

# Report

**Visy Industries Australia Pty Ltd**

**INDEPENDENT ENVIRONMENTAL AUDIT**

**112-120 Euston Road, Alexandria, NSW**

**22 December 2022**

Environment, Health &  
Safety, and Sustainability  
Consultants



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## **USE OF REPORT**

The preparation of this report has been undertaken for the purpose of providing the results of an independent environmental audit of Visy Industries Australia Pty Ltd's facility at 112-120 Euston Road, Alexandria, NSW, and this report cannot be used for any other purpose.

This report is prepared solely for the benefit of Visy Industries Australia Pty Ltd. This report is provided on the condition that it or any part of it, will not be made available to, or relied upon by any other party for any purpose except with the prior written consent of Peter J Ramsay & Associates Pty Ltd (which consent may or may not be given at its discretion). Peter J Ramsay & Associates Pty Ltd consents to Visy Industries Australia Pty Ltd making this report available to other parties for the purpose of showing the scope of, and the recommendations provided in, this report, however those third parties cannot rely on the contents of this report.

## **DISCLAIMER**

This report is provided on the condition that Peter J Ramsay & Associates Pty Ltd disclaims all liability to any person other than Visy Industries Australia Pty Ltd in respect of the actions, errors or omissions of any such person in reliance, whether in whole or in part, upon the contents of this report.

## **LIMITATIONS**

Peter J Ramsay & Associates Pty Ltd has undertaken this audit in accordance with EPA and National guidelines. The nature of an assessment is influenced by factors such as professional judgement, selective testing of representative samples from the site and the reliability of the information relating to the facility which was obtained by the methodology described in this report. Reasonable care has been taken to verify the accuracy of the data and information available to Peter J Ramsay & Associates Pty Ltd.

Our findings presented in this report are based on the information available to us during this audit, and some of those findings could vary if the information upon which they are based is determined to be false, inaccurate, or incomplete. Peter J Ramsay & Associates Pty Ltd disclaims all liability to any person for events taking place after the time during which the audit was undertaken.

## EXECUTIVE SUMMARY

An environmental audit of the facility at 118-120 Euston Road, Alexandria was undertaken for Visy Industries Australia Pty Ltd (Visy). The independent environmental audit was undertaken following a year of operation after the opening of the facility in December 2020. This was to satisfy Condition C17 in the NSW Department of Planning Development Consent for the facility.

The scope of the audit was to assess the environmental performance of the facility with regard to the Development Consent (DC), relevant standards, performance measures and statutory requirements, examine the adequacy of the plans, programs and systems in place, and recommend measures to improve the environmental performance of the facility. The audit was undertaken in accordance with AS/NZS ISO 19011:2003, *Guidelines for Quality and/or Environmental Management Systems Auditing*.

The Visy facility at Alexandria is a waste transfer station that receives and stores dry recyclable waste from fully co-mingled from kerbside collection and source-separated paper and cardboard from commercial businesses. The site is licensed under Environment Protection Licence 21359 for resource recovery and waste storage.

The facility was inspected for the environmental audit on 20 May 2022. The operations on-site were reviewed, and environmental management practices at the facility were evaluated. Interviews with site personnel were conducted. Overall the facility was observed to be well managed and the level of housekeeping was of a high standard.

Environmental management at Visy is managed through the Visy Management System. Visy's Environmental Policy is publicly available on its website. Individual Visy sites are responsible for environmental monitoring and implementing measures to achieve environmental compliance. An environmental aspects and impacts register is maintained which identifies environmental risks at the Site.

An Operational Environmental Management Plan and the associated management plans for waste, traffic, air quality, noise and flood emergency response have been prepared for stage 1 operation in accordance with the DC. The plans are made publicly available. Also an Emergency Response Plan and an incorporated Pollution Incident Response Management Plan (PIRMP) is in place to address response procedures in an event of a pollution incident. Procedures for managing complaints are also in place, which includes procedures to record, respond and resolve complaints.

Site induction and training located in an online industry system is mandatory for all site personnel and contractors.

Routine visual inspections of the Site are undertaken to assess the state of housekeeping, condition of the plant and equipment, monitoring for noise, dust and ambient odour.

The results of the audit indicate that the facility is in compliance with all licence, DC and statutory conditions.

Written notification has not been addressed in the PIRMP; however, as no incident or non-compliance had occurred, a notification was not required. It is recommended the PIRMP to be updated to include this requirement.

Minor non-conformances to the DC, the FRM&ERP and the OEMP had been identified but have now been rectified. These relate to signage, onsite display of FRM&ERP and emergency contact details and contents of site inductions.

Recommendations for measures and actions to be taken to achieve compliance with the EPL, DC and statutory requirements are made. These include updating the incident reporting protocol to include procedures for notifying the Department of Planning and providing written notifications to other relevant authorities.

Recommendations are also made to undertake noise monitoring as per requirements of the EPL and DC; produce documentation for routine inspections; updating the OEMP to include document retention requirements; and updating the OAQMP to remove extraneous requirements on induction trainings.

**LIST OF ABBREVIATIONS**

AEP	Annual Exceedance Probability
DC	Development Consent
DPE	Department of Planning and Environment
ERP	Emergency Response Plan
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EPL	Environment Protection Licence
EISP	Emergency Services Information Package
FCM	Fully Commingled Recyclable Material
FRM&ERP	Flood Risk Management and Emergency Response Plan
FRNSW	Fire Rescue New South Wales
HSE	Health, Safety, Environment
MRF	Material Recovery Facility
OAQMP	Operational Air Quality Management Plan
OEMP	Operational Environmental Management Plan
ONVMP	Operational Noise and Vibration Management Plan
PIRMP	Pollution Incidence Response Management Plan
PME	Powered Mobile Equipment
POEO	Protection of the Environment Operations
TMP	Traffic Management Plan
tpa	Tonnes per annum
VMS	Visy Management System
WH&S	Work, Health and Safety
WMP	Waste Management Plan



## 1. INTRODUCTION

On 7 April 2022, Visy engaged Peter J Ramsay & Associates to undertake an independent environmental audit (audit) of the Visy facility at 118-120 Euston Road, Alexandria, NSW (thefacility). This audit is required under Condition C17 of the Development Consent, application number SSD-10364 (the DC), issued by the Department of Planning, Industry and the Environment (DPIE), now the Department of Planning and Environment (DPE)) for the development of the facility at the Site. The DC is dated 22 April 2020.

The audit was performed in accordance with NSW Environment Protection Authority (EPA) and National Guidelines, as well as AS/NZS ISO 19011:2003 Australian/New Zealand Standard, *Guidelines for Quality and/or Environmental Management Systems Auditing*.

The facility receives and processes dry recyclable waste from fully co-mingled from kerbside collection and source-separated paper and cardboard (P&C) from commercial businesses. The facility operates under an Environment Protection Licence (EPL) number 21359 for the scheduled activity of resource recovery and waste storage. Operations at the facility commenced in December 2020.

## 2. OBJECTIVES

The objectives of the environmental audit, as outlined in C17 of the DC, are to:

- Assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any strategy, plan or program required under this consent;
- Review the adequacy of any approved strategy, plan or program required under this consent; and
- Recommend measures or actions to improve the environmental performance of the development, and any strategy, plan or program required under this consent.

### 3. SCOPE

The scope of the Environmental Audit at the Visy's facility, 112-120 Euston Road, Alexandria, included:

- Liaison with Visy regarding the environmental audit of the facility;
- Review of the operational environmental management plan (OEMP) for the facility and other procedures, registers and plans that are relevant to the environmental management of the facility;
- On-site audit of the facility and discussions with key personnel regarding the operations and environmental management;
- Consideration of the key environmental issues at the facility and the adequacy of the plans and procedures in place to manage these issues;
- Assessment of the compliance of the facility operations with the Development Consent, the Environment Protection Licence and other regulatory requirements;
- Recommendations for actions to improve the environmental performance of the facility, including systems and procedures; and
- Preparation of summarising methods and findings of the works in a report for submission to DPE.

