Independent Environmental Audit Report 2022

Visy Pulp and Paper Mill, Tumut

November 2022

Project Number: 22-441

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Acronyms and abbreviations

AQMP	Air Quality Management Plan
AR	Annual Returns
BoM	Bureau of Meteorology
CA	Concept Approval
CAR	Corrective Action Request
CCC	Community Consultative Committee
COD	Chemical Oxygen Demand
DA	Development Approval
DPE	NSW Department of Planning and Environment (formerly DPIE)
ECMR	Environmental Compliance Management Report
EPA	Environment Protection Agency (NSW)
EPL	Environment Protection Licence
FEMR	Farm and Environmental Monitoring Report
IEA	Independent Environmental Audit
LNVMP	Landscape and Native Vegetation Management Plan
ML	Megalitres
NMP	Noise Management Plan
NOW	NSW Office of Water
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVMP	Native Vegetation Management Plan
OEMP	Operational Environmental Management Plan
PA	Project Approval
POEO Act	*Protection of the Environment Operations Act 1997*
SMP	Soil Management Plan
SVC	Snowy Valleys Council
TMP	Traffic Management Plan
TSC	Tumut Shire Council
WMP	Water Management Plan

1. Audit scope and plan

AUDITED ORGANISATION	**PROJECT**
Visy	Tumut Paper Mill
LOCATION OF AUDIT	**DATE OF AUDIT**
Visy Tumut Pulp and Paper 436 Gadara Road, Tumut NSW 2720	23rd November, 2022
DEPTH OF AUDIT	**SCOPE OF AUDIT**
Environmental Approval	Compliance with: • Development Consent Conditions 6/98 • EPL 10232 • Project Approval MP 06_0159 as modified • Concept Approval 06_0159 • Reporting period: 1 July 2021 to 30 June 2022 • Activated resource recovery orders and exemptions*
AUDIT CRITERIA	**AUDIT DETAILS**
• Development Consent Conditions 6/98 • EPL 10232 • Project Approval MP 06_0159 as modified • Concept Approval 06_0159	Opening Meeting – 23/11/22, 08:30am Closing Meeting – 23/11/22, 16:00pm
PROJECT REPRESENTATIVES PRESENT	**AUDIT TEAM**
Matt O'Donovan, Visy HSE Manager Isabella Kane, Visy Environmental Officer	Mike Sutherland, NGH – Auditor Whitney Heiniger, NGH – Auditor Natascha Arens, NGH – Lead Auditor as approved by the NSW EPA (not present during site inspection)
AUDIT REPORT	
A final Audit Report is provided to Visy at the completion of the audit process.	
PREVIOUS AUDIT DATE	**PREVIOUS AUDIT REFERENCE**
13/04/2022	Visy Independent Audit Report 2021 Final (NGH, June 2022)

AUDIT SUMMARY

The audit involved an audit of compliance with the following:

- Development Consent 6/98 (Stage 1) (DA)
    - Development consent modifications Mod-45-5-2003 and supporting documentation
    - Development consent modification 6/98 Mod 3 2012
- Concept Approval 06_0159 (CA)
- Project Approval 06_0159 as modified

The audit included a site inspection, interviews and a desktop review of records and plans. The focus was on the current Project phase requirements. The audit considered and commented on conditions of approval and EPL requirements.

The audit found broad compliance was being achieved. Across the various project approvals, EPL and consultation requirements at total of 240 individual clauses or requirements were examined. Of those approval and consent clauses it was found that:

- 15 were not compliant
- 47 were not triggered
- 178 were compliant.

It is noted that the number of non-compliant findings is an increase on the 2020 – 2021 reporting period. This is due largely to an adjustment to the audit protocol (Appendix A) made for this audit to ensure all EPL clauses were appropriately captured. Note that the overall number of clauses has subsequently increased and the number of non-compliant findings as a percentage is relatively similar to the previous reporting period. Only two non-compliant findings in this reporting period were not identified in the previous audit.

Some forest resources salvaged from 2019 – 2020 bushfire areas resources have been chipped and salvaged; this has led to an ongoing enlargement of stockpiled chip within the site stormwater management area.

A number of conditions were non-compliant due to the outdated wording or parameters. All Environment Protection Licence (EPL) non-compliances (exceedances) were reported through the EPL Annual Return 2022 and Environmental Compliance and Monitoring Report 2022 Required mitigation measures were implemented to reduce the likelihood and impact of non-compliances. Visy are working toward a modification in relation to outdated conditions.

Visy's proactive and involved approach towards environmental management is commendable. Historical noise treatment measures, ongoing community engagement and a long-term reduction in odour impact on adjacent properties shows an ongoing commitment by Visy to reducing the impact of the site on the surrounding community and a high-standard of environmental management. The site Operational Environmental Management Plan and subplans have been updated during the reporting period.

During the site inspection an excavated area 100m x 50m was observed adjacent the waste yard. The excavation is in the north-eastern area of the mill marshalling area. No approval for this excavation was able to be produced during the audit and high-resolution aerial imagery (latest 2020) shows this area previously comprised landscape plantings. Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy have lodged a modification application for the use of the shed as built. These deviations from site approvals led to non-compliance with administrative conditions of the Concept and Project Approvals.

Attended noise monitoring during the reporting period encountered constraints from wind speed. Despite these impacts and some exceedances, noise impacts are considered compliant due to the completion of noise mitigation treatments and agreements with all sensitive receivers adjacent to the site.

2. Independent audit declaration

Project Name	Visy Pulp and Paper Tumut
Consent No.	MP 06_0159 as modified
Description of Project	Kraft paper production
Project Address	1302 Snowy Mountains Highway Tumut NSW
Proponent	Visy Pulp and Paper Pty Ltd
Operator Address	1302 Snowy Mountains Highway Tumut NSW
Title of Audit	Independent Environmental Audit
Date	November 2022

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

Name of Auditor	Natascha Arens
Signature	 24/02/2023
Qualification	B App Sc MBEM, Exemplar Global Lead Auditor
Email Address	natascha.a@nghconsulting.com.au
Company	NGH Pty Ltd
Company Address	1st Floor, 31-33 Beaumont Street, Hamilton NSW

3. Report summary

3.1 Introduction

NGH Pty Ltd (NGH) were engaged by Visy Pulp and Paper Pty Ltd (Visy) to carry out the Independent Environmental Audit for 2021 – 2022. The audit is required in accordance with Schedule 2, Condition 3.16 of the project approval MP 06_0159, as modified (the approval) for their Tumut Kraft paper mill.

Stage 2, Phase 1A works were completed in 2015 as part of the modified approval including additions to one of the paper machines and an additional recycled cellulose fibre (RCF) Pulper. One major shutdown occurred during October 2022. The key achievements of 2021 - 2022 included:

- The key mill processes, including boilers shut down and maintenance
- Routine maintenance was carried out on CEMS analysers
- Maintenance and cleaning of Reflux tank pump (Evaporator area)
- No fines or penalties from environmental non-conformance achieved, in line with previously set Environmental Management Targets
- Reduction in both electricity usage compared to previous reporting period
- Increased usage of wastepaper product in paper production
- Ongoing recovery of pine resources damaged by the 2019/2020 fires
- Despite an overall exceedance, a reduction in coarse particulate annual load by 28.1% at Stack 1 and Stack 2
- Ongoing provision of sponsorship and funding to local community events and organisations.

3.2 Audit team

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

The site audit was completed by Michial Sutherland and Whitney Heiniger. Michial has 35 years' experience as an environmental professional and 25 years of auditing experience. Whitney Heiniger supported Michial during the audit. Whitney has over 4 years of experience as an environmental professional, including internal and external auditing, and has completed training as a Lead Auditor in Environmental Management Systems ISO 14001:2015 and ISO 19011:2018.

3.3 Objectives

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

3.4 Audit scope

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

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

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

- Development Consent 6/98 (Stage 1) (DA)
    - Development consent modifications Mod-45-5-2003 and supporting documentation.
    - Development consent modification 6/98 Mod 3 2012
- Concept Approval 06_0159 (CA)
- Project Approval 06_0159 as modified.

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

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

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

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

3.5 Audit reporting period

The reporting period for the audit is 1 July 2021 – 30 June 2022 inclusive.

4. Audit methodology

4.1 Audit process

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

The Audit program was submitted to the Auditee on 15th November 2022 indicating the dates of the site audit, scope, criteria, audit details and required project representatives.

An Opening Meeting was held on 23rd November 2022 at 8.30am on site at the main administration building. Present at the opening meeting were:

- Matt O'Donovan, Visy – HSE Manager
- Isabella Kane, Visy – Environmental Officer
- Michial Sutherland, NGH – Auditor
- Whitney Heiniger, NGH – Auditor

A closing meeting was held on 23rd November 2022 at 4.00pm at the main administration building. The above project staff were present at the closing meeting.

4.2 Site inspection

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

- Wastewater treatment and storage area
- Log delivery area and chipper
- Maintenance and machine workshops
- Chip stockpiles
- New storage shed and outdoor storage areas
- Flyash and dregs & grits stockpiles
- Heritage buildings
- Oxygen and CO_2 tank farm
- Waste oil storage
- Solid waste storage and processing areas
- Paper recycling loading bay
- Packing and distribution warehouse.

During the site inspection, conditions were clear, cool and sunny. The Bureau of Meteorology (BoM) weather station at Burrinjuck Dam (station 073007), approximately 45 kilometres (km) northeast of the site, recorded a maximum temperature of 18°C, minimum temperature of 6.7°C and 1.8 millimetres (mm) of rainfall. Total rainfall for November 2022 at the Burrinjuck Dam weather station was 134.8mm.

4.3 Consultation

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

- **NSW DPE** – consultation undertaken requesting approval of the Auditor. Approval received 4th November 2022 (Appendix B).
- **NSW DPE** – consultation request made via email 4th November 2022. No input was received from DPE.
- **NSW EPA** – consultation request made via email 4th November 2022. EPA requested 28th November 2022 (Appendix C.2):

  > *"…that the audit of Visy Pulp and Paper Tumut address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises."*
- **NSW Department of Natural Resources Access Regulator (NRAR)** – consultation request made via email 4th November 2022. No input was received from NRAR.
- **Snowy Valleys Council (SVC)** – consultation request made via email 4th November 2022. No input was received from SVC.

4.4 Compliance status descriptors used in this report

The compliance descriptors used in this report are outlined in Table 4-1

Table 4-1 Compliance status descriptors used in this report

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

4.5 Assessment against the audit protocol

Following the site inspection M. O'Donovan, I. Kane, M. Sutherland and W. Heiniger occupied an office in the Visy Mill administration area. The audit protocol provided in Appendix A was used as a tool to systematically examine and record the compliance status of consent and approval conditions during the previous twelve months. An opinion was formed on the available evidence in relation to the requirements and the compliance status. The compliance status was described as not triggered, not compliant or compliant. The evidence sighted, a description of the assessment and the compliance status were recorded electronically in the compliance protocol (Appendix A). A summary of non-compliance and requirements that were not triggered has been prepared (Section 5). Copies of emails, correspondence, reports, management plans and other evidence, where cited, were taken as evidence and for further cross referencing during the audit report preparation.

5. Audit findings

5.1 Summary of compliance

Across the various project approvals, EPL and consultation requirements at total of 240 individual clauses or requirements were examined. Of those approval and consent clauses it was found that:

- 15 were not compliant
- 47 were not triggered
- 178 were compliant.

5.2 Summary of non-compliance

Table 5-1 Non-compliant findings recorded during the reporting period

ID	Section of Report	CoA/EPL ID	Details
22/1	Section 5.7.2	DA 6/98, CoA 41	Solid Waste Management Plan requires update to accommodate material removal to Woodlawn mine rehab site. Plan will need to discuss onsite (north of waste handling area) and offsite management by external company. Refer s5.2 of 2017 WMP for initial considerations and initial application. Sighted during audit, update waiting for EPL variation. Ongoing non-compliant finding.
22/2	Section 5.7.2	DA 6/98, CoA 68	Toxicity testing of irrigated effluent & event-based surface water monitoring is not occurring. This CoA is intended to be retired. Ongoing non-compliant finding.
22/3	Section 5.8.1	CA06_0159, CoA 1.1	During the site inspection a large excavated area adjacent the waste yard, in the northeastern section of the mill footprint, was observed. High-resolution aerial imagery (latest 2020) shows this area previously comprised revegetation plantings. This fill material was utilised in the construction of the new Woodyard Stacker Reclaimer. Although a letter from GHD (dated 17 May 2021) confirms that the proposed stacker reclaimer should be considered as being consistent with the EP&A Act, no evidence was included in the letter that this extended to the excavation of fill from the observed area. Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy have since lodged a mod application to regularise the use of the shed as built.
22/4	Section 5.8.1	CA06_0159, CoA 1.3	Inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) identified in past audits are still outstanding. Ongoing non-compliant finding.
22/5	Section 5.8.1	PA06_0159, CoA 1.1	Non-compliance with consents as detailed in 22/3.

ID	Section of Report	CoA/EPL ID	Details
22/6	Section 5.8.3	PA06_0159, CoA 2.4	COD reduction in clean condensate of 50% not achieved. COD cannot be comparatively measured with accuracy due to plant reconfiguration. This CoA is intended to be retired, discussions with DPE ongoing. Ongoing non-compliant finding.
22/7	Section 5.8.3	PA06_0159, CoA 2.10	Concentration limits have been exceeded at several of the discharge points. These are documented in the EPL annual return and subject to load-based licencing.
22/8	Section 5.8.3	PA06_0159, CoA 2.11	Exceedances reported for the averaging period and noted in ECMR 2021. Averaging periods appropriate.
22/9	Section 5.8.3	PA06_0159, CoA 3.1	Some of the pollutants specified are not being monitored. The tables are from a historic EPL and do not represent the current EPL. Ongoing non-compliant finding.
22/10	Section 5.9.2	EPL, L1.2	Coarse Particle exceedances detailed in the EPL Annual Return 2022. Load limit = 31,000kg, coarse particulate annual load for FY22 was 65,342kg,
22/11	Section 5.9.2	EPL, L3.1	Exceedances detailed in annual EPL return incl.: 1) Coarse Particulates at Point 1 & Point 22; 2) Total Solid Particles at Point 4 Lime Kiln; 3) Carbon Monoxide limit at Point 3; 4) Opacity Limit at Point 1 (Stack 1); 5) Nitrogen oxide limit at Point 1 (stack 1); 6) Opacity Limit at Point 22 (Main Stack 2); 7) Total Solid Particles at Point 1 (Stack 1); 8) Nitrogen Oxides Point 2 (Recovery Boiler A).
22/12	Section 5.9.2	EPL, L3.4	Coarse Particulates, Carbon monoxide, Opacity, Nitrogen oxide and Total Solid Particles limits exceeded at specified points during the reporting period.
22/13	Section 5.9.2	EPL, L3.8	Exceedances reported from Point 2 (Recovery Boiler) as per L3.1.
22/14	Section 5.9.2	EPL, L3.10	Exceedances reported from Point 4 (Lime Kiln) as per L3.1.
22/15	Section 5.9.2	EPL, R1.5	Annual return due by 28th August, marked as received 30th August 2022 on EPA website.

5.3 Summary of non-triggered requirements

A number of non-triggered conditions were recorded during the audit. These conditions are detailed in Appendix A.

