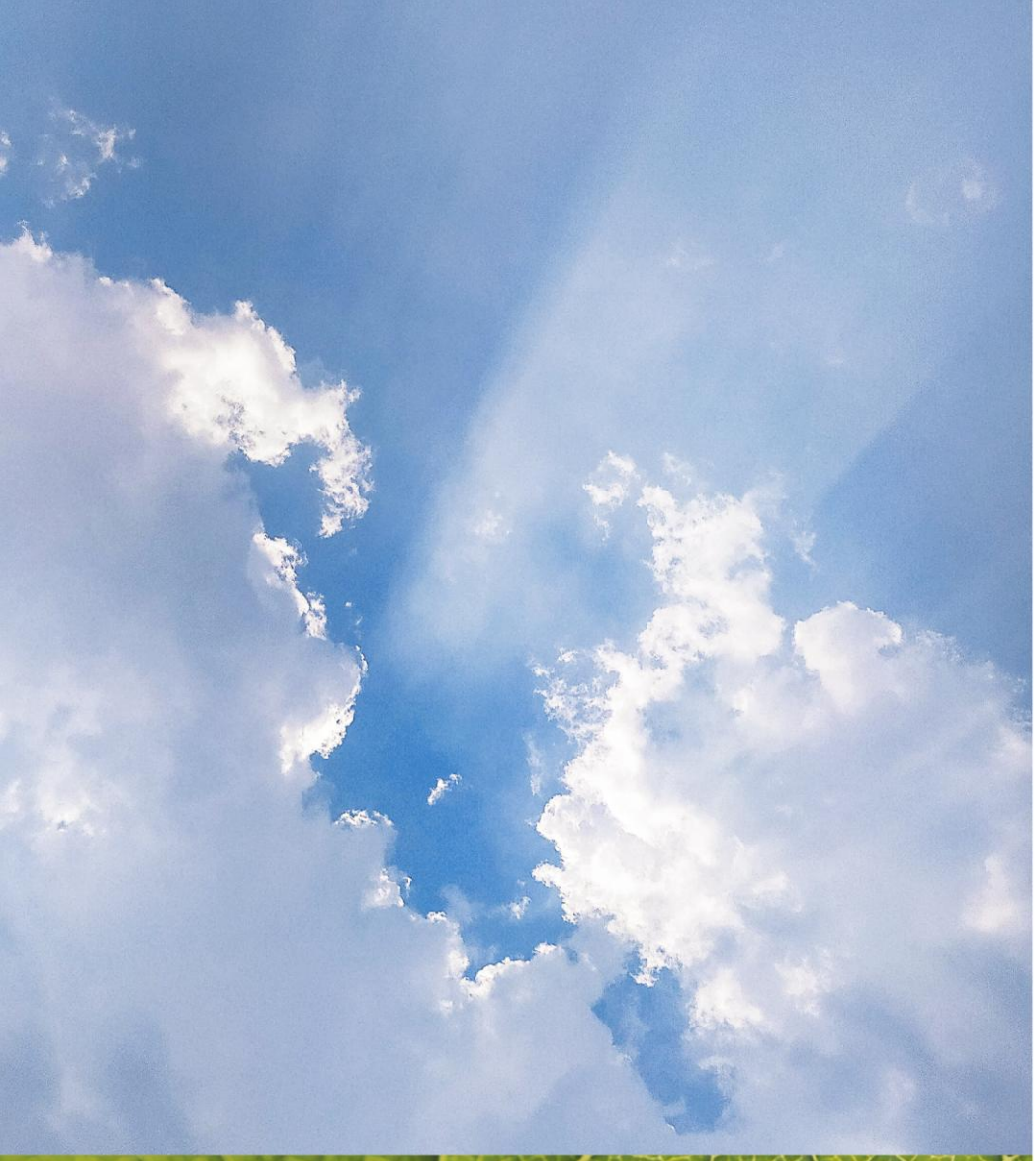

VISY GLASS OPERATIONS (AUSTRALIA) PTY LTD

INDEPENDENT AUDIT

222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland

24 September 2026

Report

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Distribution Record

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Visy Glass Operations (Australia) Pty Ltd C/- Simon Emerson Project Environment Officer, Build Run Repair	Draft	Rev.A	08/09/2026
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Visy Glass Operations (Australia) Pty Ltd C/- Simon Emerson Project Environment Officer, Build Run Repair	Revision	Rev.01	24/09/2026

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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 audit of the Visy Glass Recycling and Manufacturing Facility. The project is located within Lot 2 WD4654 and the northern section of Lot 2 SP189558 on Stapylton Jacobs Well Road, Stapylton, Queensland. This report is for submission to the Department of Climate Change, Energy, the Environment and Water and/or the National Environmental Protection Agency, and it cannot be used for any other purpose.

This report is prepared solely for the benefit of Visy Glass Operations (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 Glass Operations (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.

EXECUTIVE SUMMARY

Visy Glass Operations (Australia) Pty Ltd engaged Peter J Ramsay & Associates Pty Ltd to undertake an Independent Audit (IA) of compliance with the conditions of Approval 2022/09243 for the Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland. The Approval was issued under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) pursuant to Section 95A(3).

The IA was undertaken in accordance with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019) and assessed compliance during the period from 6 February 2023, being the date of commencement of the Action, to 12 August 2026.

Overall high level of compliance with the Approval was identified. Of the 40 conditions assessed, the table shows the outcomes:

Status	Number
Compliance	22
Non-compliance	1
Not applicable	17
Observation	0
Total	**40**

The non-compliance relates to Condition 17a, which requires publication of the Visy Offset Management Plan on Visy's website within 15 business days. It was identified that this occurred beyond the required timeframe.

The findings of the IA are that Visy has complied with the requirements of the Approval during the audit period, except for the singular non-compliance. No incidents, actual non-compliances, or potential non-compliances requiring notification under Conditions 32 to 34 were identified by Visy during the audit period. The non-compliance identified by the audit team was done so through the audit process.

LIST OF ABBREVIATIONS

DCCEEW	Department of Climate Change, Energy, the Environment and Water
EPA	National Environmental Protection Agency
IA	Independent Audit
OMP	Visy Offset Management Plan
Development Area	The location of the action, within Lot 2 WD4654 and the northern section of Lot 2 SP189558 on Stapylton Jacobs Well Road, Stapylton
Kingsholme Offset Property	The property located on Lot 906 SP280831, Kingsholme, Queensland
Offset Site	The area located within the Kingsholme Offset Property used for the establishment of offset koala habitat

1. INTRODUCTION

On 11 June 2026, Visy Glass Operations (Australia) Pty Ltd (Visy) engaged Peter J Ramsay & Associates to undertake an independent audit (IA) of the Visy Glass Recycling and Manufacturing Facility (the Facility). The IA is required by Condition 35 to 38 of the Approval (EPBC 2022/09243) issued by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) pursuant to Section 95A(3). The IA was performed in accordance with DCCEEW's guideline *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019)*.

As of 1 July 2026, approval functions under the EPBC Act are regulated by the National Environmental Protection Agency (EPA). During the audit period, the majority of Visy's regulatory interactions have been with DCCEEW. As DCCEEW is still a current government department, it is referred to throughout this report, rather than EPA.

1.1 Project Background

Visy is developing the Facility to relocate and modernise its existing glass manufacturing facility in South Brisbane. The South Brisbane facility was sought for acquisition by Queensland State Government in 2022 as part of the forthcoming Brisbane Olympics. The project comprises the development of an integrated recycled glass processing facility, container glass manufacturing plant, warehouse, and distribution centre. It is located at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland (the Site). The Site is also the location of existing can and cardboard box manufacturing facilities which are also owned and operated by Visy's associated entities.

The Facility has been designed to process approximately 145,000 tonnes of recycled glass per annum and manufacture approximately 200,000 tonnes of container glass per annum. The area where the Facility is being developed within the Site (the Development Area) is within Lot 2 WD4654 and the northern section of Lot 2 SP189558. The development of the Facility impacts approximately 11.95 ha of suitable koala habitat on Lot 2 WD4654, which comprises 4.8 ha of medium value koala habitat and 7.15 ha of low value koala habitat. The location of the Development Area relative to the Site is shown in **Figure 1**.

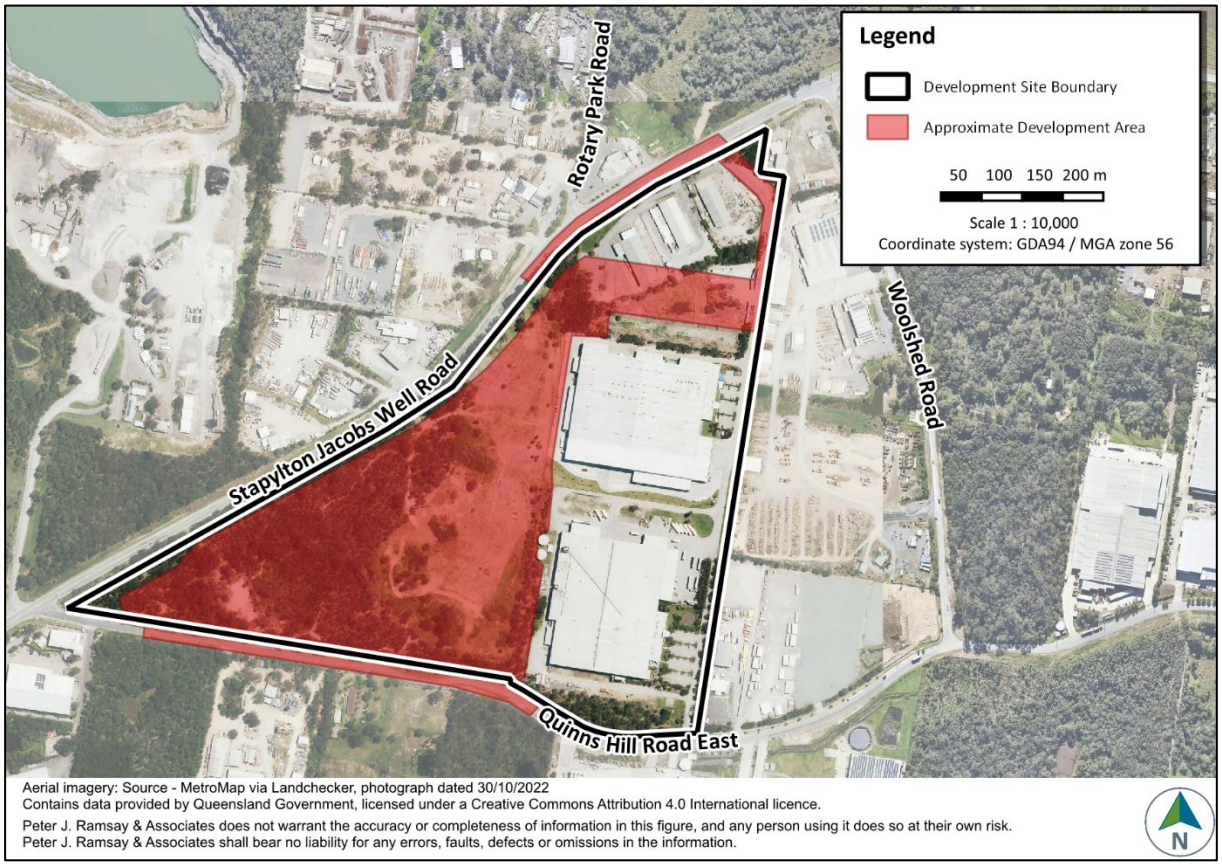


Figure 1 Location of the Development Area

To compensate for this impact, Visy is undertaking a biodiversity offset program involving the establishment, restoration, and management of koala habitat at an offset site (the Offset Site). The Offset Site is located in an area within the property located on Lot 906 SP280831, Kingsholme, Queensland. The location of the Offset Site, and its relative location to the Site, is shown in **Figure 2** and **Figure 3**, respectively.

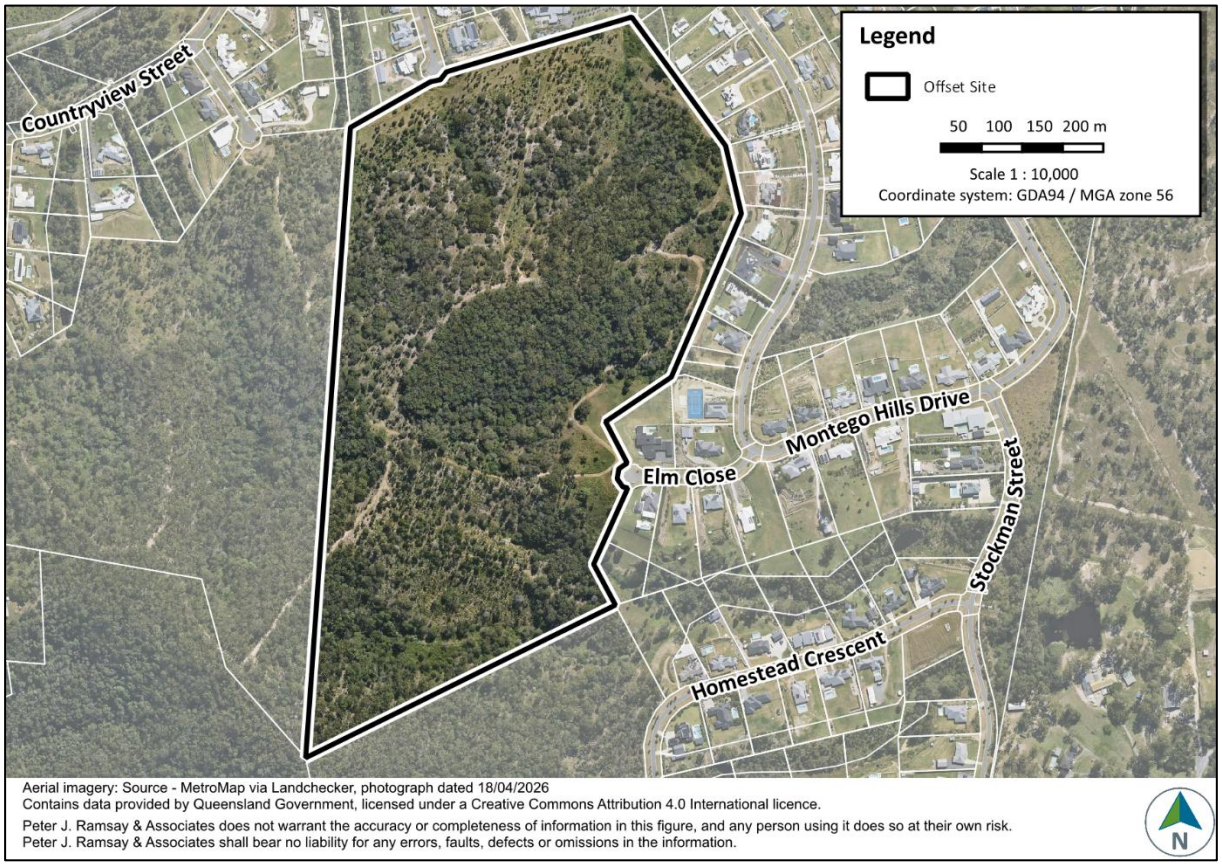


Figure 2 **Location of the Offset Site**

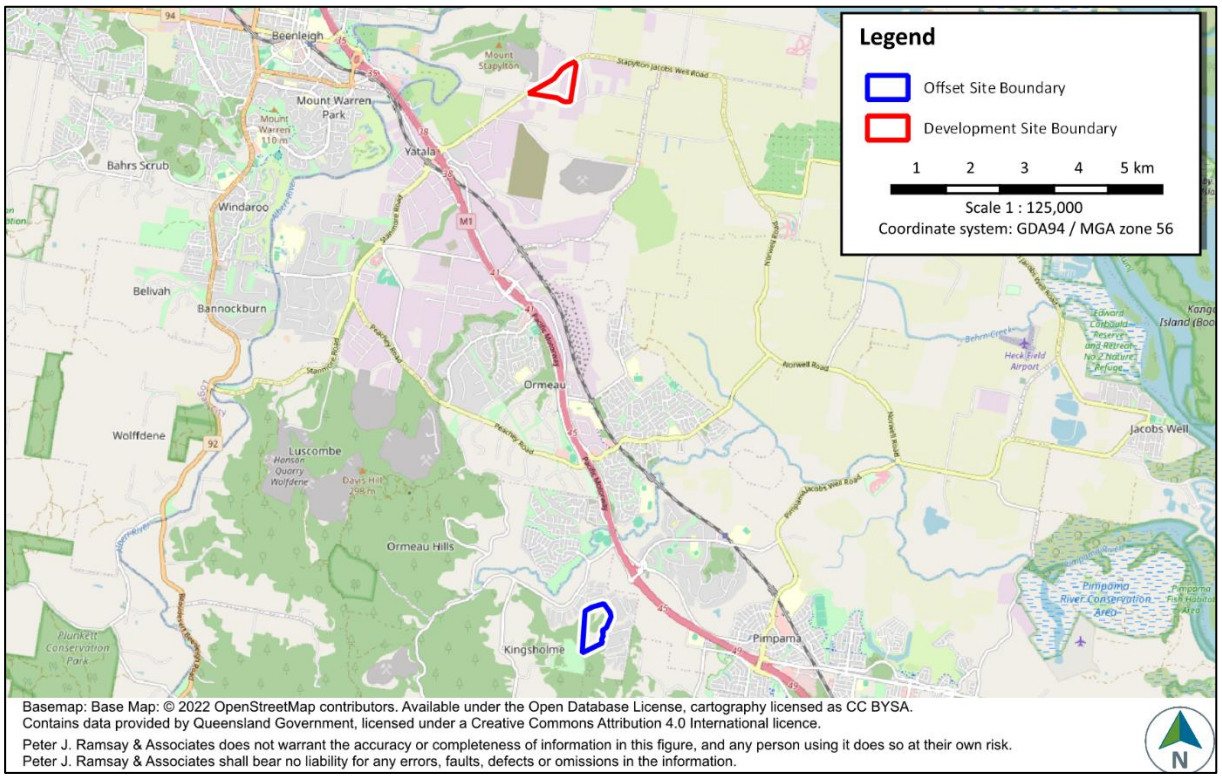


Figure 3 **Location of the Offset Site compared to the Development Site**

1.2 Approval Details

On 6 May 2022, Visy submitted an application for the referral of the development of the Facility to DCCEEW under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Visy outlined in the application that potential impacts to listed threatened species and ecological communities were identified. These were primarily associated with the clearing of koala habitat within the Development Area.

On 28 July 2022, Kylie Calhoun of DCCEEW issued a Notification of Referral Decision and Designated Proponent, whereby the status of the proposed action was that the project required assessment and approval under the EPBC Act before it could proceed. Following assessment, the project was approved under the EPBC Act by DCCEEW on 17 January 2023. The Approval contains conditions relating to the avoidance, mitigation, offsetting, monitoring, and reporting of impacts to Matters of National Environmental Significance (MNES).

The preparation and implementation of management plans, delivery of environmental offsets, compliance reporting, and the completion of IAs are also requirements under the Approval. This IA has been undertaken against the conditions of the Approval.

1.3 Audit Requirement

Condition 35 of the Approval requires Visy to ensure that an IA of compliance with the Approval conditions is conducted every three years following commencement of the Action. Conditions 36 to 38 provide the requirements for conducting of the IA, including approval of the nominated auditor, audit criteria, and audit timeframe by DCCEEW. It also requires that the preparation of an audit report be consistent with the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019)*. Specifically:

> *35. The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every three-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.*
>
> *36. For each independent audit, the approval holder must:*
>
> *a. Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.*
>
> *b. Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.*

c. *Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.*

d. *Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.*

e. *Keep every audit report published on the website until this approval expires.*

37. *Each audit report must report for the three-year period preceding that audit report.*

38. *Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019).*

This IA has been undertaken to satisfy the requirements of Conditions 35 to 38 of the Approval.

1.4 Audit Purpose

The purpose of this IA is to independently assess compliance with the conditions of the Approval during the audit period.

1.5 Audit Period

The Action commenced on 6 February 2023. In accordance with Conditions 35 and 37 of the Approval, this IA is the first IA undertaken since the commencement of the Action. Therefore, the audit period is from 6 February 2023, being the date of commencement of the Action, to 12 August 2026, the date of the audit site inspection. Visy's compliance with the Approval was assessed against the Approval conditions that were applicable during this period.

1.6 Audit Scope

The scope of the IA comprised:

- Project management and client liaison (assumes a two (2) month project duration);
- Development of audit criteria and methodology based on the Approval conditions in accordance with the *Independent Audit and Audit Report Guidelines*, including breakdown of individual condition elements and associated plan commitments;
- Liaison with Visy and DCCEEW to obtain approval of the audit team, audit criteria, and audit methodology. This includes the preparation of two letters outlining the information required to be submitted;
- Desktop review of relevant documentation, including Approval conditions, management plans, compliance reports, monitoring data, incident records, and other compliance records, as applicable;
- Site inspection of the development area and the offset site;

- Interviews with relevant personnel to confirm implementation of management measures and compliance processes;
- Assessment of compliance with each Approval condition and associated requirements, including identification of any compliances, non-compliances, and observations;
- Preparation of an independent audit report in accordance with the *Independent Audit and Audit Report Guidelines*.

1.7 Audit Team

The IA was completed by Mr Peter Ramsay in his role as Lead Auditor. Mr Ramsay was supported in his audit by Mr Nathan Williams and Mr James Linfoot, in their role as auditors. The audit team was approved by the DCCEEW on 23 June 2026 by Brendan Woolcott, Assistant Director, Environmental Audit Compliance and Enforcement Branch (ref.: EPBC 2022/09243). The letter which was submitted to DCCEEW is provided as **Appendix A** and the subsequent approval from DCCEEW is **Appendix B**.

