td>Groundwater quality monitoring</td><td></td><td>BH11D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>42</td><td>Groundwater quality monitoring</td><td></td><td>BH13 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>43</td><td>Groundwater quality monitoring</td><td></td><td>BH14 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>44</td><td>Groundwater quality monitoring</td><td></td><td>BH15S as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>45</td><td>Groundwater quality monitoring</td><td></td><td>BH15D as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>46</td><td>Groundwater quality monitoring</td><td></td><td>BH1 as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>The discharge points nominated in P1.3 are being monitored as per the EPL.</td>
<td>Compliant</td>
</tr>
</table>

<table>
<tr>
<td>P1.4</td>
<td>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.

Noise/Weather
<table><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>23</td><td>Meteorological Station</td><td>Weather Station on top of Recover Boiler B building as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr><tr><td>24</td><td>Meteorological Station</td><td>Weather Station south east of mill as outlined in DOC22/252324 provided to the EPA on 30 March 2022</td></tr></table></td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>Monitoring has been carried out from both meteorological stations during the reporting period.</td>
<td>Compliant</td>
</tr>
<tr>
<td>L1.1</td>
<td>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>The audit found that s120 of the POEO Act was complied with during the reporting period with no accidental spills, incidents or clean up notices in the last reporting period.</td>
<td>Compliant</td>
</tr>
<tr>
<td>L2.1</td>
<td>The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.</td>
<td>ECMR 2024
Annual EPL Return 2024</td>
<td>The coarse particulate load is 65000 kg on the EPL. The load for coarse particulates in the reporting period was 85,750 kg, which is above the limit and an increase from 58,005 kg in the last reporting period. All other loads compliant.</td>
<td>Not-compliant</td>
</tr>
<tr>
<td>L2.2</td>
<td>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.
Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.

<table><tr><th>Assessable Pollutant</th><th>Load limit (kg)</th></tr><tr><td>BOD (Enclosed Water)</td><td>20300.00</td></tr><tr><td>Coarse Particulates (Air)</td><td>65000.00</td></tr><tr><td>Fine Particulates (Air)</td><td>100000.00</td></tr><tr><td>Nitrogen (total) (Enclosed Water)</td><td>4600.00</td></tr><tr><td>Nitrogen Oxides (Air)</td><td>900000.00</td></tr><tr><td>Phosphorus (total) (Enclosed Water)</td><td>800.00</td></tr><tr><td>Salt (Enclosed Water)</td><td>500000.00</td></tr><tr><td>Total suspended solids (Enclosed Water)</td><td>30500.00</td></tr><tr><td>Zinc (Enclosed Water)</td><td>180.00</td></tr></table></td>
<td></td>
<td>Noted</td>
<td>Compliant</td>
</tr>
</table>

<table>
<tr><td>L3.1</td><td>For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</td><td>EPL Annual Return 2024</td><td>Various pollutant limits were exceeded at specified points during the reporting period, as detailed in the EPL Annual Return. A range of maintenance measures were implemented to minimise exceedances, which are detailed in the Annual Return.</td><td>Not-compliant</td></tr>
<tr><td>L3.2</td><td>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</td><td>EPL Annual Return 2024</td><td>pH specified in Points 9 and 10 - no discharge from Point 9 during the reporting period and all pH recordings within specified limit at Point 10.</td><td>Compliant</td></tr>
<tr><td>L3.3</td><td>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.</td><td></td><td>Noted</td><td>Compliant</td></tr>
<tr><td>L3.4</td><td>Air Concentration Limits
POINT 1,22
<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>400</td><td></td><td></td><td></td></tr><tr><td>TCDD (equivalent)</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>TRS (as H2S)</td><td>milligrams per cubic metre</td><td>3.6</td><td></td><td></td><td></td></tr><tr><td>Chlorine</td><td>milligrams per cubic metre</td><td>100</td><td></td><td></td><td></td></tr><tr><td>Total Solid Particles</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>250</td><td></td><td></td><td></td></tr><tr><td>Sulfuric acid mist and sulfur trioxide (as SO3)</td><td>milligrams per cubic metre</td><td>20</td><td></td><td></td><td></td></tr><tr><td>Hydrogen chloride</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td></td><td></td><td></td></tr></table>POINT 3
<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Dioxins & Furans</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>Mercury</td><td>milligrams per cubic metre</td><td>0.06</td><td></td><td></td><td></td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>30</td><td></td><td></td><td></td></tr><tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>140</td><td></td><td></td><td></td></tr><tr><td>Hazardous substances</td><td>milligrams per cubic metre</td><td>0.6</td><td></td><td></td><td></td></tr><tr><td>Cadmium</td><td>milligrams per cubic metre</td><td>0.06</td><td></td><td></td><td></td></tr></table></td><td></td><td>Noted</td><td>Compliant</td></tr>
<tr><td>L3.5</td><td>The limits detailed for Point 3 are only applicable when non-standard fuel is being burnt in the power boiler.</td><td>Site interviews M O'Donovan and I Kane</td><td>Noted. Non-standard fuels were not burnt in the reporting period.</td><td>Not triggered</td></tr>
</table>

<table>
<tr>
<td>L3.6</td>
<td>Water and/or Land Concentration Limits
POINT 9
<table>
<tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr>
<tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr>
<tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr>
<tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr>
<tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>5.5 - 9.5</td></tr>
<tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr>
<tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr>
</table>
POINT 10
<table>
<tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr>
<tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr>
<tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr>
<tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr>
<tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>5.5 - 9.5</td></tr>
<tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr>
<tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr>
</table></td>
<td>EPL Annual Return 2024</td>
<td>No exceedances recorded at Points 9 or 10 during the reporting period.</td>
<td>Compliant</td>
</tr>
<tr>
<td>L3.7</td>
<td>The averaging period applicable for pollutants emitted to the air are as detailed below:
<table>
<tr><th>Pollutant</th><th>Averaging period</th></tr>
<tr><td>TRS (as H2S)</td><td>1 hour</td></tr>
<tr><td>SO2</td><td>1 hour</td></tr>
<tr><td>HCl</td><td>1 hour</td></tr>
<tr><td>Nitrogen Oxides (as NO2)</td><td>1 hour</td></tr>
<tr><td>Opacity</td><td>6 minutes</td></tr>
<tr><td>Solid particles</td><td>24 hours</td></tr>
<tr><td>CO</td><td>1 hour</td></tr>
<tr><td>All other pollutants</td><td>As per test methods specified in Clauses M2 and M3</td></tr>
</table>
Reference conditions
Unless otherwise specified by the EPA, the reference condition for Points 1,3 and 22 are Dry 273 0K, 101.3 kPA, 8% O2</td>
<td></td>
<td>Noted</td>
<td>Compliant</td>
</tr>
<tr>
<td>L4.1</td>
<td>For each discharge point or utilisation area specified below (by a point number), the volume/mass of:
a) liquids discharged to water; or;
b) solids or liquids applied to the area;
must not exceed the volume/mass limit specified for that discharge point or area.
<table>
<tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr>
<tr><td>9</td><td>kilolitres per day</td><td>3000</td></tr>
<tr><td>10</td><td>kilolitres per day</td><td>16000</td></tr>
</table></td>
<td>EPL Annual Return 2024</td>
<td>No water was discharged from Point 9 during the reporting period and the greatest discharge from Point 10 was 2,274 kL/day.</td>
<td>Compliant</td>
</tr>
</table>