5.4 Previous audit non-compliances

Table 5-2 Non-compliant findings from the previous reporting period and current status

ID	Details	Comment	2022 Status
21/1	Survey and engineered plans not produced for a 3ML wastewater pond built in 2016 for process water during annual plant shutdown. Engineering signoff required. Design completed November 2021 and approved February 2022, certified by McKenzies, sighted during audit and as part of modification application. Dam filled in during Feb 2022, new dam has been built and was cited during audit. Certification and construction completed outside of reporting period, will be recorded during 2022 - 2023 reporting period.	Design retrospectively completed November 2021, approved February 2022. Original dam filled in Feb 2022 and new dam built outside of reporting period.	Closed
21/2	Solid Waste Management Plan requires update to accommodate material removal to Woodlawn mine rehab site. Plan will need to discuss onsite (north of waste handling area) and offsite management by external company. Refer s5.2 of 2017 WMP for initial considerations and initial application. Sighted during audit, update waiting for EPL variation.	Update to WMP pending EPL variation. Update should now include Woodlawn and Captains Flat RRO/RRE details.	Open
21/3	Toxicity testing of irrigated effluent & event-based surface water monitoring is not occurring. This CoA is intended to be retired.	Toxicity testing is not required by the EPA. This CoA should be removed when other consent conditions are consolidated.	Open
21/4	Inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) identified in past audits are still outstanding.	Progress still required on the inconsistencies between the consent and current EPL.	Open
21/5	COD reduction in clean condensate of 50% not achieved. COD cannot be comparatively measured with accuracy due to plant reconfiguration. This CoA is intended to be retired, discussions with DPE ongoing.	This CoA should be modified or removed when other consent conditions are consolidated in a future Modification.	Open
21/6	Concentration limits have been exceeded at several of the discharge points. These are documented in the EPL annual return and subject to load-based licencing.	Visy continues to monitor and respond to exceedances of EPL limits.	Recurring
21/7	Exceedances reported for the Averaging period and noted in ECMR 2021. Averaging periods appropriate.	Visy continues to monitor and respond to exceedances of EPL limits.	Recurring
21/8	One movement outside of curfew reported by member of the public. One truck movement recorded in Adelong at 06:42, outside of 22:00 - 07:00 curfew.	No movements recorded outside of curfew during the 21 – 22 reporting period.	Closed

ID	Details	Comment	2022 Status
	Driver was noted as a new employee, misunderstanding of curfew hours. All other movements in reporting period within curfew time.		
21/9	Some of the pollutants specified are not being monitored. The tables are from a historic EPL and do not represent the current EPL.	This licence condition should be removed or modified to request compliance with current EPL when other consent conditions are consolidated.	Open
21/10	Actual loads of assessable pollutants discharged from the premises during the reporting period have exceeded the load limit. These pollutants have been the subject of additional fees through load-based licensing.	Load limits exceeded on occasion. Applicable fees calculated and charged.	Recurring
21/11	The concentration limits have been exceeded at some monitoring discharge points for limited periods of time.	A range of maintenance measures are implemented by Visy to minimise exceedances however some exceedances still occurred during the reporting period.	Recurring

5.5 Document list

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

- Visy Operational Environmental Management Plan (MPL-TUM-ENV-001-4) August 2021
- Visy Air Quality Management Plan (MPL-TUM-ENV-002-3) May 2021
- Visy Noise Management Plan (MPL-TUM-ENV-004-3) July 2021
- Visy Landscape and Native Vegetation Management Plan (MPL-TUM-ENV-003-3) Oct 2021
- Visy Soil Management Plan (MPL-TUM-ENV-005-3) Sept 2021
- Visy Traffic Management Plan (MPL-TUM-ENV-006-3) August 2021
- Visy Water Management Plan (MPL-TUM-ENV-007-3) June 2021
- Visy Solid Waste Management Plan (VP9-10-10.3-PN-009) October 2017
- EPL 10232
- Annual Return 2022 for EPL 10232
- Annual Return Submission 2022 for the Visy EPL 10232 (submitted 30/08/2022)
- Annual Waste Report (WARRP) 2021 - 2022: Visy Pulp and Paper – 10232
- Visy Environmental Compliance and Monitoring Report 2022

- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 1 Compliance Report
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 2 CEMS Exceedance Event Details
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 3 Odour Monitoring Results
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 4 Noise Compliance Monitoring Results Summary
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 5 Noise Mitigation Action Plan
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 6 Monthly HV Movement Data
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 7 Farm and Environmental Monitoring Report (McMahon Earth Science)
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 8 Five Year Groundwater Piezometer Trend Cycle
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 9 Complaints Register
- Visy Environmental Compliance and Monitoring Report 2022 – Appendix 10 Environmental Management Targets 2022/23
- Previous IEA Reports 2016 – 2021 (NGH)
- Email to DPE, EPA and SVC 22/11/2022, submitting ECMR 2022
- Ekitmo Emission Testing Report Visy Pulp and Paper, Tumut (R011400-1) September 2021
- Revised Ekitmo Emission Testing Report Visy Pulp and Paper, Tumut (R011400-1r) November 2021
- Ektimo Emission Testing Report Visy Pulp and Paper, Tumut (R012458-1) March 2022
- Ektimo LDAR Testing Report (Methanol Plant, Steam Stripper) (R012458-2) February 2022
- Visy Waste Removal Records 2021 – 2022 (.xlsx)
- Internal description of waste streams and fuel definitions
- Letter from EPA regarding Resource Recovery Order & Exemption for Visy Material (DOC20/532167-1) July 2020
- EPA Woodlawn PHR acid mine tailings trial order 2020
- EPA Woodlawn PHR acid mine tailings exemption 2020
- EPA The Captains Flat alkaline material trial order 2022
- EPA The Captains Flat alkaline material trial exemption 2022
- Letter from EPA regarding Captains Flat alkaline material trial order and exemption 2022 (DW22/213-3) 21st June 2022
- Hazard Audit Report for Visy Pulp and Paper Tumut, Pinnacle Risk Management December 2021
- Green liquor dregs by-products monitoring 2021-22 (.xlsx)
- Bottom sand by-products monitoring 2021-22 (.xlsx)
- Fly ash by-products monitoring 2021-22 (.xlsx)

- Laboratory Analysis Report 2205-0024 (fly ash, lime mud, dregs & grits, bottom ash, PMR-fibres, bell press) DM McMahon 20/05/2022
- Monthly Water Treatment Reports (Buckman Laboratories) July 2021 – June 2022
- Caustic Soda unloading procedure 2017
- Visy Winter storage Dam Capacity Record 2017-2022
- Email to WaterNSW – Visy Groundwater Data 9/11/2022
- Groundwater licence record 2008 for piezometers on site
- Cooling Tower Monthly Water Treatment Service Reports July 2021 – June 2022 (Buckman Laboratories)
- Cooling Tower Monthly Form 3 Reports – July 2021 – June 2022
- WetSAC Monthly Form 3 Reports – July 2021 – June 2022
- Visy Pulp and Paper Quarterly Maintenance Nov 2021 (Lear Siegler)
- Visy Pulp and Paper Quarterly Maintenance Feb 2022 (Lear Siegler)
- Visy Complaints Registers Jul – Sept 21, Oct 21 – Dec 21, Jan 22 – Mar 22, Apr 22 – Jun
- Visy Complaints Audit Reports Jul – Sept 21, Oct 21 – Dec 21, Jan 22 – Mar 22, Apr 22 – Jun
- Email submission to DPE, EPA, SVC – Quarterly Complaints Registers and Audit Reports 22/11/2022
- Visy Community Consultative Committee Meeting Minutes Aug 21, Sept 21, Dec 21, Feb 22, Apr 22, Jun 22
- Email to EPA – Visy Tumut VCCC Meetings minutes submission 5/11/2022
- Visy Fire and Emergency Training Records from Noggin system 2020 – 2022
- Email to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Letter to DP&E Nominating Matt O'Donovan as sites EO Dec 11, 2012
- Visy Emergency Response Team List and Training Register
- Official Caution issued to Visy Pulp and Paper Pty Ltd (MP06_0159) Snowy Valleys LGA – DPE, 3/02/2022
- Letter DPE Approval of Independent Auditor 4/11/2022
- Tumut Paper Mill Expansion Modification 4 (MP06_0159-Mod 4) August 2020
- Tumut Paper Mill Expansion Modification 5 (MP06_0159-Mod 5) February 2022
- Tumut Pulp and Paper Mill Modification Report 06_0159 GHD October 2021
- Letter Visy Tumut – Woodyard Stacker Reclaimer Project, GHD 17 May 2021.

5.6 Notices, orders or prosecutions

An Official Caution was issued to Visy by DPE on 3rd February 2022 regarding the construction of a storage shed within the mill footprint. The approved storage shed design area was 864m^2 however the shed was constructed over an area of 1598m^2. Visy lodged a modification application to regularise the use of the shed as built (Mod-5). This is addressed in non-compliance 22/3 and 22/5 in Table 5-1.

5.7 Development consent approval

5.7.1 Environmental management

OEMP

The performance of the OEMP is reviewed annually through the Environmental Compliance Management Report (ECMR) and the Independent Environmental Audit (IEA). The Visy Environmental Compliance and Monitoring Report (ECMR) 2022 and internal audit reviews environmental performance for the reporting period.

The ECMR addresses the reporting requirements outlined in CoA12. The environmental management targets incorporate targets specific to the site operation. Site specific environmental targets that reflect the on-site needs identified in the ECMR are beneficial. Targets identified in the ECMR have been included in the OEMP and sub plans for next year. New targets have been identified for the 2022 – 23 financial year and results from 2021 – 22 targets are described in ECMR 2020 Appendix 10. Updates were made to the OEMP and most subplans during the reporting period, with some subplans updated during the previous report period (Q1, Q2 2021). The plans are updated at the time of significant changes in work practices. No major changes in the processes and facilities have occurred over the last three years. The focus of 2020 – 21 was to continue managing both the availability of timber resources and staff, as well as continue to reduce complaints, emissions and resource use.

Below average rainfall was received and recorded for previous years between 2017 – 2019. However, above average rainfall was received during the 2019 – 20, 2020 – 21 and 2021 – 2022 reporting periods. Despite higher than average rainfall, no discharges of water to Sandy Creek were required in 2021 – 22 to manage capacity within the wastewater system.

5.7.2 Specific environmental conditions

Hazard management

Visy's Hazardous Chemical Review was completed in December 2021. The previous audit (November 2021) confirmed that the above ground diesel bund capacity was adequate to contain a spill and also confirmed that the proximity of Turpentine and Caustic was acceptable once rezoned. Some material (dirt and waste materials) removal was identified as required from tank bund areas. Rezoning was updated as part of the finalisation of the Hazard Area Classification Report (Benbow, 2015). Additional signage associated with hazardous material storage was implemented in 2016/17. No large spills have occurred in the last twelve months. During the reporting period, five small spills occurred which were managed with on-site resources and did not cause off-site environmental harm. Signage and spill resources within and adjacent to the hazardous goods storage area were present during the audit.

Visy have a 4WD fire tanker with a carrying capacity of at least 3600L based on site and is available to Gilmore Bush Fire Brigade as required. The truck is serviced every 12 months, and this includes the firefighting equipment. An additional 4WD fire tanker was purchased by Visy during the previous reporting period. The second unit has a carrying capacity of less than 3600L and is a support vehicle to the main requirement. A total of 16 employees on site have Structural Fire Fighting Training, which is equal to the advanced bush firefighting training. The firefighting arrangements have remained unchanged over the last twelve months.

Noise management

Annual attended noise monitoring and subsequent Report (EMM) were completed in February 2022. The report was prepared to assess compliance with the CoAs and EPL. The requirements of the Noise Mitigation Action Plan (Appendix 5 of the ECMR) were reinforced by the report. The report indicated that where the impacts of climatic conditions were favourable the monitoring was able to establish broad compliance with the CoAs.

The Operational Noise Management Plan (ONMP) was updated in July 2021. It includes the requirements detailed in CoA-25 and was updated in 2019 to reference the NSW EPA *Noise Policy for Industry (2017).*

Eight out of eight adjacent properties now have signed noise agreements and seven have had residential acoustic treatment completed, with the remaining property, “Reka”, having had no acoustic treatment requested. No noise complaints were received during the reporting period.

Air quality

The Air Quality Management Plan (AQMP) includes the safeguards, procedures, mitigation measures and monitoring detailed in CoA-27. The AQMP adequately meets the requirements of the approvals and EPL and was updated during the previous reporting period on 16th May 2021 (Revision 3).

Odour complaints for the reporting period totalled 21, an increase on the 17 odour complaints reported during the 2020 – 2021 reporting period and a significant decrease from the 45 odour complaints reported during the 2018 – 2019 reporting period. January and March 2022 saw odour complaints peak at 4 for each month. These complaints were due to activities around the wastewater treatment plant and efficiency issues with the Recovery Boiler B vent gas scrubber, which needed to be taken offline while the heat exchanger was washed.

Water

Wastewater was not discharged into Sandy Creek during the reporting period.

There were no observed increases in water quality parameters for samples taken in the period as reported in the Farm Environmental Monitoring Report 2021 – 22.

The land identified in the EIS for irrigation of effluent is available for irrigation, however Visy have significantly reduced their water usage through improvements in plant efficiency and recycling and do not need to use all of this land at the current time.

There is a design discrepancy between the current drainage design of the contour drains and those that have been built along the top of the diversion channel. The original consent condition required a design of a 1 in 10 year event, whereas the modification requires a 1 in 100 year event. Visy continue to monitor diversion drain during high rainfall events. Discharges are only permitted through approval.

The CoA 68 requires toxicity testing for wastewater which has not been performed during any recent reporting periods nor the current reporting period. **This issue is raised as a non-compliance ID 22/2 (DA 6/98, CoA 68).** This is an outdated cross reference to past EPA EPL water quality parameters. The CoA 68 DA 6/98 should be removed in consultation with DPE.

Waste management

The Solid Waste Management Plan (SWMP) was reviewed and updated on 22 June 2019 and is considered to broadly address the requirements of DA-41. The WMP currently does not address material removal to the Woodlawn mine rehabilitation site or Captains Flat mine rehabilitation site nor does it include the new 3ML wastewater management dam constructed in 2022 and **this issue is raised as a non-compliance ID 22/1 (DA 6/98, CoA 41)**.

During 2016 a 3ML wastewater management dam was constructed without a certified design to manage effluent from the site. It is noted that this dam has now been filled in and a new dam has been constructed for this purpose with required certification and engineering signoff.

Traffic

No new access roads or tracks have been constructed since the last audit.

Automatic reports of truck movements are received by the Logistics Manager and HSE Manager based on information received at the weighbridge. All truck movements in the reporting period were recorded within the stated curfew times.

An Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) has been prepared to assist in getting curfew information and requirements across to employees. This was developed on 23rd February 2015 and is routinely developed to new and existing staff.

Visy continues to participate as a member of the Softwoods Working Group (now part of the Murray Region Forestry Hub) and the Forestry Industry Council to improve maintenance, standards and safety along the main haulage road.

Truck schedule is submitted and reviewed annually as part of the ECMR.

Community and consultation

Visy continues to hold Visy Community Consultative Committee (VCCC) meetings every two months with every second meeting being open to the public. Representatives include Snowy Valleys Council (SVC), Landcare, Tumut Regional Chamber of Commerce and neighbours.

The most recent meeting in the reporting period was held in June 2022. A different environmental topic is covered at each meeting – e.g. the reduction of speed limits in Adelong and subsequent notice to all Visy drivers was discussed at the September 2021 meeting.

Telephone services for complaints is advertised on signage on site, on website and communicated through CCC meetings.

A three-monthly internal audit of the complaints system is undertaken and provided to SVC, DPE and EPA and includes a copy of the complaints register.

Heritage

No unexpected heritage finds have been reported. No additional works have been completed for the Gadara Park Homestead during the reporting period. The homestead was inspected at the time of the audit. The site appears well maintained and past rehabilitation works were observed. Significant work still remains to be completed.

Flora and fauna

The Native Vegetation Management Plan (NVMP) was reviewed and updated in October 2021 and includes a monitoring and maintenance checklist.