Mr Ramsay is a chemical engineer and has a Graduate Diploma of Management and a Master of Environmental Science. He has over 30 years' experience in cleaner production, due diligence transactions, environmental auditing, environmental impact assessment, air quality, environmental management systems, site assessment and remediation. Prior to establishing Peter J Ramsay & Associates, Peter was Assistant Director of the Environment Protection Authority, Victoria.

Mr Ramsay is a Fellow of Engineers Australia and a Chartered Professional Engineer. Peter is appointed as an Environmental Auditor under the Victorian Environment Protection Act 2017 for both Industrial Facilities and Contaminated Land. He is also a Registered Professional Engineer of Queensland (RPEQ) and a Registered Professional Engineer of Victoria (RPEV). He has written numerous papers on environmental management.

Mr Williams holds a Master of Business Administration from the Melbourne Business School, and bachelor's degrees in chemical engineering and science (microbiology) and has over ten years' experience in environmental consulting. He is experienced in preparation of impact assessments for industrial air emissions, auditing and air dispersion modelling, designing and operating equipment for pollution control at industrial facilities. He has specific expertise in assessment of separation distances from industry for amenity impact.

Mr Linfoot holds a Bachelor of Engineering (Environmental) (Honours) degree. He has experience in conducting air quality and odour impact assessments. Additionally, James is experienced in EHS auditing of industrial facilities. He has contributed to numerous expert witness reports for various courts, tribunals,

and panels, as well as environmental audit reports for industrial facilities and landfills in Victoria, and post approval independent environmental audit reports for industrial facilities in New South Wales.

1.7.1 Audit Team Independence

The IA was undertaken by Mr Ramsay, Mr Williams, and Mr Linfoot of Peter J Ramsay & Associates Pty Ltd. The audit team was nominated by Visy and subsequently approved by DCCEEW.

Each member of the audit team completed a Declaration of Independence in accordance with the Guidelines. As outlined in those declarations, neither the auditors nor Peter J Ramsay & Associates Pty Ltd have any personal, financial, business, or employment relationship with Visy Glass Operations (Australia) Pty Ltd, the project, or associated persons that could reasonably give rise to an actual or perceived conflict of interest.

In addition, an Audit Report Auditor's Certification has been completed and is provided in **Appendix C**.

1.8 Audit Criteria and Methodology

The audit criteria and methodology were developed in accordance with the Guidelines and were based on the Approval conditions for the project and the template in Appendix B of the Guidelines.

The findings of the IA were graded in accordance with the compliance status descriptors provided in Appendix B of the Guidelines. These are:

Table 1 Compliance descriptors (adapted from Appendix B, DCCEEW 2019)

Status	Description
Compliance	A rating of 'compliance' is given when the auditee has complied with a condition, element of a condition, or measure required by a management plan, report or program etc.
Non-compliance	A rating of 'non-compliance' is given when the auditee has not met a condition, element of a condition, or measure required by a management plan, report or program etc.
Not applicable	A rating of 'not applicable at the time of the audit' is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced.
Observation	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

Note: The above ratings are to be applied by the approved independent auditor. They are also to be applied when measuring compliance in relation to management plans, reports, or programs etc (however described) required by conditions.

The proposed audit criteria and methodology were submitted to DCCEEW in a letter dated 8 July 2026, which is provided as **Appendix D**. The audit criteria and methodology was approved by DCCEEW by way

of letter dated 10 July 2026 by Brendan Woolcott, Assistant Director, Environmental Audit Compliance and Enforcement Branch (ref.: EPBC 2022/09243), which is provided as **Appendix E**.

2. SITE INSPECTION

An inspection of the Site for the audit was undertaken on 12 August 2026 by Mr James Linfoot, Senior Consultant PJRA. The inspection comprised a guided tour of the Offset Site and the Site led by Ms Anne Trevena of Visy. A representative from City of Gold Coast (Council) also attended the Offset Site. At the Site, an onsite interview with Ms Trevena was conducted to discuss compliance matters relevant to the audit scope.

Weather conditions at the time of the inspection were clear and dry. These conditions were suitable for undertaking the inspection and observing general operations and housekeeping.

The observations made during the inspection of the Offset Site indicated that the management actions required under the Visy Offset Management Plan (OMP) (GHD 2023) were being implemented. Evidence of weed management activities was observed throughout the Offset Site. Areas of revegetation and habitat improvement works were also observed and appeared healthy. Vegetation across the Offset Site was generally observed to comprise a diverse range of species and appeared healthy.

The representative from Council outlined the ongoing measures that were being implemented to improve habitat values such as native canopy, mid-storey, and groundcover species. These were consistent with those outlined in the OMP (GHD 2023).

At the Site, it was observed that construction activities were conducted within the Development Area, as defined in the Approval. The extent of clearing was also within this area and aligned the desktop review undertaken using historical aerial imagery and GIS software. No evidence of clearing outside the Development Area was observed.

Construction fencing was observed along the boundary of the Development Area adjacent to retained vegetation and the property boundary of the Site. The fencing appeared to be well-maintained in good condition. Access to the Development Area was controlled through site security measures and no signs of unauthorised access were observed.

The housekeeping across the Development Site, although not a specific requirement of the Approval, was observed to be good. There was no visible evidence of activities that were likely to result in impacts to retained vegetation or other risks to MNES. Based on a discussion with Visy at the Site, domestic dogs were prohibited from the Site, and none were observed during the inspection.

It is noted that the temporary fencing surrounding the Development Area did not appear to have features typically associated with koala exclusion, such as unclimbable sheeting on the fence. This is discussed in **Section 4**.

Photographs taken during the inspection of the sites are provided in **Appendix F**. An aerial image of the Development Area taken three months prior to the inspection is provided in **Figure 4**.

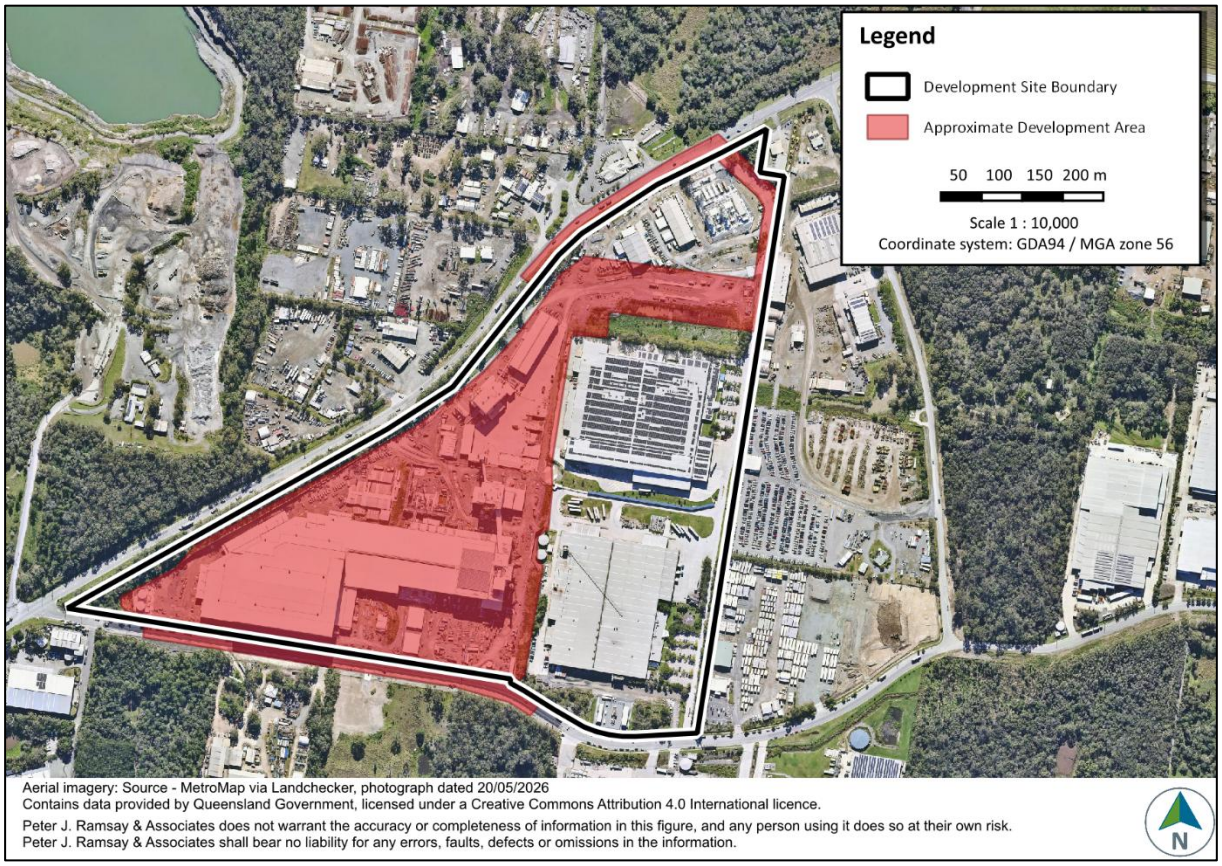


Figure 4 **Aerial photograph of the Site prior to the Site inspection**

3. DOCUMENTS AVAILABLE

In addition to the site inspections, the audit was informed by a review of documentation made available by the Approval Holder and online sources. The documentation was reviewed to the extent necessary to assess compliance with the conditions of the Approval. The documents available to the audit team and for the IA are listed below.

Table 2 Documents available for the IA

Reference	Date	In-text Reference	File Name
GHD Pty Ltd (2022) *Flood and Stormwater Assessment: Glass Manufacturing and Recycling Facility 222 & 298 Stapylton Jacobs Wells Road, Stapylton*, report number 12550313-REP-0003	01/04/2022	GHD 2022a	12550313-REP-0003-0_Flood and Stormwater Assessment.pdf
GHD Pty Ltd (2022) *Koala habitat values assessment – Tree Survey Plan: Glass Manufacturing and Recycling Facility 222 & 298 Stapylton Jacobs Wells Road, Stapylton*, report number 12550313-REP-0015	28/04/2022	GHD 2022b	12550313 Koala Habitat Assessment_Tree Survey Plan Report.pdf
GHD Pty Ltd (2022) *Matters of National Environmental Significance Assessment: Glass Manufacturing and Recycling Facility 222 & 298 Stapylton Jacobs Wells Road, Stapylton*, report number 12550313-0011	15/06/2022	GHD 2022c	12550313-REP-0011-1_Matters of National Environmental Significance Assessment.pdf
Visy Glass Operations (Australia) Pty Ltd (2022) *Print Application · Custom Portal: Visy Glass Recycling and Manufacturing Facility*, application number 01189	23/06/2022	Visy 2022a	00-2022-09243 Referral.pdf
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2022) *Notification of Referral Decision and Designated Proponent - controlled action Decision on assessment approach: Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	28/07/2022	DCCEEW 2022	2022-09243-Referral-Decision.pdf
GHD Pty Ltd (2022) *Offset Management Plan: Glass Manufacturing and Recycling Facility 222 & 298 Stapylton Jacobs Wells Road, Stapylton*, report number 12550313-REP-00	31/10/2022	GHD 2022d	Visy 2022-09243_App C - Offset Management Plan.pdf
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2023) *Notification of approval: Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	17/01/2023	DCCEEW 2023	2022-09243-Approval-Decision.pdf
Saunders Havill Group Pty Ltd (2023) *Baseline Survey Report: EPBC -*	05/05/2023	Saunders Havill Group Pty Ltd 2023	EPBC 2022-09243_Offset Baseline Survey_2023.05.pdf

Reference	Date	In-text Reference	File Name
2022/09243, report number 11510– EPBC 2022/09243			
Wild Encounters (2023) *Fauna Management Post Clearing/Vegetation Removal Report*, job number WEFS022_0015_Visy_Yatala	27/07/2023	Wild Encounters 2023	Wild Encounters_Post-Clearing Report (Fauna)_ Visy BRR Project_V2.pdf
Queensland Government Department of Resources (2023) *RE: Declaration of lot 906 on SP280831 - Council of the City of Gold Coast (the property) as an area of high nature conservation value.*, file reference 2023/002001:2053213	15/09/2023	Queensland Government Department of Resources 2023	Declaration 2023-002001 package_compiled.pdf
GHD Pty Ltd (2023) *Offset Management Plan: Glass Manufacturing and Recycling Facility 222 & 298 Stapylton Jacobs Wells Road, Stapylton*, report number 12550313-REP-01	13/10/2023	GHD 2023	EPBC 2022-09243_Offset Management Plan.pdf
Envirosphere Consulting (2023) *Baseline Koala Survey At Stage Coach Reserve Offset Area: Stage Coach Reserve Kingsholme QLD 4208 Lot 906 on SP280831*	17/11/2023	Envirosphere Consulting 2023	CoGC Stage Coach Reserve Koala Survey_171123ENSC.pdf
Envirosphere Consulting (2024) *Stage Coach Reserve Visy Offset Year One Monitoring Report: Stage Coach Reserve Kingsholme QLD 4208 Lot 906 on SP280831*	15/01/2024	Envirosphere Consulting 2024	StageCoachReserveOffsetMonitoring150124ENSC_Year 1.pdf
Tim the Tree-Man Pty Ltd (2024) *Post Clearance Report*, report number TTTMPCR1	16/02/2024	Tim the Tree-Man Pty Ltd 2024	1.1 Post clearance report Stapylton, 298 Stapylton Jacobs Well Road .pdf
Visy Glass Operations (Australia) Pty Ltd (2024) *Annual EPBC Compliance Report 2023: EPBC 2022/09243*	27/03/2024	Visy 2024	EPBC 2022-09243 Year 1 Compliance Report.pdf
Build Run Repair (2024) *Yatala Glass Project: Project Environmental Management Plan*, document number C.59150-PLN-Y08	10/05/2024	Build Run Repair 2024	C.59150-PLN-Y08-0-PROJECT ENVIRONMENTAL MANAGEMENT PLAN.pdf
Saunders Havill Group Pty Ltd (2024) *Offset Area Year 2 Assessment: Kingsholme Offset Site*, job number 11510	18/02/2025	Saunders Havill Group Pty Ltd 2025	11510 Offset Year 2 Assessment Report.pdf
Visy Glass Operations (Australia) Pty Ltd (2025) *Annual EPBC Compliance Report 2024: EPBC 2022/09243*	22/03/2025	Visy 2025	EPBC 2022-09243 Year 2 Compliance Report.pdf
Envirosphere Consulting (2025) *Stage Coach Reserve Visy Offset Year Three Monitoring Report: Stage Coach Reserve Kingsholme QLD 4208 Lot 906 on SP280831*	06/01/2026	Envirosphere Consulting 2026	StageCoachReserveOffsetMonitoring070125ENSC_Year 3.pdf
Visy Glass Operations (Australia) Pty Ltd (2026) *Annual EPBC Compliance Report Year 3 (2025): EPBC 2022/09243*	07/04/2026	Visy 2026	EPBC 2022-09243 Year 3 Compliance Report.pdf

Reference	Date	In-text Reference	File Name
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2026) *Compliance Audit Report: Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	22/05/2026	DCCEEW 2026a	2020-09243_260522_Report_Compliance Audit Report_FINAL.pdf
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2026) *Audit close out - Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	22/05/2026	DCCEEW 2026b	2022-09243_260522_Letter_Audit close out letter.pdf
Peter J Ramsay & Associates Pty Ltd (PJRA) (2026) *Re: Independent Audit in relation to the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland*, letter reference Ltr-001-334.54-Rev.00	12/06/2026	PJRA 2026a	Ltr-001-334.54-Rev.00.pdf
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2026) *Approval of Independent Auditor: Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	23/06/2026	DCCEEW 2026c	2022-09243 - 260623 - Letter to approve independent audit team.pdf
Peter J Ramsay & Associates Pty Ltd (PJRA) (2026) *Re: Independent Audit in relation to the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland*, letter reference Ltr-002-334.54-Rev.00	25/06/2026	PJRA 2026b	Ltr-002-334.54-Rev.00.pdf
National Environmental Protection Agency (EPA) (2026) *Approval of Audit Criteria and Methodology: Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD,* EPBC Act referral 2022/09243	10/07/2026	EPA 2026	2022-09243 - 260710 - Letter to approve criteria and timeframe for audit report.pdf

In addition to the documents listed above, the audit team reviewed a range of correspondence between Visy, DCCEEW, and other stakeholders. The correspondence was reviewed where necessary to verify compliance with specific approval conditions, including matters relating to notifications and submissions.

4. AUDIT FINDINGS

Visy's compliance with the Approval was assessed against all conditions of the Approval. The full list of audit findings is provided in **Appendix G**.

Overall, a high level of compliance with the Approval was identified. One non-compliance was identified during the IA. No incidents, actual non-compliances, or potential non-compliances requiring notification

under Conditions 32 to 34 were identified during the audit period. A summary of the audit findings is below. As shown in **Appendix G**, the 40 conditions of the Approval were broken down into 86 conditions and sub-conditions.

Table 3 Summary of compliance findings

Status	Number
Compliance	22
Non-compliance	1
Not applicable	17
Observation	0
Total	**40**

4.1 Non-compliances

4.1.1 Condition 17

Condition 17a of the Approval requires that where the version of a plan to be implemented is specified in the Approval, the plan must be published on the website within 15 business days of the date of approval. Specifically, it states:

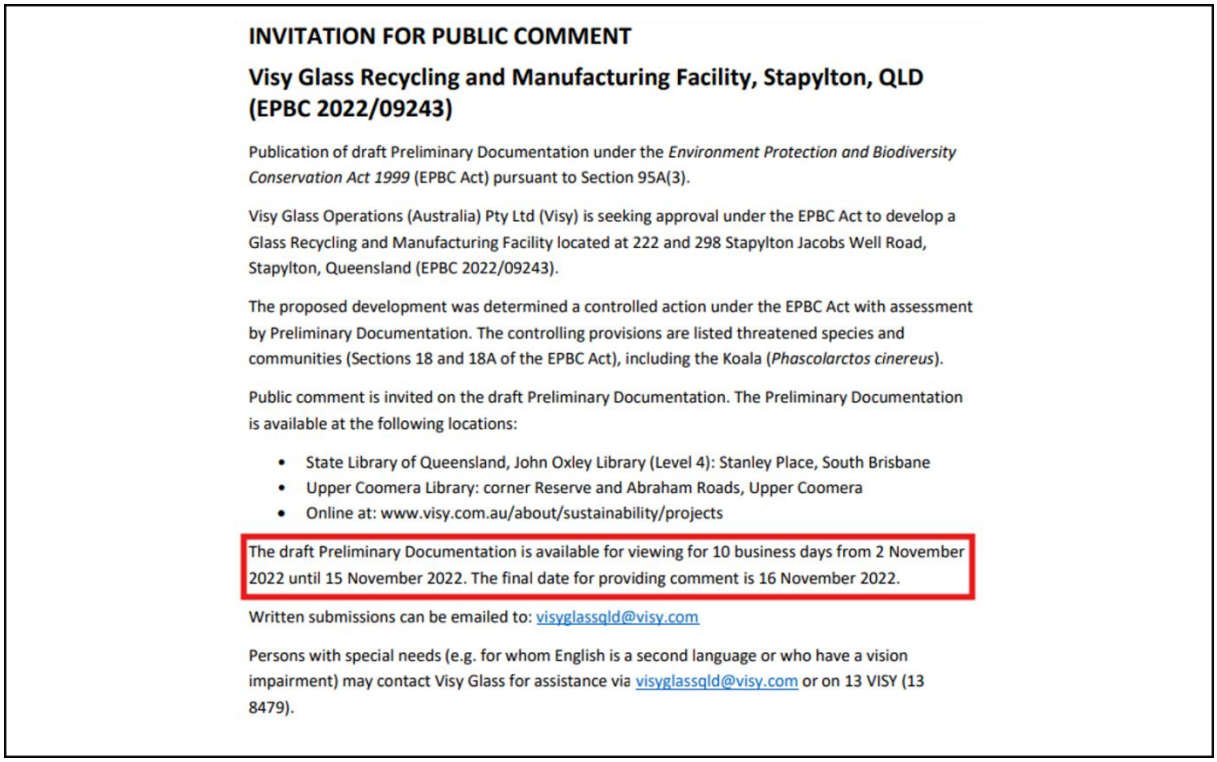
> *17. Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date:*
>
> *a. of this approval, if the version of the plan to be implemented is specified in these conditions; or*

It was identified that the OMP dated 31 October 2022 (GHD 2022d) was part of the Approval documentation. This is defined in Part C of the Approval:

> ***Visy Offset Management Plan** means the Visy Offset Management Plan 2022, prepared by GHD Pty Ltd dated 31 October 2022 and forms Appendix 5 of the Preliminary Documentation dated 21 October 2022 prepared by GHD Pty Ltd, or subsequent revised version approved by the Minister.*

A revised version of the OMP (GHD 2023) is also part of the Approval documentation.

The version of the OMP which was submitted as part of the EPBC referral application (GHD 2022d) was made publicly available during the preliminary documentation process in November 2022. This was confirmed by Visy in its Year 1 Compliance Report (Visy 2024) which states that *'The Offset Management Plan was published on the Proponent's website on 2 November 2022 (for Preliminary Documentation public notification).'* However, according to the EPBC Act Public Portal, this documentation was only required to be available on that website for a period of 10 business days.



INVITATION FOR PUBLIC COMMENT

Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)

Publication of draft Preliminary Documentation under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) pursuant to Section 95A(3).

Visy Glass Operations (Australia) Pty Ltd (Visy) is seeking approval under the EPBC Act to develop a Glass Recycling and Manufacturing Facility located at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland (EPBC 2022/09243).

The proposed development was determined a controlled action under the EPBC Act with assessment by Preliminary Documentation. The controlling provisions are listed threatened species and communities (Sections 18 and 18A of the EPBC Act), including the Koala (*Phascolarctos cinereus*).