## 4. SITE DESCRIPTION

The facility subject to this audit is located at 112-120 Euston Road, Alexandria, and is approximately 5km south of the Sydney CBD. It is within the City of Sydney government area. The location of the facility is shown in **Figure 1**.

Key features of the facility and adjacent land uses are described in the sections below.

### 4.1 Site Details

Table 1 Summary of Site Details

<b>Site Address</b>	112-120 Euston Road, Alexandria, NSW
<b>Site Area</b>	Approximately 12,600 m <sup>2</sup>
<b>Occupier</b>	Visy Industries Australia Pty Ltd
<b>Owner</b>	Lendlease Funds Management Limited
<b>Certificates of Title</b>	Lot 2 Plan (DP) 709175
<b>Local Government Administration</b>	Council of the City of Sydney
<b>Zoning</b>	IN1, General Industrial
<b>Adjacent Land Uses</b>	<p>North-west: Euston Road, industrial facility occupied by Metromix concrete batching plant surrounding by Sydney Park across Euston Road</p> <p>South-east: Burrows Road, industrial facility occupied by Bingo waste transfer station across Burrows Road.</p> <p>North-east: two multi-tenanted buildings; one building is occupied by a childcare centre, Only About Children; the other building is tenanted by a range of commercial businesses.</p> <p>South-west: industrial facility occupied by Printforce Australia, and Holcim Concrete batching Plant beyond that.</p>
<b>Topography</b>	The Site is level but the local topography slopes toward Sheas Creek which is southeast of the Site.
<b>Surface Conditions</b>	The facility is sealed with concrete. The concrete surfaces appear to be in good condition. A small portion of the facility in the northern corner and the street setback are vegetated, there is no exposed soil surface.

### 4.2 Site History

The site was comprised of an industrial warehouse building and small office buildings in 1930s. The site was subject to a major redevelopment in the 1940s, when a large industrial warehouse building was constructed and the smaller office buildings had been demolished and replaced with a large office building. The current warehouse building and office buildings were constructed between 1970 and 1980. The most recent development application (DA-123/2004) in 2004 relates to internal alternations to the office. The site was previously used for document storage and office administration.

The waste transfer facility is a relatively new operation on the site. The planning approval from the Department of Planning was issued in April 2020. Operations at the facility began in December 2020.

#### **4.3 On-Site Buildings and Facilities**

The facility is comprised of a single industrial building. There is an internal separation of the firefighting equipment, and this equipment is accessible from an external door on Euston Road. Inside the main part of the building contains office space as well an open central area for receipt of waste. There is a location in the open central area for equipment to prepare cardboard waste into bails for transport.

There is an entrance and an exit on the southeast side of the building providing access and egress for waste transport vehicles on Burrows Road. The entry and exit are both fitted with high speed, automatic, flexible doors which minimise the potential for fugitive emission from open doors.

Trucks travel in a u-shaped path with one entrance and one exit. A dedicated space is provided inside the building for truck to wait for deliveries or dispatches. Storage bays are provided for storage of recyclable material received at the Site. There are smaller storage areas dedicated for storage of occasional contaminant materials, including dangerous goods.

An aerial photo of the facility is provided in **Figure 2** and a site plan is provided in **Figure 3**.

## **5. OPERATIONS**

### **5.1 Activities of the Facilities**

Up to 110,000 tpa of fully commingled recyclables material (FCM) collected from kerbside is delivered to the facility on a daily basis (Monday to Friday). The FCM is consolidated into bulk haul trucks and dispatched to Visy's MRFs for processing. The site also receives up to 45,000 tpa of source-separated P&C from commercial collections, which is baled and transferred to Visy's recycled paper machines for remanufacturing. Waste materials are delivered by collection trucks.

The FCM collection trucks are weighed on the inbound weighbridge before unloading the incoming FCM into one of the two bunkers in the receival bay. The collection trucks are weighed again prior to leaving the facility. The FCM in the receival bay is then loaded into bulk haul trucks using a front-end loader.

The paper and cardboard collection trucks unload lose paper and cardboard into the paper and cardboard receival bay after weighing. A forklift then pushes the waste onto a conveyer which feeds the waste into the baler. Wire bound bales are removed from the baler and transported by forklift to the paper/cardboard bale storage area which will then be loaded onto a bulk haul truck.

All loading and unloading activities are undertaken within the fully enclosed building installed with high speed, automatic doors to reduce odorous emissions from escaping the building. The Internal air is discharged through three stacks extending above the roof line. The facility does not receive any putrescible material, therefore the potential to generate odour is low. A procedure is in place for the removal of contaminants if identified.

The facility operates 24 hours per day, seven days per week. The majority of the waste deliveries occur during hours in line with kerbside or commercial collection schedules, which are generally between 6am and 4pm Monday to Friday. The night-time and weekend operations are primarily limited to outbound of haul trucks. Operators are always present at the Site.

### **5.2 Licence Conditions**

The Visy facility is licensed by EPA under EPL 21359 for the scheduled activity of resource recovery and waste storage. The license was issued on 20 October 2020. All conditions on the licence are relevant to the environmental audit. The licence refers to the Development Consent (SSD-10364) issued on 24 April 2020.

### 5.3 Project Approval

On 22 April 2020, the Minister for Planning and Public Spaces approved the development application for the establishment of the facility for receipt and processing of up to 155,000 tonnes per year of dry recyclable waste from fully co-mingled and source separated kerbside collections, under Section 4.38 of the *Environmental Planning and Assessment Act 1979*.

The Development Consent (SS-10364) specifies administrative and environmental conditions for the development. The environmental conditions covered all aspects of environmental impacts, both pre and post construction, and also included conditions on preparation of management plans, reporting and auditing.

### 5.4 Site Inspection

The site was inspected by Nathan Williams, Senior Consultant, Peter J Ramsay & Associates Pty Ltd on 20 May 2022. The weather on the day of the visit was overcast, cool and there was some rainfall. The operation of the facility was not noticeable from outside the building along both Euston Road and Burrows Road.

The state of general housekeeping at the facility was observed to be very good. No litter was observed outside of the containment bays. Also, no litter was observed outside of the Site on the day of the inspection.

## 6. ENVIRONMENTAL MANAGEMENT

### 6.1 Legislative Requirements, Environmental Permits and Guidelines

Legislative requirements, permits and guidelines used to in the environmental audit to assess compliance, and which apply to the facility are shown in **Table 2**.

Table 2 Relevant Legislation, Permits and Guidelines

<p><u>Environmental Permits</u></p> <p>Environment Protection Licence 21359, issued to Visy Paper Pty Ltd, 20 October 2020</p> <p>Development Consent SSD-10364, issued to Visy Industries Australia Pty Ltd, 22 April 2020</p>
<p><u>Legislation/Regulations</u></p> <p><i>Protection of the Environment Operations Act, 1997</i></p> <p>Protection of the Environment Operations (General) Regulation, 2022</p> <p>Protection of the Environment Operations (Clean Air) Regulation, 2021</p> <p>Protection of the Environment Operations (Waste) Regulation, 2014</p> <p>Protection of the Environment Operations (Noise Control) Regulation, 2017</p> <p><i>Work Health and Safety Act, 2011</i></p> <p>Work Health and Safety Regulation, 2017</p>
<p><u>Guidelines/Standards</u></p> <p>AS/NZS 19011:2003: Guidelines for Quality and/or Environmental Management Systems Auditing</p> <p>AS/NZS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids</p> <p>AS 4282-1997 - Control of the obtrusive effects of outdoor lighting</p> <p>AS 2890.1:2004 Parking facilities Off-street car parking</p> <p>AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities</p> <p>NSW EPA Waste Classification Guidelines Part 1: Classifying Waste, 2014</p> <p>The Department of Environment and Climate Change NSW: Storing and Handling of Liquids: Environmental Protection – Participants Manual</p> <p>Work Cover NSW: Managing Risks of Hazardous Chemicals in the Workplace, Code of Practice, August 2019</p> <p>NSW EPA: Noise Policy for Industry, 2017</p>

### 6.2 Facility Environmental Management

#### 6.2.1 Environmental Management System

Visy operates an integrated health, safety and environment (HSE) management system called Visy Management System (VMS). This management system is used across the organization to plan, document, measure and monitor environmental performance. Individual sites are responsible to determine processes and methods for environmental monitoring and compliance. Annual internal audits of sites against VMS and regulatory compliance are undertaken.