No new plantings occurred in the last reporting period due to other priorities. Previous plantings completed are progressing satisfactorily.

Weed management is ongoing, with treatment of Bathurst Burr, Bracken Fern, Blackberry, Paterson's Curse, Cape Weed and Saffron Thistle occurring during the reporting period.

Monitoring

The Environmental Compliance and Monitoring Report (Visy 2022) details the environmental monitoring carried out on site, including location, scheduling and reporting requirements. The EPL Annual return summarises monitoring results required by the EPL.

All exhaust gases are monitored through the CEMS and monitoring data is published on the Visy website. All atmospheric monitoring is reported to NSW EPA through the EPL annual return. The annual return for 2022 was sighted at the time of this audit. Emissions testing is carried out on the power boiler and lime kiln annually and the main stack one and two quarterly. LDAR and leak detection audits are carried out biannually.

All laboratories used to analyse samples and report data are NATA accredited (14601) and all test methods used are also NATA accredited.

An email submitting the ECMR 2022 to relevant agencies was sighted at the time of the audit.

5.8 Concept and project approval

The latest modification (MP 06_0159) was approved by DPE on 21st August 2020 following the 2019 – 2020 bushfire season, allowing Visy to process timber from fire-damaged areas 24 hours a day with an adjustment to previous noise restrictions.

A further modification (MOD-5) is currently being assessed by DPE however does not apply to this reporting period and will be addressed during future compliance audits.

5.8.1 Administrative conditions

During the site inspection an excavated area adjacent the waste yard, in the north-eastern section of the mill marshalling area, was observed. High-resolution aerial imagery (latest 2020) shows this area previously comprised revegetation plantings. This fill material was utilised in the construction of the new Woodyard Stacker Reclaimer. Although a letter from GHD (dated 17 May 2021) confirms that the proposed stacker reclaimer should be considered as being consistent with the EP&A Act, no evidence was included in the letter that this extended to the excavation of fill from the observed area. Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy promptly lodged a mod application (Mod-5) to regularise the use of the shed as built. **This issue is raised as both non-compliance IDs 22/3 (CA06_0159, CoA 1.1) and 22/5 (PA06_0159, CoA 1.1).**

Several inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) are still outstanding. These inconsistencies are detailed in past Audit reports. Visy are currently

working towards consolidating these approvals. **This issue is raised as a non-compliance ID 22/4 (CA06_0159, CoA 1.3).**

5.8.2 Environmental management

Performance

The ECMR provides an avenue for periodic review of compliance with the conditions of consent.

OEMP and subplans

As per OEMP under Section 5.2.1:

- The Operational Environmental Management Plan (MPL-TUM-ENV-001-4) was updated August 2021
- The Air Quality Management Plan (MPL-TUM-ENV-002-3) was updated May 2021
- The Noise Management Plan (MPL-TUM-ENV-004-3) was updated July 2021
- The Landscape and Native Vegetation Management Plan (MPL-TUM-ENV-003-3) was updated October 2021
- The Soil Management Plan (MPL-TUM-ENV-005-3) was updated September 2021
- The Traffic Management Plan (MPL-TUM-ENV-006-3) was updated August 202
- The Water Management Plan (MPL-TUM-ENV-007-3) was updated June 2021

The Solid Waste Management Plan has not been updated as detailed in non-compliance ID 22/1.

Licences, permits and approvals

The following licences are being maintained for piezometers and regulated water sources:

- WAL 292121
- WAL 20298
- WAL 20297.

Additional licences and approvals held by the site include:

- NSW EPA Environment Protection Licence number 10232 Paper or Pulp Production >150,000t
- Resource Recovery Order, Woodlawn PHR acid mine tailings trial order 2020
- Resource Recovery Order, Woodlawn PHR acid mine tailings trial exemption 2020
- Resource Recovery Order, The Captains Flat alkaline material trial order 2022
- Resource Recovery Order, The Captains Flat alkaline material trial exemption 2022.

5.8.3 Specific environmental conditions

Hazard management

As per Hazard Management under Section 5.8

No demolition of structures has occurred this reporting period.

One storage shed was constructed during the reporting period, detailed in non-compliance ID 22/3.

Noise management

The Operational Noise Management Plan (ONMP) adequately included the requirements detailed in DA-25.

The Visy Tumut Pulp and Paper Mill Annual attended noise monitoring report (EMM 2022) identified broad compliance with the noise limits identified. Climatic conditions have invalidated most noise monitoring results during the evening and the night for the past three years. Visy altered the time of year selected for noise monitoring to February, however wind speeds affected this reporting period's results in the day and evening periods. Due to the completion of noise mitigation measures for all adjacent sensitive receivers, these noise results were still considered compliant despite the effects of weather on attended noise monitoring.

No noise complaints were received during the reporting period.

A Noise Mitigation Action Plan has been developed based on the recommended actions detailed in the current and past reports.

Air quality

All access roads to and from the site are sealed and watercarts are used on site during shutdown. No dust complaints have been received for the reporting period. Visible dust was not observed on site during the audit inspection.

21 odour complaints were received during 2021 – 2022 reporting period which is an increase on the 17 received during the 2020 – 2021 reporting period. Based on the significant long-term reduction in odour-related complaints during the past five years, the management of odour and evident prevention of the majority of odour from leaving the site boundary is considered compliant during this reporting period.

Ektimo completed emissions testing through sampling and analysis in September 2021 and February 2022. The sampling was conducted at ten (10) emission points across the facility. The odour concentration and rate were assessed at each location.

Visy are required to operate the vapour compression evaporator to reduce the level of chemical oxygen demand in clean condensate so as to reduce the COD to 50% of existing levels in 2006. Past assessments indicate that the clean condensate COD levels reached 47% of the original figures. As such **this issue is raised as a non-compliance ID 22/6 (PA06_0159, CoA 2.4).** Visy are of the opinion that meaningful comparison of clean condensate COD levels are no longer possible due to the changes in the process. A modification should be requested to remove or amend this condition.

Soil and water

As per Water under Section 5.7.

No extension to the winter storage dam has taken place.

Waste management

As per Waste Management under Section 5.7.

Treatment, reuse and recycling of waste is maximised on site through waste segregation. Waste oil is collected by Cleanaway for recycling. Only waste paper is accepted on site; waste paper includes cardboard boxes, clippings (offcuts) and commons (domestic curb side). Additional facilities in the form of a new sludge tank and new steel stairs at the wastewater treatment plan aim to improve safety and cost efficiency in waste management.

The recycled paper processing area was modified during the 2018 – 2019 reporting period. The waste from the pulping and screening process can now be more effectively segregated and handled. The movement areas have been previously paved also to ensure better handling of waste.

In accordance with the Resource Recovery Order, Woodlawn PHR acid mine tailings trial order 2020 and Resource Recovery Order, The Captains Flat alkaline material trial order 2022,

Visy have sent 5028 tonnes (t) to the Woodlawn mine rehabilitation site during the reporting period and 489t of dregs & grits, fly and boiler sand to Captains Flat mine rehabilitation site during the reporting period.

This waste is used to manage and rehabilitate both mine sites.

Traffic

As per Traffic under Section 5.7.

All drivers are inducted into Visy site. Visy maintains records of driver training and driver run sheets.

Trucks that deliver waste paper, backload with reels of paper. The use of Super B-doubles has never been sought or approved by Transport for NSW. The use of A-doubles was observed during the site inspection and is significantly reducing truck movement numbers from the site.

Community and consultation

As per Community & Consultation under Section 5.7.

A complaints register is being adequately maintained through ‘Vault’ and is reported through the ECMR.

Project information including copies of approvals, management plans and monitoring programs are maintained at https://www.visy.com.au/env-appv-mgmt-plan/ and are readily accessible by the public.

Heritage

No unexpected heritage finds have been reported.

Recommendations taken from both the Section 11.3.2 of the Supplementary Report 3 to the EIS (1998) and Review of Conditions Report by Long-Blackledge (2011) have been used to develop the Gadara Park Homestead Plan of Management – Ongoing Action Plan. These recommendations will be actioned and budgeted progressively.

Flora and fauna

Refer to Section 5.7.

Monitoring and reporting

As per Section 5.7.

There have been no new additions to the monitored discharge points listed in PA-2.9.

A number of exceedances were recorded at the monitoring locations, **this issue is raised as a non-compliance ID 22/7 (PA06_0159, CoA 2.10)**. The exceedances are recorded in the EPL Annual Return 2022 and ECMR 2022. A series of actions have been taken or are planned to address these exceedances. Although averaging periods are appropriate for pollutant emissions, exceedances as highlighted in CoA 2.10 are still occurring and **this issue is raised as a non-compliance ID 22/8 (PA06_0159, CoA 2.11).**

Several parameters listed in CoA 3.1 are no longer being monitored, **this issue is raised as a non-compliance ID 22/9 (PA06_0159, CoA 3.1).** The tables in the consent condition have been copied from a past EPL and are no longer relevant. This condition should be the subject of a modification to remove or reword the condition.

Soil sampling is biannual before and after the irrigation season. The site has been irrigated for over ten years. The scheduled irrigation of low strength effluent, the export of crops (and nutrients) and the clayey nature of the soils all minimise the potential impact of the effluent on the soils. As such it will take a number of years to see any change in soil chemistry however overall soil health has been observed as improving in the Farm and Environmental Monitoring Report for 21 – 22.

Odour and noise monitoring are discussed above under Air Quality.

5.9 Environment Protection Licence

5.9.1 Administrative conditions

The ECMR 2022 reports a paper production total of 681,004t, with approval listed as 800,000t.

A copy of the EPL is available on the Visy website, through the site filing system and was sighted at the time of the audit.

5.9.2 Specific environmental conditions

Hazard management

Materials handled on site are stored, processed, moved and transported appropriately.

Air quality

As per Air Quality under Section 5.7, with particular reference to odour management. The concentration limits have been exceeded at some of the points for limited periods of time, most notably opacity. **This issue is raised as a non-compliance ID 21/11 (EPL-10232 L3).**

Soil and water

As per Water under Section 5.7.

No runoff has occurred. Real time soil moisture data is monitored to ensure soil does not become oversaturated.

No spray drift has been observed which is informally monitored by the farm manager during irrigation times.

Effluent pipes and fittings are not readily accessible by the public. Lockable valves are used on pipes and outlets coming from the wastewater plant.

The Water Management Plan requires sludge to be disposed of in accordance with the EPL and the Visy procedure Wastewater Treatment Plan Sludge Disposal by Land Application on Site – Procedure (VP9-10-10.4-OP-035).

Waste management

As per Waste Management under Section 5.7.

Noise

Climatic conditions have affected some day and evening monitoring results despite selecting an alternative time of year for monitoring. Noise mitigation agreements are in place with all relevant landholders, with an additional two agreements completed during the previous reporting period, allowing compliance with noise limits despite affected monitoring results. Despite noise limits not being exceeded due to noise mitigation agreements being in place, some wind speed effects were observed during attended monitoring, with temperature inversion interference largely avoided. Approximately one third of monitoring results displayed wind speed exceedance. EMM used an alternative approach to calculate the Visy contribution to noise at sensitive receivers to account for noise impacts in accordance with the EPA Noise Policy for Industry (NPI) (2017).

Traffic and transport

Plant and equipment are maintained through ‘Enterprise Asset Management’ which schedules maintenance through assignment of work orders.

Community and consultation

Working hours have been adhered to. No working out of hours complaints have been received for the reporting period.

Monitoring and reporting

All monitoring records are being retained in a legible manner and reported in ECMR and Annual Returns (AR). Records include the required information on the Chain of Custody and Sample Run Sheets.

License Condition 1.1 of EPL 10-232 requires that all the identified points are being monitored. General compliance with this condition was observed during the reporting period, with no major or long-term interruptions to monitoring.

A number of exceedances were recorded at the monitoring locations, **this issue is raised as non-compliance IDs 22/10 (EPL 10232, L1.2), 22/11 (EPL 10232, L3.1), 22/12 (EPL 10232, L3.4), 22/13 (EPL 10232, L3.8) and 22/14 (EPL 10232, L3.10).** The exceedances are recorded in the EPL Annual Return 2022 and ECMR 2022. A series of actions have been taken or are planned to address these exceedances.

Continuous analysis equipment is periodically calibrated and serviced by a contractor; this was observed during the reporting periods and calibration and maintenance reports were sighted during the audit.

Laboratory reports show that monitoring is being undertaken as per the required methods. The Laboratory used is accredited for all test methods (14601).

The AR for the period of 30/06/2021 to 29/06/2022 was submitted to the EPA on 30/08/2022. This is outside of the permissible 60 day period and **this issue is raised as non-compliance ID 22/15 (EPL 10232, R1.5).** The AR included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA. ECMR 2022 was emailed to Snowy Valleys Council, EPA and DPE.

EPL condition L7.3, requires a minimum exit velocity of 22.1 m/s when operating at or above 70% of the applicable design firing rate. It is understood that the current sampling point is located approximately halfway up the stack where the diameter is larger, and velocity is lower. The Visy process engineers have used current readings to calculate what the velocity would be at the top where the stack is narrower and where velocity would be higher. Based on these calculations the main stack velocity would be approximately 24.8m/s which is above 70% of the applicable firing rate.

Consultation

NGH sent correspondence to NSW EPA, on 4th November 2022 requesting input to the audit. A response was received from the EPA regarding the 2022 IEA on 28th November 2022. The EPA requested:

> *"…that the audit of Visy Pulp and Paper Tumut address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to waste generated at the premises."*

Visy advised that waste generated on the premises had been applied to land under the Woodlawn PHR acid mine tailings trial order 2020 and The Captains Flat alkaline material trial order 2022. The former Order allows approximately 75,000 t of green liquor dregs and slaker grits (78%), fly ash (16%), and bottom sand (6%) to be applied to land. The latter Order allows approximately 10,000t of a mixture of green liquor dregs and slaker grits (78%), fly ash (15%) and bottom sand (7%) to be applied to land. During the reporting period Visy reported that 5028t was sent to the Woodlawn mine rehabilitation site and 489t was sent to Captains Flat mine rehabilitation site. Laboratory results from May 2022 were sighted during the audit displaying general compliance with Table 1 of the Resource Recover Order (RRO) for materials to be sent to Woodlawn.

All analytical results observed for the parameters requiring assessment for the Woodlawn RRO were below the maximum concentration threshold.

NGH sent correspondence to Snowy Valleys Council, NSW Natural Resources Access Regulator and DPE on 4th November 2022 requesting input to the audit. No response was received from any of these agencies.

6. Recommendations

The audit identified 16 non-compliant findings. The majority of those non-compliances relate to ongoing inconsistencies between approvals and, to a lesser extent, the EPL. As the approval and regulatory frameworks have evolved some variation in the EPL requirements has occurred. In some instances, the removal of CoAs is appropriate while in other cases rewording of consent conditions would be more prudent. Copying of EPL tables should be avoided in consent conditions. If additional planning emphasis is required around certain issues it would be prudent to reference the EPL in general rather than specific tables or parameters. This allows the lead agency drawing on targeted resources to set limits and level penalties (Load Based Licensing).

It is noted that this number of non-compliant findings is an increase on the 2020 – 2021 reporting period, however an adjustment to the audit protocol (Appendix A) has been made during this audit to ensure all EPL clauses were appropriately captured. Due to this, it should be noted that the overall number of clauses has increased and the number of non-compliant findings as a percentage is relatively similar to the previous reporting period. Only two non-compliant findings in this reporting period were not identified in the previous audit.