Public comment is invited on the draft Preliminary Documentation. The Preliminary Documentation is available at the following locations:

- State Library of Queensland, John Oxley Library (Level 4): Stanley Place, South Brisbane
- Upper Coomera Library: corner Reserve and Abraham Roads, Upper Coomera
- Online at: www.visy.com.au/about/sustainability/projects

The draft Preliminary Documentation is available for viewing for 10 business days from 2 November 2022 until 15 November 2022. The final date for providing comment is 16 November 2022.

Written submissions can be emailed to: visyglassqld@visy.com

Persons with special needs (e.g. for whom English is a second language or who have a vision impairment) may contact Visy Glass for assistance via visyglassqld@visy.com or on 13 VISY (13 8479).

Figure 5 Draft Preliminary Documentation Invitation for Public Comment

The evidence reviewed indicates that the original version of the OMP (GHD 2022d) was not published on Visy's website until 4 September 2023, which is more than 15 business days after the approval date of 17 January 2023. The evidence reviewed was an internal email dated 4 September 2023 arranging for publication of the OMP (GHD 2022d) to the Visy website. Therefore, Condition 17a was assessed as non-compliant.

It is noted that the non-compliance is administrative and does not appear to have resulted in adverse environmental impacts or affected implementation of the OMP in general. Further, the revised OMP, as required by the Approval, was completed on 13 October 2023 (GHD 2023). It was submitted to DCCEEW on 16 October 2023 and published on the Visy website on 1 November 2023. Therefore, the revised OMP (GHD 2023) complied with its submission and publication requirements.

4.2 Other Comments

4.2.1 Condition 2

4.2.1.1 Koala Fencing

Condition 2d requires that temporary fencing around construction areas be constructed to prevent Koalas from entering any area where the construction is taking place. Further, Condition 2h requires the implementation of the Koala-sensitive Design Guideline in all parts of the development area adjacent to koala habitat. Specifically, Condition 2 states:

> *2. To minimise the risk of injury or death to the Koala (Phascolarctos cinereus) within the development area, the approval holder must:*
>
> *a. ensure that a suitably qualified fauna spotter catcher who is given sufficient authority to delay and/or cease any clearing and construction is present during all clearing, to ensure Koalas have safely vacated the area of works before the Koala habitat is cleared,*
>
> *b. clear only in accordance with the Nature Conservation (Koala) Conservation Plan 2017 (Qld), so as to allow Koalas to safely relocate out of any area to be cleared and into nearby appropriate areas of Koala habitat,*
>
> *c. implement sequential clearing during clearing,*
>
> *d. install temporary or permanent fencing around any area of construction work after clearing and prior to the commencement of construction in that area, so as to prevent Koalas entering any area where construction is taking place,*
>
> *e. ensure that all temporary fencing around any construction area required by condition 2(d) remains in place until permanent fencing is installed,*
>
> *f. ensure that any permanent fencing required by condition 2(d) and 2(e), and is within 100 meters of Koala habitat, must be Koala exclusion fencing,*
>
> *g. prohibit workers bringing domestic dogs into the development area during clearing and construction, and*
>
> *h. implement the Koala-sensitive Design Guideline in all parts of the development area that are adjacent to Koala habitat.*

During the inspection of the Site, temporary construction fencing was observed around the Development Area. The fencing observed did not clearly demonstrate features typically associated with implementation of the Koala-sensitive Design Guideline. This includes features such as unclimbable sheeting on the habitat side of the fence.

It is noted that there is some uncertainty regarding the relationship between Conditions 2d, 2e, 2f, and 2h. Condition 2f requires permanent fencing within 100 m of koala habitat to be koala exclusion fencing.

However, it is not clear whether temporary fencing installed under Conditions 2d and 2e must also koala exclusion fencing, as defined in the Koala-sensitive Design Guideline.

The temporary construction fencing observed at the Site, in comparison to koala exclusion fencing as defined in the Koala-sensitive Design Guideline, is shown in **Figure 6**. It is noted that the Koala-sensitive Design Guideline states that *'exclusion fencing can be temporary'* and it is suitable for *'construction sites where activities or works may cause harm to koalas such as vegetation clearing'*.

Figure 6 Temporary fencing at the Site (left) and koala exclusion fencing example (right)

This matter was subsequently clarified by EPA as follows:

For clarification on condition 2:

- *Condition 2d only requires fencing that prevents koalas entering construction areas.*
- *Condition 2f specifically requires permanent fencing to be koala exclusion fencing.*
- *Condition 2h, may be intended to apply to the final design of the facility requirement rather than temporary construction fencing.*

It is therefore considered that Condition 2h is not applicable as it relates to the design of the fencing, rather than temporary construction fencing.

4.2.1.2 Domestic Dogs

It is also noted that Condition 2g requires workers to be prohibited from bringing domestic dogs into the Development Area during clearing and construction. No domestic dogs were observed during the Site inspection. Discussions with Visy also indicated that domestic dogs are not permitted onsite and no incidents involving domestic dogs were identified during the audit period. This is captured within the Project

Environmental Management Plan for the Site (Build Run Repair 2024). Table 7-10 of that document states that *'Employees will not bring domestic animals to the site'*. Therefore, Condition 2g is considered compliant.

However, no induction material, signage, or other means of communicating the rule for domestic dogs was observed. The requirement to prevent bringing domestic dogs onto the Development Area should be communicated to workers and visitors. This could be achieved in the induction to the Site or by way of fence signage at entrances to the Site.

5. ASSESSMENT OF COMPLIANCE WITH VISY OFFSET MANAGEMENT PLAN

Condition 3 of the Approval requires Visy to commence implementation of the Visy Offset Management Plan (OMP) prior to clearing within the Development Area and continue implementation of the OMP for the life of the Approval. Specifically, it states:

> *3. To compensate for the clearing of 11.95 hectares of Koala habitat, the approval holder must, prior to any clearing within the development area, commence implementing the Visy Offset Management Plan and continue to implement the Visy Offset Management Plan for the life of this approval.*

It is noted that compliance with Condition 3 has been assessed in **Appendix G**. However, a summary of the review that informed the compliance assessment is provided below.

Table 4 Summary of OMP implementation

OMP Aspect	Assessment
Legal security of offset area maintained.	• The Offset Site was and continues to be legally secured (Queensland Government Department of Resources 2023) • Signage with information on the project was observed at the main entry points to the Offset Site during the site inspection (Photo 1, 5, 6, Appendix F). • No evidence was identified of incompatible land uses within the Offset Site.
Revegetation and regeneration program implemented.	• Revegetation and regeneration works were observed across the Offset Site (Photo 2, Appendix F). • Vegetation appeared healthy and comprised a diverse range of native species. • Year 1 and Year 3 monitoring reports (Envirosphere Consulting 2024, Envirosphere Consulting 2025) show that photo and drone monitoring in years 1 and 3 were undertaken.
Weed management program implemented.	• Evidence of weed management activities was observed during the inspection of the Offset Site (Photo 3, Appendix F). • Baseline weed surveys and ongoing monitoring have been completed. • Year 1 and Year 3 monitoring reports (Envirosphere Consulting 2024, Envirosphere Consulting 2025) show the ongoing management actions being implemented by Council during those periods.

OMP Aspect	Assessment
Pest animal management program implemented.	• No evidence of pest animals was observed during the inspection of the Offset Site. • Year 1, Year 2, and Year 3 monitoring reports (Envirosphere Consulting 2024, Saunders Havill Group Pty Ltd 2025, Envirosphere Consulting 2025) show the ongoing management actions being implemented by Council during those periods.
Fire management program implemented.	• Evidence of fire management activities including burns was observed during the inspection of the Offset Site (Photo 4, Appendix F). • Year 1 and Year 3 monitoring reports (Envirosphere Consulting 2024, Envirosphere Consulting 2025) show the ongoing management actions being implemented by Council during those periods.
Monitoring and reporting program implemented.	• Baseline monitoring requirements were completed. • Year 1 monitoring and Year 3 monitoring reports (Envirosphere 2024, Envirosphere 2025) were completed in accordance with the OMP.
Progress toward performance indicators and completion criteria demonstrated.	• The Offset Area Year 2 Assessment (Saunders Havill Group Pty Ltd 2025) found that *"it is considered likely that conditions 4) c, 11 & 12 are likely to be achieved during the specified timeframes within the approval."*

6. CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

The following conclusions are made:

- The IA assessed compliance with the conditions of the Approval for the period from 6 February 2023 to 12 August 2026;
- Overall, a high level of compliance with the Approval was identified;
- Of the 40 conditions assessed, 22 were considered compliant, 1 was considered non-compliant, and 17 were not applicable during the audit period;
- The non-compliance relates to the timeframe requirements for publication of the original Offset Management Plan (GHD 2022d) under Condition 17a. No adverse environmental impacts were identified as a result of the non-compliance;
- Except for the matters identified within **Section 4**, it is concluded that Visy has generally complied with the requirements of the Approval during the audit period.

6.2 Recommendations

The following recommendations are made:

- Future plans required to be published under the Approval should be uploaded to the website within the timeframes required by the Approval. It is noted that the current version of the OMP (GHD 2023) complies with this recommendation and reporting requirement; and
- The prevention of domestic dogs at the Site should be documented in induction material for the Site or signage prohibiting dogs should be placed on fencing at entrances to the Site.

Appendix A

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Environment, Health &
Safety, and Sustainability
Consultants

PETER J RAMSAY
& ASSOCIATES

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Sydney
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Brisbane
+61 7 3285 6655

12 June 2026

Mr Simon Emerson
Project Environment Officer
Visy Glass Operations (Australia) Pty Ltd
13 Reo Crescent
CAMPBELLFIELD VIC 3061
simon.emerson@visy.com

PJRA Reference: Ltr-001-334.54-Rev.00

Dear Simon,

Re: Independent Audit in relation to the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland

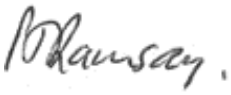
I refer to the Independent Audit (IA) of the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland, that Visy Glass Operations (Australia) Pty Ltd (Visy) has engaged me to undertake. My team and I are experienced in undertaking Independent Audits in response to government requirements. I am also appointed as an Environmental Auditor by the Environment Protection Authority Victoria for both Industrial Facilities and Contaminated Land under the Environment Protection Act 2017 (Vic).

Further to my engagement, I am pleased to submit a declaration of independence for myself and my audit team (**Attachment A**), curriculum vitae for myself (**Attachment B**), and curriculum vitae for the proposed audit team members (**Attachment C**). As outlined in my proposal of 14 May 2026, the proposed audit team members are Mr. Nathan Williams, Senior Consultant, and Mr. James Linfoot, Senior Consultant.

Mr. Williams holds a Master of Business Administration from the Melbourne Business School, and Bachelor degrees in chemical engineering and science (microbiology) and has over ten years' experience in environmental consulting. He is experienced in conducting independent audits throughout Australia as a member of audit teams led by me. He also has experience preparing impact assessments for industrial air emissions, air dispersion modelling, designing and operating equipment for pollution control at industrial facilities.

Mr. Linfoot holds a Bachelor of Engineering (Environmental) (Honours) degree. He has experience in air quality and odour impact assessments, regulatory approvals and compliance, contaminated land, and environmental investigations. He is also experienced in conducting independent audits of industrial facilities throughout Australia as a member of audit teams led by me.

Yours sincerely,



Peter J Ramsay

Enclosed:

Attachment A	Declaration of Independence for the Auditor and Audit Team Members
Attachment B	Curriculum Vitae of Peter Ramsay
Attachment C	Curriculum Vitae of Nathan Williams and James Linfoot

Attachment A

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Declaration of Independence

PETER J RAMSAY & ASSOCIATES

Job Number:	334.54
Client:	Visy Glass Operations (Australia) Pty Ltd
Date:	12 June 2026
Project Title:	Independent Audit in relation to the Visy glass recycling and manufacturing facility
Address:	222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Name:	Peter Ramsay

I, *Peter Ramsay*[1] of *Peter J Ramsay & Associates Pty Ltd* at *Level 10, 222 Kings Way, South Melbourne Victoria*, declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *Visy Glass Operations (Australia) Pty Ltd*, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)*.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

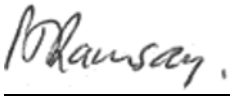
I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none): *nil*

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none): *nil*

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships): *As provided in **Attachment B**.*

In making this declaration, I am aware that section 491 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed: 

Full name (please print): Peter J Ramsay

Organisation (please print): Peter J Ramsay & Associates Pty Ltd

Date: 12/06/2026

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.

2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Declaration of Independence

PETER J RAMSAY & ASSOCIATES

Job Number:	334.54
Client:	Visy Glass Operations (Australia) Pty Ltd
Date:	12 June 2026
Project Title:	Independent Audit in relation to the Visy glass recycling and manufacturing facility
Address:	222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Name:	Nathan Williams

I, *Nathan Williams*[1] of *Peter J Ramsay & Associates Pty Ltd* at *Level 10, 222 Kings Way, South Melbourne Victoria*, declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *Visy Glass Operations (Australia) Pty Ltd*, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)*.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

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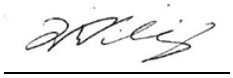
Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none): *nil*

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships): *As provided in **Attachment C**.*

In making this declaration, I am aware that section 491 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed: 

Full name (please print): Nathan Williams

Organisation (please print): Peter J Ramsay & Associates Pty Ltd

Date: 12/06/2026

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.

2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Declaration of Independence

PETER J RAMSAY & ASSOCIATES

Job Number:	334.54
Client:	Visy Glass Operations (Australia) Pty Ltd
Date:	12 June 2026
Project Title:	Independent Audit in relation to the Visy glass recycling and manufacturing facility
Address:	222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Name:	James Linfoot

I, *James Linfoot*[1] of *Peter J Ramsay & Associates Pty Ltd* at *Level 10, 222 Kings Way, South Melbourne Victoria*, declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *Visy Glass Operations (Australia) Pty Ltd*, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)*.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

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Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none): *nil*

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships): *As provided in **Attachment C**.*

In making this declaration, I am aware that section 491 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed:

Full name (please print): James Linfoot

Organisation (please print): Peter J Ramsay & Associates Pty Ltd

Date: 12/06/2026

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.

2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Attachment B

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PETER J RAMSAY & ASSOCIATES

Peter Ramsay
Managing Director

Fields of Competence

- Lead environmental auditing of industrial facilities.
- Environmental impact assessment.
- Ecological risk assessment.
- Environmental management plans for industrial facilities.
- Cleaner production and waste minimisation.
- Waste Water treatment and regulatory compliance.
- Expert witness and legal representation.
- Renewable energy.
- Sustainability reporting.
- Greenhouse gas assessment.
- Permitting for industrial facilities.
- Air Quality assessment and management.

Experience Summary

Peter has been Managing Director and Principal Consultant of Peter J Ramsay & Associates Pty Ltd since February 1988. He has over 30 years' experience in environmental auditing, air quality, cleaner production, due diligence audits, waste management and environmental assessment.

Peter is a Chartered Professional Engineer and a Fellow of Engineers Australia. He is appointed as an Environmental Auditor under the Victorian Environment Protection Act 2017 for both contaminated land and industrial facilities. He is also a registered professional engineer in Queensland (RPEQ – environmental).

Knowledge of law, policies and best practice processes in relation to auditing, including:

- Design and implementation of sampling strategies, and mitigation of pollution impacts.
- Assessment of gaseous, volatile emissions, and airborne particles.
- Identification of air pollution sources and assessment of their impacts to human health and amenity.
- Development of risk mitigation strategies for industrial facilities.
- Independent Environmental Audits.
- Wastewater treatment.

Education

Diploma of Chemical Engineering, RMIT, 1970.

Graduate Diploma of Management, RMIT, 1973.

Master of Environmental Science, Monash University, 1978.

Language Proficiency

(None, Fair, Moderate, Excellent, Native)

- English: Speak/Read/Write - Native/Native/Native

Professional Affiliations and Registrations

- Fellow of Engineers Australia (FIEAust).
- Past Chairman of the Environmental Branch, Victorian Division, Engineers Australia, 1987/88.
- Member of Clean Air Society of Australia and New Zealand.
- Waste Management & Resource Recovery Australia.
- Australian Land & Groundwater Association.
- Australian Environment Business Network
- Member of Air & Waste Management Association (USA).

Key Projects

Air quality management and assessment for industry.

Odour control and impact assessment for industrial facilities ranging from wastewater treatment plants to manufacturing facilities.

Development applications for approval of new industrial facilities.

Environmental audits of impacts to air, water, and groundwater of industrial facilities.

Independent Environmental Audits of industrial facilities.

Expert evidence on air emissions (odour and dust) and separation distances from industry.

INOGEN ALLIANCE

Key Projects (cont.)

Audits of wastewater treatment plants.

Cleaner production and waste minimisation strategies for industries.

Environmental due diligence for mergers and acquisitions.

Management of Phase I and II environmental assessments of soil and groundwater at large scale industrial facilities.

Waste to energy projects and greenhouse gas assessments.

Regulatory permitting for new and existing industrial facilities.

Environmental impact assessment for new facilities.

Hazard and Operability Studies (HAZOPS) to determine regulatory compliance.

Environmental risk assessment to determine regulatory compliance.

Environmental Health and Safety (EHS) audits.

Publications

- Ramsay, P.J. *Sustainable Challenges Facing Business*, Paper presented at the Environment Essentials Conference, Australian Environment Business Network (AEBN), Parkville, 16 September 2004.
- Ramsay, P.J. Property Council of Australia *Guide to Due Diligence*, author of Environmental section of the 2003 (current) edition, Brisbane 2003.
- Ramsay, P.J. Property Council of Australia Publication *Guide to Due Diligence*, Author of Environmental section, Brisbane, 1998.
- Ramsay, P.J. and Van Schoten, M.W. *The Critical Need for Quality Assurance in Contaminated Site Assessment*, Paper presented at the 3rd National Hazardous Solid Waste Convention, Darling Harbour, Sydney, 26-30 May 1996.
- Ramsay, P.J. and Wareham, A.E. *The Role of Buffer Zones in Environmental Management*, Symposium on Siting, Engineering and Management of Hazardous Industries, Institution of Engineers Australia, Melbourne, Australia, 13 and 14 April 1983.
- Ramsay, P.J. *Report on Study: Fluoride Levels in Vegetation and Ambient Air in the Portland Area*, Environment Protection Authority, Publication 148, Melbourne, Australia, 1982.
- Ramsay, P.J. *Stationary Source Control in Victoria: The benefits of Licensing and Monitoring*, 50th Annual Conference of Australian Institute of Health Surveyors, Victoria Division, Moonee Valley, Melbourne, Australia, 22 May 1981.
- Ramsay, P.J. *Air Pollution Control of Aluminium Smelters in North America. A Review of Emission Limits and Control Strategies for Aluminium Smelters in North America with implications for Victoria*, Environment Protection Authority, Publication 114, Melbourne, Australia, 1980.
- Hulme, J. and Ramsay, P. *Industrial Pollution and Community Attitudes*, Monash University. Victoria, Australia, 1978

Attachment C

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PETER J RAMSAY & ASSOCIATES

Nathan Williams
Senior Consultant

Fields of Competence

- Environmental auditing of industrial facilities
- Odour environmental risk assessment
- Design, installation and operation of pollution abatement equipment for industrial facilities
- Financial modelling of environmental liabilities and impact of implementing sustainability policies
- Preparation of waste management plans
- Occupation health and safety inspections
- Environmental health and safety compliance
- Due diligence for environmental impacts
- Environmental permitting for new builds and modifications to existing facilities

Experience Summary

Nathan is a Senior Consultant with Peter J Ramsay & Associates Pty Ltd. He is a chemical engineer with over 14 years' experience in environmental consulting. He has also on projects to audit the design, construction and operation of industrial facilities.

Nathan is an assistant to Mr Peter J Ramsay in his function as an Environmental Auditor appointed under the *Environment Protection Act 2017* for contaminated land and industrial facilities.

Contribution to post approval independent environmental audit reports for industrial facilities in New South Wales as an audit team member for Peter Ramsay.

Education

Bachelor of Engineering (Chemical) with honours, University of Melbourne, 2008

Bachelor of Science (Microbiology), University of Melbourne, 2008

Masters of Business Administration, Melbourne Business School, 2014

Language Proficiency

(None, Fair, Moderate, Excellent, Native)

- English: Speak/Read/Write – Native/Native/Native

Professional Affiliations and Registrations

- Member, Clean Air Society of Australia and New Zealand (CASANZ)
- Member, Australasian Land and Groundwater Association (ALGA)
- Member, Australian Environment Business Network (AEBN)

Key Projects

Assist with the Environmental Audit performed under the *Environment Protection Act 1970* of a $53 million upgrade to the Sunbury Recycled Water Plant.

Facilitation and coordination of updates to the global legal register produced by Regscan™ for biannual updates to environmental and work health and safety legislation in Australia, New Zealand and the South Pacific.

Reporting for implementation and financial impact of adopting a zero waste-to-landfill program for local operations for an international cosmetics company.

Preparation of works approval application for development of an industrial scale worm farm wastewater treatment plant, first application of this technology in Australia.

Assistance with preparation of dust and amenity impact assessment for appropriate separation distances for the Shenstone Park PSP.

Preparation of expert evidence and appearance at Victorian Civil Administrative Tribunal as an expert on air quality.

Audit of paper mill operation in Millicent, SA for compliance with Australian and South Australian regulatory requirements.

Conduct of air quality assessment for a concrete batching plant to support a planning permit application and assessment of design of the facility against best practice.

Preparation of an Environmental Management Plan to address dust management during construction and operation phases of the facility.