<table>
<tr>
<td>L4.2</td>
<td>For each discharge point specified below (by a point number), the volume of emissions to air must not exceed the volume limit specified for that discharge point.
<table>
<tr><th>Point</th><th>Units of Measure</th><th>90 percentile volume limit</th><th>100 percentile volume limit</th></tr>
<tr><td>1</td><td>Nm3/s</td><td>90.5</td><td>100</td></tr>
</table>
</td>
<td>EPL Annual Return 2024</td>
<td>The mean flow in cubic metres per second was 76.68 and the peak was 99.04 (limit 100).</td>
<td>Compliant</td>
</tr>
<tr>
<td>L5.1</td>
<td>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.
<table>
<tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr>
<tr><td>NA</td><td>Wood waste</td><td>Biomaterial from forestry operations and sawmill residue including uncontaminated organic fibrous wood residues and natural wood waste. This does not include native forest biomaterial as defined by the Protection of the Environment Operations (General) Regulation</td><td>As specified in each particular resource recovery exemption</td><td>NA</td></tr>
</table>
</td>
<td>ECMR 2024</td>
<td>Wood chip from mills is accepted on site. No waste is being disposed of at the premises. Recycled paper is accepted on site - cardboard boxes, paper clippings & commons.</td>
<td>Compliant</td>
</tr>
<tr>
<td>L5.2</td>
<td>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, excluding the following:
(a) Waste paper or cardboard for reprocessing into recycled paper;
(b) Wood residues for pulping;
(c) Standard fuels;
(d) Non-standard fuels.

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

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

Note: For the purpose of the above condition L6.1 (*) refers to Residences identified in "Visy Pulp and Paper, Proposed Mill Expansion Tumut NSW, final Environmental Assessment" dated January 2007.
<table><tr><th>Location</th><th>Day LAeq (15 minute)</th><th>Evening LAeq (15 minute)</th><th>Night LAeq (15 minute)</th><th>Night LAmax</th></tr><tr><td>"Pleasant View" (*)</td><td>40</td><td>40</td><td>40</td><td>45</td></tr><tr><td>"Deep Creek" (*)</td><td>39</td><td>39</td><td>39</td><td>45</td></tr><tr><td>"Reka" and "Glengarry" (*)</td><td>36</td><td>36</td><td>36</td><td>45</td></tr><tr><td>Any other residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table></td><td>EMM Annual Attended Noise Monitoring Report, March 2024</td><td>Noise monitoring results from February 2024 indicate that noise emissions from the mill did not exceed the assessment criteria due to negotiated agreements.

At the locations not under a negotiated agreement, the noise was inaudible during all periods.</td><td>Compliant</td></tr>
<tr><td>L6.2</td><td>For the purpose of Condition L6.1 above
Day is defined as 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays;
Evening is defined as 6pm to 10pm on day day; and
Night is defined as 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</td><td></td><td>Noted.</td><td>Compliant</td></tr>
<tr><td>L6.3</td><td>Noise-enhancing meteorological conditions
a) The noise limits set out in Condition 6.1 apply under the following meteorological conditions:
i) Assessment period: Day; meteorological conditions: Stability Categories A, B, C, D and E with wind speeds up to and including 3m/s at 10m above ground level.
b) For those meteorological conditions not referred to in Condition 6.3(a), the noise limits that apply are the noise limits in Condition 6.1 plus 5dB.</td><td>EMM Annual Attended Noise Monitoring Report, March 2024</td><td>Refer to Table 4.3 of the EMM Annual Attended Noise Monitoring Report which notes which receivers and during which time of day ther meteorological conditons were exceeded and therefore, the EPL limits for these periods plus 5 dB. This included Beale evening and night, Gentle night.</td><td>Compliant</td></tr>
<tr><td>L6.4</td><td>For the purposes of condition L6.3:
a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as Bureau of Meteorology AWS at Tumut, NSW,
b) Stability category shall be determined using the 'Pasquill-Gifford stability classification scheme' method from section D1.3.1 of Fact Sheet D of the Noise Policy for Industry (NSW EPA, 2017).</td><td>EMM Annual Attended Noise Monitoring Report, March 2024</td><td>Section 3.3 of the EMM Annual Attended Noise Monitoring Report (March 2024) notes that data was collected from the on-site AWS and no 'Tumut' weather station is listed on the NSW BoM map of stations.
Section 2.3 and Section 4.2.2 of the report describes the use of Pasquill-Gifford stability categories.</td><td>Compliant</td></tr>
<tr><td>L6.5</td><td>To assess compliance:
a) With the LAeq(15minute) or the LAmax noise limits in conditions L6.1 and L6.3, the noise measurement equipment must be located:
i) Approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to the premises, or where applicable,
ii) In an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premise; or where applicable,
iii) In an area within 50 metres of the boundary of a National Park or Nature Reserve.
b) With the LAeq(15minute) or the LAmax noise limits in conditions L6.1 and L6.3, the noise measurement equipment must be located:
i) At the reasonably most affected point at a location where there is no residence at the location; or,
ii) At the reasonably most affected point within an area at the location prescribed by condition</td><td>EMM Annual Attended Noise Monitoring Report, March 2024</td><td>Section 3.2 of the EMM Annual Attended Noise Monitoring Report (March 2024) describes the selection of assessment locations as specified and as per each site's individual requirements.</td><td>Compliant</td></tr>
</table>