With respect to the non-compliances listed above, and in the audit protocol, consideration needs to be given to the following:

- The Waste Management Plan should be updated to include details around the Resource Recovery Order in place to manage the preparation of Waste at Visy for delivery to the Woodlawn Mine and Captains Flat mine rehabilitation sites. The updates to the management plan must address the capture and handling contaminated runoff from materials mixing and handling areas, and the responsibilities and resources to ensure this occurs. The expected quantities to be handled and the timing of various tasks should also be articulated. Testing and reporting details for the RRO analytical requirements should be described.
- Consolidation of the site's consents should be prioritised prior to the next IEA to reduce the amount of ongoing non-compliances due to administrative issues. The site is generally well managed, particularly considering the scale of operations, and the number of non-compliances reported in the annual IEAs are not reflective of environmental management and rather of inconsistencies in outdated and conflicting approvals.
- Approval of the excavated area adjacent the waste yard and any associated impacts should be sought from DPE. The removal of landscaping from this area should be considered in determining the site's overall vegetation management performance and future actions.

7. Conclusions

In general Visy were broadly compliant with the project approvals and EPL. Across the various project approvals, EPL and consultation requirements at total of 240 individual clauses or requirements were examined. Of those approval and consent clauses it was found that:

- 15 were not compliant
- 47 were not triggered
- 178 were compliant.

It is the auditors' understanding that Visy have discussed many of the inconsistencies that are mentioned above with DPE. These matters should be resolved as soon as is practicable.

Most of the other non-compliances are either trivial or are captured by the EPL and load based licensing. Historical noise treatment measures, ongoing community engagement and a long-term reduction in odour impact on adjacent properties shows an ongoing commitment by Visy to reducing the impact of the site on the surrounding community and a high standard of environmental management.

Appendix A Audit table

Development Consent, Project and Concept Approval Compliance Status - November 2022

Reference	Approval or licence requirement	Evidence collected 2022	Audit Finding	Compliance status	Action Reference	Visy Comment
Development Consent (DA 6/98 MOD 4)						
Annual Reporting						
9	Is an annual report detailing the using of Non-Standard Fuels & with the required details to the DG?	Annual Environmental Compliance and Monitoring Report (ECMR) 2022 Interview M O'Donovan	Non-Standard Fuels not used on site. The definition of fuels is now subject to new guidelines from NSW EPA "Eligible waste fuel guidelines" Dec 2016. This will require updates to both the EPL and the Consent. Negotiations are currently underway with NSW EPA (Pers Com Matt O). The EPL will need to be modified prior to the modification of the consent. ECMR provides fuel feed quantities utilised during the reporting period.	Compliant	N/A	
OEMP						
11	OEMP shall address: a) Identification of the statutory obligations b) role, responsibility, authority, accountability & reporting c) management measures/mitigation measures d) environmental management procedures e) monitoring, inspection & test plans f) audit requirements g) delegation of responsibility for breaches & receipt of PINs issues by EPA h) community consultation & nonfiction strategy	OEMP Rev 4, 30 August 2021	OEMP is current and up to date. Sighted statutory obligations Section 4. Roles and responsibilities documented Section 6. Visy People Connect lists organisational chart with current staff names. Management measures under the OEMP occur in various sections. Some mitigation measures are in the OEMP but most are included in the subplans. Monitoring and inspection is dealt with generically in section 16 and specific details are provided in the relevant subplans. Auditing addressed in Section 20. Community consultation is dealt with in Section 8. Map in Section 1 indicates overall site area.	Compliant	Recommend referencing the DPE Independent Audit Guidelines in Section 20 in next OEMP update.	
12	OEMP required to be reviewed annually by the preparation of an environmental report which analyses the results of monitoring required. The report shall review the performance of the plant against the relevant EMP's, the Conditions of Consent & other licences and approvals relating to operation of plant.	OEMP Rev 4, 30 August 2021 ECMR 2022	OEMP was reviewed in August 2021. The Annual Environmental Compliance and Monitoring Report 2022 addresses the requirements of the Consent management plans and the EPL.	Compliant	N/A	
12	Annual report shall include: a) review of effectiveness of environmental management of plant b) results of monitoring including interpretation by suitably qualified person c) discussion of actual performance d) listing of any variations obtained to approvals e) record of heavy vehicle movements f) set out environmental management targets for the next year	ECMR 2022	The ECMR 2022 investigates the performance of the Mill against the targets, Consent and EPL as required. Sufficient detail is provided to support the discussion. Non conformances particularly in response to odour are investigated, described and discussed. Specialist reports or summaries there of are presented in the Appendices, eg. Farm Environmental Monitoring, Odour and Emission Testing (Ektimo, Nov 2021).	Compliant	N/A	
Hazard Management						

15	Has a report for incidents associated with operation &/or transport of the proposed development and with an actual or potential significant off-site impacts on people or environment been prepared and submitted to the Department within 24hrs?	ECMR 2022	No incidents with a significant impact off site have occurred during the reporting period. 5 minor spills, contained to the mill site, occurred and were recorded within internal Visy systems.	Not triggered	N/A	
	Has a further detailed report be prepared and submitted following investigations?	ECMR 2022	No incidents with a significant impact off site have occurred during the reporting period.	Not triggered	N/A	
16	Are hazard audits being completed every 3 years and carried out in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, *Hazard Audit Guidelines*?	Hazard Audit Dec 2021, Pinnacle Risk Management.	Hazard audit carried out within required timeframe (Nov 2021) and reported during the period (2021 - 2022). Audit prepared in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, *Hazard Audit Guidelines*	Compliant	N/A	
18	Do all hazardous goods road tankers unloading areas have bunding to the size of the total quantity of the largest road tanker?	Previous audit report (NGH, 2021) Site observations	The 2021 review indicates that there is sufficient bunding. Recommendations made regarding storage of materials and maintenance of bund integrity. No material change in volume of bunding or tank dimensions for delivery of chemicals during the reporting period.	Compliant	N/A	
19	Do all dangerous goods vehicles delivering bulk dangerous goods to site include brake interl	Previous audit report (NGH, 2021) Interview M O'Donovan	Staff supervise unloading of tankers, valves not operable until trailer brakes engaged. Safety procedure documents unloading and brake interlock. Visy Protocols/contracts specifies the requirement for brake interlocks, no changes to procedure during the reporting period.	Compliant	N/A	
Noise Management						
20a)	Are all non-applicant residences that are likely to be affected by operation noise levels more than 5dB(A) LA10 above background noise levels to the satisfaction of the EPA?	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	Monitoring in February 2022 found noise levels at most assessment locations satisfied the assessment criteria. Wind speeds greater than 3m/s affected 13 out of 24 readings. Most homes accousticaly insulated via landowner agreements. Mod 4 approved by DPIE Aug 2020, allows higher noise levels for homes with agreements in place. The consent also required winter time noise monitoring. Eight properties have agreements in place.	Compliant	N/A	
20b)	Have these residences been acoustically treated for longer the 6 months if requested by the owner to the satisfaction of the EPA?	ECMR 2022	Residences at Glengarry, Reka, Whispering Pine, Pleasant View, Brentwood, Nolte, Deep Creek and Poverty Lane are identified in the ECMR 2022 as having signed agreements.	Compliant		
23	Noise emissions from the operation of the mill shall: a) not exceed an LA10(15min) noise limit of 40dB(A) during the day (0700-2200) at the nearest residential receiver b) not exceed the LA10(15min) noise emission of 38dB(A) during the night (2200-0700) at the nearest residential receiver	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	ECMR noise results (Feb 2022) indicates that noise emissions from the mill did not exceed the assessment criteria due to weather contributions and negotiated agreements however estimated site contribution values exceeded limits. Noise limits for 13 measurements during the monitoring period were not applicable due to the presence of winds greater than 3 m/s at the time. All other locations with exceedances have noise agreements negotiated with Visy.	Compliant	N/A	
	Has monitoring indicated that increased levels of noise emissions due to temperature inversions?	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	Noise limits for 13 measurements during the monitoring period were not applicable due to the presence of winds greater than 3 m/s.	Compliant	N/A	

24	If so, has this been documented, ameliorative measures put in place?	Previous audit report (NGH, 2021) Interview M O'Donovan	Elements of the Noise Mitigation Action Plan are being implemented progressively. Seven of eight properties assessed for treatment and mitigation measures are in place with eight properties.	Compliant	N/A	
25	Does the ONMP include: a) information on mitigation measures b) complaints handling, noise monitoring, reporting of complaints & response actions c) measures for dealing with low freq noise & extreme noise incidences?	Noise Management Plan, July 2021	The Noise Management Plan 2021 addresses: a) In Section 6 b) In Section 8 c) In Section 6 - incidence recorded & the cause determined. Mitigation put in place and response given to complainant. It is noted that an update to the Noise Management Plan was made in July 2021 which addresses previous recommendation for includion of NSW EPA Noise Policy for Industry 2017.	Compliant		
Air Quality						
26	Is the 'Best Available Technology' (BAT) for this type of pulp and paper mill being applied to achieve, at a minimum, compliance with the provision of the USEPA's NESHAP limits?	Air Quality Management Plan May 2021 Continuous Event Monitoring Systems (CEMS) exceedance summary 2021 - 2022 Stack Sensor calibration records 2021 and 2022 Visy Pulp and Paper Emission Testing Reports (Ektimo Nov 2021, March 2022)	Visy employs CEMS for stack emissions at multiple locations on the plant. CEMS sensors are calibrated twice per year. Additional emissions monitoring also occurs twice per year. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant	N/A	
27	AQMP shall include - safeguards and procedures for dealing with all emission discharges, dust control and monitoring of odour	Air Quality Management Plan May 2021 ECMR 2021 - 2022 Section 3.2	Plan updated in May 2021 including minor updates and edits. The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmisions.	Compliant	N/A	
29	Are all access roads and tracks constructed, designed and maintained in consultation with DLWC, and in accordance with the "Guidelines for the planning, construction and maintenance of tracks", Soil Con (1994)?	Site observations Interview M O'Donovan	No new access roads or tracks have been created in this reporting period. The main access roads are sealed.	Compliant	N/A	
30	Are forestry operations being carried out in accordance with the 'Forest code of practice for plantations on private lands in the SW slopes of NSW'?	Site observations and reference to aerial images	No forestry has taken place on the subject land since the last audit.	Not triggered	N/A	

32	Have any earthwork structures for the storage of wastewater been undertaken? If so is it to the satisfaction of the DWLC?	Observations from the site inspection conducted as part of the audit. Mod 5 GHD Report Oct 2021, Appendix A (Xeros Picolo Engineers - Dam Plans)	Design for a 3ML waste water pond constructed in 2016 retrospectively completed November 2021 and approved February 2022, certified by McKenzies, sighted during audit and as part of modification application. Dam filled in during Feb 2022, new dam has been built and was sighted during audit. Certification and construction completed outside of reporting period, will be recorded during 2022 - 2023 reporting period.	Compliant		
Wastewater Management						
33	Are discharges of treated wastewater from the mill into Sandy Creek or any of its tributaries: a) have a average frequency of 1 in 10 or less b) permitted as per the EPL c) recorded - amount, duration & flow conditions	Winter Storage Dam records 2017 - 2022 cited.	Winter storage dam was not more than 60% 2017, 40% 2018, 40% 2019, 80% 2020, 61% 2021 and 89% 2022. Storage dam reached approximately 110% capacity during reporting period however was not discharged. Storage dam typically discharged when capacity nears 110%.	Not triggered	N/A	
34	WWMP shall include: a) crop management b) irrigation scheduling c) nutrient budgets d) salinity management measures e) site drainage control measures f) comprehensive soil details of areas proposed for irrigation g) measures to ensure maximisation of water recycling/reuse	Updated Water Management Plan MPL-TUM-ENV-007-3 June 2021	WWM requirements are addressed in the WMP: a) sections 4.4, 6.3, 7.4 b) sections 4.4.4, 4.4.5, 4.4.5.8, 4.4.5.9, 6.3 c) sections 4.3.1, 4.3.2, 4.3.4, 4.4.1, 4.4.4, 4.4.5.2, 4.4.5.8, 6.3.2, Appendix 2 d) sections 4.4.1, 4.4.5.3, 4.4.5.9, 4.5.3 e) sections 4.1, 4.4.5 f) section 4.1.4, 4.2.4, 4.4.1, 4.3.4, 7.3.1.2 g) sections 4.2.4 WMP updated during reporting period.	Compliant		
35	Has monitoring indicated a water table rise in either the shallow or deep piezometer that exceeds an average 10cm per year over a 5 year period, &/or that the water table under the effluent irrigation area has risen within 2m of the land surface?	ECMR Appendix 8 - Groundwater Trend Cycle Farm and Environmental Monitoring Report 2022	Groundwater levels have remained either stable or have shown an increase, likely due to higher than average rainfall levels during 2021/2022. Levels have risen closer to 2016 levels during the reporting period after falling during drier years 2017 - 2019 due to above average rainfall and are now more reflective of pre-drought levels despite larger rise.	Compliant	N/A	
36	Has a program to monitor groundwater salinity levels been prepared? Has there been any significant increases in salinity levels found attributable to the irrigation scheme? If so what methods have been implemented to avoid adverse impacts?	ECMR 2022 Farm and Environmental Monitoring Report 2022	The reporting does not indicate an increase in soil salinity in the irrigation area or groundwater salinity as measures at the piezometers across the site as a consequence of irrigation.	Compliant	N/A	
37	Are those lands identified in the EIS for irrigation of effluent available for irrigation?	Site observations during audit Aerial imagery	Land identified in the EIS for irrigation is being used for irrigation with the exception of 20ha to the east of the centre pivots. This land is available but there is insufficient effluent to warrant its use.	Compliant	N/A	
Surface Water & Storage						
38	SWMP shall include: a) areas potentially subject to contaminated stormwater runoff b) measures to prevent pollution of waterways c) proposed bunding for storage areas d) total run-off detention for flood mitigation e) provision for treatment of fire water on site, to prevent direct discharge offsite	Water Management Plan MPL-TUM-ENV-007-3 June 2021	The audit indicated the SWMP addressed: a) Section 4.5 b) Section 4.1 d) Section 4.2 e) Section 4.2 Plan updated during reporting period.	Compliant	N/A	