INOGEN ALLIANCE

PETER J RAMSAY & ASSOCIATES

James Linfoot
Senior Consultant

Fields of Competence

- Project management and contractor liaison
- Environment, health, safety, and sustainability (EHS&S) advice, compliance, and auditing
- Preliminary and Detailed Site Investigations
- Due Diligence
- Air quality and odour assessments
- Environmental management plans
- Environmental auditing of industrial facilities
- Permissions, permission exemptions and designations for industrial facilities
- Development applications
- Air dispersion modelling
- Mapping and Geographic Information Systems (GIS)

Experience Summary

James is a Senior Environmental Consultant with Peter J Ramsay & Associates. He is an Environmental Engineer with broad knowledge of industrial facilities and contaminated land. In particular, James has experience in conducting air quality and odour impact assessments, buffer assessments, environmental audits, EHS audits, and regulatory approval applications. He has also prepared ESG and EHS legal registers.

James has been successfully screened on an odour panel in accordance with AS/NZS: 4323.3:2001 *'Stationary source emissions – determination of odour concentration by dynamic olfactometry'.*

Education

Bachelor of Engineering (Environmental) (Honours) Honours 1st Class - RMIT University 2022

Professional Affiliations and Registrations

Member, Clean Air Society of Australia and New Zealand (CASANZ)

Member, Australasian Land & Groundwater Association (ALGA)

Language Proficiency

(None, Fair, Moderate, Excellent, Native)

- English: Speak/Read/Write – Native/Native/Native

Key Projects

Preparation of legal registers for tracking of environmental legislative requirements (including, water, air, waste, noise) in all states of Australia and New Zealand.

Provision of advice on environment, health, safety, and sustainability (EHS&S) compliance for a variety of clients.

Preparation of Environment Protection Authority permission (e.g., licence) applications.

Assessment of separation distance for the potential adverse amenity impact from various industrial facilities on sensitive land uses.

Provision of support to Mr Peter Ramsay for various environmental audits of industrial facilities in Victoria.

Provision of support to Mr Peter Ramsay for various Post Approval Independent Environmental Audits for industrial facilities in New South Wales as an audit team member.

Provision of support to Mr Peter Ramsay for various expert witness cases regarding buffers, odour, and contaminated land.

Assisted with environmental field work and on-site monitoring of third-party contractors during a large-scale remediation project for soil containing asbestos.

Completion of numerous air quality and odour impact assessments in Victoria and New South Wales, including conducting air dispersion modelling using AERMOD.

Undertaking of field odour surveillance in accordance with EPA publication 1881 *Guidance for Field Odour Surveillance* for a variety of clients.

Review of construction reports and quality assurance data for the construction of various landfills in Victoria.

INOGEN ALLIANCE

Appendix B

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Australian Government
Department of Climate Change, Energy, the Environment and Water

Our ref: EPBC 2022/09243

Simon Emerson
Project Environment Officer
Visy Glass Operations (Australia) Pty Ltd
13 Reo Crescent
Campbellfield, VIC 3061

Dear Simon

Approval of Independent Auditor
Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)

I refer to your correspondence dated 15 June 2026, nominating an independent audit team from Peter J Ramsay & Associates for the audit of the Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243).

I note the Visy Glass Recycling and Manufacturing Facility was approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 17 January 2023 and has 40 conditions of approval.

I approve the nominated audit team from Peter J Ramsay & Associates to conduct the independent audit.

I request that you submit the draft audit criteria and propose a timeframe for submitting the audit report to the Department of Climate Change, Energy, the Environment and Water no later than 20 business days from the date of this letter for approval as required under condition 36 of the EPBC 2022/09243 approval. Please do not commence the independent audit prior to receiving written approval of the audit criteria from the department.

If you have any questions regarding this matter, please contact Jacinta Wilson at audit@dcceew.gov.au.

Yours sincerely

Brendan Woolcott
Assistant Director, Environmental Audit
Compliance and Enforcement Branch
23 June 2026

Appendix C

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Audit Report
Auditor's Certification

PETER J RAMSAY & ASSOCIATES

Job Number:	334.54
Client:	Visy Glass Operations (Australia) Pty Ltd
Date:	9 September 2026
Project Title:	Independent Audit in relation to the Visy glass recycling and manufacturing facility
Address:	222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Name:	Peter Ramsay

I, *Peter Ramsay*[1] of *Peter J Ramsay & Associates Pty Ltd* at *Level 10, 222 Kings Way, South Melbourne Victoria*, certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signed: P Ramsay.

Full name (please print): Peter J Ramsay

Organisation (please print): Peter J Ramsay & Associates Pty Ltd

Date: 09/09/2026

Appendix D

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Environment, Health &
Safety, and Sustainability
Consultants

PETER J RAMSAY
& ASSOCIATES

Melbourne
+61 3 9690 0522

Sydney
+61 2 8338 1655

Brisbane
+61 7 3285 6655

25 June 2026

Mr Simon Emerson
Project Environment Officer
Visy Glass Operations (Australia) Pty Ltd
13 Reo Crescent
CAMPBELLFIELD VIC 3061
simon.emerson@visy.com

PJRA Reference: Ltr-002-334.54-Rev.00

Dear Simon,

Re: Independent Audit in relation to the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland

I refer to the Independent Audit (IA) of the Visy glass recycling and manufacturing facility at 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland, that Visy Glass Operations (Australia) Pty Ltd (Visy) has engaged me to undertake. The Department of Climate Change, Energy, the Environment and Water (DCCEEW/Department) approval number for the project is EPBC 2022/09243.

On 23 June 2026, Brendan Woolcott, Assistant Director of the Environmental Audit Compliance and Enforcement Branch of DCCEEW, provided a letter which approved the nominated audit team comprising myself, Mr Nathan Williams, and Mr James Linfoot. Specifically, the letter stated:

> *I approve the nominated audit team from Peter J Ramsay & Associates to conduct the independent audit.*

Further to the approval of the audit team, and as required under condition 36 of the approval, it is requested in the letter that the audit team provide the draft audit criteria and proposed audit timeframe by 21 July 2026. Specifically, the letter stated:

> *I request that you submit the draft audit criteria and propose a timeframe for submitting the audit report to the Department of Climate Change, Energy, the Environment and Water no later than 20 business days from the date of this letter for approval as required under condition 36 of the EPBC 2022/09243 approval. Please do not commence the independent audit prior to receiving written approval of the audit criteria from the department.*

To that end, I am pleased to submit the proposed scope, criteria, methodology, and timeframe for the audit.

1. AUDIT SCOPE

Subject to consultation with DCCEEW, the scope of the Independent Audit is expected to involve:

- Project management and client liaison (assumes a two (2) month project duration);
- Development of audit criteria and methodology based on the Approval conditions in accordance with the *Independent Audit and Audit Report Guidelines*, including breakdown of individual condition elements and associated plan commitments;
- Liaison with Visy and DCCEEW to obtain approval of the audit team, audit criteria, and audit methodology. This includes the preparation of two letters outlining the information required to be submitted;
- Desktop review of relevant documentation, including Approval conditions, management plans, compliance reports, monitoring data, incident records, and other compliance records, as applicable;
- Site inspection of the development area and the offset site;
- Interviews with relevant personnel to confirm implementation of management measures and compliance processes;
- Assessment of compliance with each Approval condition and associated requirements, including identification of any compliances, non-compliances, and observations;
- Preparation of an independent audit report in accordance with the *Independent Audit and Audit Report Guidelines*.

2. AUDIT CRITERIA AND METHODOLOGY

The audit criteria and methodology have been developed in accordance with the *Independent Audit and Audit Report Guidelines* (DCCEEW, 2019) (Guidelines) and are based on the approval conditions for the project. In particular, the template provided in Appendix B of the Guidelines has been adopted and the completed proforma is provided in **Attachment A** to this letter.

The findings of the audit will be graded in accordance with the compliance status descriptors provided in Appendix B of the Guidelines. These are:

Table 1 Compliance descriptors (adapted from Appendix B, DCCEEW 2019)

Status	Description
Compliance	A rating of 'compliance' is given when the auditee has complied with a condition, element of a condition, or measure required by a management plan, report or program etc.
Non-compliance	A rating of 'non-compliance' is given when the auditee has not met a condition, element of a condition, or measure required by a management plan, report or program etc.
Not applicable	A rating of 'not applicable at the time of the audit' is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced.
Observation	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

Note: The above ratings are to be applied by the approved independent auditor. They are also to be applied when measuring compliance in relation to management plans, reports, or programs etc (however described) required by conditions.

3. AUDIT TIMEFRAME

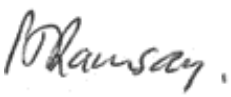
It is noted that the Guidelines state that audit timeframes can be found either in the approval conditions or in the formal notification from the Minister or delegate directing an independent audit to occur. For this project, it is understood that a timeframe is to be proposed by the auditor and is subject to approval by the Department.

On the basis of the audit scope specified in **Section 1**, the audit report is expected to be submitted to the Department within two (2) months of the audit criteria and methodology (as outlined in **Section 2** and **Attachment A**) being approved in writing by the Department.

4. CLOSING

The proposed scope, criteria and methodology, and timeframe for the audit are submitted to the Department for approval. Should you wish to discuss any matters concerning this audit, please do not hesitate to contact me on 07 3285 6655.

Yours sincerely,



Peter J Ramsay

Enclosed:

Attachment A Proposed Audit Criteria and Methodology

Attachment A

Printed on
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Audit Criteria and Methodology

Template

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Example	*[CRITERIA] Each condition must be included in its entirety (above) and then broken down into its individual element (criteria).*	*The verification method field is to articulate how the audit team intends going about measuring compliance with the conditions/condition elements or commitments contained within associated plans, reports, programs etc. E.g. reviewing documentation in the nature of xxxxx and/or by undertaking a site inspection of xxxxx.*	*The evidence field is to provide thorough details of audit evidence obtained and actual measurements made. Details should be provided of documents, mapping and any site visits including dates, locations, titles, observations and conclusions. Where the implementation of plans, reports or programs (however described) is required by the approval conditions, the details of the individual commitments contained in those plans, reports or programs are to be separately identified.*	*The documents sighted field is to list the documents sighted or reviewed as part of the audit and should include the title, author and date. This field should also include details of any site visits and inspections undertaken as part of the audit.*	*The determination field is to summarise the justification for findings against the criteria.*	*[COMPLIANT] [NON-COMPLIANT] [NOT APPLICABLE]*
Total						

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
1	The approval holder must not clear:
1a	outside of the development area,
1b	more than 11.95 hectares of Koala habitat.
2	To minimise the risk of injury or death to the Koala (Phascolarctos cinereus) within the development area, the approval holder must:
2a	ensure that a suitably qualified fauna spotter catcher who is given sufficient authority to delay and/or cease any clearing and construction is present during all clearing, to ensure Koalas have safely vacated the area of works before the Koala habitat is cleared,
2b	clear only in accordance with the Nature Conservation (Koala) Conservation Plan 2017 (Qld), so as to allow Koalas to safely relocate out of any area to be cleared and into nearby appropriate areas of Koala habitat,
2c	implement sequential clearing during clearing,
2d	install temporary or permanent fencing around any area of construction work after clearing and prior to the commencement of construction in that area, so as to prevent Koalas entering any area where construction is taking place,
2e	ensure that all temporary fencing around any construction area required by condition 2(d) remains in place until permanent fencing is installed,
2f	ensure that any permanent fencing required by condition 2(d) and 2(e), and is within 100 meters of Koala habitat, must be Koala exclusion fencing,
2g	prohibit workers bringing domestic dogs into the development area during clearing and construction, and
2h	implement the Koala-sensitive Design Guideline in all parts of the development area that are adjacent to Koala habitat.
3	To compensate for the clearing of 11.95 hectares of Koala habitat, the approval holder must, prior to any clearing within the development area, commence implementing the Visy Offset Management Plan and continue to implement the Visy Offset Management Plan for the life of this approval.
4	The approval holder must:
4a	within 10 months of this approval, legally secure at least 31.07 hectares of land at the Kingsholme Offset Property,
4b	within 10 business days of legally securing the Kingsholme Offset Property, provide the department with written evidence demonstrating that the Kingsholme Offset Property has been legally secured, and provide shapefiles and offset attributes of the Kingsholme Offset Property, and
4c	complete all monitoring and Habitat quality uplift prior to the end of Year 15.
5	If the approval holder has not legally secured the 31.07 hectares of land at the Kingsholme Offset Property within 10 months of this approval, all clearing and construction within the development area must cease immediately, or as otherwise agreed to in writing by the Minister.
6	The approval holder must not recommence any clearing or construction unless the approval holder legally secures at least 31.07 hectares of land of the Kingsholme Offset Property and provides written evidence to the department demonstrating that the Kingsholme Offset Property has been legally secured, or as otherwise agreed to in writing by the Minister.
7	Within 6 months of this approval, the approval holder must ensure a suitably qualified field ecologist completes baseline surveys of the Kingsholme Offset Area in accordance with a scientifically valid, robust and repeatable methodology, to determine the:
7a	extent of weed cover, and
7b	abundance of feral animals.
8	Within 9 months of this approval, the approval holder must submit to the department a version of the Visy Offset Management Plan, revised to include:
8a	the methods, dates and results of the baseline surveys required under condition 7,
8b	details of how the outcomes specified in conditions 11 and 12 will be achieved, and
8c	a program of monitoring and a schedule to report progress against performance and completion criteria in respect of achieving the ecological outcomes specified in conditions 11 and 12.
8 (cont)	The approval holder must implement the revised Visy Offset Management Plan for the life of the approval.
9	If the Minister writes to the approval holder stating that he/she considers that the revised Visy Offset Management Plan, required under condition 8 is not likely to achieve the requirements of conditions 11 and 12, all clearing and construction in the development area must cease within 48 hours of receiving notice from the Minister, or as otherwise directed by the Minister.
10	Clearing and/or construction may only recommence once the Minister notifies the approval holder that the Minister approves the revised Visy Offset Management Plan, or otherwise with the Minister's written agreement.
11	The approval holder must, by the end of Year 10 , ensure that the highest abundance of each feral animal species is less than 10% of the maximum feral animal species abundance as determined by the baseline surveys required under condition 7.
12	The approval holder must, by the end of Year 7, have reduced the extent of weed cover at the Kingsholme Offset Area by 95% relative to the extent of weed cover determined by the baseline surveys required under condition 7.

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
13	Once the approval holder achieves the outcomes of condition 11 and 12, the outcomes must be maintained or improved for the rest of the period of effect of approval.
14	Within 3 months prior to the end of each of Year 2, Year 7, Year 10 and Year 15, the approval holder must have an independent suitably qualified field ecologist undertake an assessment as to whether conditions 4.c), 11 and 12 have been, or are likely to be, achieved. Within 6 months of the end of the respective period, the approval holder must publish the findings of each assessment on the website and provide the findings to the department. The approval holder must ensure the findings of each assessment remain published on the website for the remainder of the period of effect of approval.
15	If, at any time during the period of effect of the approval, the Minister is not satisfied that any of the requirements or outcomes required under conditions 4.c), 11 and 12 have been or are likely to be achieved or maintained, the Minister may require the approval holder to submit a revised Visy Offset Management Plan to the department for approval by the Minister, specifying corrective actions and/or commitments to monitor, manage, avoid, mitigate, offset, record and/or report on, impacts to the Koala. In addition:
15a	The Minister may specify a timeframe in which the approval holder must submit the revised Visy Offset Management Plan to the department.
15b	The Minister may specify that the revised Visy Offset Management Plan must be prepared or reviewed by an independent suitably qualified field ecologist.
15c	If the revised Visy Offset Management Plan is not provided within a timeframe specified by the Minister, all clearing and construction within the development area must cease immediately. The approval holder must not recommence any clearing or construction unless the Minister approves the revised Visy Offset Management Plan in writing, or as otherwise agreed to in writing by the Minister.
16	The approval holder must submit all plans required by these conditions electronically to the department.
17	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date:
17a	of this approval, if the version of the plan to be implemented is specified in these conditions; or
17b	the plan is approved by the Minister in writing, if the plan requires the approval of the Minister; or
17c	the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister; or
17d	the plan is approved by a state/territory government official as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions.
18	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval.
19	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.
20	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 19, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.
21	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.
22	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.
23	The approval holder must maintain accurate and complete compliance records.
24	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.
25	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guidelines for biological survey and mapped data (2018), or as otherwise specified by the Minister in writing.
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guide to providing maps and boundary data for EPBC Act projects (2021), or as otherwise specified by the Minister in writing.
27	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 3 months or in accordance with the requirements of the Visy Offset Management Plan.
28	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.
29	Each compliance report must be consistent with the department's Annual Compliance Report Guidelines (2014).
30	Each compliance report must include:
30a	Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.
30b	One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.
30c	A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.
31	The approval holder must:
31a	Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.
31b	Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
31c	Provide the weblink for the compliance report in the notification to the department.
31d	Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.
31e	Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.
31f	If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.
32	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.
33	The approval holder must specify in the notification:
33a	Any condition or commitment made in a plan which has been or may have been breached.
33b	A short description of the incident and/or potential non-compliance and/or actual non-compliance.
33c	The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.
34	The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:
34a	Any corrective action or investigation which the approval holder has already taken
34b	The potential impacts of the incident and/or non-compliance and/or non-compliance
34c	The method and timing of any corrective action that will be undertaken by the approval holder.
35	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every three-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.
36	For each independent audit, the approval holder must:
36a	Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.
36b	Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.
36c	Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.
36d	Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.
36e	Keep every audit report published on the website until this approval expires.
37	Each audit report must report for the three-year period preceding that audit report.
38	Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019).
39	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.
40	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.
Total	**86**