## 6.2.2 Environmental Management Plan

A requirement of the DC is to prepare an OEMP which must be submitted to the Planning Secretary prior to commencement of operations at the facility. The EMS is to identify the relevant statutory obligations that apply to the development, describe measures to be implemented for compliance; include monitoring and reporting procedures; contingency measures and a program to improve environmental performance. Also procedures for community engagement; as well as procedures to deal with any complaints that are received are required. The roles and responsibilities of all key members of the project should be described.

An OEMP is in place for stage 1 operation. Other management plans are available as required by condition C6 of the DC, including:

- Operational Waste Management Plan
- Operational Traffic Management Plan
- Operational Air Quality Management Plan
- Operational Noise Management Plan
- Flood Emergency Response Plan

Community consultation and complaints handling is incorporated into the management plans.

The OEMP is saved on the site document control system and a hard copy is available on site. The plans are also made available to the public on Visy website.

The Site Manager is responsible for implementation of the OEMP in compliance with all statutory obligations.

The environmental performance of the facility is described in the annual returns, and is publicly available on the EPA website. Monitoring programs are described in other associated management plans, such as air quality and noise management plans. The key environmental conditions and management measures are provided in a Register of Statutory Environmental Control Measures.

Visy conducts annual internal audits to verify the effectiveness of the environmental management at the facility against regulatory and Visy requirements. Furthermore, if a pollution incident takes place, a requirement of the facility's ERP is that community and neighbours be notified. There is a procedure for logging complaints into the complaints reporting register for the facility and resolution of complaints. This triggers corrective actions and a response to the complaint is then made by the Site Manager or Visy National Environment Manager (for regulatory environmental matters).

### 6.2.3 Environmental Policy

Visy has an environmental policy approved by executive management. This policy applies to all company activities, including those undertaken by contractors, and those in the value chain. It commits Visy to compliance with all environmental laws and permits, and voluntary commitments; and to continually evaluate and improve performance to minimise environmental risk. Visy's environmental policy was on display at the facility.

### 6.2.4 Hazard Identification and Risk Assessment

The Site has an environmental aspects and impacts register (A&I Register) that is reviewed and updated annually or whenever the conditions for review of the management plans are triggered (i.e., change of key personnel; changes to site conditions; non-compliance).

The A&I Register includes all identified environmental risks at the facility, including aspects of noise, air quality, odour, waste, litter, flies and vermin, traffic and flooding.

### 6.2.5 Training

Training modules are located in an online induction system, and training undertaken is tracked for all personnel on-site.

### 6.2.6 Site and Plant Maintenance

#### 6.2.6.1 Housekeeping

The state of housekeeping is assessed by the Site Manager during the daily inspection.

#### 6.2.6.2 Plant Maintenance

Task specific inductions, including operation of the plant and equipment are included in the induction trainings. The site conducts inspection of the plant/equipment prior to each use.

### 6.2.7 Emergency Response

The site has an emergency response plan (ERP), and a Pollution Incident Response Management Plan (PIRMP) is incorporated into the ERP. The site also has an emergency services information package (ESIP) that provides emergency response procedures in an event of fire or liquid spill. The ESIP is displayed at the office entry.

An evacuation drill is performed annually. The effectiveness of the ERP is reviewed following each drill.

Fire safety checks are conducted by an external contractor, records of the checks were available on site and no equipment was observed to be out-of-date during the Site inspection.

Spill kits are provided around the facility and adjacent to fuel and lubrication store (see photo 8).

All personnel are trained in incident response for spills or environmental issues as part of the Induction Training.

#### 6.2.8 Communication

A sign at the front gate of the facility provides a telephone number (Visy Recycling complaints hotline) for complaints. The complainant is to be contacted on the means of addressing and resolving the issue.

Clause 98D of the Protection of the Environment Operations (POEO) (General) Regulation requires that a PIRMP to be made available on a publicly accessible website. Visy's universal minimum standards and procedures for emergency response is provided on Visy's website, the Site' PIRMP has not been made public. However, as the site-specific PIRMP was developed based on Visy's minimum standards, compliance with Clause 98D is considered to have been achieved.

#### 6.2.9 Monitoring and Recording

If complaints are received then they are logged in a company incident report database that triggers a corrective action, and a response is then required to be implemented by the Site Manager. The method for monitoring and reporting complaints is provided in the OEMP. The OEMP does not include requirements for record retention as per condition M2.3 of the EPL.

The Site Manager was not aware of any complaints alleged against Visy's operation at the Site during the inspection.

#### 6.2.10 Reporting

In accordance with licence conditions the facility must submit annual returns to the EPA. The annual returns must detail a statement of compliance and a monitoring and complaints summary. Annual returns for the 2020/2021 and 2021/2022 financial years were received by EPA in December 2021 and November 2022, respectively. The OEMP contains requirements on annual returns. Retention of the annual return is not addressed as per requirement R1.6 of the EPL.

Licence condition C11 and the facility's PIRMP and the OEMP, specify that the EPA and other relevant agencies must be notified if a notifiable pollution occurs. At the time of the audit, there had been no notifiable pollution incidences, and so reporting has not been required.

In accordance with licence condition C12 to 13 and the OEMP, the facility must notify the EPA and other relevant agencies if a non-compliance occurs. At the time of the audit, there had been no non-compliance, and so reporting has not been required.

#### 6.2.11 Contractor Management

All contractors at the facility are required to sign in at reception, and to take mandatory induction prior to commencing work. Any person not inducted must be accompanied by an inducted person. The induction covers required personal protective equipment, permitting, emergency procedures, hazard and incident reporting as well as risks on the facility. Contractors may also be required to complete activity specific training.

## **7. EMISSIONS TO AIR**

### **7.1 On-Site Observations**

During the audit, no visible emissions were observed from the stacks on the roof. There was a detectable odour from the waste materials contained within the building and no odours were detected outside the building and near the facility boundary. Also, no litter was observed at the boundary of the facility.

Signage directing engines to be turned off in the staging area was not in place. This was immediately corrected by the Site Manager who put the signage in place within the designated staging area (see photo 6).

### **7.2 Monitoring**

An Operational Air Quality Management Plan (OAQMP) for stage 1 of the development has been prepared by Wilkinson Murray Pty Ltd. The OAQMP requires the facility to conduct regular monitoring for dust and odour. Also monitoring in response to complaints or non-conformances is required.

Regular monitoring is performed, including weekly inspections of equipment and the facility for dust emissions and dust deposits; and weekly inspection at the premises boundary for offensive odour or as required when a contaminated load is detected. A record of the observations from the inspections which is required by the OAQMP is not retained.

The OAQMP requires response monitoring be undertaken when potential off-site odour or dust impacts are expected, including continuous dust monitoring against reactive management trigger levels outlined in the OAQMP and an odour audit using field olfactometry. At the time of the audit, there had been no suspected potential off-site air impacts, and so response monitoring has not been required.

### **7.3 Environmental Control Measures**

The building housing the facility has a building ventilation system that extracts air from within the building and discharges to the environment through three stacks on the roof. This generates point source emissions and minimizes fugitive emissions. Discharging stacks on the roof allows air emissions, such as particulates and odour to disperse and minimize dust and odour impacts at ground level.

All operations are kept within the enclosed building to minimize fugitive dust and odour emissions. The building is equipped with high-speed doors that open and close automatically.

The facility has also implemented operational controls such as ensuring trucks entering and leaving the facility are covered except when loading and unloading; and providing signage directing that engine be turned off when not in use.

Environmental awareness training, which is provided to all site personnel, includes training on minimising dust and odorous emissions.