L6.6	A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to In condition L6.5 (a) or L6.5 (b). Note: For condition L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.	EMM Annual Attended Noise Monitoring Report, March 2024	Noted. Refer L6.1 and L6.5.	*Not triggered*
L6.7	For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 of the Noise Policy for industry (NSW EPA,2017) may be applied, if appropriate, to the noise measurement by the noise monitoring equipment.	EMM Annual Attended Noise Monitoring Report, March 2024	Section 3.3 of the EMM Annual Attended Noise Monitoring Report (March 2024) describes the use of this correction factor as required.	Compliant
L6.8	Noise measurements must not be undertaken where rain or wind speed at the microphone level will affect acquisition of valid measurements.	EMM Annual Attended Noise Monitoring Report, March 2024	Refer to Table 4.3 of the EMM Annual Attended Noise Monitoring Report which notes which receivers and during which time of day ther meteorological conditons were exceeded and therefore, the EPL limits for these periods plus 5 dB. This included Beale evening and night, Gentle night.	Compliant
L6.9	The noise limits specified in condition L6.1 do not apply to any residence where a noise agreement is in place between the licensee and the owner of those residences in relation to noise impacts and/or noise limits.	EMM Annual Attended Noise Monitoring Report, March 2024	Noise monitoring results from February 2024 indicate that noise emissions from the mill did not exceed the assessment criteria due to negotiated agreements. At the locations not under a negotiated agreement, the noise was inaudible during all periods.	Compliant
L7.1	The total mass of Non-standard Fuel, excluding the sub-category of “Known Fuel not Requiring Further Testing”, used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler.	ECMR 2024 Site interview M O'Donovan and I Kane	Non-standard fuels are not used on site.	*Not triggered*
L7.2	The minimum exit velocity for Stack 2 when the recovery boiler is operating at or above 70% of the applicable design firing rate is as follows in table below. For the purpose of this condition, tds/day is tonnes dry solids per day for the new recovery boiler. **Phase** / **Equipment discharging to Stack 2** / **Minimum exit velocity m/s @ 750tds/day** / **Minimum exit velocity m/s @ 900tds/day** 1a / New recovery boiler (NRB) / 18.4 / 22.1	Previous audit report (NGH, 2016)	As per 2016 audit. As of 2016, the current sampling point is located approximately halfway up the stack where the diameter is larger and velocity is lower. The Visy process engineers have used current readings to calculate the velocity at the top of the stack. Based on these calculations the main stack velocity is approximately 24.8 m/s which is above 70% of the applicable firing rate.	Compliant
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	Site inspection observations ECMR 2024 OEMP and Subplans	Materials handling, manufacturing and waste management is planned, monitored and reviewed in a competent and on going manner. Monitoring results indicate that environmental performance is largely compliant and continues to improve where required.	Compliant

O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Site inspection observations Site interview M O'Donovan and I Kane	Plant and equipment are managed through the IFS (asset management system for internal). It includes a scheduler for preventative and routine maintenance. Stormwater valves have scheduled maintenance every three months where they are checked, recorded and any issues raised through a work order (sighted). All stormwater valves etc have been labelled so they can be inserted into IFS. Site maintenance team will receive a prompt to understand what maintenance requirements are coming up. Calibration of plant and equipment are routine.	Compliant
O2.2	Equipment used to conduct any monitoring required by this licence must: (a) be properly calibrated to ensure that it measures as accurately as possible; and (b) be maintained and serviced at least as often as often is recommended by the manufacturer or supplier.	ECMR 2024 Group Instrumentation, LearSiegler and Ecotech calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant
O2.3	Where maintenance, calibration or operation are detailed as part of the standards listed in the licence limit or monitoring sections of this licence, then the maintenance, calibration or operation must be undertaken in accordance with the standard.	ECMR 2024 Group Instrumentation, LearSiegler and Ecotech calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise dust at the boundary of the premises.	Site inspection observations ECMR 2024 Site interviews M O'Donovan and I Kane	Access roads to the site and most internal access roads are sealed. Unsealed roads are sheeted with hard roadbase. The chip piles and logs are sprayed to reduce dust emissions. No dust complaints received during the reporting period.	Compliant
O4.1	Effluent resulting from the operation of the premises must only be applied to the defined irrigation area.	ECMR 2024 Farm and Environmental Monitoring Report 2024	Farm and Environmental Monitoring Report indicates that 830 megalitres of effluent was irrigated over 110ha of land via five centre pivots and a soft hose travelling irrigator.	Compliant
O4.2	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' include the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.	ECMR 2024 Farm and Environmental Monitoring Report 2024	The effluent and solids applied the farm soils are sampled, tested and analysed. The soils are routinely smapled, tested and analysed. The soils are not showing any elevated parameters relating to the key waste characteristics. Overall soil health is improving over the long-term use of the site.	Compliant

O4.3	Effluent application must not occur in a manner that causes surface runoff.	ECMR 2024 Farm and Environmental Monitoring Report 2024 Interviews	Real time soil moisture is monitored during irrigation, to inform future scheudling of irrigation so soil does not become over saturated. Rainfall in November 2023 and January 2024 was recorded well above the avergae. However, for most other months, rainfall was well below the monthly average during the 23/24 reporting period. Evaporation for the reporting period was generally lower than average. Soil moisture probes in pivot areas are currently being replaced with an upgraded moisture detection system.	Compliant
O4.4	Spray from effluent application must not drift beyond the boundary of the premises.	ECMR 2024 Farm and Environmental Monitoring Report 2024	No complaints regarding spray drift were recorded. Centre pivots have coarse nozzle size to minimise small droplets.	Compliant
O4.5	Effluent liquid waste pipelines and fittings must be clearly identified. Standard watertaps, hoses and valves must not be fitted to the pipelines of the effluent system. The effluent system must not be connected to other pipelines. Lockable valves or removable handles must be used where there is public access to the effluent.	Site inspection observations Site interview M O'Donovan and I Kane	All effluent liquid waste pipelines and fittings were clearly identified during audit period. A record of these fittings are now all contained within IFS internal asset system.	Compliant
O4.6	Public access to any effluent utilisation area must be denied during effluent application and until the effluent application area has dried.	Site inspection observations Site interview M O'Donovan and I Kane	The irrigation area is located on private property. The irrigation area is located 6.5 km from the closest centre of population. The irrigation area is fenced and has a lockable gate.	Compliant
O4.7	Adequate notices, warning the public not to drink or otherwise use the treated effluent, must be erected on the site. These notices must be legible English and in any other languages as may be necessary, and must indicate at least that the water in use is "Reclaimed Water - Unfit for Drinking".	Site inspection observations Site interview M O'Donovan and I Kane	Public do not have access to site. Each line has a sticker (green at farm). Stamped tags are attached to valves so they can be matched up in IFS asset management. Sighted photo of new signage.	Compliant
O4.8	Prior to any discharge to Sandy Creek, approval in writing must be obtained from the EPA. This application for discharge must be submitted to the EPA at least two weeks before the requested start date for discharge.	ECMR 2024 EPL Annual Return 2024	There were no discharges to Sandy Creek in the reporting period.	*Not triggered*
O4.9	The application for discharge must be accompanied by supporting documentation, which includes: (a) Volume of effluent generated, the volume of effluent reused, and the percentage capacity of the holding dam, for both the system as designed and the actual volumes for the previous 12 months. This information is to be presented in both text and graphical form. (b) Details of reasons for the discharge in the event that it is proposed to discharge in a year when the rainfall has been less than the wettest year in ten		Refer O4.8.	*Not triggered*