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
1	• Not applicable. This condition establishes Conditions 1a and 1b.	• Compliance is assessed through Conditions 1a and 1b.				
1a	• No clearing has occurred outside the development area as defined in Attachment A to the Approval.	• Review of spatial data defining the development area (e.g., shapefile), as available. • Review of clearing records, including spatial data, submitted as part of compliance reporting. • Review of aerial imagery and Lidar including the following image capture dates since Approval: - 20/05/2026 - 06/12/2025 - 11/10/2025 - 11/07/2025 - 04/11/2024 - 22/08/2024 - 17/07/2024 - 02/06/2024 - 09/09/2023 - 01/05/2023 - 30/10/2022 • Inspection of the site to verify that clearing is confined within the development area and that no evidence of clearing is present outside the development area.				
1b	• The total area of Koala habitat cleared within the development area does not exceed 11.95 hectares.	• Review of clearing records, including spatial datasets submitted as part of compliance reporting. • Undertaking of spatial analysis via GIS to calculate the extent (hectares) of Koala habitat cleared. • Cross check calculated clearing extent against reported figures in compliance reports.				
2	• Not applicable. This condition establishes Conditions 2a to 2h.	• Compliance is assessed through Conditions 2a to 2h.				
2a	• A suitably qualified fauna spotter catcher is present during all clearing. • The fauna spotter catcher has authority to delay or cease clearing and construction. • Clearing does not proceed until Koalas have safely vacated areas of Koala habitat.	• Review of personnel records including qualifications and role descriptions. • Review of clearing procedures. • Review of clearing records, including fauna handling and incident records, as available. • Conducting of interviews with relevant site personnel, as necessary.				
2b	• Clearing is undertaken in accordance with the Nature Conservation (Koala) Conservation Plan 2017 (Qld). • Clearing methods facilitate safe relocation of Koalas to nearby suitable habitat.	• Review of clearing procedures against requirements of the Nature Conservation (Koala) Conservation Plan 2017 (Qld). • Review of fauna handling and incident records, as available. • Conducting of interviews with relevant site personnel, as necessary.				
2c	• Clearing is undertaken using sequential clearing methods.	• Review of clearing procedures against requirements of the provisions specified in Sequential clearing in Koala district A or B under the Nature Conservation (Koala) Conservation Plan 2017 under the Nature Conservation Act 1992 (Qld). • Review of clearing records and verification through historical aerial imagery, if possible.				
2d	• Temporary or permanent fencing is installed around construction areas following clearing and prior to construction. • Fencing prevents Koala access to active construction areas.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fenced construction areas. • Verification of fencing installation through historical aerial imagery, if possible.				
2e	• Temporary fencing remains in place until permanent fencing is installed for each construction area.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fenced construction areas. • Verification of fencing installation through historical aerial imagery, if possible.				
2f	• Permanent fencing within 100 m of Koala habitat is designed and installed as Koala exclusion fencing.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fencing type and installation. • Verification of fencing locations and distances to Koala habitat using GIS.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2g	• Domestic dogs are prohibited within the development area during clearing and construction.	• Review of site plans/policies, inductions, and any other material relating to site personnel. • Review of incident and/or non-compliance records. • Conducting of interviews with relevant site personnel, as necessary.				
2h	• The Koala-sensitive Design Guideline is implemented in all areas adjacent to Koala habitat.	• Review of design documentation against the requirements of the Koala-sensitive Design Guideline. • Inspection of the site to verify implementation of design measures.				
3	• Implementation of the Visy Offset Management Plan (OMP) is commenced prior to any clearing within the development area. • The OMP is continuously implemented for the life of the Approval.	• Review of information relating to project timeline (e.g., clearing records) to confirm implementation of the OMP commenced prior to clearing. • Review of records relating to implementation of the OMP (e.g., monitoring and reporting requirements). • Inspection of the offset site to verify implementation of OMP measures.				
4	• Not applicable. This condition establishes Conditions 4a to 4c.	• Compliance is assessed through Conditions 4a to 4c.				
4a	• At least 31.07 hectares of land at the Kingsholme Offset Property is legally secured by 17 November 2023.	• Review of land tenure documentation. • Verification of area of land being at least 31.07 ha using GIS.				
4b	• Written evidence demonstrating legal security of the Kingsholme Offset Property is provided to the Department 10 business days of securing the land. • Shapefiles and offset attributes are provided to the Department.	• Review of correspondence with the Department (submission records, emails, letters). • Verification of timing of submission relative to date securing the offset site. • Review of shapefiles and offset attribute datasets, and verification using GIS.				
4c	• All monitoring and habitat quality uplift at the Kingsholme Offset Area is completed. • Completion is achieved prior to the end of Year 15.	Not triggered.				
5	• If the offset property (≥31.07 ha) is not legally secured by 17 November 2023, all clearing and construction cease immediately, unless otherwise agreed in writing by the Minister.	• Review of land tenure documentation (or absence of) to determine if condition is triggered. • Should the condition be triggered: - Review of construction and clearing records to confirm cessation of activities - Review of any correspondence with the Department to identify any written agreement from the Minister. - Review of historical aerial imagery to verify cessation of activities during the relevant period.				
6	• Clearing and construction do not recommence unless the requirement is satisfied or written agreement is obtained.	• Review of land tenure documentation (or absence of) to determine if condition is triggered. • Should the condition be triggered: - Review of construction and clearing records to confirm cessation of activities - Review of any correspondence with the Department to identify any written agreement from the Minister. - Review of historical aerial imagery to verify cessation of activities during the relevant period.				
7	• Baseline surveys of the Kingsholme Offset Area are completed by a suitably qualified field ecologist. • Surveys are completed by 17 July 2023. • Surveys are undertaken in accordance with a scientifically valid, robust and repeatable methodology. • Surveys determine the extent of weed cover and abundance of feral animals (as per Conditions 7a and 7b).	• Review of baseline surveys including: - Survey completion date. - Qualifications and experience of the field ecologist. - Survey methodologies. - Confirmation of addressing weed cover and feral animal abundance.				
7a	• Baseline survey quantifies the extent of weed cover across the Kingsholme Offset Area.	• Review baseline survey report and data relating to weed cover extent. • Confirm methodology used to quantify weed cover is robust and repeatable.				
7b	• Baseline survey quantifies the abundance of feral animals within the Kingsholme Offset Area.	• Review baseline survey report and data relating to abundance of feral animals. • Confirm methodology used to quantify abundance of feral animals is robust and repeatable.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
8	• A revised Visy Offset Management Plan (OMP) is submitted to the Department by 17 October 2023. • The revised OMP incorporates the requirements of Conditions 8a to 8c.	• Review of submission records to confirm timing of OMP submission relative to approval date. • Review the submitted revised OMP to confirm inclusion of components required by Conditions 8a to 8c.				
8a	• The revised OMP includes the methods, dates, and results of the baseline surveys required under Condition 7.	• Review of the revised OMP to confirm inclusion of baseline survey methodology, survey dates, and results.				
8b	• The revised OMP includes details of how the outcomes specified in Conditions 11 and 12 will be achieved.	• Review of the revised OMP to confirm documentation of measures/actions/strategies to address Conditions 11 and 12. • Assessment of measures proposed for alignment with outcomes required.				
8c	• The revised OMP includes a monitoring program and reporting schedule to track progress against performance and completion criteria for Conditions 11 and 12.	• Review of the revised OMP to confirm documentation of monitoring methodology, performance indicators, and reporting schedule. • Assessment of measures proposed for alignment with outcomes required.				
8 (cont)	• The revised OMP is implemented for the life of the approval.	• Inspection of the offset site to verify implementation of OMP measures.				
9	• If the Minister issues written notice that the revised OMP is not likely to achieve Conditions 11 and 12, all clearing and construction cease within 48 hours of receipt of the notice, unless otherwise directed by the Minister.	• Determination of whether written notice has been issued by the Minister (i.e., condition triggered). • Should the condition be triggered: - Review of correspondence to confirm date and time of receipt of notice. - Review of clearing and construction records to verify cessation within 48 hours. - Review of any alternative directions or written agreements provided by the Minister.				
10	• Clearing and/or construction does not recommence unless: - The Minister has provided written notification approving the revised Visy Offset Management Plan; or - The Minister has otherwise provided written agreement permitting recommencement.	• Determination of whether written notice has been issued by the Minister to cease clearing and/or construction (i.e., condition triggered). • Should the condition be triggered: - Review of correspondence to confirm receipt of written Ministerial approval of the revised OMP, or alternative written agreement. - Review of clearing and construction records to verify recommencement occurred only after approval.				
11	• By the end of Year 10, the highest abundance of each feral animal species at the Kingsholme Offset Area is ≤10% of the maximum baseline abundance determined under Condition 7. • Abundance is assessed using a consistent and comparable methodology to the baseline surveys.	• Not triggered.				
12	• By the end of Year 7, the extent of weed cover at the Kingsholme Offset Area is reduced by ≥95% relative to the baseline extent determined under Condition 7. • Weed cover is assessed using a consistent and comparable methodology to the baseline surveys.	• Not triggered.				
13	• Once the outcomes of Conditions 11 and 12 are achieved, those outcomes are maintained or improved for the remaining duration of the approval. • Feral animal abundance remains ≤10% of baseline maximum (Condition 11), and weed cover remains reduced by ≥95% (Condition 12).	• Not triggered.				
14	• An independent suitably qualified field ecologist undertakes an assessment within 3 months prior to the end of each of Year 2, Year 7, Year 10 and Year 15. • Each assessment evaluates whether Conditions 4c, 11 and 12 have been, or are likely to be, achieved. • The findings of each assessment are: - Provided to the Department; and - Published on the website within 6 months of the end of the relevant period. • Published assessment findings are maintained on the website for the remaining duration of the approval.	• Review of qualifications and independence of the field ecologist undertaking the assessment. • Verification of date of assessment one (Year 2). Other assessments not triggered. • Review of assessment report to confirm coverage of Conditions 4c, 11 and 12. • Review of proof of submission to the Department to confirm timing of submission. • Verification of publication of assessment findings on the website, including timing relative to each milestone.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
15	• Where the Minister determines that outcomes under Conditions 4c, 11 or 12 have not been, or are not likely to be, achieved or maintained, the approval holder: - Submits a revised Visy Offset Management Plan (OMP) to the Department for approval, and - The revised OMP includes corrective actions and/or commitments addressing impacts to the Koala.	• Determination of whether the condition has been triggered (i.e. written notice from the Minister issued). • Should the condition be triggered: - Review of correspondence from the Minister specifying requirements for OMP revision. - Review of revised OMP content to confirm inclusion of corrective actions and commitments.				
15a	• Where a timeframe is specified by the Minister, the revised OMP is submitted within the required timeframe.	• Review of Ministerial correspondence specifying submission timeframe. • Verification of submission date of revised OMP relative to specified timeframe.				
15b	• Where required by the Minister, the revised OMP is prepared or reviewed by an independent suitably qualified field ecologist.	• Review of Ministerial correspondence specifying requirement. • Review of qualifications and independence of the ecologist.				
15c	• If the revised OMP is not submitted within the timeframe specified by the Minister, all clearing and construction cease immediately. • Clearing and construction must not recommence unless: - The Minister approves the revised OMP in writing; or - Otherwise agreed in writing by the Minister.	• Determination of whether a timeframe was specified and whether it was met. • In the event it was not met: - Review of clearing and construction records to confirm cessation of activities. - Review of correspondence to verify Ministerial approval of revised OMP or alternative written agreement. - Verification of timing of recommencement relative to approval.				
16	• All plans required under the approval are submitted electronically to the Department.	• Identification of all plans required under the approval conditions. • Review of submission records (e.g., email correspondence, portal uploads) to confirm each plan was submitted electronically.				
17	• Each plan required under the approval is published on the website within 15 business days, unless otherwise agreed in writing by the Minister. • Timing of publication is linked to the relevant trigger event specified in Conditions 17a to 17d.	• Identification of all plans required under the approval conditions. • Review of publication records (e.g., website content, timestamps) to confirm plans are publicly available.				
17a	• Where the version of a plan is specified in the approval, the plan is published within 15 business days of the approval date.	• Identification of plans specified in the approval. • Verification of approval date and website publication date.				
17b	• Where a plan requires Ministerial approval, the plan is published within 15 business days of Ministerial approval.	• Review of Ministerial approval correspondence and approval date. • Verification of website publication date relative to approval.				
17c	• Where a plan does not require Ministerial approval, the plan is published within 15 business days of submission to the Department.	• Review of submission records to identify submission date. • Verification of website publication date relative to submission.				
17d	• Where a plan is approved by a State or Territory authority, the plan is published within 15 business days of that approval.	• Review of State/Territory approval documentation and approval date. • Verification of website publication date relative to approval.				
18	• All plans required under the approval and published on the website are retained on the website until the expiry date of the approval.	• Identification of all plans required under the approval conditions. • Review of publication records (e.g., website content, timestamps) to confirm plans are publicly available.				
19	• Sensitive ecological data is appropriately excluded or redacted from plans published on the website or otherwise provided to the public.	• Review of published versions of plans on the website. • Comparison with full/internal versions of the plans to confirm appropriate exclusion/redaction.				
20	• Where sensitive ecological data is excluded or redacted, the approval holder notifies the Department in writing of the nature of the exclusions and redactions.	• Review of correspondence with the Department identifying exclusions/redactions, if any.				
21	• The Department is notified electronically of the date of commencement of the Action within 5 business days of commencement.	• Identification of the actual commencement date of the Action. • Review of notification records (e.g. email or submission) to the Department. • Verification of timing of notification relative to commencement date.				
22	• If commencement does not occur within 5 years of approval, the Action is not commenced without prior written agreement of the Minister.	Not triggered.				
23	• Accurate and complete compliance records are maintained for all obligations under the approval.	• Review of compliance record systems and document registers. • Sample of compliance records (e.g., monitoring data, reports, logs) to assess accuracy and completeness.				
24	• Where requested in writing by the Department, electronic copies of compliance records are provided within the timeframe specified in the request.	• Review of Department requests for records, if any. • Should any requests have been made: - Verification of submission dates against timeframes by the Department in the requests.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
25	• All monitoring data, surveys, maps, and spatial/metadata are prepared in accordance with the Department's *Guidelines for biological survey and mapped data (2018)* , or as otherwise approved by the Minister.	• Identification and review of monitoring data, survey reports, and spatial outputs. • Assessment of those outputs alignment with *Guidelines for biological survey and mapped data (2018)* requirements (e.g., formats, methods, metadata standards). • Review of any written Ministerial directions specifying alternative requirements.				
26	• All monitoring data, maps, spatial data, and metadata are prepared in accordance with the Department's *Guide to providing maps and boundary data for EPBC Act projects (2021)* , or as otherwise approved by the Minister.	• Identification and review of spatial data (e.g., shapefiles, metadata, etc). • Assessment of those outputs alignment with *Guide to providing maps and boundary data for EPBC Act projects (2021)* requirements (e.g., formats, coordinate reference systems, metadata completeness). • Review of any written Ministerial directions specifying alternative requirements.				
27	• All monitoring data, surveys, maps, spatial data, metadata, and species occurrence records are submitted electronically to the Department: - Within 3 months, or - In accordance with the Visy Offset Management Plan, where applicable.	• Identification of datasets and records required under the approval and OMP. • Review of submission records (e.g., emails, uploads) to confirm electronic submission. • Verification of timing of submissions relative to timeframes required.				
28	• A compliance report is prepared for each 12-month period following the date of approval, unless otherwise agreed in writing by the Minister.	• Identification of reporting periods based on the date of approval. • Review of compliance reports to confirm submission for each 12-month period. • Verification of timing and completeness of reports. • Review of any written Ministerial agreements for alternate reporting arrangements.				
29	• Each compliance report is prepared in accordance with the Department's *Annual Compliance Report Guidelines (2014*).	• Review of compliance reports against the requirements of the 2014 Guidelines (e.g., required content, structure, completeness).				
30	• Not applicable. This condition establishes Conditions 30a to 30c.	• Compliance is assessed through Conditions 30a to 30c.				
30a	• The compliance report includes accurate and complete details of: - Compliance with all conditions and plans; - Any non-compliance; and - Any incidents.	• Review of compliance reports for complete summary of compliance status and incidents during reporting period. • Undertaking of a cross check against compliance records, incident reports, and site records to verify that all known non-compliances and incidents are reported.				
30b	• The compliance report includes one or more shapefiles showing all clearing of protected matters and/or their habitat undertaken during the relevant 12-month period.	• Review of shapefiles for completeness including a cross check with clearing records other datasets to verify consistency between reported and mapped outputs.				
30c	• The compliance report includes: - A schedule of all plans in existence; and - Accurate and complete details of how each plan is being implemented.	• Review of compliance reports to identify listed plans and implementation details including a cross check with plans required by the approval.				
31	• Not applicable. This condition establishes Conditions 31a to 31f.	• Compliance is assessed through Conditions 31a to 31f.				
31a	• Each compliance report is published on the website within 60 business days following the end of the relevant 12-month reporting period.	• Identification of reporting periods and corresponding report dates. • Verification of website publication date relative to reporting period end.				
31b	• The Department is notified electronically within 5 business days of publication of each compliance report.	• Review of correspondence notifying the Department. • Verification of timing relative to publication date.				
31c	• The notification to the Department includes the weblink to the published compliance report.	• Review of correspondence notifying the Department. • Verification of inclusion and accuracy of the weblink.				
31d	• All compliance reports are retained on the website until the expiry of the approval.	• Review of website to confirm availability of all historical compliance reports including a cross check of reporting periods for completeness.				
31e	• Sensitive ecological data is appropriately excluded or redacted from publicly available compliance reports.	• Comparison of published compliance reports with full/internal versions. • Confirmation of appropriate application of exclusions/redactions.				
31f	• Where redactions occur: - The full compliance report is submitted to the Department within 5 business days of publication; and - The Department is notified in writing of the exclusions and redactions.	• Review of submission records of full compliance reports. • Verification of timing relative to publication date. • Review of written notification to the Department detailing exclusions/redactions.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
32	• The Department is notified electronically within 2 business days of the approval holder becoming aware of: - Any incident; - Any potential non-compliance; and/or - Any actual non-compliance with approval conditions or plan commitments.	• Review of incident and non-compliance records to identify relevant events, if any. • Review of correspondence to the Department to confirm notifications were made. • Verification of timing of notification relative to the date the approval holder became aware of the event.				
33	• Not applicable. This condition establishes Conditions 33a to 33c.	• Compliance is assessed through Conditions 33a to 33c.				
33a	• The notification identifies any condition or plan commitment that has been or may have been breached.	• Review of notification content for identification of relevant conditions/commitments.				
33b	• The notification includes a short description of the incident and/or potential or actual non-compliance.	• Review of notification content to confirm inclusion of a clear description.				
33c	• The notification includes the location (including coordinates), date and time of the incident and/or potential or actual non-compliance.	• Review notification content for spatial and temporal details.				
34	• Written details of any incident, potential non-compliance, or actual non-compliance are provided to the Department within 12 business days of the approval holder becoming aware of the event. • Notifications include the information specified in Conditions 34a to 34c.	• Review of incident and non-compliance records. • Review of correspondence to the Department to confirm written submissions. • Verification of timing of submission relative to date of awareness.				
34a	• The notification includes details of any corrective actions or investigations already undertaken.	• Review of submitted notifications for documentation of actions taken.				
34b	• The notification includes details of the potential impacts of the incident or non-compliance.	• Review of notification content for assessment of potential impact.				
34c	• The notification includes the method and timing of any corrective actions to be undertaken.	• Review of notification content for corrective actions planned and associated timelines.				
35	• An independent audit of compliance with approval conditions is conducted for each three-year period following commencement of the Action. • Audits are undertaken for the duration of the approval, unless otherwise specified in writing by the Minister.	• Identification of the commencement date of the Action and relevant three-year audit periods. • Review of any written Ministerial directions modifying audit requirements.				
36	• Not applicable. This condition establishes Conditions 36a to 36e.	• Compliance is assessed through Conditions 36a to 36e.				
36a	• Prior to commencing each audit, the approval holder provides to the Department: - The name and qualifications of the nominated independent auditor; - The draft audit criteria; and - The proposed audit report timeframe.	• Inclusion of evidence of submission of proposed auditor details, audit criteria, and timeframe, in the final audit report.				
36b	• The independent audit does not commence until the Department has approved in writing: - The nominated auditor; - The audit criteria; and - The audit report timeframe.	• Inclusion of evidence of Department approval of auditor details, audit criteria, and timeframe, in the final audit report.				
36c	• The audit report is submitted to the Department for approval within the approved timeframe.	• Not triggered.				
36d	• Each audit report is published on the website within 15 business days of the Department's approval.	• Not triggered.				
36e	• Each audit report is published on the website within 15 business days of the Department's approval.	• Not triggered.				
37	• Each audit report addresses compliance for the three-year period preceding the audit report.	• Inclusion of confirmation of audit period within the final audit report.				
38	• Each audit report is: - Completed to the satisfaction of the Minister; and - Consistent with the EPBC Act *Independent Audit and Audit Report Guidelines (2019)* .	• Not triggered.				
39	• The Department is notified electronically at least 60 business days prior to the expiry date of the approval that the approval is due to expire.	• Not triggered.				
40	• The Department is notified electronically of the date of completion of the Action: - Within 20 business days of completion; and - Prior to expiry of the approval. • Completion data is provided with the notification.	• Not triggered.				

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Total			86			

Appendix E

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Australian Government
National Environmental Protection Agency

Our ref: EPBC 2022/09243

Simon Emerson
Project Environment Officer
Visy Glass Operations (Australia) Pty Ltd
13 Reo Crescent
Campbellfield, VIC 3061

Dear Simon

Approval of Audit Criteria and Methodology
Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243)

I refer to your correspondence dated 8 July 2026, submitting the audit criteria and methodology for the independent audit of the Visy Glass Recycling and Manufacturing Facility, Stapylton, QLD (EPBC 2022/09243). I note the project was approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 17 January 2023.

I approve the audit criteria and methodology prepared by Peter J Ramsay & Associates, and request that you submit the independent audit report to the National Environmental Protection Agency by no later than two months from the date of this letter for approval. I look forward to receiving a copy of the audit report.

If you have any questions regarding this matter, please contact Jacinta Wilson at audit@NationalEPA.gov.au.

Yours sincerely

Brendan Woolcott
Acting Director, Environmental Audit
Compliance and Enforcement Branch
10 July 2026

Appendix F

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PHOTOGRAPHIC RECORD

PETER J RAMSAY & ASSOCIATES

Project: Independent Audit, Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland

Reference: 334.54 **Prepared by:** JL

Date: 9/09/2026 **Reviewed by:** PJR

Photo ID: 1 – Entrance to Stage Coach Reserve (Offset Site). Signing indicating land used for Koala Offset Site and that dogs are prohibited.	**Date:** 12/08/2026

Photo ID: 2 – New tree growth at Offset Site.	**Date:** 12/08/2026

Project: Independent Audit, Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland

Reference: 334.54 **Prepared by:** JL

Date: 9/09/2026 **Reviewed by:** PJR

Photo ID: 3 – Evidence of recent weed management at the Offset Site.	**Date:** 12/08/2026

Photo ID: 4 – Evidence of burn at the Offset Site.	**Date:** 12/08/2026

Project: Independent Audit, Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland

Reference: 334.54 **Prepared by:** JL

Date: 9/09/2026 **Reviewed by:** PJR

Photo ID: 5 – Alternative entrance to the Offset Site. Evidence of clear signage in place.	**Date:** 12/08/2026

Photo ID: 6 – Additional signage at the entrance to the Offset Site	**Date:** 12/08/2026

Project: Independent Audit, Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland

Reference: 334.54 **Prepared by:** JL

Date: 9/09/2026 **Reviewed by:** PJR

Photo ID: 7 – Further evidence of weed control activities at the Offset Site.	**Date:** 12/08/2026

Photo ID: 8 – Irrigation equipment at the Offset Site.	**Date:** 12/08/2026

Project: Independent Audit, Visy Glass Recycling and Manufacturing Facility at Stapylton, Queensland

Reference: 334.54 **Prepared by:** JL

Date: 9/09/2026 **Reviewed by:** PJR

Photo ID: 9 – Fencing observed surrounding the Development Area at the Site.	**Date:** 12/08/2026

Photo ID: 10 – Further fencing observed at the Site.	**Date:** 12/08/2026

Appendix G

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Audit Criteria and Methodology

Template

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Example	*[CRITERIA] Each condition must be included in its entirety (above) and then broken down into its individual element (criteria).*	*The verification method field is to articulate how the audit team intends going about measuring compliance with the conditions/condition elements or commitments contained within associated plans, reports, programs etc. E.g. reviewing documentation in the nature of xxxxx and/or by undertaking a site inspection of xxxxx.*	*The evidence field is to provide thorough details of audit evidence obtained and actual measurements made. Details should be provided of documents, mapping and any site visits including dates, locations, titles, observations and conclusions. Where the implementation of plans, reports or programs (however described) is required by the approval conditions, the details of the individual commitments contained in those plans, reports or programs are to be separately identified.*	*The documents sighted field is to list the documents sighted or reviewed as part of the audit and should include the title, author and date. This field should also include details of any site visits and inspections undertaken as part of the audit.*	*The determination field is to summarise the justification for findings against the criteria.*	*[COMPLIANT] [NON-COMPLIANT] [NOT APPLICABLE]*
Total						

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
1	The approval holder must not clear:
1a	outside of the development area,
1b	more than 11.95 hectares of Koala habitat.
2	To minimise the risk of injury or death to the Koala (Phascolarctos cinereus) within the development area, the approval holder must:
2a	ensure that a suitably qualified fauna spotter catcher who is given sufficient authority to delay and/or cease any clearing and construction is present during all clearing, to ensure Koalas have safely vacated the area of works before the Koala habitat is cleared,
2b	clear only in accordance with the Nature Conservation (Koala) Conservation Plan 2017 (Qld), so as to allow Koalas to safely relocate out of any area to be cleared and into nearby appropriate areas of Koala habitat,
2c	implement sequential clearing during clearing,
2d	install temporary or permanent fencing around any area of construction work after clearing and prior to the commencement of construction in that area, so as to prevent Koalas entering any area where construction is taking place,
2e	ensure that all temporary fencing around any construction area required by condition 2(d) remains in place until permanent fencing is installed,
2f	ensure that any permanent fencing required by condition 2(d) and 2(e), and is within 100 meters of Koala habitat, must be Koala exclusion fencing,
2g	prohibit workers bringing domestic dogs into the development area during clearing and construction, and
2h	implement the Koala-sensitive Design Guideline in all parts of the development area that are adjacent to Koala habitat.
3	To compensate for the clearing of 11.95 hectares of Koala habitat, the approval holder must, prior to any clearing within the development area, commence implementing the Visy Offset Management Plan and continue to implement the Visy Offset Management Plan for the life of this approval.
4	The approval holder must:
4a	within 10 months of this approval, legally secure at least 31.07 hectares of land at the Kingsholme Offset Property,
4b	within 10 business days of legally securing the Kingsholme Offset Property, provide the department with written evidence demonstrating that the Kingsholme Offset Property has been legally secured, and provide shapefiles and offset attributes of the Kingsholme Offset Property, and
4c	complete all monitoring and Habitat quality uplift prior to the end of Year 15.
5	If the approval holder has not legally secured the 31.07 hectares of land at the Kingsholme Offset Property within 10 months of this approval, all clearing and construction within the development area must cease immediately, or as otherwise agreed to in writing by the Minister.
6	The approval holder must not recommence any clearing or construction unless the approval holder legally secures at least 31.07 hectares of land of the Kingsholme Offset Property and provides written evidence to the department demonstrating that the Kingsholme Offset Property has been legally secured, or as otherwise agreed to in writing by the Minister.
7	Within 6 months of this approval, the approval holder must ensure a suitably qualified field ecologist completes baseline surveys of the Kingsholme Offset Area in accordance with a scientifically valid, robust and repeatable methodology, to determine the:
7a	extent of weed cover, and
7b	abundance of feral animals.
8	Within 9 months of this approval, the approval holder must submit to the department a version of the Visy Offset Management Plan, revised to include:
8a	the methods, dates and results of the baseline surveys required under condition 7,
8b	details of how the outcomes specified in conditions 11 and 12 will be achieved, and
8c	a program of monitoring and a schedule to report progress against performance and completion criteria in respect of achieving the ecological outcomes specified in conditions 11 and 12.
8 (cont)	The approval holder must implement the revised Visy Offset Management Plan for the life of the approval.
9	If the Minister writes to the approval holder stating that he/she considers that the revised Visy Offset Management Plan, required under condition 8 is not likely to achieve the requirements of conditions 11 and 12, all clearing and construction in the development area must cease within 48 hours of receiving notice from the Minister, or as otherwise directed by the Minister.
10	Clearing and/or construction may only recommence once the Minister notifies the approval holder that the Minister approves the revised Visy Offset Management Plan, or otherwise with the Minister's written agreement.
11	The approval holder must, by the end of Year 10 , ensure that the highest abundance of each feral animal species is less than 10% of the maximum feral animal species abundance as determined by the baseline surveys required under condition 7.
12	The approval holder must, by the end of Year 7, have reduced the extent of weed cover at the Kingsholme Offset Area by 95% relative to the extent of weed cover determined by the baseline surveys required under condition 7.