#### **7.4 Environmental Compliance**

The OAQMP prepared by Wilkinson Murray Pty Ltd, includes air quality and odour monitoring programs, emission mitigation strategies and processes for record keeping, compliance reporting and revision of the plan as required by Condition B22 of the DC. The OAQMP meets the requirements of the DC and EPL.

Emission management and mitigation measures detailed in Appendix 3 of the DC and the OAQMP were observed to have been implemented during the audit, except that signage directing engines to be turned off was not in place. This was immediately rectified.

The content of the site induction does not include all training details listed in the OAQMP. Some training content which is required by the OAQMP is unnecessary and not relevant for all employees and contractors.

The OAQMP should be revised to remove the following extraneous requirements:

- Existence and requirements of this OAQMP
- Relevant legislation and consent conditions
- Locations of sensitive receptors

##### **7.4.1 Odour**

Condition L5 of the EPL, and Condition B24 of the DC, requires that no offensive odour be released beyond the boundary of the facility.

No odours related to waste or waste management were observed outside of the warehouse building during the Site Inspection. No unusual odour was observed inside the facility and there was no evidence that waste had been allowed to remain inside the building for any extended period of time. PJRA was informed by the Site Manager that material storage bays are fully emptied, and material is not usually stored at the Site for more than 24 hours. PJRA was informed by the Site Manager that Visy was not aware of any odour complaints alleged against Visy's operation at the Site.

#### 7.4.2 Dust

Condition O3 of the EPL, and Condition B17 of the DC, requires that all reasonable steps to minimise the generation of dust be undertaken.

Operational controls have been designed and implemented to minimize dust emissions. Dust is contained with the operations building and is extracted and discharged via a point source (stacks through the roof). Fugitive emissions are minimized using fast acting soft doors at the entry and exit for trucks to the warehouse building. No obvious signs of excessive dust or litter either within or near the Site were observed during the Site inspection (see photo 1 and 2).

## **8. NOISE EMISSIONS**

### **8.1 On-Site Observations**

On the day of the Site Inspection for the audit, the facility was quiet outside. The operations at the Site were not observed to be creating a noticeable noise impact outside of the buildings. It was stated by the Site Manager that Visy was not aware of any noise complaints since the facility began operation.

### **8.2 Environmental Control Measures**

Roller doors are kept closed while not in use. All operations are carried out within the enclosed building with vehicle access via high-speed automatic doors that only open to allow vehicle access and close immediately afterwards. Acoustic louvres have been installed on the disused doorways. Ductwork of the building ventilation system are acoustically shielded to reduce noise emissions.

Powered Mobile Equipment (PME) is required by the Noise Management Plan to meet Visy's minimum standards for PME. The PMEs are fitted with exhaust mufflers and are inspected prior to every use to ensure equipment functionality. Non-audible warning system is used for all PMEs. PMEs are required to be parked in a designated area and engines turned off whenever not in use. Signage is present to direct trucks drivers turn of engines when waiting.

Minimising noise emissions is covered in the Environmental Awareness training, which is offered to all site personnel and contractors.

### **8.3 Environmental Compliance**

The Operational Noise Management Plan (ONMP) is prepared by Visy and reviewed by a third-party consultant, Wilkinson Murray Pty Ltd. The consultant confirms that the ONMP addresses the requirements detailed in Condition B31 of the DC. It is also noted that no high generating noise activities are performed, therefore addressing condition B31(a) and (c) is not necessary. A complaints hotline is displayed at the front gate and Visy has a procedure to manage complaints made directly to Visy or via EPA and DPE.

The ONMP makes reference to the noise criteria and operational noise modelling results provided in the Noise and Vibration Impact Assessment (NVIA), undertaken by Wilkinson Murray, as part of the Environmental Impact Statement submitted for the development approval. Both the ONMP and the NVIA identified that the predicted noise levels at the sensitive receptors achieve compliance to EPL.

A Driver Code of Conduct is incorporated in the TMP and as per Condition B33 of the DC. Site personnel and contractors, including drivers, are inducted to the Driver Code of Conduct and minimizing road traffic noise.

#### **8.4 Noise Monitoring**

Noise monitoring was required as per requirement of condition M4.1 of the EPL. This noise monitoring should be undertaken in compliance with the methodologies outlined in L3.1 to L3.8 of the EPL by a suitably qualified consultant. Noise monitoring should be undertaken for Stage 1 operations to demonstrate compliance to the noise limits.

This noise monitoring was performed by RWDI Group for three consecutive days from Monday 21 March to Wednesday 23 March 2022. The results of this monitoring is described in the report, *Compliance Noise Monitoring – Stage 1 Operations*, RWDI # 2203644, prepared by RDWI Australia Pty Ltd, dated 31 March 2022 (the Noise Monitoring Report). Noise monitoring has been performed in accordance with the required methodology from the EPL.

The results provided in the Noise Monitoring Report show that the operational noise impact of the operation of the facility complies with the requirements of the EPL. This also shows compliance with noise limits in the DC in accordance with requirement B28.

## **9. WASTE MANAGEMENT**

### **9.1 On-Site Observations**

Two waste streams are received and stored on site:

- Paper and cardboard
- Fully commingled recyclables – paper, plastics, glass and metal

The site has an inbound and an outbound weighbridge to track waste movements. The amount of waste in tonnes is measured and recorded daily. Records of all weighbridge records and waste classification records are retained on-site.

Upon delivery of the waste, waste is unloaded into the designated receival bays (see photo 1 and 3). The FCM is consolidated onto bulk haul trucks; while the paper and cardboard is compacted into bales, and is stored in a designated bale storage area (see photo 4) prior to being loaded to the haul trucks for transporting off-site for processing.

The landscaped area in the north-east corner of the facility was observed to have been properly maintained. Unusual number of pests, vermin and weeds were not observed.

### **9.2 Environmental Control Measures**

Waste tracking is undertaken via the two weighbridges that uploads data directly to a software. The software provides real-time feedback on stock levels.

Minor contamination in the delivered waste is either removed by hand or left in place. When a major incidence of contamination is identified, the waste is inspected by the Site Manager and moved to a contaminated waste area prior to removal. Putrescible waste is removed as a priority to prevent odour generation. When hazardous material is identified to be present, the incident is recorded, and the source identified. Hazardous waste is stored in a designated hazardous waste area prior to removal. Hazardous waste is stored on pallet racking elevated above the 1% AEP flood level in accordance with Condition B41 of the DC.

Regular housekeeping is maintained to ensure litter does not escape from the operation building. The standard housekeeping was observed to be good.

Loading and unloading of waste, storage and handling of waste are undertaken only inside the enclosed building, doors are kept closed when not in use. The high-speed automatic doors only opens when vehicles enter and close immediately afterwards.

Waste retention at the facility is maintained less than 48 hours whenever possible.

Vermin and weed management services are maintained by an external service provider. A rodent management system using bait traps (see photo 13) and good housekeeping is ongoing.

### **9.3 Environmental Compliance**

Continuous monitoring via a waste tracking software is undertaken to ensure FCM stockpile and bale stack height do not exceed 5 m in height (measured by a yellow marker line drawn on the wall of the receival bays) and 250 tonnes in each receival bay in accordance with the requirements of the EPL. The FCM in the bunds were not observed to exceed the 5 m marker during the Site Inspection (see photo 3).

All wastes leaving the facility are classified in accordance with the NSW EPA *Waste Classification Guidelines*, and is transported to one of Visy's networks of MRFs or paper recycling facility that is licenced to receive such wastes. Waste classification and transportation documents are retained on the Visy management system. Batteries are recycled through Ecocycle or Ecobatt.

The site has a waste management plan (WMP) and is reviewed and updated annually or when conditions for review are triggered (i.e., change of key personnel or change of operation processes). The WMP contains sections on measures implemented, litter management and contingency plans. Incident, complaints and non-compliance procedures are covered in the OEMP and the ERP.

Pests, vermin and pests appeared to be properly managed and not expected to pose a hazard on the environment or cause any amenity issues.