40	Has all uncontaminated surface runoff that has left site to the satisfaction of the DLWC?	Site observations during audit	No scouring of waterways was observed at the time of the audit. Waterways accepting overland flow were generally grassed and or tree lined. Sandy Creek does have some historic cut bank erosion.	Compliant	N/A	
Solid Waste Management						
41	WMP shall include: a) details of solid wastes returning to the pulping process b) details of ongoing analysis & monitoring for solids being disposed by landfill c) details of investigations into beneficial reuse of purge fly ash & purge lime mud d) other measures to reduce amount of waste going to landfill	VP9-10-10.3-PN-009 Solid Waste Management Plan 2017 Site observations during audit Resorce Recovery and Waste Reuse Exemption 2022 (Captains Flat)	a) Section 4.2 of the WMP details the reuse of suitable solid waste in the pulping process as fuel and fibre sources. B) Section 3 of the WMP details the analysis and monitoring waste and identifies the waste disposed of to landfill. C) Section 4.2 of the WMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption. d) Section 5 of the WMP details the landfill diversion strategy that Visy are pursuing. Exemption and order now available for Dregs and Grits and boiler (bottom) sand. Plan not yet updated, waiting for EPL variation. An EPL varriation has been submitted to the EPA and is currently being considered. Will require update to accommodate material removal to Woodlawn mine rehab site. Plan will need to discuss onsite (north of waste handling area) and offsite management by external company. Refer s5.2 of 2017 WMP for initial considerations and initial application. Sighted during audit.	Not-compliant	Update WMP to include specific detail around Woodlawn RRO and Captains Flat.	
Access & Traffic Management						
45A	Has the construction of the refuelling area and associated access road commenced? If so, have the plans: a) been prepared on consultation with council b) include details of onsite traffic management signage c) prepared to accommodate 36m articulated vehicles?	Site observations during audit	As per previous audit; no work has commenced the construction of the refuelling area and associated access road is not likely to proceed.	Not triggered	N/A	
46	Is all access to site via the new intersection & access road?	Site observations during audit	The upgraded intersection and access road frpm the Snowy Mountains Highway is the site access.	Compliant	N/A	
47	Has there been any night time (2200-0700) semi-trailer or B-double truck movements to and from the plant via Snow Mountains Highway through Adelong?	ECMR Appendix 6 Monthly HV Movement Data Complaints Register	Nil movements out of hours. A large proportion of paper movements are now on A-Double vehicles which can only use the Gocup Road.	Compliant	N/A	
48	Has MR280 north of Adelong been upgraded to give B-double access? Has this route been used by semi-trailers or B-doubles to and from the plant?	ECMR Appendix 6 Monthly HV Movement Data	No truck movements on MR280 north of Adelong are recorded. No upgrade of MR280 north of Adelong has occurred.	Compliant	N/A	
49	Is transport of waste restricted to SH4, Boonderoo Rd and MR280?	Waste removal records sighted	Waste travels on Gocup Road and the Snowy Mountains Highway to facilities north of Tumut. Boonderoo Waste Facility no longer exists and subsequently not utilised.	Compliant	Recommend removing condition	
50	Prior to construction of refuelling area, has a revised TMP been prepared that includes: a) records of all heavy vehicles (>3tonne) entering or leaving site - times and access routes b) measures to reduce sleep disturbances in built up areas c) measures to reduce other impacts in built up areas - movement through town, parking, etc d) measures to ensure plan is implemented e) measures to ensure drivers are aware of any provisions & restrictions associated with the utilisation of the refuelling facility f) proposed onsite traffic signage	Site observations during audit	No work has commenced on the construction of the refuelling area and associated access road is not likely to proceed.	Not triggered	N/A	

52	Does Visy participate in any relevant committees established to investigate transport infrastructure initiatives?	SWG website: https://murrayregionforestryhub.com.au/softwoods-working-group/ FIC website: http://forestindustrycouncil.com.au/members/	Visy is listed as a member of Softwoods Working Group (SWG) (now part of Murray Region Forestry Hub) & Forestry Industry Council (FIC) - focussed on improving the maintenance, standards & safety along the main haulage road.	Compliant	N/A	
Landscape & Vegetation Management						
54	LMP shall be integrated with the NVMP and include: a) existing landforms & final landforms b) proposals for the irrigation areas & softwood plantations c) planting species, purpose, maintenance requirements, irrigation req & illustration of typical visual character d) location of all hard & soft landscaping features e) program for staged work & maintenance of all landscaping & rehab works	MPL-TUM-ENV-003-3, Landscape and Native Vegetation Management Plan, Oct. 2021	The LMP and NVMP are integrated and were reviewed and updated in Oct 21. Pre-existing and final landforms landforms are described. Irrigations of softwood plantations has not occurred on site. Irrigation areas fully described in the Water Management Plan. Planting species and purpose are described in section 2 and app B, maintenance in section 3 and App G+H, illustrations are shown in App D,E+F. Existing and planted vegetations is described in Appendix A, C + F. Revegetation is described in app A + F.	Compliant		
55	NVMP shall include: a) retained native veg is appropriately fenced & signposted to exclude stock b) large HBT's shall be retained where possible c) native veg buffers are retained 50m to each side of Sandy Creek & 20m to each side of major drainage depressions d) indigenous plant species used for site reveg	ECMR 2022	Vegetation established continues to grow taking advantage of wetter winters between 2020 - 2022. No plantings in 2017-2022. Retained vegetation is fenced with appropriate signage. Large HBT have been retained and interspersed with plantings to promote connectivity. The creeks have been fenced on both sides and the buffer generally exceeds 50m, smaller drainage depressions have been fenced and revegetated with native trees and shrubs. No fire impact durring 19/20 summer. No significant losses.	Compliant		
	Is the plan incorporated in OEMP?	OEMP Rev 4, 30 August 2021	Yes, the plan is incorporated in the OEMP.	Compliant		
Monitoring						
57	A detailed monitoring program shall include: a) provisions for monitoring the implementation & effectiveness of MP's required by the consent b) sampling locations, frequencies & parameters to be tested c) characteristics of existing env - i.e. ambient air levels d) timing of monitoring reports	OEMP Rev 4, 30 August 2021 and associated subplans	The OEMP details the need for monitoring and references the Environmental Performance, Measurement and Reporting (Procedure 205-0). The OEMP and subplans detail the location and methods for monitoring, evaluation criteria and reporting requirements.	Compliant		
	Is a NATA accredited lab being used for monitoring analysis?	NATA certificates sighted online and in monitoring reports	NATA certificates were sighted for flyash and dregs & grits analysis EKTIMO NATA certification cited at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO. McMahon NATA Certification Cited at https://nata.com.au/accredited-organisation/wagga-wagga-laboratory-3349-3342/?highlight=McMahon	Compliant	N/A	
60	Have CEMS been installed to monitor the combined exhaust gases from the stack?	ECMR 2022 s3.2.1, ECMR 2022 Appendix 2 EPL Annual Return 2022	Continuous Emissions Monitoring (CEMS) been installed to monitor exhaust gases from the stacks.	Compliant	N/A	
61	Are source emission tests on the recovery boiler, lime kiln & power boiler being undertaken annually?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022	Emission testing on the recovery boiler, lime kiln & power boiler provided by CEMS. Sensors calibrated and checked six monthly.	Compliant	N/A	
	Is an odour audit (including LDAR) being undertaken annually?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	An odour audit (including LDAR) is being twice each year. The auditing takes place in September (2021) and February (2022) each year, with LDAR completed February 2022.	Compliant	N/A	
61A	Is the concentration of each pollutant specified being monitored at each discharge point?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022	Yes testing includes Solid particles, fine particulate matter (PM10), sulphur trioxide (as SO3), dioxins and furans, metals type 1 and 2 substances, chlorine, carbon dioxide, oxygen at Stacks 1 and 2. At other discharge points monitoring variously includes Solid particles, hydrogen chloride, carbon dioxide, oxygen, and methanol	Compliant	N/A	
62	Has a groundwater monitoring strategy been developed that includes - installation of piezo's (shallow & deep) that are representative of irrigated pastures, irrigated trees, non-irrigated buffers & untreated areas?	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2022 Farm and Environmental Monitoring Report 2022 EPL Annual Return 2022	A groundwater strategy has been developed and is described in the Water Management Plan June 2021. It include shallow and deep piezometers in irrigated and non-irrigated areas. The results are reported in the ECMR 2022.	Compliant	N/A	

63	Have piezo's been installed in the vicinity of winter storages to monitor leakages? Has there been any significant leakages?	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2022 Farm and Environmental Monitoring Report 2022 EPL Annual Return 2022	Yes, piezometers have been installed in the vicinity of the winter storage facility. Groundwater chemistry and standing water levels do not indicate leakage. No observable soaks, green vegetation or water in down gradient waterways noted at the time of the audit.	Compliant	N/A	
64	Have DWLC been supplied details of piezo's?	Email to WaterNSW sighted during audit. Bore registration from WaterNSW sighted during previous audits, no new piezos installed.	Registration for groundwater monitoring bores cited and dated 2012. No new piezos have been installed during the reporting period.	Compliant	Consolidate CoA	
65	Is an annual interpreted report on the groundwater monitoring program being submitted to DLWC?	Email to WaterNSW sighted during audit	Response from WaterNSW sighted dated 09/11/22 included groundwater data submission, confirming lodgement of correspondence against Visy approvals.	Compliant	Consolidate CoA	
66	Is an annual soils monitoring program in all areas used for effluent irrigation being undertaken?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	A soils monitoring program for the irrigation areas is being completed.	Compliant	N/A	
	Are the required parameters being tested?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	The required soil parameters are being tested.	Compliant	N/A	
67	Has the soil monitoring program indicated that effluent irrigation is having an adverse impact on the sustainability of soils? If so has an amended plan of effluent disposal been prepared to the satisfaction of DLWC?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	Soil nutrient levels reported in the ECMR 2022 and attributes are typical of local soil conditions.	Compliant	Consolidate CoA	
68	Is toxicity testing of irrigation water reuse & event based surface water monitoring being undertaken?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	Toxicity testing not carried out. Not compliant. This is an ongoing non-compliance as this CoA is intended to be retired.	Not-compliant	Removal/consolidation of CoA.	This CoA is intended to be retired.
69	Are all monitoring results arising from the DA conditions being submitted annually to EPA, DLWC, the Council & the community consultative committee?	Email submitting ECMR to DPE, SVC and comms committee, dated 22/11/2022 sighted	Results observed as being sent to appropriate departments	Compliant	N/A	
70	Are monitoring results made available to DG upon request?	ECMR 2022	No results requested this reporting period, monitoring results observed as available.	Compliant	N/A	
Independent Environmental Audit						
71	Is an annual independent environmental audit being undertaken?	Past Environmental reports for 2016, 2017, 2018, 2019, 2020, 2021	NGH Pty Ltd conducted audits 2017, 2018, 2019, 2020, 2021 and current.	Compliant	N/A	
71A	Are 12 monthly independent audits being undertaken on the use of Non-Standard Fuels?	ECMR 2016 - 2022	Non-standard fuels not in use.	Not triggered	N/A	
Community Consultation						
72	Is a community consultative committee established? If so, what are the details - frequency of meetings, how issues raised are dealt with, who are the representatives?	Minutes sighted for Aug 21, Sep 21, Dec 21, Feb 22, April 22, Jun 22	Yes, meetings held every two months with local reps, Chamber of Commerce, Landcare, Visy reps. Plant operation and additional information, responses to enquiries and complaints.	Compliant	N/A	
73	Is a telephone service being operated, maintained & promoted that allows members of the public to report unacceptable noise or air quality impacts?	https://www.visy.com.au/env-appv-mgmt-plan/	Number maintained and advertised through web site, signage minutes of CCC.	Compliant	N/A	
74	Is a complaints register being maintained with adequate detail?	Quartlery complaints registers ECMR 2022 Appendix 9	A complaint resister is being maintained and electronically managed in Vault. It has sufficient detail to record track and manage complaints.	Compliant	N/A	
75	Has the effectiveness and the degree of public satisfaction with the complaints service been audited?	As per previous audit feedback from the public in the reporting period (x4). Visy quarterly Internal Audit Reports of the Complaints System	Direct feedback from the public is not sought with each complaint, however, complainants have offered thanks for responses in the reporting period. The internal audit reports found the system was generally compliant.	Compliant	Consolidate CoA	
76	Is Visy providing a copy of the complaints register every 3 months to Council & EPA & accompanied by an internal audit report of the system?	Major Projects Portal Quarterly Submission of Complaints Register sighted November 2022.	Complaints for the quarter forwarded with summation and analysis of the type and probable cause of complaint.	Compliant	N/A	
Archaeology & Heritage						
77	Has the recommendations from the Cultural Heritage Assessment been implemented to the satisfaction of the DG?	Site observations	No new works this reporting period due to lack of funding and availability of resources.	Compliant	N/A	

80	Has any Aboriginal artefacts been identified during operation of the mill? If so, were the correct procedures & reporting undertaken?	Interview M O'Donovan	No Aboriginal objects have been reported in the last twelve months.	Compliant	N/A	
Fire Fighting Control						
82	Is a 4WD Fire Tanker with 3600L water carrying capacity on site?	Registration receipt for main fire tanker (3600L) sighted. Pers Com Luke Manton (Visy Saftey Coordinator).	Isuzu Fire tanker available on site. Estimated volume 3600L. Pink slip and registration obtained for fire tanker to ensure servicability. Additional 1500L tanker purchased Dec 2021 for use in log yard as initial response.	Compliant	N/A	
83	Is the tanker available to the Gilmore Bush Fire Brigade?	Interview M O'Donovan The Unit is labelled with Gilmore Fire Brigade.	The tanker is available on request.	Compliant	N/A	
84	Is there a minimum of 10 staff that have received Rural Fire Service basic fire fighter standard training available? Is a minimum of 1 staff member with advanced fire fighter standard competency training available?	Training records Noggin provided	Internal training completed. New employees completed various fire training units during the reporting period.	Compliant	N/A	
85	Is the maintenance of bush fire fighting equipment at all times in accordance with current bush fire control and safety practice & in consultation with TSC Fire Control Officer?	Noggin system training record register sighted	As per the 2021 audit ERT training includes tanker maintenance review and checks.	Compliant	N/A	
Environmental Officer						
88	Is the Environmental Officer that is appointed qualifications acceptable to the DG?	Matt Donovan HSE Manager still primary Isabella Kane - Enviro Officer since Nov 2022	Matthew O'Donovan is the HSE manager. Isabella Kane to be nominated as alternate with the department in future.	Compliant		
Cooling Tower						
90	Does the operation of the cooling tower comply with AS3666 - 1995 & with microbial control provisions of the Public Health Act, 1991 & Regulations?	Monthly Water Treatment Reports (Buckman Laboratories) July 2021 – June 2022	Cooling towers maintained and monitored continuously. Weekly testing of waters sampled is conducted by Buckman Laboratories and reported monthly. No exceedances noted for the reporting period. Reporting moved from quarterly to monthly documentation as of April 2021.	Compliant	N/A	
Compliance with Dangerous Goods Act						
91	Compliance with Dangerous Goods Act 1975?	Hazard Audit Dec 2021, Pinnacle Risk Management.	Visy now has an annual Hazard review process in place to identify issues and propose solutions. External hazard report by Pinnacle Risk Management in Dec 2021 found general compliance and some minor matters for attention by Visy.	Compliant	N/A	
Traffic Noise						
93	Have Mr & Mrs Beale & Mr F Dutton requested any window or acoustic barrier treatments? If so what has been done?	Interview M O'Donovan Google images of Beal Residence 2006 and present.	Dutton residence sold to Steunkal has been resold to an unknown third party. Beal residence was demolished.	Compliant	OfI 2017/005, Consolidate or remove condition	
Public Notification of Wastewater Discharge						
94	Has Visy given public notice of any impending wastewater discharge from its wastewater storages including those persons downstream of the site?	EPL Annual Return 2022 Winter Storage Dam records	Nil intended discharges in this reporting season.	Not triggered	N/A	
Truck Scheduling						
95	Has a truck scheduling been submitted to the DG & how often is it required to be reviewed? Show evidence of the review	ECMR 2022 ECMR Appendix 6 - Monthly HV Movement Data	Heavy vehicle movements submitted to DP&E on an annual basis in the ECMR. Figures are reviewed annually as part of the ECMR preparation. Truck movements minimised between WW and the Mill by backloading with white pulp. Introduction of A-doubles have decreased HV movement numbers for exported product and vehicles though Adelong. White pulp trained from Port (Sydney/Melbourne) to Wagga Wagga reducing HV numbers on the Hume Highway.	Compliant	N/A	
Process Water Reuse						
96	How often is the process water use report required to be reviewed? Show evidence of reviews	Visy Process Water Review 2121 23/12/21	Process water reuse was last reviewed by a site process engineer on December 2021. This review has yet to be submitted submitted to DPE.	Compliant	N/A	
Concept Approval CA06_0159						
Administrative Conditions						