O5.1	Only the following materials (Standard Fuels) may be used within the power boiler: a) Bark; b) Fines (small pieces of wood chip and dust from the pulp log chipping process); c) Softwood and hardwood residues; d) Forest residues; e) Non-Standard Fuels.	ECMR 2024 EPL Annual Return 2024	The power boiler utilises fuels listed in this condition, except non-standard fuels.	Compliant
O5.2	The total mass of Non-standard Fuel, excluding the sub-category of "Known Fuel not Requiring Further Testing", used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler.	ECMR 2024 Site interview M O'Donovan & Isabella Kane	No non-standard fuels are used on site.	*Not triggered*
O5.3	After plant commissioning and at least annually thereafter, an odour audit must be carried out. Part of this odour audit must include a leak detection and repair program (LDAR) (as outlined in the MACT Rules) for the entire foul gas and foul condensate collection systems.	Ektimo LDAR Testing Report August 2023 and February 2024	An odour audit is being conducted twice annually by Ektimo. The auditing took place in August 2023 and February 2024 during the reporting period, with LDAR completed August 2023 and February 2024.	Compliant
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	ECMR 2024 Annual EPL Return 2024	All monitoring records are maintained electronically and some in hard copy. The results of monitoring are reported in ECMR 2024 and the EPL Annual Return 2024.	Compliant
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Internal electronic monitoring records Reports from external specialist consultants	All records are kept electronically and in legible format.	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	ECMR 2024 (specifically appendices) Annual Return 2024 Farm and Environmental Monitoring Report 2024	The records sighted included the: date of sampling, time of sampling, point of sampling and the name of person sampling (or person managing the dataset).	Compliant
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:		Noted - compliance assessed against M2.2 and M2.3 individually.	Compliant

M2.2	Air Monitoring Requirements POINT 1,22 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Chlorine / milligrams per cubic metre / Yearly / TM-7 & TM-8 Flow / normalised cubic metres per second / Continuous / CEM-6 Hydrogen chloride / milligrams per cubic metre / Continuous / TM-8 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 Sulfur dioxide / milligrams per cubic metre / Continuous / CEM-2 Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / Yearly / TM-3 TCDD (equivalent) / nanograms per cubic metre / Yearly / TM-18 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Quarterly / TM-15 TRS (as H2S) / milligrams per cubic metre / Continuous / CEM-5 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Yearly / TM-12, TM-13 & TM-14 POINT 2 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Methanol / milligrams per cubic metre / Yearly / TM-35 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Oxygen (O2) / percent / Continuous / CEM-3 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 POINT 3 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Cadmium / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Mercury / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 TCDD (equivalent) / milligrams per cubic metre / Special Frequency 2 / TM-18 Temperature / degrees Celsius / Continuous / Other Approved Method 1 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 POINT 4,21 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 POINT 16 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 4 / Representative sample	EPL Annual Return 2024 N/A - no non-standard fuels used N/A - no non-standard fuels used	It is noted that the TRS Analyser in Main Stack 1 (Point 1) completely failed during the reporting period and attempts to repair the unit were unsuccessful. There were delays in the delivery of a new unit from overseas. 86% data capture this reporting period - TRS Analyser failed so no data for March and April 2024. Monitoring is otherwise being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable. Monitoring is otherwise being carried out as required.	Not-compliant

	POINT 17 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 4 / Representative sample	N/A - no non-standard fuels used		
	POINT 18 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Ash / percent / Special Frequency 5 / Representative sample Chlorine / milligrams per kilogram / Special Frequency 5 / Representative sample Copper / milligrams per kilogram / Special Frequency 5 / Representative sample Fluorine / milligrams per kilogram / Special Frequency 5 / Representative sample Organochlorine pesticides / milligrams per kilogram / Special Frequency 5 / Representative sample Organophosphate pesticides / milligrams per kilogram / Special Frequency 5 / Representative sample Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 5 / Representative sample	N/A - no non-standard fuels used		
	POINT 19 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 4 / TM-12, TM-13 & TM-14	N/A - no non-standard fuels used		
	POINT 20 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Type 1 and Type 2 substances in aggregate / milligrams per kilogram / Special Frequency 4 / Representative sample	N/A - no non-standard fuels used		
M2.3	Water and/ or Land Monitoring Requirements POINT 9 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** BOD / milligrams per litre / Special Frequency 1 / Grab sample Nitrogen (total) / milligrams per litre / Special Frequency 1 / Grab sample pH / pH / Special Frequency 1 / Grab sample Phosphorus (total) / milligrams per litre / Special Frequency 1 / Grab sample Total dissolved solids / milligrams per litre / Special Frequency 1 / Grab sample Total suspended solids / milligrams per litre / Special Frequency 1 / Grab sample Zinc / milligrams per litre / Special Frequency 1 / Grab sample	EPL Annual Return 2024 Farm and Environment Report 2024 No discharge to Sandy Creek in reporting period.	All water and land monitoring has been carried out at specified locations during the reporting period.	Compliant
	POINT 10 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** BOD / milligrams per litre / 6 Times a year / Grab sample Nitrogen (total) / milligrams per litre / 6 Times a year / Grab sample Oil and Grease / milligrams per litre / 6 Times a year / Grab sample pH / pH / 6 Times a year / Grab sample Phosphorus (total) / milligrams per litre / 6 Times a year / Grab sample Sodium Adsorption Ratio / sodium adsorption ratio / 6 Times a year / Grab sample Total dissolved solids / milligrams per litre / 6 Times a year / Grab sample Total suspended solids / milligrams per litre / 6 Times a year / Grab sample Zinc / milligrams per litre / 6 Times a year / Grab sample	EPL Annual Return 2024 Farm and Environment Report 2024		
	POINT 11,12 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** BOD / milligrams per litre / Special Frequency 1 / Grab sample Nitrogen (total) / milligrams per litre / Special Frequency 1 / Grab sample pH / pH / Special Frequency 1 / Grab sample Phosphorus (total) / milligrams per litre / Special Frequency 1 / Grab sample Total dissolved solids / milligrams per litre / Special Frequency 1 / Grab sample	No discharge to Sandy Creek in reporting period.		