## **10. TRAFFIC AND ACCESS**

### **10.1 On-Site Observations**

The Traffic Management Plan (TMP) was observed at the Site. An area for bicycle parking was available. The layout of the facility includes the U-shaped path for vehicles appeared effective in minimising the time on-site for recyclable collection and unloading. An internal staging area was available for trucks to wait for unloading if necessary. PJRA was informed that in an emergency, truck would be diverted to other Visy facilities.

### **10.2 Compliance**

The facility was observed to operating in compliance with the requirements for the TMP except that signage directing engines to be turned off in the staging area was not in place. This was immediately corrected by the Site Manager who put signage in place within the designated staging area.

The TMP is prepared in accordance with the Condition B15 of the DC. The TMP is prepared by Visy and reviewed by Traffix, an external traffic engineer.

## **11. FLOOD MANAGEMENT**

### **11.1 On-Site Observations**

Majority of the facility is covered by a concrete surface that appears to be in good condition. A small portion of the facility in the northern corner and the street setback are vegetated, there is no exposed soil surface. All stormwater pits inside the operations building are sealed to prevent water ingress to the stormwater system.

The topography of the facility slopes towards the southeast. There are a number of stormwater inlets external to the building housing the facility. The grills of the stormwater drains were observed to be clean and free of particulates.

All hazardous materials were stored in a location at least 0.5 m above the 1% AEP flood level. Hazardous material storage was elevated on pallets and was located on the Burrow Road side of the warehouse building.

### **11.2 Flood Risk Management & Emergency Response Plan**

The Flood Risk Management and Emergency Response Plan (FRM&ERP) was available at the Site. It is recommended in the FRM&ERP that a copy be made available on a noticeboard so that it is available to all employees and contractors. This was not present at the time of inspection, but this was immediately rectified by the Site Manager when pointed out.

## 12. STORAGE

The Site stores and handles small quantities of diesel fuel and lubricants that does not trigger manifest requirements in accordance with the *Work Health and Safety Act 2011*.

Approximately 2,000 L of diesel fuel is stored in a self-bunded aboveground tank (see photo 12). The tank is fitted with an overflow protection to prevent spills from re-fuelling. Lubrication and hydraulic oil (800 litres) are stored in 200 Litre drums (see photo 9). The drums are stored in bunded pallets on pallet racking. Spill kits are provided throughout the facility to manage spills (see photo 8).

### 12.1 Dangerous Goods

Dangerous goods are occasionally received as contaminants in waste. Examples of contaminant materials include gas bottles and car batteries. When found these are segregated in a dangerous goods area for appropriate disposal. Multiple secure storage containers are available to allow segregation of incompatible materials (see photos 10, 11).

### 12.2 Chemical Storage

Waste liquid chemicals were stored in drums provided with bunding. Funnels were provided for decanting of liquid waste containers into the drums for appropriate off-site disposal.

### 12.3 Flammable Goods

There is a flammable goods cabinet at the Site (see photo 7). The cabinet is used to contain small quantities of flammable goods. These includes small quantities of paint, petrol and similar products. No flammable goods were observed to be in storage outside of the cabinet during the Site inspection.

### 12.4 Environmental Compliance

Dangerous goods storage was observed to be stored in compliance with the NSW Work Cover *Code of Practice for the Storage and Handling of Dangerous Goods*, the AS/NZ *Standard for The Storage of Handling of Flammable and Combustible Liquids*, and with the NSW WH&S Regulation.

### **13. SUMMARY OF REVIEW AND AUDIT FINDINGS**

A summary of compliance of the operations at the facility with licence conditions and regulations is provided in Table 3.