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
13	Once the approval holder achieves the outcomes of condition 11 and 12, the outcomes must be maintained or improved for the rest of the period of effect of approval.
14	Within 3 months prior to the end of each of Year 2, Year 7, Year 10 and Year 15, the approval holder must have an independent suitably qualified field ecologist undertake an assessment as to whether conditions 4.c), 11 and 12 have been, or are likely to be, achieved. Within 6 months of the end of the respective period, the approval holder must publish the findings of each assessment on the website and provide the findings to the department. The approval holder must ensure the findings of each assessment remain published on the website for the remainder of the period of effect of approval.
15	If, at any time during the period of effect of the approval, the Minister is not satisfied that any of the requirements or outcomes required under conditions 4.c), 11 and 12 have been or are likely to be achieved or maintained, the Minister may require the approval holder to submit a revised Visy Offset Management Plan to the department for approval by the Minister, specifying corrective actions and/or commitments to monitor, manage, avoid, mitigate, offset, record and/or report on, impacts to the Koala. In addition:
15a	The Minister may specify a timeframe in which the approval holder must submit the revised Visy Offset Management Plan to the department.
15b	The Minister may specify that the revised Visy Offset Management Plan must be prepared or reviewed by an independent suitably qualified field ecologist.
15c	If the revised Visy Offset Management Plan is not provided within a timeframe specified by the Minister, all clearing and construction within the development area must cease immediately. The approval holder must not recommence any clearing or construction unless the Minister approves the revised Visy Offset Management Plan in writing, or as otherwise agreed to in writing by the Minister.
16	The approval holder must submit all plans required by these conditions electronically to the department.
17	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date:
17a	of this approval, if the version of the plan to be implemented is specified in these conditions; or
17b	the plan is approved by the Minister in writing, if the plan requires the approval of the Minister; or
17c	the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister; or
17d	the plan is approved by a state/territory government official as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions.
18	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval.
19	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.
20	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 19, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.
21	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.
22	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.
23	The approval holder must maintain accurate and complete compliance records.
24	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.
25	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guidelines for biological survey and mapped data (2018), or as otherwise specified by the Minister in writing.
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guide to providing maps and boundary data for EPBC Act projects (2021), or as otherwise specified by the Minister in writing.
27	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 3 months or in accordance with the requirements of the Visy Offset Management Plan.
28	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.
29	Each compliance report must be consistent with the department's Annual Compliance Report Guidelines (2014).
30	Each compliance report must include:
30a	Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.
30b	One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.
30c	A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.
31	The approval holder must:
31a	Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.
31b	Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.

Audit Criteria and Methodology

Conditions Register

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition No.	Full Approval Condition
31c	Provide the weblink for the compliance report in the notification to the department.
31d	Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.
31e	Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.
31f	If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.
32	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.
33	The approval holder must specify in the notification:
33a	Any condition or commitment made in a plan which has been or may have been breached.
33b	A short description of the incident and/or potential non-compliance and/or actual non-compliance.
33c	The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.
34	The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:
34a	Any corrective action or investigation which the approval holder has already taken
34b	The potential impacts of the incident and/or non-compliance and/or non-compliance
34c	The method and timing of any corrective action that will be undertaken by the approval holder.
35	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every three-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.
36	For each independent audit, the approval holder must:
36a	Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.
36b	Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.
36c	Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.
36d	Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.
36e	Keep every audit report published on the website until this approval expires.
37	Each audit report must report for the three-year period preceding that audit report.
38	Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019).
39	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.
40	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.
Total	**86**

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
1	• Not applicable. This condition establishes Conditions 1a and 1b.	• Compliance is assessed through Conditions 1a and 1b.	-	-	-	Not applicable
1a	• No clearing has occurred outside the development area as defined in Attachment A to the Approval.	• Review of spatial data defining the development area (e.g., shapefile), as available. • Review of clearing records, including spatial data, submitted as part of compliance reporting. • Review of aerial imagery and Lidar including the following image capture dates since Approval: - 20/05/2026 - 06/12/2025 - 11/10/2025 - 11/07/2025 - 04/11/2024 - 22/08/2024 - 17/07/2024 - 02/06/2024 - 09/09/2023 - 01/05/2023 - 30/10/2022 • Inspection of the site to verify that clearing is confined within the development area and that no evidence of clearing is present outside the development area.	A review of aerial imagery dated 30 October 2022 (pre-development) and subsequent imagery through to 20 May 2026 identified that clearing and development activities were within the approved development area. No evidence of clearing or disturbance outside the approved development area was identified. These findings were verified during the site inspection, whereby visual observations confirmed that development was contained within the approved development area.	• Historical aerial imagery (30 October 2022 to 20 May 2026). • Site inspection observations.	Based on the review of historical aerial imagery and site inspection findings, no evidence was identified of clearing occurring outside the approved development area.	Compliance
1b	• The total area of Koala habitat cleared within the development area does not exceed 11.95 hectares.	• Review of clearing records, including spatial datasets submitted as part of compliance reporting. • Undertaking of spatial analysis via GIS to calculate the extent (hectares) of Koala habitat cleared. • Cross check calculated clearing extent against reported figures in compliance reports.	A review of the Koala habitat identified in Attachment B of the Approval was undertaken using GIS to determine the extent of Koala habitat cleared within the development area. The total area of Koala habitat cleared was determined to be less than 11.95 hectares. As identified in response to Condition 1a, review of aerial imagery and site inspection observations did not identify any clearing outside the approved development area.	• DCCEEW 2023 • Historical aerial imagery (30 October 2022 to 20 May 2026). • Site inspection observations and photographs.	An analysis undertaken using GIS indicates that the extent of Koala habitat cleared within the development area is less than the approved limit of 11.95 hectares. No evidence was identified of additional clearing outside the development area that would increase the extent of Koala habitat cleared.	Compliance
2	• Not applicable. This condition establishes Conditions 2a to 2h.	• Compliance is assessed through Conditions 2a to 2h.	-	-	-	Not applicable
2a	• A suitably qualified fauna spotter catcher is present during all clearing. • The fauna spotter catcher has authority to delay or cease clearing and construction. • Clearing does not proceed until Koalas have safely vacated areas of Koala habitat.	• Review of personnel records including qualifications and role descriptions. • Review of clearing procedures. • Review of clearing records, including fauna handling and incident records, as available. • Conducting of interviews with relevant site personnel, as necessary.	Fauna spotter catcher services were provided by Wild Encounters during vegetation clearing activities. The fauna spotter catcher supervised clearing crews and machine operators during vegetation removal works and had authority to stop works when fauna required assessment, capture or relocation. Daily inspections of habitat features were undertaken prior to clearing, and clearing crews operated under the direction of the fauna spotter catcher. A total of 75 native fauna individuals were captured and successfully relocated during the clearing program, with no fauna injuries reported. The site inspection undertaken on 12 August 2026 confirmed that clearing activities had been completed and no evidence was identified to suggest clearing occurred without fauna spotter catcher oversight. Wild Encounters experience and qualifications are available on its website, in addition to those described in the report (Wild Encounters 2023).	• Wild Encounters 2023 • Site inspection observations.	Evidence demonstrates that suitably qualified fauna spotter catcher personnel were present during clearing activities, supervised clearing operations, and facilitated the safe relocation of fauna prior to vegetation removal. The requirements of Condition 2a were met.	Compliance
2b	• Clearing is undertaken in accordance with the Nature Conservation (Koala) Conservation Plan 2017 (Qld). • Clearing methods facilitate safe relocation of Koalas to nearby suitable habitat.	• Review of clearing procedures against requirements of the Nature Conservation (Koala) Conservation Plan 2017 (Qld). • Review of fauna handling and incident records, as available. • Conducting of interviews with relevant site personnel, as necessary.	The fauna management report (Wild Encounters 2023) documents that fauna management activities were conducted in accordance with relevant legislation. Clearing was undertaken under the supervision of fauna spotter catchers, with habitat inspections completed prior to clearing and fauna relocated to suitable nearby habitat. Habitat trees were assessed prior to removal and impacts to koala habitat trees were minimised under fauna spotter catcher direction.	• Wild Encounters 2023 • Site inspection observations.	The documented clearing methodology and fauna relocation procedures are consistent with the principles of the Nature Conservation (Koala) Conservation Plan 2017 (Qld), including measures to facilitate safe fauna relocation and minimise impacts to koalas and koala habitat.	Compliance
2c	• Clearing is undertaken using sequential clearing methods.	• Review of clearing procedures against requirements of the provisions specified in Sequential clearing in Koala district A or B under the Nature Conservation (Koala) Conservation Plan 2017 under the Nature Conservation Act 1992 (Qld). • Review of clearing records and verification through historical aerial imagery, if possible.	The fauna post-clearing report states that clearing proceeded using a sequential clearing pattern wherever possible, with clearing undertaken generally from north to south. Smaller vegetation and understorey were removed first, followed by larger and habitat trees, providing fauna with opportunities to relocate naturally before habitat removal. The arborist post-clearance report similarly documents staged clearing and notes that the area cleared daily was reduced to allow fauna to disperse and be managed appropriately.	• Wild Encounters 2023 • Tim the Tree-Man Pty Ltd 2024 • Site inspection observations.	Evidence demonstrates that clearing was undertaken progressively using sequential clearing methods that facilitated fauna movement and relocation before vegetation removal.	Compliance
2d	• Temporary or permanent fencing is installed around construction areas following clearing and prior to construction. • Fencing prevents Koala access to active construction areas.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fenced construction areas. • Verification of fencing installation through historical aerial imagery, if possible.	Temporary fencing was observed around construction and retained vegetation interface areas during the site inspection undertaken on 12 August 2026. Historical photographic records contained within the post-clearance report demonstrate the installation and maintenance of fencing prior to and during construction activities. No evidence was identified of unfenced active construction areas adjacent to retained habitat.	• Tim the Tree-Man Pty Ltd 2024 • Site inspection observations.	Temporary fencing was observed to be installed and maintained around active construction areas, restricting fauna access to construction activities. The requirements of Condition 2d were met.	Compliance
2e	• Temporary fencing remains in place until permanent fencing is installed for each construction area.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fenced construction areas. • Verification of fencing installation through historical aerial imagery, if possible.	Temporary fencing remained in place around retained vegetation and habitat interface areas at the time of the site inspection undertaken on 12 August 2026. No evidence was identified indicating removal of temporary fencing prior to installation of permanent boundary fencing. Site observations confirmed fencing was in place.	• Site inspection observations.	Site observations indicate that temporary fencing remained in place for construction areas. No evidence was identified of premature fencing removal.	Compliance
2f	• Permanent fencing within 100 m of Koala habitat is designed and installed as Koala exclusion fencing.	• Review of fencing plans and installation records, as available. • Inspection of the site to view fencing type and installation. • Verification of fencing locations and distances to Koala habitat using GIS.	As the development area was under construction at the time of the audit, temporary fencing remained in place.	• Site inspection observations.	Limited establishment of permanent fencing at the time of the audit.	Not applicable

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2g	• Domestic dogs are prohibited within the development area during clearing and construction.	• Review of site plans/policies, inductions, and any other material relating to site personnel. • Review of incident and/or non-compliance records. • Conducting of interviews with relevant site personnel, as necessary.	Discussions with site personnel during the site inspection indicated that domestic dogs are prohibited from entering the operational site. Site access controls and security arrangements are used to manage access to the development area. No evidence of domestic dogs was observed during the site inspection and no incidents relating to domestic dogs were identified during the audit period.	• Site inspection observations.	No evidence was identified that domestic dogs were present within the development area during construction or operation; therefore, this conditino is complied with. Access controls and security measures support compliance with this requirement. No information regarding a policy on the presence of dogs at the Site was observed on signage or in the induction material. For best practice it is recommended that induction material be revised to state the dogs are not allowed on the Site during construction and clearing.	Compliance
2h	• The Koala-sensitive Design Guideline is implemented in all areas adjacent to Koala habitat.	• Review of design documentation against the requirements of the Koala-sensitive Design Guideline. • Inspection of the site to verify implementation of design measures.	Based on advice from EPA, Condition 2h is considered to apply to the final design of the Site, rather than for temporary construction fencing. Therefore, this condition is not applicable.	• Site inspection observations.	Limited establishment of permanent fencing at the time of the audit.	Not applicable
3	• Implementation of the Visy Offset Management Plan (OMP) is commenced prior to any clearing within the development area. • The OMP is continuously implemented for the life of the Approval.	• Review of information relating to project timeline (e.g., clearing records) to confirm implementation of the OMP commenced prior to clearing. • Review of records relating to implementation of the OMP (e.g., monitoring and reporting requirements). • Inspection of the offset site to verify implementation of OMP measures.	Implementation of the Offset Management Plan commenced in late January 2023, prior to clearing commencing on 6 February 2023. Activities completed during the audit period included baseline weed and feral animal surveys, koala monitoring, weed management, feral animal control, ecological monitoring and ongoing offset site management. Annual compliance reports demonstrate ongoing implementation of the Offset Management Plan throughout the audit period.	• GHD 2023 • Visy 2024 • Visy 2025 • Visy 2026 • Saunders Havill Group Pty Ltd 2023 • Envirosphere Consulting 2024	Evidence demonstrates implementation of the Offset Management Plan commenced prior to clearing and has continued throughout the audit period.	Compliance
4	• Not applicable. This condition establishes Conditions 4a to 4c.	• Compliance is assessed through Conditions 4a to 4c.	-	-	-	Not applicable
4a	• At least 31.07 hectares of land at the Kingsholme Offset Property is legally secured by 17 November 2023.	• Review of land tenure documentation. • Verification of area of land being at least 31.07 ha using GIS.	Lot 906 SP280831 was declared an Area of High Nature Conservation Value under the Vegetation Management Act 1999 on 15 September 2023. The declaration legally secured approximately 31.07 hectares of offset land within the required timeframe.	• Queensland Government Department of Resources 2023	The Kingsholme Offset Property was legally secured through an enduring statutory conservation mechanism in accordance with Condition 4a.	Compliance
4b	• Written evidence demonstrating legal security of the Kingsholme Offset Property is provided to the Department 10 business days of securing the land. • Shapefiles and offset attributes are provided to the Department.	• Review of correspondence with the Department (submission records, emails, letters). • Verification of timing of submission relative to date securing the offset site. • Review of shapefiles and offset attribute datasets, and verification using GIS.	The Kingsholme Offset Property (Lot 906 SP280831) was legally secured through declaration as an Area of High Nature Conservation Value on 15 September 2023. On 20 September 2023, the Approval Holder notified DCCEEW that the offset property had been legally secured and provided the declaration documentation. On the same date, the Approval Holder submitted shapefiles identifying the Kingsholme Offset Property and the offset area within the property in accordance with Condition 4b. The Department acknowledged receipt of the submission on 21 September 2023.	• DCCEEW 2023 • Queensland Government Department of Resources 2023 • Email: EPBC 2022/09243 - Declared Area 2023/002001 & PMAV 2023/002085 (20 September 2023) • Email: EPBC 2022/09243 - Fw: Declared Area Request Assessment (20 September 2023) • Email: EPBC 2022/09243 - Declared Area 2023/002001 & PMAV 2023/002085 (21 September 2023)	Evidence demonstrates that written notification of legal security was provided to DCCEEW within 10 business days of securing the offset property. Shapefiles identifying the offset property and offset area were also submitted to DCCEEW in accordance with Condition 4b.	Compliance
4c	• All monitoring and habitat quality uplift at the Kingsholme Offset Area is completed. • Completion is achieved prior to the end of Year 15.	Not triggered.	Condition 4c requires completion of all monitoring and habitat quality uplift by the end of Year 15. The audit period covers Years 1 to 3 following approval. Monitoring and habitat quality uplift activities are ongoing and the Year 15 completion milestone has not yet been reached.	Not applicable.	Not applicable.	Not applicable
5	• If the offset property (≥31.07 ha) is not legally secured by 17 November 2023, all clearing and construction cease immediately, unless otherwise agreed in writing by the Minister.	• Review of land tenure documentation (or absence of) to determine if condition is triggered. • Should the condition be triggered: - Review of construction and clearing records to confirm cessation of activities - Review of any correspondence with the Department to identify any written agreement from the Minister. - Review of historical aerial imagery to verify cessation of activities during the relevant period.	Condition 5 is only triggered if the offset property was not legally secured by 17 November 2023, as required by Condition 4a. As Condition 4a is complied with, Condition 5 is not triggered.	Not applicable.	Not applicable.	Not applicable
6	• Clearing and construction do not recommence unless the requirement is satisfied or written agreement is obtained.	• Review of land tenure documentation (or absence of) to determine if condition is triggered. • Should the condition be triggered: - Review of construction and clearing records to confirm cessation of activities - Review of any correspondence with the Department to identify any written agreement from the Minister. - Review of historical aerial imagery to verify cessation of activities during the relevant period.	Condition 6 only applies where Condition 5 has been triggered and clearing and construction activities have ceased pending satisfaction of offset security requirements. As Condition 5 was not triggered, Condition 6 was also not triggered.	Not applicable.	Not applicable.	Not applicable
7	• Baseline surveys of the Kingsholme Offset Area are completed by a suitably qualified field ecologist. • Surveys are completed by 17 July 2023. • Surveys are undertaken in accordance with a scientifically valid, robust and repeatable methodology. • Surveys determine the extent of weed cover and abundance of feral animals (as per Conditions 7a and 7b).	• Review of baseline surveys including: - Survey completion date. - Qualifications and experience of the field ecologist. - Survey methodologies. - Confirmation of addressing weed cover and feral animal abundance.	Baseline surveys of the Kingsholme Offset Area were completed during February and March 2023 by Saunders Havill Group. The survey report (Saunders Havill Group Pty Ltd 2023) documents methodologies used to assess weed cover and feral animal abundance and provides baseline results for both parameters. The survey was completed within six months of approval. The report provides the qualifications and experience of the team.	• Saunders Havill Group Pty Ltd 2023 • GHD 2023	Baseline surveys were completed by suitably qualified personnel using repeatable and scientifically valid methodologies.	Compliance
7a	• Baseline survey quantifies the extent of weed cover across the Kingsholme Offset Area.	• Review baseline survey report and data relating to weed cover extent. • Confirm methodology used to quantify weed cover is robust and repeatable.	Baseline weed mapping quantified weed cover across the offset area and established a baseline weed extent of 77,185 m² (7.72 ha), representing 50.87% of the offset area.	• Saunders Havill Group Pty Ltd 2023	Baseline weed extent was quantified in accordance with Condition 7a requirements.	Compliance
7b	• Baseline survey quantifies the abundance of feral animals within the Kingsholme Offset Area.	• Review baseline survey report and data relating to abundance of feral animals. • Confirm methodology used to quantify abundance of feral animals is robust and repeatable.	Six camera traps were deployed for 114 survey nights and detections were used to establish a baseline feral animal Relative Abundance Index (RAI) of 7.02.	• Saunders Havill Group Pty Ltd 2023	Baseline feral animal abundance was established as required by Condition 7b.	Compliance
8	• A revised Visy Offset Management Plan (OMP) is submitted to the Department by 17 October 2023. • The revised OMP incorporates the requirements of Conditions 8a to 8c.	• Review of submission records to confirm timing of OMP submission relative to approval date. • Review the submitted revised OMP to confirm inclusion of components required by Conditions 8a to 8c.	A revised Offset Management Plan dated 13 October 2023 was prepared to address Condition 8 requirements. The revised OMP was submitted to DCCEEW by email on 16 October 2023 and incorporated the baseline survey results, measures to achieve Conditions 11 and 12, and monitoring and reporting requirements.	• GHD 2022 • GHD 2023 • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023)	Review of the revised Offset Management Plan (GHD 2023) confirmed inclusion of the information required by Conditions 8a to 8c. Evidence demonstrates the revised OMP was submitted to DCCEEW on 16 October 2023, within the timeframe required by the Approval.	Compliance