	POINT 25,26,27,28,29,30,31 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Aggregate stability / As approp. / Special Frequency 3 / Special Method 1 Aluminium / parts per million / Special Frequency 3 / Special Method 1 Available phosphorus / parts per million / Special Frequency 3 / Special Method 1 Conductivity / millisiemens per centimetre / Special Frequency 3 / Special Method 1 Exchangeable aluminium / parts per million / Special Frequency 3 / Special Method 1 Exchangeable calcium / parts per million / Special Frequency 3 / Special Method 1 Exchangeable magnesium / parts per million / Special Frequency 3 / Special Method 1 Exchangeable potassium / parts per million / Special Frequency 3 / Special Method 1 Exchangeable sodium / parts per million / Special Frequency 3 / Special Method 1 Exchangeable sodium percentage / percent / Special Frequency 3 / Special Method 1 Nitrate / parts per million / Special Frequency 3 / Special Method 1 Nitrogen (total) / parts per million / Special Frequency 3 / Special Method 1 Organic carbon / percent / Special Frequency 3 / Special Method 1 pH / pH / Special Frequency 3 / Special Method 1 Phosphorus Sorption Capacity / As approp. / Special Frequency 3 / Special Method 1	EPL Annual Return 2024 Farm and Environment Report 2024		
	POINT 32,33,34,35,36,37,38,39,40,41,42,43,44,45 **Pollutant** / **Units of measure** / **Frequency** / **Sampling Method** Conductivity / millisiemens per centimetre / Every 6 months / Special Method 2 Depth / metres / Quarterly / Special Method 2 Nitrate / parts per million / Every 6 months / Special Method 2 pH / pH / Quarterly / Special Method 2	EPL Annual Return 2024 Farm and Environment Report 2024		
M2.4	**Special Frequency Details** Special Frequency 1: On the day discharge of effluent into Sandy Creek commences, and monthly thereafter. Special Frequency 2: Quarterly when non-standard fuels are being burnt in the Power Boiler, and not required at other times. Special Frequency 3: Yearly for topsoils, and every 3 years for the subsoils. Special Frequency 4: a) Sampling and analysis under Special Frequency 4 is not required if only “Standard Fuel” or “Known Fuels Not Requiring Further Testing” is being burnt in the Power Boiler. b) Sampling and analysis must be done once every three months. Sampling of Point 3 (Power Boiler duct downstream of electro-static precipitator), Point 19 (Power Boiler duct upstream of the electro-static precipitator)) and Point 18 (boiler fuel feed) must be done concurrently. c) Sampling of the bottom ash and fly ash from Points 16 and 17 must representative of the ash generated during the time of the sampling at Points 3 and 19. d) Sampling of Point 20 (fluidised bed sand) must be representative of the fluidised bed sand in the Power Boiler during the sampling at Points 3 and 19. Special Frequency 5: a) Sampling and analysis under Special Frequency 5 is not required if only “Standard Fuel” or “Known Fuels Not Requiring Further Testing” is being burnt in the Power Boiler. b) Sampling and analysis must be undertaken every month, except that on every second month the samples are to be taken at the same time as the sampling done at Points 3 and 19 in	EPL Annual Return 2024 ECMR 2024 Farm and Environment Report 2024	Special Frequency 1: N/A during the reporting period, no discharges into Sandy Creek. Special Frequency 2: N/A during the reporting period, no non-standard fuels burned. Special Frequency 3: Topsoils sampled by McMahon as per timings specified Special Frequency 4: N/A during the reporting period, no non-standard fuels burned. Special Frequency 5: N/A during the reporting period, no non-standard fuels burned.	Compliant

	Special Methods Details Special Method 1: At each soil sampling site, 10 representative samples shall be taken on a 30 metre by 30 metre grid. Special Method 2: Sample to be collected in accordance with the "Approved Methods for the Sampling and Analysis of Water Pollutants in NSW"	ECMR 2024 Farm and Environmental Monitoring Report 2024	Special Methods 1 and 2 are described in the Farm and Environmental Monitoring Report (2024) in Section 9.3.	Compliant
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	Stack testing, Ektimo, August 2023 Stack testing, Ektimo, November 2023 Stack testing, Ektimo, February 2024 Stack testing, Ektimo, June 2024	Laboratory Reports show that monitoring is being undertaken as required. NATA accredited lab for all test methods - 14601 EKTIMO NATA certification sighted at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO.	Compliant
M3.2	All air emission monitoring points and equipment must be installed and operated strictly in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.	Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023 Stack testing, Ektimo, August 2023 Stack testing, Ektimo, November 2023 Stack testing, Ektimo, February 2024 Stack testing, Ektimo, June 2024	Ektimo Emission Testing Reports list approved methods in Section 6. AQMP lists approved methods in Section 2.	Compliant
M3.3	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	ECMR 2024 Farm and Environmental Monitoring Report 2024	Specific methodology for various tests are listed throughout the Farm and Environmental Monitoring Report for the reporting period.	Compliant
M4	Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.	EPL Annual Return 2024	All monitoring data reported in the EPL Annual Return 2023 is used to calculate the load calculations in accordance with the protocol listed in the Administrative Conditions of the EPL.	Compliant

<table>
<tr><td>M5.1</td><td>The licensee must collect and analyse meteorological data for the parameters specified for each of the following monitoring point at the frequency and using the method specified for each parameter.</td><td>ECMR 2024</td><td>Two meteorological monitoring stations commissioned in 2014 are located to the southeast of the mill site (Monitoring Point 24) and on top of the Recovery Boiler B building (Monitoring Point 23).</td><td>Compliant</td></tr>
<tr><td>M5.2</td><td>Meteorological monitoring at Point 24<table><tr><th>Parameter</th><th>Units of measure</th><th>Averaging period</th><th>Method</th><th>Frequency</th></tr><tr><td>Siting</td><td>NA</td><td>NA</td><td>AM-1</td><td>NA</td></tr><tr><td>Wind speed @ 10 m</td><td>m/s</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Wind direction @ 10 m</td><td>o</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Sigma Theta @ 10 m</td><td>o</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 2m</td><td>oK</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 10 m</td><td>oK</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Total Solar Radiation @ 10 m</td><td>W/m2</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr></table></td><td>ECMR 2024</td><td>As per M5.1</td><td>Compliant</td></tr>
<tr><td>M6.1</td><td>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</td><td>Quarterly Complaints Registers - July 2023 - June 2024
Quarterly Complaints Audit Reports - July 2023 - June 2024</td><td>All complaints received are entered into the VAULT complaint system when received.
The complaints sighted included the details required in EPL M6.
Refer to CA Condition 4.3</td><td>Compliant</td></tr>
<tr><td>M6.2</td><td>The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.</td><td></td><td>Complaints register observed to contain all required information. Refer to CA Condition 4.3.</td><td>Compliant</td></tr>
<tr><td>M6.3</td><td>The record of a complaint must be kept for at least 4 years after the complaint was made.</td><td>Visy VAULT complaint system.</td><td>All complaints are stored electronically.</td><td>Compliant</td></tr>
<tr><td>M6.4</td><td>The record must be produced to any authorised officer of the EPA who asks to see them.</td><td>Site interviews M O'Donovan & Isabella Kane</td><td>No records had been requested by the EPA in the 2023-2024 reporting year.

EPA asked for information regarding the non-compliances in the Annual Report 22-23. Visy provided EPA with some more information and there was no comment from EPA.</td><td>Not triggered</td></tr>
<tr><td>M7.1</td><td>The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.</td><td>https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans</td><td>Details are provided on the Visy website.
Details on sign at front security gate and the gate is staffed 24/7
Details included in VCCC meetings each quarter</td><td>Compliant</td></tr>
<tr><td>M7.2</td><td>The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</td><td>https://www.visy.com/products/paper/tumut-kraft-mill-environmental-approvals-and-management-plans</td><td>Website states that number is specifically for complaints. Complaints process also clearly communicated through VCCC meetings.</td><td>Compliant</td></tr>
</table>

<table>
<tr><td>M7.3</td><td>The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.</td><td></td><td>Noted</td><td>Not triggered</td></tr>
<tr><td>M8.1</td><td>For each discharge point or utilisation area specified below, the licensee must monitor:
a) the volume of liquids discharged to water or applied to the area;
b) the mass of solids applied to the area;
c) the mass of pollutants emitted to the air;
at the frequency and using the method and units of measure, specified below.