Table 3 Summary of Compliance Status

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
<b>Compliance with EPL</b>			
Pollution of Waters	Condition L1 of EPL	Compliant	The EPL does not have any discharge limits on stormwater, and discharge to stormwater has therefore not been monitored. There are systems and procedures in place to minimise the potential for stormwater contamination, including measures to prevent pollution by flood and firefighting water.
Waste	Condition L2 of EPL	Compliant	The site uses a waste tracking system that monitors the amount of incoming and outgoing waste to ensure tonnage of waste received and in storage does not exceed the limits specified in the EPL.
Noise Limits	Condition L3 of EPL	Compliant	Noise monitoring as recorded in the Noise Monitoring Report demonstrates compliance.
House of Operation	Condition L4 of EPL	Compliant	The site operations 24 hours per day 7 days a week.
Odour	Condition L5 of EPL	Compliant	No unusual odour related to the operation of the facility was detected inside and outside of the warehouse building during the Site Inspection. The Site has procedures in place to ensure waste retention onsite is minimized. The Site is unaware of any odour complaints alleged against the operation at the Site.
Competency of Operations	Condition O1 of EPL	Compliant	The Site has a comprehensive set of procedures and systems in place, as well as control technologies, to ensure that all site activities are carried out in a competent manner and that the risk to the environment is minimised.
Maintenance of Plant and Equipment	Condition O2 of EPL	Compliant	Visy has systems in place to ensure that plant and equipment is maintained and operated in a proper and efficient manner.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Dust	Condition O3 of EPL	Compliant	Design and operational controls are in place to minimize dust generation. All operations are carried out in enclosed buildings with mechanical ventilation. Environmental Awareness training covers dust minimization. Regular site cleaning minimises dust on-site.
Emergency Response	Condition O4 of EPL	Compliant	Visy has an ERP that documents procedures to follow should an emergency take place.
Processes and Management	Condition O5 of EPL	Compliant	The required design and operational controls have been implemented on site.
Monitoring Records	Condition M1 of EPL	Compliant	All monitoring records are kept on-site for at least 4 years.
Recording of Pollution Complaints	Condition M2 of EPL	Compliant	A complaints register is maintained, however at the time of the audit, no complaints had been received.
Telephone Complaints Line	Condition M3 of EPL	Compliant	There is a phone number advertised at the front entrance of the facility, and a telephone line for complaints is posted on the company website.
Noise Monitoring	Condition M4 of EPL	Compliant	Noise monitoring as recorded in the Noise Monitoring Report demonstrates compliance.
Annual Return Documents	Condition R1 of EPL	Compliant	To annual returns have been submitted to EPA since commencement of operations at the Site. The most recent annual return was submitted by Visy and received by EPA on 14 November 2022.
Notification of Environmental Harm	Condition R2 of EPL	Compliant	All relevant contact details are listed in the PIRMP for the Site, however at the time of the audit, no notifiable incident had occurred.  Visy's universal minimum standards and procedures for emergency management response are publicly available on Visy's website. The procedures apply to all Visy sites. A site specific PIRMP has been developed based on these standards.
Written Report	Condition R3 of EPL	Compliant	There have been no requests by the EPA for a written report of the facility, except for the annual returns which have been completed.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Other Reporting Conditions	Condition R4 of EPL	Compliant	
Copy of Licence at Premises	Condition G1 of EPL	Compliant	A copy of the licence is kept on the Site Manager's file.
Environmental Obligations of the Licensee	Condition E2 of EPL	Compliant	Housekeeping at the Site was observed to be good. The Site has procedures to manage contamination in the waste received. Also there are procedures to manage spills and pollution incidents. Annual returns had been submitted to EPA in accordance with the requirements of the EPL.
<b>Compliance with DC</b>			
Waste – Waste Storage and Processing	Condition B1	Compliant	Wastes are kept within the fully enclosed operations building in storage areas designated for waste types. Regular inspection has been performed and good housekeeping had been kept during the inspection for the audit.
Waste – Operational Waste Management Plan	Conditions B4, Appendix 3-Waste Management	Compliant	The site has an adequate WMP prepared in accordance with the requirements of the DC. Management and mitigation measures in Appendix 3 of the DC has been implemented on site.
Waste Statutory Requirements	Conditions B5-B6	Compliant	All wastes are classified in accordance with the NSW EPA Waste Classification Guidelines, and taken to a licenced facility to receive such wastes. Waste classification and transportation documents are retained on the Visy management system.
Pest, Vermin and Noxious Weed Management	Condition B9	Compliant	The general housekeeping at the facility was observed to be of a high standard. The site has procedures to manage vermin, pest and weed, and is incorporated in the WMP. Vermin and weed management services are undertaken by an external service provider.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Traffic and Access	Conditions B10, B11, B15, B16, Appendix 3	Compliant	The site has an adequate OTMP prepared in accordance with the requirements of the DC. Management and mitigation measures in Appendix 3 of the DC has been implemented on site.
Air Quality	Condition B17, B19, B24	Compliant	<p>Design and operational controls are in place to minimize dust generation. Environmental Awareness training covers dust minimization. Regular cleaning minimises dust on-site. Management and mitigation measures in Appendix 3 of the DC has been implemented on site.</p> <p>Visy has systems in place to ensure that plant and equipment are maintained and operated in a proper and efficient manner.</p> <p>The EPL does not specify any air emission limits. Regular inspection of dust and odour on site has been undertaken.</p> <p>No unusual odour related to the operation were observed inside and outside of the warehouse building during the site inspection.</p>
Air Quality - Operational Air Quality Management Plan	Condition B22	Compliant	The site has an adequate OAQMP prepared in accordance with the requirements of the DC.
Hours of work	Condition B25	Compliant	The site operations 24 hours per day 7 days a week.
Noise limits	Condition B28	Compliant	Noise monitoring as recorded in the Noise Monitoring Report demonstrates compliance.
Operational Noise and Vibration Management Plan	Conditions B31, B32	Compliant	The site has an adequate ONVMP prepared in accordance with the requirements of the DC.
Road Traffic Noise	Condition B33	Compliant	A Driver Code of Conduct is incorporated in the TMP, and is included in the drivers' induction training.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Discharge Limits	Condition B38	Compliant	The EPL does not have any discharge limits on stormwater, and discharge to stormwater has therefore not been monitored. Management and mitigation measures in Appendix 3 of the DC have been implemented to minimise stormwater contamination.
Flood	Conditions B39 -42	Compliant	Management and mitigation measures in Appendix 3 of the DC have been implemented. The site has an FRM&ERP. Dangerous goods and hazardous waste are stored on bunded area with regard to flood.
Hazardous Waste	Condition B45	Compliant	Procedures for storage of hazardous waste is provided in WMP. There is a designated area for storage of hazardous waste above the 1% AEP flood level with proper bunding.
Dangerous Goods	Condition B46, B47	Compliant	The quantities of dangerous goods stored at the facility is below the threshold quantities listed in the Guideline. The quantities do not trigger manifest requirements. Storage of dangerous goods on site was observed to be consistent with NSW EPA's requirements.
Fire Safety	Conditions B48, B49	Compliant	Measures have been implemented to contain fire water. Fire safety checks are up to date and performed by a contractor. The EIS stated the system was designed in consultation with the Council and FRNSW regarding the design of the fire safety measures.
Visual Amenity	Conditions B51, B52	Cannot be determined	Lighting did not appear to have created a nuisance to surrounding properties or public roads. External lighting was not on due to the inspection was undertaken during the day, therefore could not be assessed.
Community Engagement	Condition B53	Compliant	Stakeholder engagement is addressed in the OEMP. The OEMP and its attached management plans are publicly available on Visy's website.
Management Plan Requirements	Conditions C1, C5, C6	Compliant	The OEMP and its attached management plans are prepared in accordance with the requirements of the DC.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Revision of Strategies, Plans and Programs	Conditions C8, C9, C10	Not Applicable	The conditions for revision have not been triggered. A revision may be required following the submission of this environmental audit.
Incident and Non-Compliance Reporting	Conditions C11, C12, C13, C14, C15	Compliant	There have been no notifiable incidences since commissioning. The ERP outlines procedures for verbal notification to authorities, written notification to the DPE is not addressed. The OEMP outlines procedures to notify the DPE in writing.
<b>Compliance with DC (Applicant's Management and Mitigation Measures):</b>			
Noise and Vibration	Appendix 3, DC	Compliant	Noise monitoring as recorded in the Noise Monitoring Report demonstrates compliance.
Air Quality	Appendix 3, DC	Compliant	Dust and odour are monitored through routine inspection of the facility, and all management and mitigation measures are in place to minimise dust and odour on-site. Signage directing to turn off engines were not provided in the staging area during the inspection, but had been rectified.
Water Management	Appendix 3, DC	Compliant	All management and mitigation measures are in place to prevent pollution of stormwater. Appropriate bunding are provided for hazardous materials, fire fighting water and other fluids stored on site. Spill kits are available close to liquid storage.
Waste Management	Appendix 3, DC	Compliant	All management and mitigation measures are in place. Procedures are in place for management of hazardous waste. House keeping was observed to be good.
Hazards and Risks	Appendix 3, DC	Compliant	All management and mitigation measures are in place. Appropriate bunding are provided for hazardous materials, firefighting water and other fluids stored on site. Spill kits are available close to liquid storage. Emergency response is incorporated in the site induction trainings. House keeping was observed to be good.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Fire and Incident Management	Appendix 3, DC	Compliant	Fire safe system has been designed in consultation with the FRNSW. Emergency response in an event of fire is addressed in the ERP.
Traffic and Transport	Appendix 3, DC	Compliant	All management and mitigation measures are in place. Signage directing to turn off engines were not provided in the staging area during the inspection, but had been rectified.
Visual Amenity	Appendix 3, DC	Compliant	All management and mitigation measures are in place.
Social-economic Impact	Appendix 3, DC	Compliant	Site contact details are made publicly available. The site will maintain a complaints register, however not complaints have been received at the time of the audit. The site has a procedure to manage complaints.
Contaminated Soils and Asbestos	Appendix 3, DC	Compliant	Spill kits are available close to the liquid storage areas. The site has an environmental aspects and impacts register (A&I Register) that is reviewed regularly. Incident management are addressed in the site's PIRMP (as part of the ERP).

#### Compliance with Regulatory Requirements

Air Emissions	POEO Act	Compliant	No unusual or offensive odour were detected inside the warehouse building or at the external boundary of the premises. Good housekeeping has been maintained and Visy has systems in place to ensure that plant and equipment are maintained and operated in a proper and efficient manner.
Waste	POEP (Waste) Regulation 2014	Compliant	Movement of incoming and outgoing waste and records is tracked and provided to EPA on a monthly basis.
Noise Emissions	NSW Industrial Noise Policy	Compliant	Noise monitoring as recorded in the Noise Monitoring Report demonstrates compliance.

Aspect	Source of Compliance Condition	Compliance Status	Auditor Comment
Pollution Incident Notification	Clause 140, POEO (General) Regulation 2021	Compliant	<p>Visy's generic standards and procedures for emergency management response is publicly available on Visy's website. The procedures apply to all Visy sites. A site specific PIRMP has been developed based on these standards.</p> <p>There have been no notifiable incidences since commissioning.</p> <p>The PIRMP (incorporated in the ERP) does not contain requirement for written notification. The verbal notification must be followed by a written notification within 7 days of the date on which the incident occurred. This written notification must contain all the information required under Clause 150 of the POEO Act. Notification to DPE is not included in the PIRMP as per Condition C11 of the DC.</p>

## 14. CONCLUSIONS AND RECOMMENDATIONS

### 14.1 Conclusions

This independent environmental audit has considered all aspects of impacts to the environment from the Visy Dry Recyclables Facility, as well as management systems and control technologies that are in place to minimise these risks. The facility is well run with a high standard of housekeeping.

The operation of the facility complies with the EPL, DC and regulatory requirements for environmental management.

Minor non-conformances with requirements in Appendix 3 of the DC, the FRM&ERP and the OEMP were identified during the site inspection. However, these have been subsequently rectified.

- Signage directing engines to be turned off in the staging area was not provided;
- The FRM&ERP and emergency contact details were not provided in a displayed area onsite; and
- Site inductions did not cover all elements related to air quality management addressed in the OAQMP.