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
8a	• The revised OMP includes the methods, dates, and results of the baseline surveys required under Condition 7.	• Review of the revised OMP to confirm inclusion of baseline survey methodology, survey dates, and results.	Baseline surveys were undertaken to determine weed cover and feral animal abundance. The survey methodology, dates, and results are discussed in Section 8.3.3, Section 8.3.4, Section 8.4.3, and Section 8.4.1 of the OMP. The field survey report is provided in Appendix C of the OMP.	• GHD 2023	Review of the revised OMP confirmed inclusion of baseline survey methods, survey timing and survey results relating to weed cover and feral animal abundance.	Compliance
8b	• The revised OMP includes details of how the outcomes specified in Conditions 11 and 12 will be achieved.	• Review of the revised OMP to confirm documentation of measures/actions/strategies to address Conditions 11 and 12. • Assessment of measures proposed for alignment with outcomes required.	Table 8.6 and Table 8.9 of the revised OMP outlines the measures to achieve the outcomes required by Conditions 11 and 12.	• GHD 2023	Review of the revised OMP confirmed that the measures required by Conditions 11 and 12 were adequately described.	Compliance
8c	• The revised OMP includes a monitoring program and reporting schedule to track progress against performance and completion criteria for Conditions 11 and 12.	• Review of the revised OMP to confirm documentation of monitoring methodology, performance indicators, and reporting schedule. • Assessment of measures proposed for alignment with outcomes required.	Table 8.6 and Table 8.9 of the revised OMP describes a program of monitoring and a schedule to report progress in respect of the outcomes required by Conditions 11 and 12.	• GHD 2023	Review of the revised OMP confirmed that the program of monitoring and schedule of reporting were adequately described.	Compliance
8 (cont)	• The revised OMP is implemented for the life of the approval.	• Inspection of the offset site to verify implementation of OMP measures.	Implementation of the revised OMP is demonstrated through completion of baseline surveys, annual compliance reporting, koala monitoring, weed management, feral animal management, revegetation activities and ongoing offset site management. The Year 1, Year 2 and Year 3 Compliance Reports document continued implementation of OMP commitments throughout the audit period.	• GHD 2023 • Visy 2024 • Visy 2025 • Visy 2026 • Saunders Havill Group Pty Ltd 2023 • Saunders Havill Group Pty Ltd 2025 • Envirosphere Consulting 2024 • Envirosphere Consulting 2026 • Site inspection observations	Evidence demonstrates ongoing implementation of the revised OMP in accordance with approval requirements.	Compliance
9	• If the Minister issues written notice that the revised OMP is not likely to achieve Conditions 11 and 12, all clearing and construction cease within 48 hours of receipt of the notice, unless otherwise directed by the Minister.	• Determination of whether written notice has been issued by the Minister (i.e., condition triggered). • Should the condition be triggered: - Review of correspondence to confirm date and time of receipt of notice. - Review of clearing and construction records to verify cessation within 48 hours. - Review of any alternative directions or written agreements provided by the Minister.	Condition 9 is contingent upon the Minister issuing written notice that the revised Offset Management Plan is not likely to achieve the requirements of Conditions 11 and 12. No Ministerial correspondence or direction was identified indicating that such notice had been issued during the audit period.	• Visy 2024 • Visy 2025 • Visy 2026	No evidence was identified that the Minister issued notice under Condition 9. Therefore, the condition was not triggered during the audit period.	Not applicable
10	• Clearing and/or construction does not recommence unless: - The Minister has provided written notification approving the revised Visy Offset Management Plan; or - The Minister has otherwise provided written agreement permitting recommencement.	• Determination of whether written notice has been issued by the Minister to cease clearing and/or construction (i.e., condition triggered). • Should the condition be triggered: - Review of correspondence to confirm receipt of written Ministerial approval of the revised OMP, or alternative written agreement. - Review of clearing and construction records to verify recommencement occurred only after approval.	Condition 10 only applies where Condition 9 has been triggered. No evidence was identified indicating that Condition 9 was triggered during the audit period.	• Visy 2024 • Visy 2025 • Visy 2026	As no Ministerial notice under Condition 9 was identified, the recommencement provisions under Condition 10 were not applicable during the audit period.	Not applicable
11	• By the end of Year 10, the highest abundance of each feral animal species at the Kingsholme Offset Area is ≤10% of the maximum baseline abundance determined under Condition 7. • Abundance is assessed using a consistent and comparable methodology to the baseline surveys.	• Not triggered.	Condition 11 requires achievement of the feral animal abundance outcome by the end of Year 10. The audit period covers Years 1 to 3 following approval and the Year 10 milestone has not yet been reached.	Not applicable.	Condition 11 is time-based and was not triggered during the audit period.	Not applicable
12	• By the end of Year 7, the extent of weed cover at the Kingsholme Offset Area is reduced by ≥95% relative to the baseline extent determined under Condition 7. • Weed cover is assessed using a consistent and comparable methodology to the baseline surveys.	• Not triggered.	Condition 12 requires achievement of the weed reduction outcome by the end of Year 7. The audit period covers Years 1 to 3 following approval and the Year 7 milestone has not yet been reached.	Not applicable.	Condition 12 is time-based and was not triggered during the audit period.	Not applicable

Audit Criteria and Methodology

Audit Table

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EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
13	• Once the outcomes of Conditions 11 and 12 are achieved, those outcomes are maintained or improved for the remaining duration of the approval. • Feral animal abundance remains ≤10% of baseline maximum (Condition 11), and weed cover remains reduced by ≥95% (Condition 12).	• Not triggered.	Condition 13 only applies after the outcomes required under Conditions 11 and 12 have been achieved. Neither milestone had been reached during the audit period.	Not applicable.	Condition 13 is time-based and was not triggered during the audit period.	Not applicable
14	• An independent suitably qualified field ecologist undertakes an assessment within 3 months prior to the end of each of Year 2, Year 7, Year 10 and Year 15. • Each assessment evaluates whether Conditions 4c, 11 and 12 have been, or are likely to be, achieved. • The findings of each assessment are: - Provided to the Department; and - Published on the website within 6 months of the end of the relevant period. • Published assessment findings are maintained on the website for the remaining duration of the approval.	• Review of qualifications and independence of the field ecologist undertaking the assessment. • Verification of date of assessment one (Year 2). Other assessments not triggered. • Review of assessment report to confirm coverage of Conditions 4c, 11 and 12. • Review of proof of submission to the Department to confirm timing of submission. • Verification of publication of assessment findings on the website, including timing relative to each milestone.	A Year 2 Assessment Report was prepared by Saunders Havill Group and issued on 18 February 2025. Surveys were undertaken on 26 November and 10 December 2024 by suitably qualified ecologists, within three months prior to the end of Year 2. The assessment specifically evaluated whether Conditions 4c, 11 and 12 had been, or were likely to be, achieved and concluded that the required outcomes were likely to be achieved within the specified timeframes. Evidence was also reviewed demonstrating submission of the assessment findings to DCCEEW and publication of the findings on the Visy project webpage.	• Saunders Havill Group Pty Ltd 2025 • Visy 2025 • Email: EPBC 2022/09243 - Annual Compliance Report year 2 (1 April 2025) • Email: RE: EPBC 2022/09243 - Annual Compliance Report year 2 [SEC=OFFICIAL] (29 April 2025)	The Year 2 Assessment Report was completed by an independent suitably qualified field ecologist within the timeframe required by Condition 14 and assessed progress against Conditions 4c, 11 and 12. Evidence reviewed during the audit demonstrates that the Year 2 Assessment findings were provided to DCCEEW and published on the Visy project webpage within the required timeframe. The assessment findings remained publicly available at the time of the audit. Therefore, the requirements of Condition 14 have been met.	Compliance
15	• Where the Minister determines that outcomes under Conditions 4c, 11 or 12 have not been, or are not likely to be, achieved or maintained, the approval holder: - Submits a revised Visy Offset Management Plan (OMP) to the Department for approval, and - The revised OMP includes corrective actions and/or commitments addressing impacts to the Koala.	• Determination of whether the condition has been triggered (i.e. written notice from the Minister issued). • Should the condition be triggered: - Review of correspondence from the Minister specifying requirements for OMP revision. - Review of revised OMP content to confirm inclusion of corrective actions and commitments.	Condition 15 is only triggered if the Minister determines that the outcomes required under Conditions 4c, 11 or 12 have not been, or are not likely to be, achieved or maintained. No evidence was identified indicating that the Minister has made such a determination during the audit period.	• Saunders Havill Group Pty Ltd 2025	No Ministerial determination triggering Condition 15 was identified during the audit period.	Not applicable
15a	• Where a timeframe is specified by the Minister, the revised OMP is submitted within the required timeframe.	• Review of Ministerial correspondence specifying submission timeframe. • Verification of submission date of revised OMP relative to specified timeframe.	No Ministerial determination or correspondence was identified indicating that Condition 15 had been triggered.	• Visy 2024 • Visy 2025 • Visy 2026	As Condition 15 was not triggered, no Ministerial timeframe for submission of a revised OMP was specified. Therefore, Condition 15a was not applicable during the audit period.	Not applicable
15b	• Where required by the Minister, the revised OMP is prepared or reviewed by an independent suitably qualified field ecologist.	• Review of Ministerial correspondence specifying requirement. • Review of qualifications and independence of the ecologist.	No Ministerial determination or correspondence was identified indicating that Condition 15 had been triggered.	• Visy 2024 • Visy 2025 • Visy 2026	As Condition 15 was not triggered, the requirements of Condition 15b were not applicable during the audit period.	Not applicable
15c	• If the revised OMP is not submitted within the timeframe specified by the Minister, all clearing and construction cease immediately. • Clearing and construction must not recommence unless: - The Minister approves the revised OMP in writing; or - Otherwise agreed in writing by the Minister.	• Determination of whether a timeframe was specified and whether it was met. • In the event it was not met: - Review of clearing and construction records to confirm cessation of activities. - Review of correspondence to verify Ministerial approval of revised OMP or alternative written agreement. - Verification of timing of recommencement relative to approval.	No Ministerial determination or correspondence was identified indicating that Condition 15 had been triggered.	• Visy 2024 • Visy 2025 • Visy 2026	As Condition 15 was not triggered, the requirements of Condition 15c were not applicable during the audit period.	Not applicable
16	• All plans required under the approval are submitted electronically to the Department.	• Identification of all plans required under the approval conditions. • Review of submission records (e.g., email correspondence, portal uploads) to confirm each plan was submitted electronically.	The Visy Offset Management Plan was submitted electronically to DCCEEW on 31 October 2022 and a revised Offset Management Plan was submitted electronically on 16 October 2023. Email records demonstrate electronic submission of plans required under the approval. The approval holder also submitted revised plans and associated documentation electronically to DCCEEW throughout the audit period.	• GHD 2022d • GHD 2023 • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023)	Evidence demonstrates that plans required under the approval were submitted electronically to DCCEEW in accordance with Condition 16.	Compliance
17	• Each plan required under the approval is published on the website within 15 business days, unless otherwise agreed in writing by the Minister. • Timing of publication is linked to the relevant trigger event specified in Conditions 17a to 17d.	• Identification of all plans required under the approval conditions. • Review of publication records (e.g., website content, timestamps) to confirm plans are publicly available.	The approval holder maintained published versions of required plans on the Visy website. Email correspondence confirmed publication of the original Offset Management Plan on 4 September 2023 and publication of the revised Offset Management Plan on 1 November 2023.	• GHD 2022d • GHD 2023 • Email: Re: Yatala glass Visy website information (4 September 2023) • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023) • Email: Re: Yatala glass Visy website information (1 November 2023)	Not Applicable (administrative parent condition, compliance assessed in Conditions 17a-17d.)	Not applicable
17a	• Where the version of a plan is specified in the approval, the plan is published within 15 business days of the approval date.	• Identification of plans specified in the approval. • Verification of approval date and website publication date.	The Visy Offset Management Plan (OMP) s the only plan specified in the Approval. The version of the OMP which formed part of the Approval is dated 31 October 2022 (GHD 2022d). In the Year 1 compliance report (Visy 2024), the Approval Holder states "The Offset Management Plan was published on the Proponent's website on 2 November 2022 (for Preliminary Documentation public notification)." However, the Invitation for Public Comment (file: 2022-09243-Draft-PD.pdf) states that "The draft Preliminary Documentation is available for viewing for 10 business days from 2 November 2022 until 15 November 2022. The final date for providing comment is 16 November 2022." The original OMP (GHD 2022d) was not published again on the Visy website on 4 September 2023. Therefore, it is understood that the OMP (GHD 2022d) was not available on the website between the date of the Approval (17 January 2023) and 4 September 2023.	• GHD 2022d • GHD 2023 • Email: Re: Yatala glass Visy website information (4 September 2023) • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023) • Email: Re: Yatala glass Visy website information (1 November 2023)	The original Offset Management Plan specified under the Approval (GHD 2022d) was published on the Approval Holder's website more than 15 business days after the date of the Approval.	Non-compliance

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
17b	• Where a plan requires Ministerial approval, the plan is published within 15 business days of Ministerial approval.	• Review of Ministerial approval correspondence and approval date. • Verification of website publication date relative to approval.	No plans requiring Ministerial approval were identified during the audit period.	• DCCEEW 2023	No approval trigger requiring assessment under Condition 17b was identified during the audit period.	Not applicable
17c	• Where a plan does not require Ministerial approval, the plan is published within 15 business days of submission to the Department.	• Review of submission records to identify submission date. • Verification of website publication date relative to submission.	The revised Offset Management Plan was submitted to DCCEEW on 16 October 2023 and subsequently published on the Visy website on 1 November 2023.	• GHD 2022d • GHD 2023 • Email: Re: Yatala glass Visy website information (4 September 2023) • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023) • Email: Re: Yatala glass Visy website information (1 November 2023)	The revised Offset Management Plan was published following submission to DCCEEW in accordance with Condition 17c.	Compliance
17d	• Where a plan is approved by a State or Territory authority, the plan is published within 15 business days of that approval.	• Review of State/Territory approval documentation and approval date. • Verification of website publication date relative to approval.	No plans approved by a State or Territory authority requiring publication under Condition 17d were identified during the audit period.	• DCCEEW 2023	Condition 17d was not triggered during the audit period.	Not applicable
18	• All plans required under the approval and published on the website are retained on the website until the expiry date of the approval.	• Identification of all plans required under the approval conditions. • Review of publication records (e.g., website content, timestamps) to confirm plans are publicly available.	The approval requires plans published under the approval conditions to remain available on the website until the expiry date of the approval. Review of the approval conditions identified that the OMP is required to be published on the website. At the time of the audit, the OMP was observed to be publicly available on the website.	• GHD 2022d • GHD 2023 • Email: Re: Yatala glass Visy website information (4 September 2023) • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023) • Email: Re: Yatala glass Visy website information (1 November 2023)	The OMP, being the only plan currently required to be published under the approval, was observed to be available on the approval holder's website at the time of the audit. Therefore, the requirements of Condition 18 have been met.	Compliance
19	• Sensitive ecological data is appropriately excluded or redacted from plans published on the website or otherwise provided to the public.	• Review of published versions of plans on the website. • Comparison with full/internal versions of the plans to confirm appropriate exclusion/redaction.	The published OMP and other documents available on the website were reviewed. No sensitive ecological data was identified within the published documents. Therefore, no redactions appear necessary.	• GHD 2022d • GHD 2023	Review of the published documents identified no sensitive ecological data requiring exclusion or redaction. Therefore, the requirements of Condition 19 have been met.	Compliance
20	• Where sensitive ecological data is excluded or redacted, the approval holder notifies the Department in writing of the nature of the exclusions and redactions.	• Review of correspondence with the Department identifying exclusions/redactions, if any.	Review of the published OMP and other documents available on the approval holder's website did not identify any sensitive ecological data requiring exclusion or redaction. As no redactions were necessary, there was no requirement to notify DCCEEW of any exclusions or redactions.	• GHD 2022d • GHD 2023	As no sensitive ecological data requiring exclusion or redaction was identified in the published documents, Condition 20 was not triggered.	Not applicable
21	• The Department is notified electronically of the date of commencement of the Action within 5 business days of commencement.	• Identification of the actual commencement date of the Action. • Review of notification records (e.g. email or submission) to the Department. • Verification of timing of notification relative to commencement date.	Visy notified DCCEEW by email on 6 February 2023 that clearing associated with the action would commence during the week of 6 February 2023. A subsequent email also dated 6 February 2023 confirmed that clearing works had commenced on 6 February 2023.	• Email: RE: EPBC 2022/09243 Visy Glass Recycling and Manufacturing Facility [SEC=UNOFFICIAL] (6 February 2023 - multiple)	The action commenced on 6 February 2023 and DCCEEW was notified electronically on the same day. Accordingly, notification was provided within the required timeframe under Condition 21.	Compliance
22	• If commencement does not occur within 5 years of approval, the Action is not commenced without prior written agreement of the Minister.	Not triggered.	Condition 22 applies only where commencement of the Action does not occur within five years of the approval date. Review of project records confirmed that the Action commenced on 6 February 2023, which is within five years of the approval date. Therefore, the condition was not triggered.	• Email: RE: EPBC 2022/09243 Visy Glass Recycling and Manufacturing Facility [SEC=UNOFFICIAL] (6 February 2023 - multiple)	The Action commenced on 6 February 2023, within five years of the approval date. As the condition was not triggered, Condition 22 is not applicable at the time of the audit.	Not applicable
23	• Accurate and complete compliance records are maintained for all obligations under the approval.	• Review of compliance record systems and document registers. • Sample of compliance records (e.g., monitoring data, reports, logs) to assess accuracy and completeness.	Compliance records were reviewed, including annual compliance reports, offset monitoring reports, ecological surveys, management plans and supporting correspondence. These records demonstrate that compliance documentation has been maintained for approval obligations throughout the audit period.	• Visy 2024 • Visy 2025 • Visy 2026 • GHD 2023	Compliance records were maintained and made available for review, including annual compliance reports, monitoring reports, survey data and management documentation.	Compliance
24	• Where requested in writing by the Department, electronic copies of compliance records are provided within the timeframe specified in the request.	• Review of Department requests for records, if any. • Should any requests have been made: - Verification of submission dates against timeframes by the Department in the requests.	A review of compliance reporting indicates that no written requests for compliance records were received from DCCEEW during the audit period. As no request was made, the requirement to provide electronic copies of compliance records was not triggered.	• Visy 2024 • Visy 2025 • Visy 2026	No request for compliance records for the Project was made by DCCEEW during the audit period. Therefore, Condition 24 was not triggered and is not applicable at the time of the audit.	Not applicable
25	• All monitoring data, surveys, maps, and spatial/metadata are prepared in accordance with the Department's *Guidelines for biological survey and mapped data (2018)* , or as otherwise approved by the Minister.	• Identification and review of monitoring data, survey reports, and spatial outputs. • Assessment of those outputs alignment with *Guidelines for biological survey and mapped data (2018)* requirements (e.g., formats, methods, metadata standards). • Review of any written Ministerial directions specifying alternative requirements.	Monitoring reports, ecological surveys, annual compliance reports and associated datasets prepared for the Project were reviewed. Monitoring and survey information was prepared by suitably qualified ecologists and documented in a consistent and repeatable manner. No evidence was identified indicating that the monitoring data or survey outputs were inconsistent with DCCEEW's Guidelines for biological survey and mapped data (2018). No alternative Ministerial requirements were identified.	• Saunders Havill Group Pty Ltd 2023 • Visy 2024 • Visy 2025 • Visy 2026	Based on the documentation reviewed, monitoring data and survey information appear to have been prepared in accordance with DCCEEW's Guidelines for biological survey and mapped data (2018). No evidence of non-compliance was identified.	Compliance
26	• All monitoring data, maps, spatial data, and metadata are prepared in accordance with the Department's *Guide to providing maps and boundary data for EPBC Act projects (2021)* , or as otherwise approved by the Minister.	• Identification and review of spatial data (e.g., shapefiles, metadata, etc). • Assessment of those outputs alignment with *Guide to providing maps and boundary data for EPBC Act projects (2021)* requirements (e.g., formats, coordinate reference systems, metadata completeness). • Review of any written Ministerial directions specifying alternative requirements.	A review of figures, maps and spatial data prepared for the Project was undertaken. A sample of shapefiles provided by Visy was reviewed against the Guide to providing maps and boundary data for EPBC Act projects (2021). The spatial data appeared to be prepared in a manner consistent with the guideline, including the presentation of mapped outputs and associated spatial datasets. No inconsistencies were identified during the audit.	• Sample shapefiles provided by Visy. • Figures and mapping contained within Project compliance documentation.	Based on the review of a sample of shapefiles and associated mapping outputs, the spatial data appears to have been prepared in accordance with Guide to providing maps and boundary data for EPBC Act projects (2021).	Compliance
27	• All monitoring data, surveys, maps, spatial data, metadata, and species occurrence records are submitted electronically to the Department: - Within 3 months, or - In accordance with the Visy Offset Management Plan, where applicable.	• Identification of datasets and records required under the approval and OMP. • Review of submission records (e.g., emails, uploads) to confirm electronic submission. • Verification of timing of submissions relative to timeframes required.	Monitoring data, survey results and associated mapping were submitted to DCCEEW through the revised Offset Management Plan, Annual Compliance Reports and supporting spatial data submissions. Evidence reviewed included submission of offset property shapefiles on 20 September 2023, submission of the revised Offset Management Plan on 16 October 2023, and submission of habitat clearing shapefiles on 8 April 2024. No sensitive ecological data submissions were required during the audit period.	• Email: EPBC 2022/09243 - Fw: Declared Area Request Assessment (20 September 2023). • Email: EPBC 2022/09243 - Revised Offset Management Plan (16 October 2023). • Email: EPBC 2022/09243 - Annual Compliance Report Year 1 - shapefile (8 April 2024). • Visy 2024 • Visy 2025 • Visy 2026	Evidence demonstrates that monitoring data, survey information, maps and spatial datasets required under the approval were submitted electronically to DCCEEW in accordance with Condition 27.	Compliance
28	• A compliance report is prepared for each 12-month period following the date of approval, unless otherwise agreed in writing by the Minister.	• Identification of reporting periods based on the date of approval. • Review of compliance reports to confirm submission for each 12-month period. • Verification of timing and completeness of reports. • Review of any written Ministerial agreements for alternate reporting arrangements.	The approval requires preparation of an annual compliance report for each 12-month reporting period. Annual compliance reports have been prepared for Year 1, Year 2 and Year 3 reporting periods.	• Visy 2024 • Visy 2025 • Visy 2026	Review of the compliance reporting record demonstrates annual compliance reports have been prepared for each required 12-month reporting period following approval. No evidence was identified indicating a reporting period had been omitted or delayed.	Compliance