1.1	Is the project being carried out generally in accordance with: a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, NSW, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) e) the Statement of Commitments f) Tumut mill expansion - Project component phasing changes (Jun 2007) g) conditions of this approval	Site observations MetroMap imagery (2020) Interview M O'Donovan Official Caution issued to Visy Pulp and Paper Pty Ltd (MP06_0159) Snowy Valleys LGA – DPE, 3/02/2022 Letter Visy Tumut – Woodyard Stacker Reclaimer Project, GHD 17 May 2021	During the site inspection a large excavated area adjacent the waste yard, in the northeastern section of the mill footprint, was observed. High-resolution aerial imagery (latest 2020) shows this area previously comprised revegetation plantings. This fill material was utilised in the construction of the new Woodyard Stcaker Reclaimer. Although a letter from GHD (dated 17 May 2021) confirms that the proposed stacker reclaimer should be considered as being consistent with the EP&A Act, no evidence was included in the letter that this extended to the excavation of fill from the observed area. Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy have since lodged a mod application to regularise the use of the shed as built. Other activites on site were observed to be generally in accordance with specified approvals and documents.	Not-compliant	Obtain retroactive approval for the excavation activities.	
1.3	Have there been any inconsistencies with this approval or any other approvals?	Previous audit report (NGH, 2021) Interview M O'Donovan	Several inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) and are still outstanding. A plan exists for modification of CoA where inconsistencies occur, however, other planning issues have precedence.	Not-compliant	Inconsistent CoA's flagged with DP&E, action in 2018.	
Compliance Monitoring & Tracking						
3	Has a compliance tracking program been developed & implemented that includes: a) periodic review b) periodic reporting to relevant approval authorities c) a program for independent environmental auditing d) means of rectifying non-compliances identified e) provisions & framework that demonstrates the regulatory interactions between approval instruments & licences	ECMR 2022 EPL Annual Return 2022 Previous audit report (NGH, 2021)	a) periodic review using ECMR, EPL Annual Return. b) Annual EPL report and provision of EMR to relevant authorities cited. c) Independent Auditing required and completed annually d) Non-compliances added to targets for subsequent years or immediate correction. e) EMR and management plans	Compliant	N/A	
Community Information Consultation & Involvement						
4.1	Is Visy continuing to participate with the Community Consultation Committee?	Minutes sighted for Aug 21, Sep 21, Dec 21, Feb 22, April 22, Jun 22	Visy are holding quarterly CCC meetings, minutes sighted.	Compliant	N/A	
4.2	Is a telephone number, postal address & email address available for community complaints & displayed on a sign near the entrance to site?	https://www.visy.com.au/env-appv-mgmt-plan/ Site observations	Number maintained and advertised through web site, signage and in the minutes of CCC.	Compliant	N/A	
4.3	Is a complaints register being maintained with the following information: a) date, time b) means by which complaint was made (telephone, email, etc) c) personal details d) nature of complaint e) action taken f) if no action, why?	Quartlery complaints registers ECMR 2022 Appendix 9	Complaints numbered 21 for the reporting period. Quarterly complaint Audit sighted, included review of complaints and reference to the last four years of data. Odour issues comprised all complaints during the reporting period and each complaint is investigated and responded to.	Compliant	N/A	
4.4	Is appropriate electronic info being made available on website, including: a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact	https://www.visy.com.au/env-appv-mgmt-plan/	The Visy Tumut web site has Project assessment documents and consent, licences for EPL and water extraction, Management Plans, Annual monitoring reports, EPL compliance report and audit outcomes. Contact details (24h) are also available on the website.	Compliant	N/A	
Environmental Management						
5	Is an OEMP being maintained?	OEMP Rev 4, 30 August 2021	OEMP updated 30 August 2021. Doc MPL-TUM-ENV-001-4. Environmental targets updated on annual basis, 2022 - 2023 Targets included.	Compliant	N/A	
Environmental Reporting						
6.1	Has there been any events where there was actual or potential significant off-site impacts on people or the biophysical environment? If so was it reported to the DG within 12hrs of the event & full written details provided to DG within 7 days?	ECMR 2022	Nil reportable events in the 2021/22 reporting period.	Not triggered	N/A	
6.2	Were the requirements of the DG met to address cause or impact of incident?	ECMR 2022	Nil reportable events in the 2021/22 reporting period.	Not triggered	N/A	

6.3	Is a Annual Environmental Management Report (AEMR) being submitted to the DG reviewing performance against the OEMP and does it include: a) details of compliance with this approval b) copy of complaints register c) identification of any circumstances in which the environmental impacts & performance of the project during the year have not been generally consistent with environmental impacts & performance predicted d) results of environmental monitoring & interpretation	ECMR 2022 sighted	ECMR 2022 sighted. Compliance report included as App 1 to the document. Complaints dealt with in section 3.1 and listed in App 9. Complaints from odour exceedances noted and source identified as is corrective action. Monitoring results and interpretations documented in ECMR and App 3, 4, 6, 7, 8, and 10.	Compliant	N/A	
4.4	Is appropriate electronic info being made available on website, including: a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact	http://www.visy.com.au/env-appv-mgmt-plan/	The Visy Tumut web site has Project assessment documents and consent, licences for EPL and water extraction, Management Plans, Annual monitoring reports, EPL compliance report and audit outcomes. Contact details (24h) are also available on the website.	Compliant	N/A	
Project Approval 06_0159						
Administrative Conditions						
1.1	Is the project being carried out generally in accordance with: a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, NSW, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) d) concept approval 06_0159 e) the Statement of Commitments f) Tumut mill expansion - Project component phasing changes (Jun 2007) g) conditions of this approval	Site observations Production figures 2021/22 Waste figures 2021/22	Visy have been granted (7/7/17) approval to go from 700,000t/a to 800,000t/a. Production for the period was 681,000t. Non-compliance detailed in CA06_0159 CoA 1.1.	Not-compliant	N/A	
1.2	Have there been any inconsistencies with this approval or any other approvals?	EPL, WALs, RRE, RRO, ECMR 2022	Minor inconsistency have arisen due to restructuring of government departments. Addressed through new departments. However the operation is generally consistent with the consent. Compliant.	Compliant	N/A	
1.5	Are all licences, permits & approvals obtained & maintained as required?	EPL, WALs, RRE, RRO, ECMR 2022	Refer to Condition 91 Development Consent EPL10232 WAL 40AL405643 WAL 40AL405644 WAL 40AL412076 NDG035066 (Dangerous Goods) Woodlawn PHR acid mine tailings trial order 2020 Woodlawn PHR acid mine tailings trial exemption 2020 Captains Flat trial order 2022 Captains Flat trial exemption 2022	Compliant	N/A	
Dust Generation						
2.1	Is dust generation being minimised on site and mitigation where required?	Site observations during the audit	No dust observed on site at the time of the audit as 2021-2022 has seen above average rainfall. The main access roads are sealed. Water carts are available on site for dust suppression.	Compliant	N/A	
Odour						
2.2	Is offensive odour being prevented from being emitted beyond the boundary of site?	ECMR 2022	There were 21 odour complaints for the 21/22 period. This is up from 17 complaints in the previous period but well below 60+ complaints four years ago. The source of the odour was identified and in most cases minimised through action. Offensive odour is prevented from leaving the boundary most of the time. The majority of odour produced on site is prevented from leaving the site boundary and a consistent decrease in odour-related complaints has been observed during previous and current reporting periods.	Compliant		
2.3	Is an odour collection & reduction system being operated for relevant new plant?	Air Quality Management Plan MPL-TUM-ENV-002-3 May 2021	The capture and management of gasses causing odour is a key aspect of existing and new plant. Air Quality Management Plan 2021 details the management of emissions. Reference to the odour complaint system identifies the sources of most odour complaints. This indicates that Visy staff are aware of the various odour sources producing complaints. Annual plant shutdowns will typically include modifications to the plant and in subsequent years this has focused on odour management. Repairs to the liquor tank 102 roof have decreased fugitive emissions by improving the operation of the HVLC system. Increased focus on process control has also decreased odour generation. This represents evidence of ongoing improvement in odour management.	Compliant	N/A	

2.4	Are vapour compression evaporators for both new & existing plant being operated to reduce the level of chemical oxygen demand in clean condensate & reduced to 50% of existing levels?	Cannot comply as no longer applicable. Condition needs changing	A comparison of the COD levels in the clean condensate between 2007 and any time after 2010 is no longer meaningful. This is due to process changes in the production of clean condensate streams. Previous comparisons, now believed to be flawed indicated a COD reduction in the clean condensate that was close to but less than 50%.	Not-compliant	Make application to DPE to consolidate or remove condition.	In progress.
Best Available Technology						
2.7	Is the BAT being used for all combustion & air emission control equipment associated with the project?	Site observations, plant replacement, odour monitoring and plant controls.	The operation of the plant is managed through continuous monitoring of process inputs and outputs and conditions. Odour sources are routinely monitored by certified external parties. Inclusion of advanced controllers on lime kilns has improved overall controlls.	Compliant	N/A	
Monitoring & Discharge Points						
2.9	Is air monitoring/air discharge points being identified as provided below: **Monitoring / Discharge Point** / **Monitoring/ Discharge Point Location** Main Stack 2 / Main Stack 2 Recovery Boiler 2 / In the discharge duct downstream of Recovery Boiler 2 and before the junction with Main Stack 2 Natural Gas Boiler / In the discharge duct downstream of Natural Gas Boiler Electro-static Precipitator and before the junction with Main Stack 2 Multi-fuel Boiler / In the discharge duct downstream of the Multi-Fuel Boiler after the fabric filters and before the junction	ECMR 2022	A Continuous Emissions Monitoring System (CEMS) is installed and monitors at: Stack 1, stack 2, Main stack 2, Recovery Boiler2(B), Natural Gas Boiler, Multifuel Boiler, Lime Kiln 2 (B), Gas Turbine. Compliant.	Compliant	N/A	
2.10	Has any of the below concentration limits been exceeded at any of the discharge points? **Table 2 - Maximum Allowable Discharge Concentration Limits (Main Stack 2)** Pollutant / 100 Percentile limit (mgm^{-3}) Cadmium 0.5 Chlorine 100 Mercury 0.5 Nitrogen Oxides 400 Hydrogen Chloride** 50 Sulfur Dioxide** 250 Total Solid Particulates 50 Sulfuric acid mist and sulfur trioxide (as SO_3) 20 Opacity* 20 TCDD (equivalent)* 0.1 Hydrogen Fluoride 20 Type 1 and Type 2 Substances (in aggregate) 1 TRS (as H_2S) 2 * Note: The unit of measure for Opacity is %Opacity and for TCDD (equivalent) it is ngm^{-3}. ** Note: is the maximum allowable discharge concentration limit for the multi-fuel boiler operating on standard fuels only. **Table 6 – Averaging Periods** Pollutant / Averaging Period TRS (as H_2S) 1 hour SO2 1 hour HCl 1 hour Nitrogen Oxides (as NO_2) 1 hour Opacity 6 minutes All other pollutants As per test methods specified in condition 3.1 **Table 3 - Maximum Allowable Discharge Concentration Limits (Natural Gas Boiler)** Pollutant / 100 Percentile limit (mgm^{-3}) Nitrogen Oxides 100 Solid Particulates 30 Carbon Monoxide 120 Type 1 and Type 2 Substances (in aggregate) 0.5 **Table 4 - Maximum Allowable Discharge Concentration Limits (Multi-fuel Boiler)** Pollutant / 100 Percentile limit (mgm^{-3}) Cadmium 0.05 Mercury 0.05 Hydrogen Chloride 50 Dioxins & Furnans* 0.1 Nitrogen Oxides 300 Solid Particulates 25 Carbon Monoxide 120 Type 1 and Type 2 Substances (in aggregate) 1 * Note: The unit of measure for Dioxins & Furans is ngm^{-3}. **Table 5 - Maximum Allowable Discharge Concentration Limits (Gas Turbine)** Pollutant / 100 Percentile limit (mgm^{-3}) Nitrogen Oxides 70 Solid Particulates 10 Carbon Monoxide 20	ECMR 2022 ECMR Appendix 2 - CEMS Exceedance Report EPL Annual Return 2022	Exceedances documented in ECMR and the EPL annual Return.	Not-compliant	On going routine maintenance to the plant.	
2.11	Is compliance being met with averaging periods for pollutants emitted from the discharge points?	ECMR 2022 ECMR Appendix 2 - CEMS Exceedance Report EPL Annual Return 2022	Exceedances reported for the Averaging period and noted in ECMR 2022. Averaging periods appropriate.	Not-compliant	N/A	
Noise Impacts						
2.12	Has vibration resulting from operation exceeded the evaluation criteria presented in British Standard BS6472 for low probability of adverse comment, at any affected residential dwelling? **Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings** Place and time / Low probability of adverse comment ($m\,s^{-1.75}$) / Adverse comment possible ($m\,s^{-1.75}$) / Adverse comment probable ($m\,s^{-1.75}$) Residential buildings 16 h day 0.2 to 0.4 0.4 to 0.8 0.8 to 1.6 Residential buildings 8 h night 0.1 to 0.2 0.2 to 0.4 0.4 to 0.8	Site observations Interview M O'Donovan	No vibration monitoring completed. No vibration works (blasting, rock breaking, piling, compaction etc) in the reporting period. No residences within close proximity to the site.	Not triggered	N/A	

2.15	Has the noise contribution from the project to the background acoustic environment exceeded the maximum allowable noise contribution:		The attended noise monitoring data indicated that noise from the site was inaudible during 7 out of 24 measurements. Where site noise was audible and limits applied, the LAeq(15-min) multiple estimated noise contributions did not comply with the relevant limits during the night period, however noise agreements exist with all properties monitored. Most of the day and evening time readings were affected by wind speeds >3m/s and the results could not be used. In general based on exemptions the site is compliant. Mod -4 Aug 2020 allows for noise above previous limits where agreements are in place.	Compliant	Despite change in monitoring date to Feb 2022, wind speeds continue to influence night and evening noise results.	
2.16	Noise monitoring shall be: a) at any point within the residential boundary, or at any point within 30m of dwelling b) 30m from boundary c) subject to the modification factors	EMM Annual Attended Noise Monitoring Report, February 2022	Noise monitoring conducted at the appropriate locations during the reporting period.	Compliant	N/A	
Soil & Water Quality Impacts						
2.17	Has any pollution of waters under the POEO Act s120 been caused by the project?	Water storage levels 2021/22 Farm and Environmental Monitoring Report 2022 Site observations Interview M O'Donovan	No discharges to the surface water system have occurred in the reporting period. No incidents resulting in offsite impacts, even during periods of above average rainfall in the reporting period. No runoff observed during site inspection.	Compliant	N/A	
2.18	Has surface water runoff been maintained at similar levels post-construction?	Water storage levels 2021/22 Stormwater system plans and site observations.	All clean stormwater runoff is directed to controlled water quality treatment ponds prior to release off site.	Compliant	N/A	
Waste Generation Management						
2.21	Is all waste materials removed from site being directed to a licenced landfill permitted to accept that waste?	ECMR 2023 Annual Waste Report 21/22 Interview M O'Donovan	Waste is directed to waste facilities at: > Hi Quality EPL 10398 Goulburn > Woodlawn EPL 20476 Goulburn. > Captains Flat EPL (Dept Regional NSW) > Tumbalong Landfill (commenced January 2021) EPL 21440	Compliant	N/A	
2.22	Is the treatment, reuse & recycling on site of any waste oils, excavated soils, slurries, dusts & sludges being maximised?	ECMR 2022	Oils taken by contractor Cleanaway contractors. Excavated soils are stored at the rear of the plant and used on site for earthworks. Organic dusts are fed to the boiler. Slurries and sludges are processed in the waste water treatment system and irrigated on site. Resource recovery exemption now in place for the reuse of Dregs and gritts, fly ash and boiler sand at Woodlawn Mine rehabilitation site. A total of 5028t sent to Woodlawn during the reporting period and a total of 489 was sent to Captains Flat during the reporting period.	Compliant	N/A	
2.23	Has any offsite generated waste been accepted or received onsite unless as permitted by the EPL?	ECMR 2022	Visy accepted 241,733t of waste paper and 426,757t of sawmill chip as a raw fibre source during the reporting period. Visy also powered the boilers on site with waste generated on site and received from off site in the form of timber residues.	Compliant	N/A	
2.24	Are waste being classified as per Environmental Guidelines: Assessment, Classification & M/ment of Liquid & Non-Liquid Wastes (DECC 2004)?	Previous audit report (NGH, 2021) VP9-10-10.3-PN-009 Solid Waste Management Plan 2017	As per 2016-2020 audits. Waste is being classified using the NSW Waste Classification Guidelines. Compliant.	Compliant	N/A	
Wastewater Management						
2.25	Is effluent irrigation on existing & expanded area identified in the EA being undertaken in a sustainable manner including: a) use of crops that will reduce soil salinity levels b) measuring to maintain crop biodiversity - e.g. Lucerne crop rotation c) the provision of subsurface drainage under low-lying areas d) use of best practice ameliorative measures where soil improvement is determined to be necessary	Water Management Plan June 2022 Farm and Environmental Monitoring Report 2021/22 ECMR 2022	Waste water testing is routinely carried out. Soil and plant analysis of crops/pastures is completed for the monitoring period on the Gadara Park Farm. Nutrient balances calculated to ensure net accumulation of nutrients is managed. Soils are limed to manage soil pH. Crops are rotated between millet, winter cereals and lucerne. Testing carried out in October 2021 and April 2022 of the reporting period.	Compliant	N/A	
2.26	Are all those lands identified in the EA for the purpose of irrigation of effluent available for effluent irrigation?	MetroMap Images Water Management Plan June 2022 Farm and Environmental Monitoring Report 2021/22 ECMR 2022	All farm land identified in the EA is available for irrigation. However, Visy have minimised effluent production and as such need less land. As a consequence 16 ha of irrigation land to the east of the centre pivots is currently not irrigated.	Compliant	N/A	