### 14.2 Recommendations

The following recommendations for measures and actions to achieve compliance with the EPL, DC and statutory requirements and improve the environmental performance of the facility are made:

- In order to ensure compliance with C11 & C12 of the DC, include in the incident reporting protocol (including the PIRMP), a requirement to notify the DPE in writing immediately after an incident, and within seven days after a non-compliance. Within thirty days after the incident, provide a detailed written report of the incident in accordance with Appendix 4 of the DC to DPE and any relevant public authorities (as determined by DPE).
- To ensure compliance with Clause 140, POEO (General) Regulation 2022, include in the incident reporting protocol (including the PIRMP), a requirement to provide a notification in writing, following an initial verbal notification, to relevant authorities within seven days after an incident.
- Routine site inspections for odour and dust should be documented, including recording information on the observation of visible dust emissions, increased dust deposition and presence of odour.
- It is also recommended that the OEMP be updated to specify that records of any environmental performance be retained at the site for at least 4 years. This is in accordance with requirements for record retention as per conditions R1.6, M1.2 (b) and M2.3 of the EPL that the annual returns, any record of complaints and monitoring records to be kept for at least 4 years.

- Within three months of submission of this audit report, revision of strategies, plans and programs should be performed as per requirements of C8-C10 of DC.
- The content of the induction program does not include all elements relating to air quality management as specified in the OAQMP, however some of these appear unnecessary and not relevant for all employees and contractors. It is recommended that the OAQMP be updated to remove the following extraneous requirements from the induction program:
  - Relevant legislation and consent conditions; and
  - Locations of sensitive receptors.

## 15. REFERENCES

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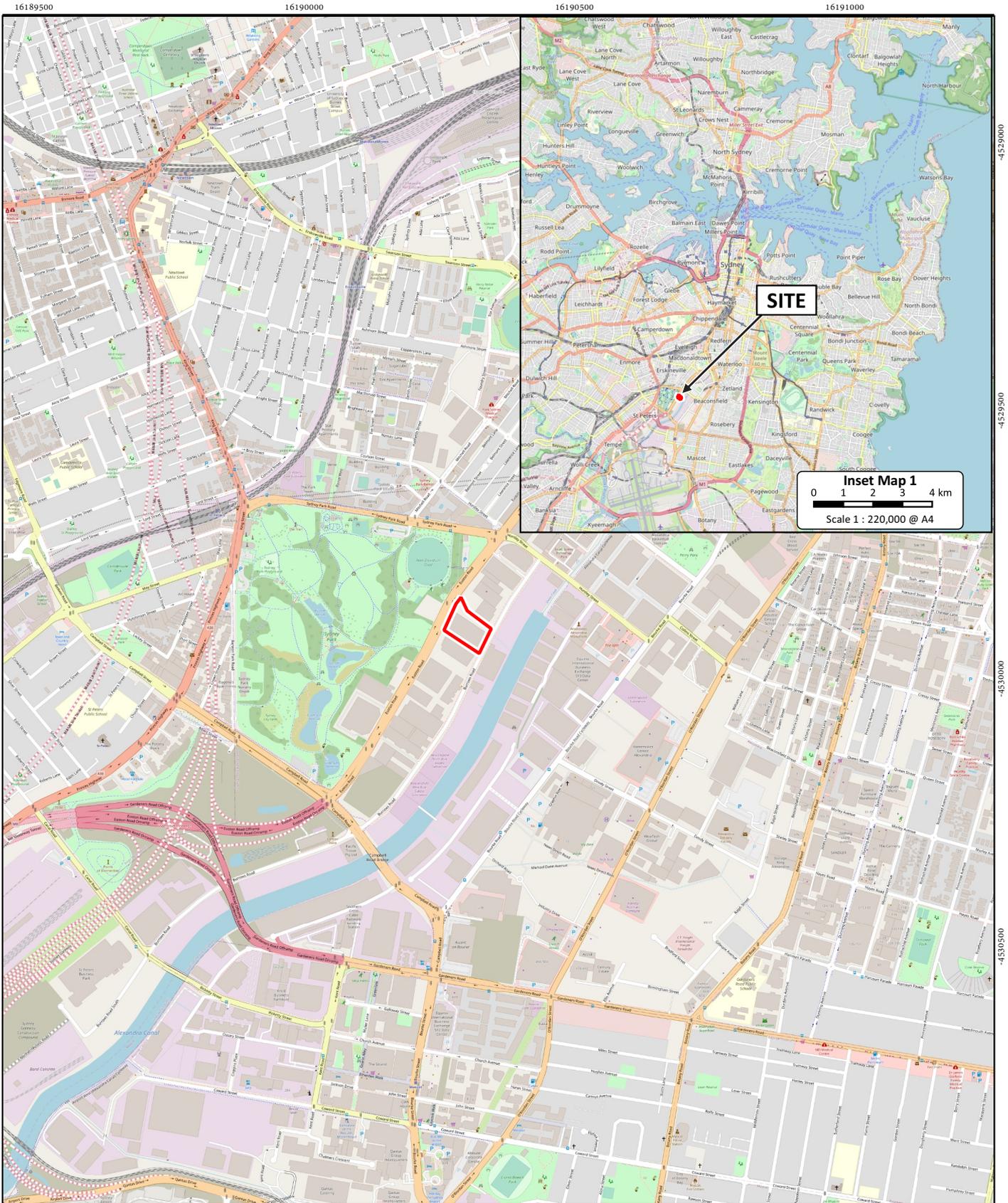
Work Cover NSW, 2005, *Storage and Handling of Dangerous Goods, Code of Practice*, Work Cover NSW, Sydney.



# Figures



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 PETER J RAMSAY & ASSOCIATES

Project: 334.46  
 Date: 18/12/2022  
 Revision: Rev00  
 Designed: AD  
 Drawn: VH  
 Reviewed: AD



Main Map Scale 1 : 20,000 @ A4

**LEGEND**

 Site Boundary

**Data Sources**

OpenStreetMap Standard  
 Basemap: © 2019 OpenStreetMap contributors.  
 Available under the Open Database License, cartography licensed as CC BY-SA.

**LOCALITY MAP**

*Visy Dry Recyclables Facility  
 Independent Environmental Audit*

112-120 Euston Rd, Alexandria  
 NSW 2151

Client: Visy

Figure

**F1**

16189500

16190000

16190500

16191000

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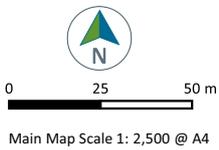
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 Revision: Rev00  
 Designed: AD  
 Drawn: VH  
 Reviewed: AD