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
29	• Each compliance report is prepared in accordance with the Department's *Annual Compliance Report Guidelines (2014*).	• Review of compliance reports against the requirements of the 2014 Guidelines (e.g., required content, structure, completeness).	Three Annual Compliance Reports have been prepared since commencement of the Action and fall within the audit period. A review of the reports identified that they include the elements required by DCCEEW's Annual Compliance Report Guidelines (2014), including details of compliance against approval conditions, compliance findings, reporting period information, and supporting compliance evidence.	• Visy 2024 • Visy 2025 • Visy 2026	Three compliance reports have been prepared since commencement of the Action and reviewed as part of the audit. The reports include the elements required by DCCEEW's Annual Compliance Report Guidelines (2014) and are considered consistent with the guideline. Therefore, Condition 29 is considered satisfied.	Compliance
30	• Not applicable. This condition establishes Conditions 30a to 30c.	• Compliance is assessed through Conditions 30a to 30c.	-	-	-	Not applicable
30a	• The compliance report includes accurate and complete details of: - Compliance with all conditions and plans; - Any non-compliance; and - Any incidents.	• Review of compliance reports for complete summary of compliance status and incidents during reporting period. • Undertaking of a cross check against compliance records, incident reports, and site records to verify that all known non-compliances and incidents are reported.	The Year 1, Year 2 and Year 3 Compliance Reports include condition-by-condition compliance assessments, details of management plan implementation, offset delivery and monitoring activities. The reports state that no incidents, potential non-compliances or actual non-compliances occurred during the reporting periods. This is consistent with the findings of this audit.	• Visy 2024 • Visy 2025 • Visy 2026	The compliance reports provide details of compliance with approval conditions and implementation of management plans. No non-compliances or incidents were identified within the reports reviewed. This is consistent with the findings of this audit.	Compliance
30b	• The compliance report includes one or more shapefiles showing all clearing of protected matters and/or their habitat undertaken during the relevant 12-month period.	• Review of shapefiles for completeness including a cross check with clearing records other datasets to verify consistency between reported and mapped outputs.	Annual Compliance Reports were prepared for Year 1, Year 2 and Year 3 reporting periods. Review of the Year 1 Annual Compliance Report identified that a shapefile showing the extent of protected habitat clearing was submitted separately to DCCEEW on 8 April 2024 in accordance with Condition 30b. Site discussions undertaken on 12 August 2026 confirmed that clearing occurred as a single clearing event during the Year 1 reporting period and no additional clearing occurred during subsequent reporting periods. As such, the extent of clearing reported remained unchanged following the initial clearing event and no additional clearing shapefiles were required for Years 2 and 3.	• Visy 2024 • Visy 2025 • Visy 2026 • Email: EPBC 2022/09243 - Annual Compliance Report Year 1 - shapefile (8 April 2024). • Site inspection observations.	Evidence demonstrates that a shapefile showing the extent of protected habitat clearing was submitted to DCCEEW following completion of the clearing program. As clearing occurred as a single event within the Year 1 reporting period and no further clearing occurred during Years 2 or 3, the reporting approach adopted by the approval holder is consistent with Condition 30b.	Compliance
30c	• The compliance report includes: - A schedule of all plans in existence; and - Accurate and complete details of how each plan is being implemented.	• Review of compliance reports to identify listed plans and implementation details including a cross check with plans required by the approval.	Three Annual Compliance Reports prepared during the audit period were reviewed. The reports include a schedule of plans in existence under the approval and details regarding implementation of those plans. The Visy Offset Management Plan (including the revised Offset Management Plan) was identified as the only management plan in existence under the Approval. The reports describe implementation activities including offset site management, ecological monitoring, weed management, feral animal control and compliance reporting.	• Visy 2024 • Visy 2025 • Visy 2026 • GHD 2023	The compliance reports include a schedule of plans in existence under the approval and provide details regarding implementation of those plans. Therefore, the requirements of Condition 30c have been met.	Compliance
31	• Not applicable. This condition establishes Conditions 31a to 31f.	• Compliance is assessed through Conditions 31a to 31f.	-	-	-	Not applicable
31a	• Each compliance report is published on the website within 60 business days following the end of the relevant 12-month reporting period.	• Identification of reporting periods and corresponding report dates. • Verification of website publication date relative to reporting period end.	Email records demonstrate that the Year 1 Annual Compliance Report was published on the Visy website on 2 April 2024 and submitted to DCCEEW on 4 April 2024. The Year 2 Annual Compliance Report was published and submitted on 1 April 2025. The Year 3 Annual Compliance Report was published and submitted on 8 April 2026. These publication dates fall within 60 business days following the end of the relevant reporting periods.	• Email: EPBC 2022/09243 - Annual Compliance Report Year 2 (1 April 2025). • Email: EPBC 2022/09243 - Annual Compliance Report Year 1 (4 April 2024). • Email: EPBC 2022/09243 - Annual Compliance Report Year 3 (8 April 2026).	Evidence demonstrates that Annual Compliance Reports for Years 1, 2 and 3 were published on the approval holder's website within 60 business days of the end of the relevant reporting period.	Compliance
31b	• The Department is notified electronically within 5 business days of publication of each compliance report.	• Review of correspondence notifying the Department. • Verification of timing relative to publication date.	The approval holder notified DCCEEW of publication of the Year 1, Year 2 and Year 3 Annual Compliance Reports through email correspondence dated 4 April 2024, 1 April 2025 and 8 April 2026 respectively.	• Email: EPBC 2022/09243 - Annual Compliance Report Year 2 (1 April 2025). • Email: EPBC 2022/09243 - Annual Compliance Report Year 1 (4 April 2024). • Email: EPBC 2022/09243 - Annual Compliance Report Year 3 (8 April 2026).	Evidence demonstrates that DCCEEW was notified electronically following publication of each Annual Compliance Report in accordance with Condition 31b.	Compliance
31c	• The notification to the Department includes the weblink to the published compliance report.	• Review of correspondence notifying the Department. • Verification of inclusion and accuracy of the weblink.	Review of the Year 1, Year 2 and Year 3 notification emails confirmed that each notification provided to DCCEEW included the hyperlink to the webpage where the Annual Compliance Report was published.	• Email: EPBC 2022/09243 - Annual Compliance Report Year 2 (1 April 2025). • Email: EPBC 2022/09243 - Annual Compliance Report Year 1 (4 April 2024). • Email: EPBC 2022/09243 - Annual Compliance Report Year 3 (8 April 2026).	The notifications submitted to DCCEEW included the web link to the published Annual Compliance Reports. Accordingly, the requirements of Condition 31c were met.	Compliance
31d	• All compliance reports are retained on the website until the expiry of the approval.	• Review of website to confirm availability of all historical compliance reports including a cross check of reporting periods for completeness.	The Visy project webpage was reviewed during the audit. Annual Compliance Reports for Year 1, Year 2 and Year 3 were available on the project webpage at the time of the audit.	• Visy 2024 • Visy 2025 • Visy 2026	All Annual Compliance Reports prepared to date were observed to remain publicly available on the approval holder's website. Therefore, the requirements of Condition 31d have been met.	Compliance
31e	• Sensitive ecological data is appropriately excluded or redacted from publicly available compliance reports.	• Comparison of published compliance reports with full/internal versions. • Confirmation of appropriate application of exclusions/redactions.	Published Annual Compliance Reports were reviewed and no sensitive ecological data was identified within the publicly available versions of the reports.	• Visy 2024 • Visy 2025 • Visy 2026	No sensitive ecological data requiring exclusion or redaction was identified within the published compliance reports. Therefore, the requirements of Condition 31e have been met.	Compliance
31f	• Where redactions occur: - The full compliance report is submitted to the Department within 5 business days of publication; and - The Department is notified in writing of the exclusions and redactions.	• Review of submission records of full compliance reports. • Verification of timing relative to publication date. • Review of written notification to the Department detailing exclusions/redactions.	Review of the published Year 1, Year 2 and Year 3 Annual Compliance Reports did not identify any sensitive ecological data that required exclusion or redaction from the publicly available reports. As no exclusions or redactions were required, there was no requirement to submit an unredacted version of the reports to DCCEEW or notify DCCEEW of any exclusions or redactions.	• Visy 2024 • Visy 2025 • Visy 2026	As no redactions were required, Condition 31f was not triggered during the audit period.	Not applicable

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
32	• The Department is notified electronically within 2 business days of the approval holder becoming aware of: - Any incident; - Any potential non-compliance; and/or - Any actual non-compliance with approval conditions or plan commitments.	• Review of incident and non-compliance records to identify relevant events, if any. • Review of correspondence to the Department to confirm notifications were made. • Verification of timing of notification relative to the date the approval holder became aware of the event.	The Year 1, Year 2 and Year 3 Annual Compliance Reports state that no incidents, potential non-compliances or actual non-compliances occurred during the reporting periods. This was confirmed during discussions with approval holder representatives during the site inspection undertaken on 12 August 2026. No evidence was identified during the audit indicating that notification under Condition 32 was required.	• Visy 2024 • Visy 2025 • Visy 2026	The evidence reviewed and discussions with site personnel indicate that no incidents, actual non-compliances or potential non-compliances were identified by Visy that would trigger the notification requirements of Condition 32.	Not applicable
33	• Not applicable. This condition establishes Conditions 33a to 33c.	• Compliance is assessed through Conditions 33a to 33c.		• Visy 2024 • Visy 2025 • Visy 2026		Not applicable
33a	• The notification identifies any condition or plan commitment that has been or may have been breached.	• Review of notification content for identification of relevant conditions/commitments.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. Consequently, Condition 32 was not triggered and no notifications to DCCEEW were required. As no notifications were required, there was no requirement to identify any approval condition or plan commitment that had been or may have been breached.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 32 was not triggered. Therefore, Condition 33a was not triggered and is not applicable at the time of the audit.	Not applicable
33b	• The notification includes a short description of the incident and/or potential or actual non-compliance.	• Review of notification content to confirm inclusion of a clear description.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. Consequently, Condition 32 was not triggered and no notifications to DCCEEW were required. As no notifications were required, there was no requirement to provide a short description of the incident and/or potential non-compliance and/or actual non-compliance.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 32 was not triggered. Therefore, Condition 33b was not triggered and is not applicable at the time of the audit.	Not applicable
33c	• The notification includes the location (including coordinates), date and time of the incident and/or potential or actual non-compliance.	• Review notification content for spatial and temporal details.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. Consequently, Condition 32 was not triggered and no notifications to DCCEEW were required. As no notifications were required, there was no requirement to provide the location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 32 was not triggered. Therefore, Condition 33c was not triggered and is not applicable at the time of the audit.	Not applicable
34	• Written details of any incident, potential non-compliance, or actual non-compliance are provided to the Department within 12 business days of the approval holder becoming aware of the event. • Notifications include the information specified in Conditions 34a to 34c.	• Review of incident and non-compliance records. • Review of correspondence to the Department to confirm written submissions. • Verification of timing of submission relative to date of awareness.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. Consequently, Condition 32 was not triggered and there was no requirement to notify DCCEEW under Conditions 32 to 34. As no notification was required, no written details of incidents or non-compliances were required to be provided to DCCEEW.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 34 was not triggered. Therefore, Condition 34 is not applicable at the time of the audit.	Not applicable
34a	• The notification includes details of any corrective actions or investigations already undertaken.	• Review of submitted notifications for documentation of actions taken.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. As Condition 34 was not triggered, there was no requirement to provide details of corrective actions or investigations undertaken to DCCEEW.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 34a was not triggered and is not applicable at the time of the audit.	Not applicable
34b	• The notification includes details of the potential impacts of the incident or non-compliance.	• Review of notification content for assessment of potential impact.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. As Condition 34 was not triggered, there was no requirement to provide details of potential impacts to DCCEEW.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 34b was not triggered and is not applicable at the time of the audit.	Not applicable
34c	• The notification includes the method and timing of any corrective actions to be undertaken.	• Review of notification content for corrective actions planned and associated timelines.	No incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period. As Condition 34 was not triggered, there was no requirement to provide details of proposed corrective actions or implementation timeframes to DCCEEW.	• Visy 2024 • Visy 2025 • Visy 2026	As no incidents, potential non-compliances or actual non-compliances were identified by Visy during the audit period, Condition 34c was not triggered and is not applicable at the time of the audit.	Not applicable
35	• An independent audit of compliance with approval conditions is conducted for each three-year period following commencement of the Action. • Audits are undertaken for the duration of the approval, unless otherwise specified in writing by the Minister.	• Identification of the commencement date of the Action and relevant three-year audit periods. • Review of any written Ministerial directions modifying audit requirements.	The Action commenced on 6 February 2023. Condition 35 requires an independent audit to be conducted for each three-year period following commencement of the Action. Peter J Ramsay & Associates was nominated as the independent auditor and approved by DCCEEW on 23 June 2026. Audit criteria, methodology and timeframe were subsequently approved by DCCEEW on 10 July 2026, and the independent audit was undertaken in accordance with Condition 35.	• Email: RE: EPBC 2022/09243 Visy Glass Recycling and Manufacturing Facility [SEC=UNOFFICIAL] (6 February 2023 - multiple) • PJRA 2026a • DCCEEW 2026c • PJRA 2026b • EPA 2026	An independent audit was initiated and undertaken for the first three-year audit period following commencement of the Action in accordance with Condition 35.	Compliance
36	• Not applicable. This condition establishes Conditions 36a to 36e.	• Compliance is assessed through Conditions 36a to 36e.	-	-	-	Not applicable
36a	• Prior to commencing each audit, the approval holder provides to the Department: - The name and qualifications of the nominated independent auditor; - The draft audit criteria; and - The proposed audit report timeframe.	• Inclusion of evidence of submission of proposed auditor details, audit criteria, and timeframe, in the final audit report.	On 12 June 2026, Peter J Ramsay & Associates submitted the proposed independent audit team to Visy, including declarations of independence, qualifications and curriculum vitae (CV) for Peter Ramsay, Nathan Williams and James Linfoot. On 25 June 2026, Peter J Ramsay & Associates submitted the proposed audit scope, audit criteria, methodology and proposed audit report timeframe to Visy. These were subsequently provided to DCCEEW prior to commencement of the independent audit. Visy submitted details of the nominated independent auditor, including qualifications, curriculum vitae and declarations of independence, to DCCEEW on 15 June 2026. Audit criteria, methodology and proposed audit report timeframes were subsequently submitted to DCCEEW on 8 July 2026 prior to commencement of the independent audit.	• PJRA 2026a • DCCEEW 2026c • PJRA 2026b • EPA 2026	The nominated independent auditor, auditor qualifications, audit criteria and proposed audit timeframe were submitted to DCCEEW prior to commencement of the independent audit.	Compliance
36b	• The independent audit does not commence until the Department has approved in writing: - The nominated auditor; - The audit criteria; and - The audit report timeframe.	• Inclusion of evidence of Department approval of auditor details, audit criteria, and timeframe, in the final audit report.	DCCEEW approved the nominated audit team from Peter J Ramsay & Associates in writing on 23 June 2026. Subsequently, the audit criteria, methodology and proposed audit report timeframe were approved by DCCEEW in writing on 10 July 2026. The Department's approval letter required submission of the independent audit report within two months of the approval date. The evidence reviewed demonstrates that the independent audit did not commence until the nominated auditor, audit criteria and audit timeframe had been approved in writing by DCCEEW.	• PJRA 2026a • DCCEEW 2026c • PJRA 2026b • EPA 2026	The Department approved the nominated independent audit team, audit criteria, methodology and audit report timeframe in writing prior to commencement of the independent audit.	Compliance
36c	• The audit report is submitted to the Department for approval within the approved timeframe.	• Not triggered.	Condition 36c requires the audit report to be submitted to DCCEEW within the approved timeframe. At the time of the audit, the audit report had not been submitted to DCCEEW. Therefore, the condition had not yet been triggered.	Not applicable.	At the time of the audit, the audit report had not been completed and submitted to DCCEEW. Therefore, Condition 36c had not yet been triggered and is not applicable at the time of the audit.	Not applicable

Audit Criteria and Methodology

Audit Table

Project Code: 334.54
Client: Visy Glass Operations (Australia) Pty Ltd
Site ID: 222 and 298 Stapylton Jacobs Well Road, Stapylton, Queensland
Project Name: Visy Glass Recycling and Manufacturing Facility
EPBC Approval: 2022/09243

Condition	Criteria	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
36d	• Each audit report is published on the website within 15 business days of the Department's approval.	• Not triggered.	Condition 36d requires publication of the audit report on the website within 15 business days of DCCEEW's approval of the audit report. At the time of the audit, the audit report had not been submitted or approved by DCCEEW. Therefore, the condition had not yet been triggered.	Not applicable.	As the audit report had not yet been approved by DCCEEW, the requirement to publish the audit report had not been triggered. Condition 36d is therefore not applicable at the time of the audit.	Not applicable
36e	• Each audit report is published on the website within 15 business days of the Department's approval.	• Not triggered.	Condition 36e requires approved audit reports to remain published on the website until the approval expires. At the time of the audit, no audit report had yet been approved or published. Therefore, the condition had not yet been triggered.	Not applicable.	As no audit report had yet been approved or published at the time of the audit, Condition 36e had not been triggered and is not applicable at the time of the audit.	Not applicable
37	• Each audit report addresses compliance for the three-year period preceding the audit report.	• Inclusion of confirmation of audit period within the final audit report.	The audit report has been prepared to assess compliance with the Approval for the three-year period following commencement of the Action. The Action commenced on 6 February 2023 and the audit scope and criteria have been developed to assess compliance over the period from 6 February 2023 to the date of this audit.	Not applicable.	This audit assesses compliance with Approval EPBC 2022/09243 for the first three-year audit period following commencement of the Action, being 6 February 2023 to 12 August 2026, together with any subsequent information required to complete the audit. Therefore, the requirements of Condition 37 have been met.	Compliance
38	• Each audit report is: - Completed to the satisfaction of the Minister; and - Consistent with the EPBC Act *Independent Audit and Audit Report Guidelines (2019)* .	• Not triggered.	Condition 38 requires the audit report to be completed to the satisfaction of the Minister and be consistent with the EPBC Act Independent Audit and Audit Report Guidelines (2019). At the time of the audit, the audit report had not yet been submitted to DCCEEW or assessed by the Minister. Therefore, the condition had not yet been triggered.	Not applicable.	At the time of the audit, the audit report had not yet been submitted to or assessed by DCCEEW. Therefore, Condition 38 had not been triggered and is not applicable at the time of the audit.	Not applicable
39	• The Department is notified electronically at least 60 business days prior to the expiry date of the approval that the approval is due to expire.	• Not triggered.	Condition 39 requires notification to DCCEEW 60 business days prior to the expiry date of the approval. The approval has not reached its expiry date and the notification period has not commenced. Therefore, the condition had not been triggered at the time of the audit.	Not applicable.	The approval is not approaching expiry and the required notification period has not commenced. Therefore, Condition 39 had not been triggered and is not applicable at the time of the audit.	Not applicable
40	• The Department is notified electronically of the date of completion of the Action: - Within 20 business days of completion; and - Prior to expiry of the approval. • Completion data is provided with the notification.	• Not triggered.	Condition 40 requires notification to DCCEEW within 20 business days following completion of the Action and prior to expiry of the approval. At the time of the audit, the Action had not been completed and the approval had not expired. Therefore, the condition had not been triggered.	Not applicable.	As the Action has not been completed and the approval has not expired, Condition 40 had not been triggered at the time of the audit. Therefore, the condition is not applicable at the time of the audit.	Not applicable
Total			86			

PETER J RAMSAY & ASSOCIATES