POINT 9
<table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>kilolitres per day</td><td>Flow meter and continuous logger</td></tr></table>
POINT 10
<table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>kilolitres per day</td><td>Other Approved Method 1</td></tr></table></td><td>ECMR 2024
EPL Annual Return 2024</td><td>Both Points 9 and 10 were monitored as required during the reporting period. No discharge was made from Point 9 during the reporting period.</td><td>Compliant</td></tr>
<tr><td>M8.2</td><td>Other approved method 1 means the sum of individual flow meters for all the various irrigation areas.</td><td></td><td>Noted</td><td>Not triggered</td></tr>
<tr><td>M9.1</td><td>The analysis for the concentration of the specified analytes (for non-standard fuel usage) must be conducted in accordance with the documents as detailed below:

Wood Analysis
<table><tr><th>analyte</th><th>Sample Preparation</th><th>Analysis Method</th></tr><tr><td>Antimony</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Arsenic</td><td>AS 1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Beryllium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Cadmium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Chromium (VI)</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Cobalt</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Lead</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Manganese</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Mercury</td><td>USEPA3052 Acid Digestion</td><td>USEPA 7470/1 (CVAA)</td></tr><tr><td>Selenium</td><td>AS 1038.8.1 Eschka Ashing</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Tin</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Vanadium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>Copper</td><td>USEPA3052 Acid Digestion</td><td>USEPA 6010B (ICP-AES)</td></tr><tr><td>OP</td><td>USEPA SW846</td><td>USEPA 8081A (GC)</td></tr><tr><td>OC</td><td>USEPA SW846</td><td>USEPA 8141A (GC)</td></tr><tr><td>Calorific value</td><td>-212 um air dried sample analysed</td><td>AS1038.5 (bomb calorimetry)</td></tr><tr><td>Chlorine</td><td>-212 um air dried sample analysed</td><td>AS1038.10.0 & based on AS1038.14.3 (WD XRF)</td></tr><tr><td>Sulfur</td><td>-212 um air dried sample analysed</td><td>AS1038.6.3.3 (IR)</td></tr><tr><td>Fluorine</td><td>-212 um air dried sample analysed</td><td>AS1038.10.4 (ISE)</td></tr><tr><td>-</td><td>-</td><td></td></tr><tr><td>ALTERNATIVE METHOD</td><td></td><td></td></tr><tr><td>Antimony, Arsenic, Cadmium, Chromium (VI), Cobalt, Lead, Manganese, Mercury, Nickel, Selenium, Tin, Vanadium and</td><td>Pressed Wax Disc</td><td>AS1038.10.0 & based on AS1038.14.3 (WD XRF)</td></tr></table></td><td>ECMR 2024
Site interview M O'Donovan & Isabella Kane</td><td>No non-standard fuels have been used this reporting period or since 2008</td><td>Not triggered</td></tr>
</table>

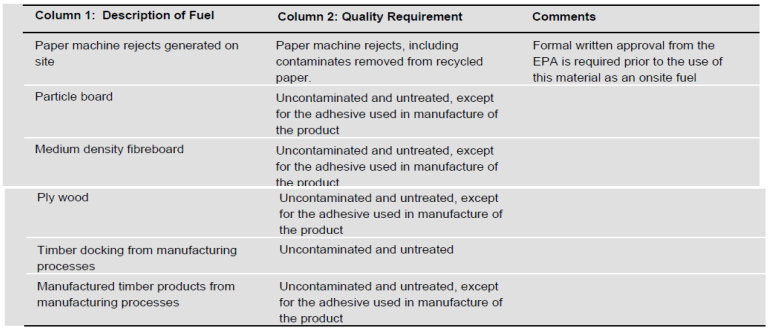
	Fly Ash, Bottom Ash and Fluidised Bed Sand Analysis Analyte / Sample Preparation / Analysis method Antimony — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Arsenic — AS1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Beryllium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cadmium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Chromium (VI) — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cobalt — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Lead — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Manganese — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Mercury — USEPA3052 Acid Digestion — USEPA 7470/1 (CVAA) Nickel — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Selenium — AS1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Tin — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Vanadium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES)	ECMR 2024 Site interview M O'Donovan & Isabella Kane	No non-standard fuels have been used this reporting period or since 2008	*Not triggered*
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that	EPL Annual Return 2024	The 2023/2024 Annual Return included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA.	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	EPL Annual Return 2024	An Annual Return has been prepared for the reporting period.	Compliant
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	EPL 10232	This EPL has not been transferred or revoked during the reporting period.	*Not triggered*
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates	EPL 10232	The EPL has not been surrendered or revoked during the reporting period.	*Not triggered*

R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=10232&id=10232&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issu	Annual return due by 28 August, marked as received 20 August 2024 on EPA website.	Compliant
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	EPL Annual Return 2024	Pollutant loads were calculated for the AR and submission was made within the specified timeframe.	*Not triggered*
R1.7	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	EPL Annual Return 2024	Copy of the signed return was available at the time of the audit. Previous annual returns now stored in the EPA portal.	Compliant
R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	EPL Annual Return 2024	Certified by Anthony Pratt, Director & Robert Kaye, Company Secretary.	Compliant
R1.9	In addition to the documents specified in Clause R1.1, the licensee must supply the following documents to the EPA : (a) A copy of the relevant environmental report/s produced in accordance with the requirements of Conditions 11 and 12 of the Development Consent; and (b) Independent Environmental Audit in accordance with Condition 71 of the Development Consent.	Email to DPHI, EPA and SVC 19/11/2024, submitting ECMR 2024	The ECMR 2024 was emailed to EPA, DPHI and SVC concurrently on 19/11/2024.	Compliant
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Site interview M O'Donovan and I Kane	No notifications via the Environment Line were required in the reporting period.	*Not triggered*
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Site interview M O'Donovan and I Kane	No notifications via the Environment Line were required in the reporting period.	*Not triggered*
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Site interview M O'Donovan and I Kane	No notifications via the Environment Line were required in the reporting period. No incidents during the reporting period.	*Not triggered*
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Site interview M O'Donovan and I Kane	As per R3.1	*Not triggered*

R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and	Site interview M O'Donovan and I Kane	As per R3.1	*Not triggered*
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Site interview M O'Donovan and I Kane	As per R3.1	*Not triggered*
R4.1	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2023 - 2024	Due 29 August 2024, submitted via the online Portal on 27/08/2024 at 1.42pm.	Compliant
R4.2	The Annual Waste Summary Report must be submitted to the EPA via the online Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2023 - 2024	Due 29 August 2024, submitted via the online Portal on 27/08/2024 at 1.42pm.	Compliant
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site interview M O'Donovan and I Kane	An electronic and hard copy of the EPL is held on site. Website to access, staff can access, Matt and Isabella with a hard copy.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Site interview M O'Donovan and I Kane	No requests have been made. Latest version is July 2023.	*Not triggered*
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site interview M O'Donovan and I Kane Site inspection observations	An electronic and hard copy of the EPL was held on site and sighted at the time of the audit.	Compliant
E1.1	Non-standard fuels must not be burnt unless: a) they comply with the sampling, analysis and quality/source requirement of this licence; or b) have been defined as a Known Fuel Not Requiring Further Testing and the supply source has been assessed in accordance with Clause E1.6.	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*