2.27	Has the winter storage dam been extended?	Site observations Interview M O'Donovan	No extension of the winter storage dam occurred in the reporting period.	Compliant	N/A	
2.28	Have all treated wastewater discharges occurred as permitted by the DECC & in accordance with DECC's Environmental Guidelines: Use of Effluent by Irrigation (2004), including relevant discharge information?	Water Management Plan June 2021 Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	Discharges to the irrigation area are planned, implemented, monitored and reviewed in accordance with the Water Management Plan 2021 and the DECC (EPA) guidelines. Groundwater and soil monitoring results indicate that accumulations in the soil and impacts to groundwater are being effectively managed.	Compliant	N/A	
Hazards & Risks						
2.29	Has any structures been demolished? If so was it in accordance with AS2601:1991?	Site observations Interview M O'Donovan	No demolition has occurred during the reporting period.	Compliant	N/A	
2.31	Is the storage & handling of dangerous goods as per AS?	Observations on site Pinnacle Hazard Audit Dec 2021	Hazard Audit undertaken in Dec 2021 sighted during audit. Some minor findings were identified and are being scheduled for action.	Compliant	N/A	
Traffic Impacts						
2.34 & 2.35	Has any traffic access arrangements changed?	Traffic Management Plan (MPL-TUM-ENV-006-3) August 2021 Observations on site Monthly Day/Night Movements By Route 21/22	There have been no changes to the traffic access arrangements in the reporting period. Go Cup road has been upgraded and as such off site conditions are safer for drivers. A-doubles started running in July 2021 and have reduced HV numbers accessing the site and passing through Adelong.	Compliant	N/A	
2.36	Is the use of B-doubles & backloading being maximised? Is the use of super B-doubles being used so as to reduce the number of heavy vehicle movements?	Traffic Management Plan (MPL-TUM-ENV-006-3) August 2021 ECMR 2022	Logs ave. 94% B doubles and 6% semi-trailers, ave. log truck load B double = 39t, semi-trailer = 28t. Sawmill chip 52% B doubles and 48% semi-trailers, ave. load 37t B double and 29t semi-trailer. Paper domestic was 20% A-Double, 70% B doubles and 5% semi-trailers, ave. load 36t B double and 24t semi-trailer. Paper export 100% A-Double 44t/load	Compliant	N/A	
2.37	Has there been any night time (2200-0700) semi-trailer, super B-Double or B-double movements to & from plant via Snowy Mountain Highway through Adelong or to & from the plan via MR280 north of Adelong?	ECMR 2022 ECMR Appendix 9 - Complaint Register	No movements outside of curfew period occured.	Compliant	N/A	
2.38	Do all trucks associated with the project: a) utilise air bag suspension b) minimise use of exhaust brakes at night in residential areas c) operate in a manner that reduces adverse noise impacts?	Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) Complaints register 2021/2022	Drivers and employees at Visy site are inducted and trained. A toolbox talk developed February 2015 and has been used to train new and existing staff. No complaints have been received from the public regarding airbrake noise for the reporting period. Heavy vehicles observed accessing the site at the time of the audit had airbag suspension	Compliant	N/A	
Visual Amenity Impacts						
2.42	Is all external lighting associated with the project mounted, screen & directed in such a manner so as not to create nuisance?	Site observations	Plant lighting at the time of the audit was observed to be fixed and directed toward the plant. Lights face towards work areas, no light complaints recorded. Solar lights are installed at Gadara Road intersection for queueing trucks.	Compliant	N/A	
Air Quality Monitoring						

3.1	Are the detailed pollutant concentrations & emission parameters in the tables below being monitored? **Table 8 – Periodic Pollutant and Parameter Monitoring (Main Stack 2)** Pollutant/ Parameter | Units of Measure | Method | Frequency Cadmium | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Chlorine | mgm^{-3} | TM-7, TM-8 | Annually Chromium | mgm^{-3} | OM-4 | Annually Flow | Nm^3/s | CEM-6 | Continuous Hazardous substances | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Hydrogen chloride | mgm^{-3} | TM-8 | Continuous Hydrogen fluoride | mgm^{-3} | TM-9 | Annually Mercury | mgm^{-3} | TM-12, TM-13, TM-14 | Annually Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O2) | % | CEM-3 | Continuous Sulfuric acid mist and sulfuric trioxide (as SO3) | mgm^{-3} | TM-3 | Annually Sulphur dioxide | mgm^{-3} | CEM-2 | Continuous TCDD (equivalent) | ngm^{-3} | TM-18 | Annually TRS (as H2S) | mgm^{-3} | CEM-5 | Continuous Temperature | °C | TM-2 | Continuous **Table 9 – Periodic Pollutant and Parameter Monitoring (Recovery Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Flow | Nm^3/s | CEM-6 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly Volatile Organic Compounds | mgm^{-3} | CEM-8 | Continuous **Table 10 – Periodic Pollutant and Parameter Monitoring (Natural Gas Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Flow | Nm^3/s | CEM-6 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | Other approved method 1 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 11 – Periodic Pollutant and Parameter Monitoring (Multi-Fuel Boiler)** Pollutant/ Parameter | Units of Measure | Method | Frequency Cadmium | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Chromium | mgm^{-3} | OM-4 | Quarterly Flow | Nm^3/s | CEM-6 | Continuous Hazardous substances | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Mercury | mgm^{-3} | TM-12, TM-13, TM-14 | Quarterly Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous TCDD (equivalent) | mgm^{-3} | TM-18 | Quarterly Temperature | °C | Other approved method 1 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 12 – Periodic Pollutant and Parameter Monitoring (Lime Kiln 2)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | CEM-4 | Continuous Moisture | % | TM-22 | Continuous Nitrogen oxides | mgm^{-3} | CEM-2 | Continuous Opacity | % Opacity | CEM-1 | Continuous Oxygen (O_2) | % | CEM-3 | Continuous Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly **Table 13 – Periodic Pollutant and Parameter Monitoring (Gas Turbine)** Pollutant/ Parameter | Units of Measure | Method | Frequency Carbon Monoxide | mgm^{-3} | TM-32 | Quarterly Moisture | % | TM-22 | Quarterly Nitrogen oxides | mgm^{-3} | TM-11 | Quarterly Oxygen (O_2) | % | TM-25 | Quarterly Temperature | °C | TM-2 | Continuous Total Solid Particles | mgm^{-3} | TM-15 | Quarterly	ECMR 2022 Annual Return 2022	The tables in the consent condition have been compiled from a past EPL. Discussions with DPE regarding inconsistent consent conditions have occurred. DPE have indicated that they are willing to discuss this issue.	Not-compliant	Remove condition of consent to avoid inconsistency with EPL over time.	See Above
3.2	Has any new project phases commenced since the last audit? If so, has a program to confirm air emission performance been undertaken including: a) point source emission sampling & analysis b) a comprehensive air quality impact assessment c) a comparison of results from those collected & predicted d) a comparison of results from those collected to the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW e) details of any complaints relating to air quality impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
3.3	Did the program indicate any of the following: a) greater point source emissions or ground-level concentrations of air pollutants than predicted in the documents listed under condition 1.1 of this approval b) greater point source emission or ground-level concentrations of air pollutants than the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW? If so has detail of remedial measures & timetable for implementation been submitted to	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	

3.4	Has any new project phases commenced since the last audit? If so, has an independent, qualified person or team been commissioned to undertake odour performance monitoring 90 days prior to commencement of this phase, including: a) point & area source emission sampling & analysis b) a comprehensive odour assessment c) a comparison of results from those collected & predicted d) a comparison of results from those collected to the impact assessment criteria detailed in Technical Framework - Assessment & Management of Odour from Stationery Sources in NSW & Technical Notes: Assessment & Management of Odour from Stationary Sources in NSW e) details of any complaints relating to odour impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
3.5	Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater odour impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
3.6	Has any new project phases commenced since the last audit? If so, has a revised Human Health Impact Assessment been undertaken within 12 months of commencement of that phase using actual air emission data collected? Was it submitted to the DG & NSW Health within 3 months of commencement of emission data collection?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
Noise Monitoring						
3.7	Has any new project phases commenced since the last audit? If so, has a program to confirm noise emission performance been undertaken including: a) noise monitoring b) methodologies, locations & frequencies for noise monitoring c) identification of monitoring sites at which pre & post-project noise levels can be ascertained d) details of any complaints relating to noise impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
3.8	Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater noise impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A	
Soil Monitoring						
3.10	Is the Soil Monitoring Program being conducted every 12 months including: a) installation of soil moisture probes for daily moisture monitoring b) calibration of probes c) locations of soil sampling d) soil sampling undertake biannually, before & after irrigation season	Farm and Environmental Monitoring Report 2021/2022	a) soil moisture probes are installed under the irrigation areas and are used to monitor and schedule irrigation. b) The probes are calibrated c) Soil sample locations recorded d) Soil sampling is biannually, before & after irrigation season as specified in the CoA.	Compliant	N/A	
3.11	Has the program indicated that effluent irrigation is having an adverse impact on the sustainable use of soils within the irrigation area? If so, what soil amelioration measures have been put in place in consultation with DPI?	Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	The soil and ground water monitoring do not indicate changing soil parameters of an adverse influence.	Compliant	N/A	
Water Monitoring						
3.12	Is a surface & groundwater monitoring program being implemented?	Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	A surface water and groundwater monitoring program is being implemented.	Compliant	N/A	
Hazard Compliance						
3.13	Has a report detailing compliance with conditions 2.32 (Fire Safety Study and Construction Safety Study) & 2.33 (Emergency Plan and Safety Management System) been submitted within 90 days of the commencement of each phase including the following detail: a) dates of study, plan or system completion b) actions taken or proposed to implement recommendations made in studies, plans or systems c) responses to each requirement that may be requested by the DG?	Site observations ECMR 2022 Previous audit reports	No new phases have occurred in the last reporting period. Complaint	Not triggered	N/A	
Auditing						
3.14	Refer to DA Condition 16	Previous audit reports	As per 2016 audit. Compliant	Compliant	N/A	

3.15	Is an annual odour audit being undertaken including a leak detection & repair program? Have reports been submitted to DECC no later than 1 month after completion of the audit?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022 ECMR 2022	Biannual odour emissions monitoring reports sighted. Performed in 2021 and 2022. Submitted with ECMR 2022.	Compliant	N/A	
3.16	Refer to DA Condition 71 - annual audit required	Refer to DA Condition 71	Compliant	Compliant	N/A	
4.1	Refer to CA Condition 4.1	Refer to CA Condition 4.1	Compliant	Compliant	N/A	
4.2	Refer to CA Condition 4.2	Refer to CA Condition 4.2	Compliant	Compliant	N/A	
4.3	Refer to CA Condition 4.3	Refer to CA Condition 4.3	Compliant	Compliant	N/A	
OEMP						
5.3	Has OEMP been updated to detail an environmental framework, practices & procedures to follow during operation? Does the OEMP include: a) identification of all statutory & other obligations including approvals/licences b) description of roles & responsibilities c) environmental policies/principles d) environmental performance review & improvement e) management policies to ensure environmental goals are met f) additional studies listed under condition 5.4 g) monitoring requirements	OEMP Rev 4, 30 August 2021	The OEMP has been modified to include updated targets for environmental programs. a) Section 4 of the OEMP describes and lists relevant approvals and legislation. b) Section 6 of the OEMP describes roles & responsibilities c) Sections 1 and 2 of the OEMP describes the role of the environmental policy and procedures employed by Visy. d) Sections 16-21 describe monitoring, management review and improvement. e) Section 5 of the OEMP describes the objectives targets and management of the OEMP. f) Section 1 and 9 describe the additional air quality action required. The Air Quality Management Plan supports the OEMP in this respect. g) Section 16 of the OEMP and the Management Subplans describes monitoring for the Visy operation. OEMP and subplans have been updated within the reporting period, as reflected in relevant condition evidence	Compliant	N/A	
5.4a	Has the AQMP been updated and does it include: i) identification of major sources of particulate & gaseous air pollutants that may be emitted, both point-source & diffuse emissions, including identification of major components & quantities ii) monitoring iii) procedures for minimisation of gaseous & particulate emissions iv) pro-active & reactive management & response mechanism for particulates, odour & gaseous emissions v) specific procedures for m/ment of generating efficiency & minimisation of GGH per unit of electricity generated vi)procedures aimed at maximising the efficiency of start-up & shut-down vii) provision for regular review of air quality monitoring data & comparison of assumed & predicted viii) plans for regular maintenance to minimise leaks & fugitive emissions	Air Quality Management Plan May 2021 MPL-TUM-ENV-002-3	The AQMP addresses the requirements of: i) In section 4.1 ii) In section 7 iii) In section 6 iv) In section 6 v) In section 6.6 and app J vi) In section 6.3 vii) In section 9 viii) In section 6.3.2 ix) In section 6.4	Compliant	N/A	
5.4b)	Has the WMP been updated and does it include: i) options to avoid discharge to ground & ambient waters ii) identification of clean & dirty water areas on site maps iii) details of water management measures for clean & dirty water iv) calculations for water balance for waters generated on site v) details of remedial actions in response to exceedances or performance criteria vi)characteristics of wastewater quality & quantities for reuse vii) specification of wastewater reuse areas shall be specified on maps including contingency land viii) contingency plans in the event irrigation land becomes unavailable ix) specific details of wastewater irrigated x) specific details regarding groundwater monitoring xi) detailed description of measures to mitigate adverse impacts on groundwater	Water Management Plan June 2021 - MPL-TUM-ENV-007-3	The WMP addresses the requirements of: i) In section 4 ii) In section 4 iii) In section 4 iv) In section 4 v) In section 4 vi) In section 4 vii) In section 4 viii) In section 4 ix) In section 4 x) In section 4 xi) In section 4	Compliant	N/A	