**LEGEND**

 Site Boundary

**Data Sources**

Aerial Image: Metromap Aerometrex Ltd, photographed dated 09/06/2022

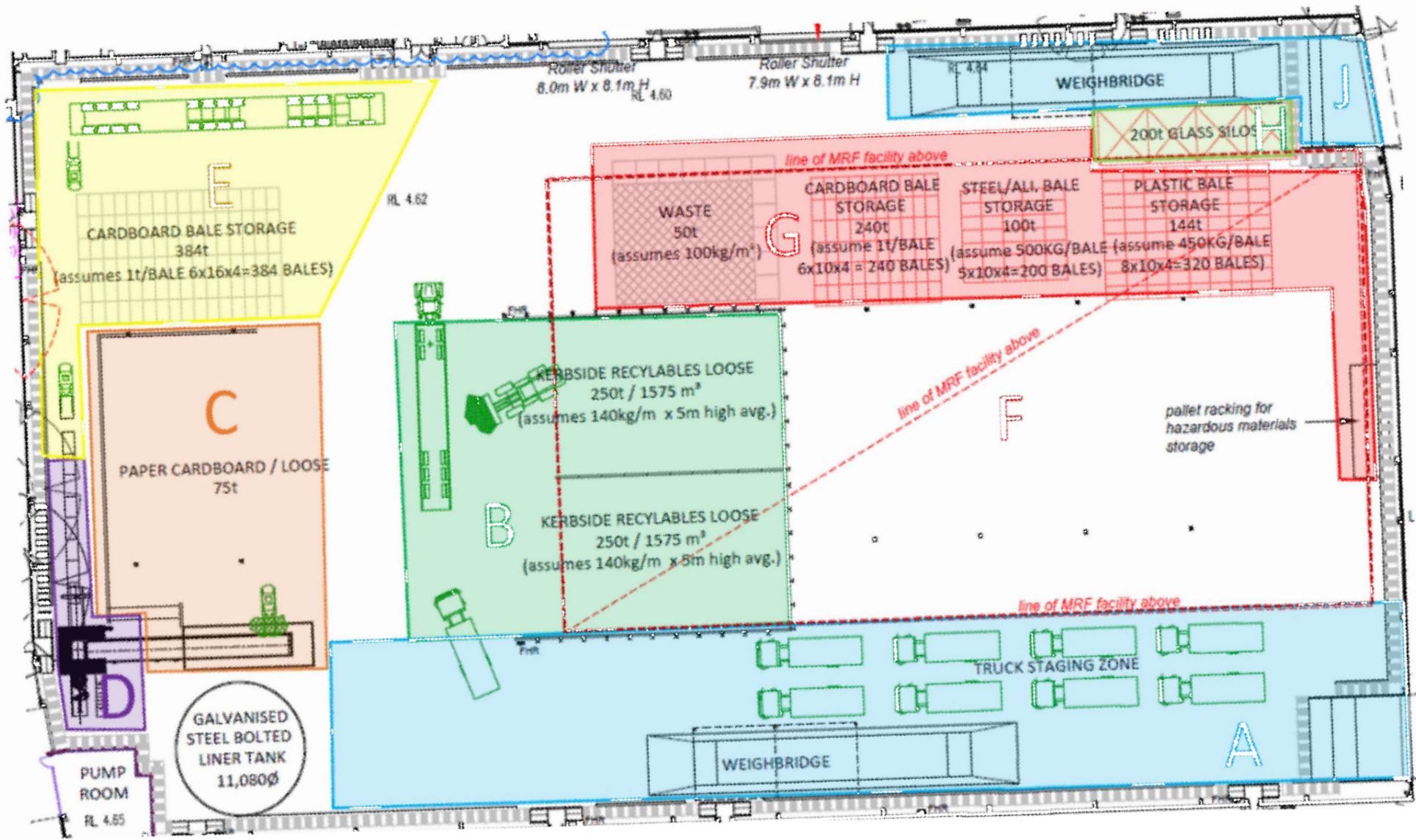
**SITE AERIAL**

*Visy Dry Recyclables Facility  
Independent Environmental Audit*

112-120 Euston Rd, Alexandria  
NSW 2015

Client: Visy

Figure  
**F2**



File: C:\Users\staby\dell\PETER J RAMSAY and ASSOCIATES PTY LTD\GIS - Documents\Projects\334.46\Map\Working\Map.dwg



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Project: 334.46  
 Date: 18/12/2022  
 Revision: Rev.00  
 Designed: AD  
 Drawn: VHO  
 Reviewed: AD



NOT TO SCALE

**LEGEND**

Data Sources  
 Site Plan Source: Visy Industries Australia Pty Ltd (Visy)

**SITE PLAN**

*Visy Dry Recyclables Facility  
 Independent Environmental Audit*

112-120 Euston Rd, Alexandria NSW 2015

Client: Visy

Figure  
**F3**

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## **Appendix A**

### **Photographs from the Audit**



# PHOTOGRAPHIC RECORD

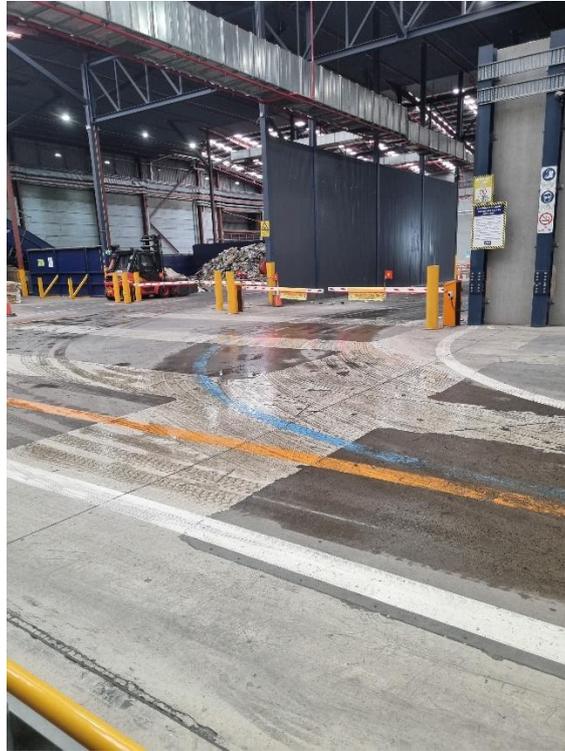
**Project:** Independent Environmental Audit, Visy, Alexandria NSW

**Reference:** 334.46

**Prepared by:** AD

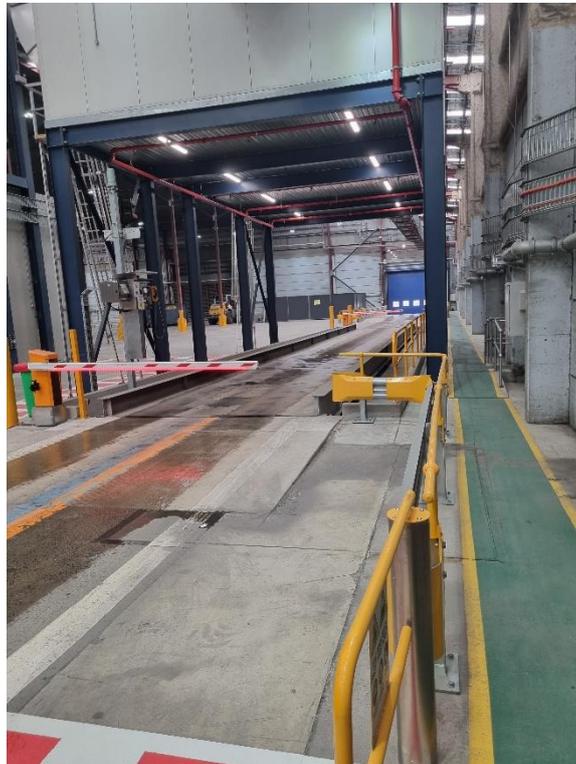
**Date:** 16/12/2022

**Reviewed by:**



**Photo ID:** 1 – Paper/cardboard receival bay (on the left)

**Date:** 20/05/2022



**Photo ID:** 2 - Entry, inbound weighbridge and staging area

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

**Reference:** 334.46

**Prepared by:** AD

**Date:** 16/12/2022

**Reviewed by:**



**Photo ID:** 3 - FCM receival bay

**Date:** 20/05/2022



**Photo ID:** 4 - Paper/cardboard bale storage

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

**Reference:** 334.46

**Prepared by:** AD

**Date:** 16/12/2022

**Reviewed by:**



**Photo ID:** 5 - Fire services system inside fire pump room

**Date:** 20/05/2022



**Photo ID:** 6 - Signage directing engines to be turned off

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

**Reference:** 334.46

**Prepared by:** AD

**Date:** 16/12/2022

**Reviewed by:**



**Photo ID:** 7 – Flammable goods storage

**Date:** 20/05/2022



**Photo ID:** 8 – Spill kit

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

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**Prepared by:** AD

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**Reviewed by:**



**Photo ID:** 9 – Hydraulic oil storage on banded pallet

**Date:** 20/05/2022



**Photo ID:** 10 – Waste gas bottles storage

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

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**Prepared by:** AD

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**Reviewed by:**



**Photo ID:** 11 – Waste car batteries storage

**Date:** 20/05/2022



**Photo ID:** 12 – Diesel storage tank

**Date:** 20/05/2022

**Project:** Independent Environmental Audit, Visy, Alexandria NSW

**Reference:** 334.46

**Prepared by:** AD

**Date:** 16/12/2022

**Reviewed by:**



**Photo ID:** 13 – Rodent bait trap

**Date:** 20/05/2022