E2.1	The maximum concentration of the following contaminants in any sample of Non-standard Fuel must:- i. not exceed 317 mg/kg of hazardous substances calculated in accordance with Equation 1. ii. not exceed 21 mg/kg of Cadmium; iii. not exceed 2 mg/kg of Mercury. Equation 1 is (0.2Sb + 1.09As + 1.49Cd + 2.18Pb + 16.16Hg + Be + 1.4Cr + 0.73Co + 1.07Mn + 1.18Ni + Se + 0.82Sn + 0.09V) Where: Sb is the concentration of Antinomy in the sample in mg/kg; As is the concentration of Arsenic in the sample in mg/kg; Cd is the concentration of Cadmium in the sample in mg/kg; Pb is the concentration of Lead in the sample in mg/kg; Hg is the concentration of Mercury in the sample in mg/kg; Be is the concentration of Beryllium in the sample in mg/kg; Cr is the concentration of Chromium in the sample in mg/kg; Co is the concentration of Cobalt in the sample in mg/kg; Mn is the concentration of Manganese in the sample in mg/kg; Ni is the concentration of Nickel in the sample in mg/kg; Se is the concentration of Selenium in the sample in mg/kg; Sn is the concentration of Tin in the sample in mg/kg; V is the concentration of Vanadium in the sample in mg/kg; and	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*
E3.1	a) The frequency and sampling collection methodology for Non-standard Fuels must be in accordance with Sampling Protocol, except as noted below. b) If a Non-standard Fuel source is assessed and classified as a Known Fuel Not Requiring Further Testing, it will not require ongoing sampling and analysis unless requested by the EPA. This request may be made either orally or in writing. If a sample is requested, it must be obtained in accordance with Sampling Protocol.	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*
E4.1	a) All samples of Non-standard Fuels must be analysed for the following parameters: - Hazardous substances - Ash - Copper - Chlorine - Fluorine - Calorific Value b) The first set of samples of Non-standard Fuel from any new supply source must also be analysed for the following contaminants. - Organochlorine Pesticides - Organophosphate Pesticides c) The sample preparation and analytic method shall be in accordance with the requirements of	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*

E5.1	a) All Non-standard Fuels must comply with the following quality assurance control requirements prior to delivery to Visy Pulp and Paper, Tumut; I. Visual inspection and removal of all visible contaminants or treated pieces of wood; II. Sampling and analysis in accordance with the Sampling Protocol, and the conditions E1.3 and E1.4 of this licence, and; III. Assessment of suitability for use as a fuel in accordance with the Fuel Specification. b) Any Non-standard Fuel, which fails to meet the Fuel Specification must:- I. not be blended with any other fuel; II. not be retested. c) Records must be maintained for a period of not less than four (4) years for each of the following:- - the date time and location of each sample of Non-standard Fuel; - the analysis results for each sample taken of Non-standard Fuel; - the approximate volume and mass of each stockpile of Non-standard Fuel sampled; and, - for each stockpile that fails to meet the Fuel Specification, the date and location of its disposal. d) Only Non-standard Fuel that has been sampled, analysed, and complies with the Fuel Specification may be received at the premise.	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*
E6.1	a) The materials that can be considered for classification under the category of Known Fuel Not Requiring Further Testing are detailed in Column 1 of Schedule VF1. b) Unless noted otherwise, each supply source of a fuel intended to be used as a Known Fuel Not Requiring Further Testing must comply with the following requirements before it is used: 1. Sampling and analysis of representative samples from three (3) separate batches in accordance with the procedures detailed in this licence; 2. Identification of all contaminants other than those listed in Column 2 of Schedule VF1. For all such contaminants, the licensee must submit supporting scientific information and/or analysis that demonstrates the material will not have a significant impact on the environment if burnt; 3. Details of the quality assurance and quality control procedures that will be implemented to ensure the fuel quality will be maintained; 4. The results of the above assessment and quality systems must be forward to EPA for review; Written confirmation is received from the EPA that a particular source may be used. This consent may be withdrawn at any time in writing by the EPA. c) All fuels classified as Known Fuels Not Requiring Further Testing must comply at all times with the Fuel Specification. d) The licensee may make application to EPA to burn other types of homogenous wood or wood fibre material where there is a low risk of contamination in addition to those already listed in Column 1 of Schedule VF1. The application to the EPA must be in accordance with the requirements as detailed in Paragraph b) above.	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008.	*Not triggered*

		Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*
E7.1	At the completion of 12 months from the date of commencement of authorisation to burn up to 50% Non-standard Fuels, the licensee must prepare a report that reviews the Fuel Specification, based on the results of the testing requirements as detailed in Clause M2. The report shall establish; a) individual partitioning factors for each Hazardous Substance (i.e. relative percentage in the bottom ash, fly and air emissions); b) Assess the accuracy of the assumptions and simplifications contained in the initial fuel specification; c) Develop a revised fuel specification equation. This report must be submitted to the EPA within 60 days from the end of the initial 12-month operational period detailed above.	Site interview M O'Donovan and I Kane ECMR 2024 Annual Return 2024	No non-standard fuels have been used during this reporting period or since 2008	*Not triggered*
E8.1	Sludge from the Wastewater Treatment Plant may be disposed on site in accordance with the current reviewed Wastewater Treatment Plant Sludge Disposal By Land Application On Site procedure, as subsequently updated and approved in writing by the EPA.	Visy Solid Waste Management Plan (PLANS-VPP-TUM-HSE-009-7) 31 July 2024	Sludge is being disposed of as per procedure, as referenced in the updated Solid Waste Management Plan (July 2024). The sludge is sampled and tested monthly, with unusually high results across multiple parameters observed in June 2023 to September 2023. Sample results returned to normal once the sampling location was changed back to the treated	Compliant
E9.1	Standard Fuel - Natural gas; and untreated and uncontaminated timber, timber off-cuts and residues from sawmills and forestry operations. Non-Standard Fuel - Any wood or plant based fuel that does not meet the criteria for Standard Fuel. Known Fuel Not Requiring Further Testing - A sub-category of Non-Standard Fuel that on account of being homogenous wood or wood fibre material from a verifiable source with controls over its lifecycle, are considered to present a low risk of contamination.		Noted	*Not triggered*

Consultation Compliance Status - December 2024

Reference	Approval or licence requirement	Evidence collected 2024	Audit Finding	Compliance status
Consultation				
DPHI	In addition to the consent requirements, please review the management of air quality, including odour, surface, water, groundwater and soil management.	ECMR 2024 - Appendices Farm and Environment Report 2024, CEMS Exceedance Data 2023/2024, Compliants Register Summary, Odour Monitoring Results Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023 Visy Air Quality Management Plan (PLANS-VPP-TUM-HSE-002-4) 16 April 2023 Visy Soil Management Plan (PLANS-VPP-TUM-HSE-005-4) 21 April 2023	The Project operates under the OEMP and subplans. The relevant subplans that guide operations at the Mill to provide a response to the Department's consultation request includes the Water Management Plan, Air Quality Management Plan and Soil Management Plan. Air monitoring is continuous and detailed in the CEMS, and addressed in EPL 10232 M2.1. It is noted that the TRS Analyser in Main Stack 1 (Point 1) completely failed during the reporting period and attempts to repair the unit were unsuccessful. It was replaced in June 2024. Calibration of equipment occurs routinely. There were 17 odour complaints in the reporting period with each one investigated. 12 of the 17 odour complaints could not be pinpointed to source at the Mill and could be attributed to surrounding industry. An odour audit is being conducted twice annually by Ektimo. The auditing took place in August 2023 and February 2024 during the reporting period, with Leak Detection and Repair testing completed August 2023 and February 2024. The Farm and Environment Report 2024 identifies the monitoring of soil, surface water and groundwater in compliance with the Project EPL. GW levels have decreased following the last three years of increases in the GW levels. Levels of pH and EC have remained stable in the winter storage bores since 2003. Nitrate levels in the irrigation bores are elevated when compared to the winter storage bores and background bores. EC in the irrigation bores is elevated, which was also noted in 2003. The results of surrounding surface water bodies indicates that water quality is generaly similar to that of previous years. Hexane Extractable Matter was used to test oil and grease with results above detectable levels. This is likely from a natural source as there are no known sources of fuel-related, grease related or oil-related contaminating activities at or upstream of the surface water sites. Mill surface water is captured in the Mill's wastewater system, treated and reused within the Mill. There were no releases (accidental or not) offsite in the reporting period following the repair of the valves in the last reporting period. Irrigation water was tested six times in the reporting period. The amount irrigated was 354.24 ML. Results indicated that it was classified as low strength effluent, or below the EPL limit or with the ANZG 2018 limits. Surface soil monitoring occurs annually with the subsoil tested every three years. Returned results generally showed that nutrient levels in the soil were suitable for agricultural production. The average sodium as a percentage of cations is also low. Chloride levels were low but elevated compated to readings from October 2022. The mointoring report identified that overall soil health appears to be good.	Compliant
DCCEEW Water	The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope: - The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: * Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. * Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan. - The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting. - Water supply availability is clearly defined for the project. - Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. - Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. - Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. - Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.	Visy Water Management Plan (PLANS-VPP-TUM-HSE-007-5) 18 July 2023 ECMR 2024	The Project holds a Water Management Plan, updated on 18 July 2023. The WMP details water supply, water licences held by the project, the site's water treatment plant, annual external groundwater, surface water and soil monitoiring and all contextual information relating to the Project's water requirements. No TARPs have been specified for the Project. However, water quality objectives have been set and are reported upon annually in the Project ECMR and associated appendices.	Compliant

Appendix D Consultation

D.1 Department of Planning, Housing and Infrastructure

From: Georgia Dragicevic
To: Nicola Smith
Cc: Katrina O"Reilly; Natascha Arens
Subject: RE: A240738.00 - Annual Environmental Audit
Date: Tuesday, 17 December 2024 1:24:46 PM
Attachments: image001.png
image002.png
image003.png
image004.png

Hi Nicola,

Thank you for consulting the department on the upcoming audit for the Visy site. In addition to the consent requirements, please review the management of air quality, including odour, surface, water, groundwater and soil management.

Thank you kindly,
Georgia

From: Nicola Smith <nicola.s@nghconsulting.com.au>
Sent: Monday, December 16, 2024 2:21 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Natascha Arens <natascha.a@nghconsulting.com.au>
Subject: A240738.00 - Annual Environmental Audit

Good afternoon,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut (Project Approval MP 06_0159 as modified). We have an Independent Environmental Audit of the site scheduled for 16 December 2024.

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

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2024 audit scope.

Best regards,

Nicola Smith
NSW Regional Lead - Environmental Management

m: p: 02 6971 9696
e. nicola.s@nghconsulting.com.au
a. 35 Kincaid Street (PO Box 5464), Wagga Wagga, NSW 2650
w. nghconsulting.com.au | Our commitment to reconciliation

D.2 NSW Environment Protection Agency

From:	Nicola Smith
To:	EPA.westopsregional@epa.nsw.gov.au; info@epa.nsw.gov.au
Cc:	Natascha Arens
Bcc:	90c6df20-e597-478d-bf9b-a592b291433b.metaPublish@nghconsultingmx.deltekpim.com
Subject:	A240738.00 - Visy Pulp and Paper Mill Annual Environmental Audit Consultation
Date:	Monday, 16 December 2024 2:24:24 PM
Attachments:	image001.png image002.png image003.png image004.png 90c6df20-e597-478d-bf9b-a592b291433b.png

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Good afternoon,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut (EPL 10232). We have an Independent Environmental Audit of the site scheduled for 17 December 2024.

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

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2024 audit scope.

Best regards,

Nicola Smith
NSW Regional Lead - Environmental Management

m: p: 02 6971 9696
e. nicola.s@nghconsulting.com.au
a. 35 Kincaid Street (PO Box 5464), Wagga Wagga, NSW 2650
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D.3 DCCEEW Water

NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT24/19683

Nicola Smith
NGH Consulting PTY
nicola.s@nghconsulting.com.au

17 December 2024

Subject: **Visy Pulp & Paper Tumult Mill (DA06/98) - Independent Environmental Audit 2024**

Dear Nicola,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

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

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

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

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

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

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

Yours sincerely,

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

D.4 Snowy Valleys Council

From:	Nicola Smith
To:	info@svc.nsw.gov.au
Cc:	Natascha Arens
Bcc:	a7c68a4f-edd8-4f98-b05a-180202979f67.metaPublish@nghconsultingmx.deltekpim.com
Subject:	A240738.00 - Visy Paper and Pulp Annual Environmental Audit Consultation
Date:	Monday, 16 December 2024 3:43:30 PM
Attachments:	image001.png image002.png image003.png image004.png a7c68a4f-edd8-4f98-b05a-180202979f67.png

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Good afternoon,

I am part of the audit team for the Visy Tumut Pulp and Paper Mill development at Gadara Road, Tumut. We have an Independent Environmental Audit of the site scheduled for 17 December 2024.

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

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the 2024 audit scope.

Best regards,

Nicola Smith
NSW Regional Lead - Environmental Management

m: p: 02 6971 9696
e. nicola.s@nghconsulting.com.au
a. 35 Kincaid Street (PO Box 5464), Wagga Wagga, NSW 2650
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Appendix E Site inspection photos

Photo 1 – Two jerry cans and a gas bottle stored together in an area not bunded.

Photo 2 – Visy 1 fire truck in emergency shed.

Photo 3 – Refuelling area with recycling bin, spill kit and spill waste disposal bin.

Photo 4 – Minor dust impacts from use of unsealed road.

Photo 5 – New loop road with concrete partition to capture litter from waste storage area.

Photo 6 – Operating machinery within the paper line.

Photo 7 – Lined wastewater storage and treatment plant.

Photo 8 – Waste material stockpile to be reused (brown) and plastics and other wastes from paper recycling to be landfilled (foreground).

NGH Pty Ltd

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