5.4c)	Has the NMP been updated and does it include: i) procedures to ensure best management practice & best available technology is being considered & implemented ii) procedures to generate suitable for annual environmental auditing iii) identification of all relevant receivers & applicable criteria iv) calculations for water balance for waters generated on site v) procedures for periodic consideration of noise impacts, limits & goals vi) details of management methods & procedures for noise emission control vii) reactive & pro-active strategies for dealing with complaints	Noise Management Plan (MPL-TUM-ENV-004-3) July 2021	The NMP addresses the requirements of: i) In section 1, 2 and 6 ii) In Section 9 iii) In Section 4 iv) N/A v) In Section 8 vi) In Section 6 vii) In Section 6.3 and 8.2 viii) In Section 7 and 8	Compliant	N/A	
5.4d)	Has the TMP been updated and does it include: i) driver education programme ii) best noise practice iii) movement schedule iv) specific measures v) specific measures for minimising noise impacts at identified sensitive areas vi) a system for identifying & ensuring conformance with the Plan vii) a continual improvement process	Traffic Management Plan (MPL-TUM-ENV-006-3) August 2021	The TMP addresses the requirements of: i) In section 6.8 ii) In section 1.3, 4.3 and 6.2 iii) In section 6 iv) In section 6 v) In section 6 and 9 vi) In section 7, 8 and 9 vii) In section 1 and 9	Compliant	N/A	
5.4e)	Has the SMP been prepared that includes: i) detailed identification of soil types & properties within irrigation area ii) a monitoring regime for assessing soil health iii) a detailed description of conditions that would trigger amelioration measures iv) methodologies for soil improvement	Soil Management Plan (MPL-TUM-ENV-005-3) Sept 2021	The SMP addresses the requirements of: i) In section 4 ii) In section 6 iii) In section 3, 6 and 7 iv) In section 4.7	Compliant	N/A	
EPL 10232						
Administrative Conditions						
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. **Scheduled Activity** / **Fee Based Activity** / **Scale** Paper or pulp production / Paper or pulp production / > 150000 T annual production capacity	EPL 10232 ECMR 2022 Site observations OEMP	Current production 2021/2022 681,004 t. EPL allows for production over 150,000t.	Compliant	N/A	
A2.1	The licence applies to the following premises: **Premises Details** VISY PULP & PAPER PTY LTD 436 GADARA ROAD TUMUT NSW 2720 PULP AND PAPER MILL SITE, CONSISTING OF LANDS AS LISTED BELOW. Details of Land Parish of Gilmore – Lots 61 & 82 in DP No. 757229 Parish of Gadara – Lots 4, 5, 7, 8, 9, 12, 14, 19, 42, 46, 47, 48, 49, 50, 57, 61, 62, 63, 64, 76, 83, 84, 91, 92, 93, 94, 103, 105, 106, 107, 115, 116, 117, 118, 119, 129, 130, 131, 132, 133, 134, 135, and 138, in DP No. 757228; Lot 2 in DP No. 598661; Lots 1 and 2 in DP No. 45454; Lots 211, 219, 220, 221, 222, 223, 224, 229, 230, and 235 in DP No. 757252; Lot A (which contains parts of Lots 73, 74, and 78 and the whole of Lot 77 in DP No. 757228) and Lot B in DP No. 364539; Lot D in DP No. 364540; Lots 3 and 4 in DP No. 793196; Lot 1 in DP No. 832090; and Lots 8 and 9 in DP No. 113036.	MetroMap Images (2022) Site observations	The premises and activities are located as per the EPL.	Compliant	N/A	
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	Site observations OEMP ECMR 2022	Plant operations generally in accordance with the EPL and Consent	Compliant	N/A	
Discharges to Air & Water & Applications to Land						

<table>
<tr><td>P1.1</td><td>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.
Air<table><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>1</td><td>Air Emissions from main stack 1</td><td>Air Emissions from main stack 1</td><td>Main Stack 1</td></tr><tr><td>2</td><td>Air emissions from recovery boiler</td><td></td><td>In the discharge duct downstream of the recovery boiler and before the junction with the main stack 1</td></tr><tr><td>3</td><td>Emissions from Power Boiler</td><td>Emissions from Power Boiler</td><td>In the discharge duct downstream of the power boiler electro-static precipitator and before the junction with the main stack 1</td></tr><tr><td>4</td><td>Emissions from Lime Kiln</td><td></td><td>Lime kiln discharge duct before the junction with the main stack 1</td></tr><tr><td>7</td><td>Meteorological monitoring</td><td></td><td>Meteorological Station at the mill site (exact location currently under investigation)</td></tr><tr><td>8</td><td>Meteorological monitoring</td><td></td><td>Meteorological monitoring station, southeast of mill.</td></tr><tr><td>16</td><td>Fly ash quality monitoring</td><td></td><td>Power Boiler.Hopper for fly ash discharge from the Electro-static Precipitator</td></tr><tr><td>17</td><td>Bottom ash quality monitoring</td><td></td><td>Power Boiler. Bottom ash discharge point</td></tr><tr><td>18</td><td>Fuel quality monitoring</td><td></td><td>Power Boiler. Fuel Bins</td></tr><tr><td>19</td><td>Air Emission Monitoring</td><td></td><td>Power Boiler. Discharge duct, upstream of the Electro-static Precipitator</td></tr><tr><td>20</td><td>Fluidised bed sand quality monitoring</td><td></td><td>Fluidised bed sand storage bin.</td></tr><tr><td>21</td><td>Emission from Lime Kiln 2</td><td></td><td>Lime kiln 2 discharge duct before junction with main stack 1</td></tr><tr><td>22</td><td>Main Stack 2</td><td>Main Stack 2</td><td>Main Stack 2</td></tr></table></td><td>ECMR 2022
Annual EPL Return 2022</td><td>Monitoring points were generally monitored during the reporting period.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>P1.2</td><td>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</td><td>ECMR 2022
Annual EPL Return 2022</td><td>The discharge points nominated in P1.1 are being monitored as per the EPL.</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>P1.3</td><td>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.
Water and land<table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>9</td><td>Overflow from winter storage dam</td><td>Overflow from winter storage dam</td><td>Outlet pipe from the 400 ML storage pond into Sandy Creek</td></tr><tr><td>10</td><td>Effluent discharge to the reuse area</td><td>Effluent discharge to the reuse area</td><td>Decant line from the sequencing batch reactor</td></tr><tr><td>11</td><td>Ambient water quality monitoring</td><td></td><td>Sandy Creek, upstream of overflow discharge point.</td></tr><tr><td>12</td><td>Ambient water quality monitoring</td><td></td><td>Sandy Creek, downstream of overflow discharge point</td></tr><tr><td>13</td><td>Soil monitoring network</td><td></td><td>Soil monitoring sites (SMS) 1 to 7 inclusive, as detailed in Operational Environmental Management Plan, Comprehensive Monitoring Plan, Revision B Figure 1.</td></tr><tr><td>14</td><td>Groundwater monitoring network</td><td></td><td>Monitoring Bores BH1 to BH4 and BH7 to BH 15 as detailed in the Operational Environmental Management Plan, Groundwater Monitoring Program, Revision B, Figure 1</td></tr></table></td><td>ECMR 2022
Annual EPL Return 2022</td><td>The discharge points nominated in P1.1 are being monitored as per the EPL.</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td colspan="7">Limit Conditions</td></tr>
<tr><td>L1.1</td><td>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</td><td>ECMR 2022
EPL Annual Return 2022</td><td>No discharges to Sandy Creek during the reporting period. Some licence exceedances have been reported as per the requirements of the EPL.</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>L2.1</td><td>The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.</td><td>EPL Annual Return 2022</td><td>Coarse Particle exceedances detailed in the EPL Annual Return 2022. Load limit = 31,000kg, coarse particulate annual load for FY22 was 65,342kg, 28.1% reduction on FY21. Lime kiln performance issues noted as primary cause, as well as the performance of the Power Boiler Electrostatic Precipitator.</td><td>Not-compliant</td><td>Licence fee paid for load exceedance.</td><td></td></tr>
<tr><td>L2.2</td><td>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.
Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.<table><tr><th>Assessable Pollutant</th><th>Load limit (kg)</th></tr><tr><td>BOD (Enclosed Water)</td><td>20300.00</td></tr><tr><td>Coarse Particulates (Air)</td><td>31000.00</td></tr><tr><td>Fine Particulates (Air)</td><td>100000.00</td></tr><tr><td>Nitrogen (total) (Enclosed Water)</td><td>4600.00</td></tr><tr><td>Nitrogen Oxides (Air)</td><td>900000.00</td></tr><tr><td>Phosphorus (total) (Enclosed Water)</td><td>800.00</td></tr><tr><td>Salt (Enclosed Water)</td><td>500000.00</td></tr><tr><td>Total suspended solids (Enclosed Water)</td><td>30500.00</td></tr><tr><td>Zinc (Enclosed Water)</td><td>180.00</td></tr></table></td><td>Noted</td><td>Noted</td><td>Not triggered</td><td></td><td></td></tr>
</table>

<table>
<tr><td>L3.1</td><td>For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</td><td>EPL Annual Return 2022</td><td>Exceedances detailed in annual EPL return incl.: 1) Coarse Particulates at Point 1 & Point 22; 2) Total Solid Particles at Point 4 Lime Kiln; 3) Carbon Monoxide limit at Point 3; 4) Opacity Limit at Point 1 (Stack 1); 5) Nitrogen oxide limit at Point 1 (stack 1); 6) Opacity Limit at Point 22 (Main Stack 2); 7) Total Solid Particles at Point 1 (Stack 1); 8) Nitrogen Oxides Point 2 (Recovery Boiler A).</td><td>Not-compliant</td><td>A range of maintenance measures were implemented to minimise exceedance.</td><td></td></tr>
<tr><td>L3.2</td><td>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</td><td>EPL Annual Return 2022</td><td>pH specified in Points 9 and 10 - no discharge from Point 9 during the reporting period and all pH recordings within specified limit at Point 10.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>L3.3</td><td>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.</td><td>Noted</td><td>Noted</td><td>Not triggered</td><td></td><td></td></tr>
<tr><td>L3.4</td><td>Air Concentration Limits
POINT 1,22<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>400</td><td></td><td></td><td></td></tr><tr><td>TCDD (equivalent)</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>TRS (as H2S)</td><td>milligrams per cubic metre</td><td>3.6</td><td></td><td></td><td></td></tr><tr><td>Chlorine</td><td>milligrams per cubic metre</td><td>100</td><td></td><td></td><td></td></tr><tr><td>Total Solid Particles</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>250</td><td></td><td></td><td></td></tr><tr><td>Sulfuric acid mist and sulfur trioxide (as SO3)</td><td>milligrams per cubic metre</td><td>20</td><td></td><td></td><td></td></tr><tr><td>Hydrogen chloride</td><td>milligrams per cubic metre</td><td>50</td><td></td><td></td><td></td></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td></td><td></td><td></td></tr></table>POINT 3<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Dioxins & Furans</td><td>nanograms per cubic metre</td><td>0.1</td><td></td><td></td><td></td></tr><tr><td>Mercury</td><td>milligrams per cubic metre</td><td>0.05</td><td></td><td></td><td></td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>30</td><td></td><td></td><td></td></tr><tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>140</td><td></td><td></td><td></td></tr><tr><td>Hazardous substances</td><td>milligrams per cubic metre</td><td>0.5</td><td></td><td></td><td></td></tr><tr><td>Cadmium</td><td>milligrams per cubic metre</td><td>0.05</td><td></td><td></td><td></td></tr></table></td><td>EPL Annual Return 2022</td><td>Coarse Particulates, Carbon monoxide, Opacity, Nitrogen oxide and Total Solid Particles limits exceeded at specified points during the reporting period.</td><td>Not-compliant</td><td></td><td></td></tr>
<tr><td>L3.5</td><td>The limits detailed for Point 3 are only applicable when non-standard fuel is being burnt in the power boiler.</td><td>Annual Environmental Compliance and Monitoring Report (ECMR) 2022
Interview M O'Donovan</td><td>No non-standard fuels have been used this reporting period or since 2008</td><td>Not triggered</td><td></td><td></td></tr>
<tr><td>L3.6</td><td>Water and/or Land Concentration Limits
POINT 9<table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DQM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>5.5 - 9.5</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr></table>POINT 10<table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DQM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>40</td></tr><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>5.5 - 9.5</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td></td><td></td><td>5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>45</td></tr></table></td><td>EPL Annual Return 2022</td><td>No exceedances recorded at Points 9 or 10 during the reportind period.</td><td>Compliant</td><td></td><td></td></tr>
</table>

<table>
<tr>
<td>L3.7</td>
<td>The averaging period applicable for pollutants emitted to the air are as detailed below:
<table>
<tr><th>Pollutant</th><th>Averaging period</th></tr>
<tr><td>TRS (as H2S)</td><td>1 hour</td></tr>
<tr><td>SO2</td><td>1 hour</td></tr>
<tr><td>HCl</td><td>1 hour</td></tr>
<tr><td>Nitrogen Oxides (as NO2)</td><td>1 hour</td></tr>
<tr><td>Opacity</td><td>6 minutes</td></tr>
<tr><td>Solid particles</td><td>24 hours</td></tr>
<tr><td>CO</td><td>1 hour</td></tr>
<tr><td>All other pollutants</td><td>As per test methods specified in Clauses M2 and M3</td></tr>
</table>
Reference conditions
Unless otherwise specified by the EPA, the reference condition for Points 1,3 and 22 are Dry 273 0K, 101.3 kPA, 8% O2</td>
<td>Noted</td>
<td>Noted</td>
<td>Not triggered</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L3.8</td>
<td>Point 2 (Recovery Boiler)
Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 2 (Recovery Boiler).
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Reporting limit</th><th>Reference Conditions</th><th>Averaging Period</th></tr>
<tr><td>NOx (as NO2)</td><td>mg/m3</td><td>250</td><td>dry, 273 K, 101.3 kPa, 8% O2</td><td>1 hour</td></tr>
<tr><td>Particles</td><td>mg/m3</td><td>34</td><td>dry, 273 K, 101.3 kPa, 8% 02</td><td>as per test method</td></tr>
<tr><td>Methanol</td><td>kg/tonne BLS</td><td>0.012</td><td>dry, 273 K, 101.3 kPa, 8% 02</td><td>as per test method</td></tr>
</table></td>
<td>EPL Annual Return 2022</td>
<td>As per L3.1</td>
<td>Not-compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L3.9</td>
<td>Point 3 (Power Boiler)
Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 3 (Power Boiler).
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Reporting limit</th><th>Reference Conditions</th><th>Averaging Period</th></tr>
<tr><td>NOx (as NO2)</td><td>mg/m3</td><td>300</td><td>dry, 273 K, 101.3 kPa, 8% O2</td><td>1 hour</td></tr>
</table></td>
<td>EPL Annual Return 2022</td>
<td>Exempt as per L3.5.</td>
<td>Compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L3.10</td>
<td>Point 4 (Lime Kiln)
Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 4 (Lime Kiln).
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Reporting limit</th><th>Reference Conditions</th><th>Averaging Period</th></tr>
<tr><td>NOx (as NO2)</td><td>mg/m3</td><td>400</td><td>dry, 273 K, 101.3 kPa, 10% 02</td><td>1 hour</td></tr>
<tr><td>Particles</td><td>mg/m3</td><td>23</td><td>dry, 273 K, 101.3 kPa, 10% 02</td><td>As per test method</td></tr>
</table></td>
<td>EPL Annual Return 2022</td>
<td>As per L3.1</td>
<td>Not-compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L4.1</td>
<td>For each discharge point or utilisation area specified below (by a point number), the volume/mass of:
a) liquids discharged to water; or;
b) solids or liquids applied to the area;
must not exceed the volume/mass limit specified for that discharge point or area.
<table>
<tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr>
<tr><td>9</td><td>kilolitres per day</td><td>3000</td></tr>
<tr><td>10</td><td>kilolitres per day</td><td>16000</td></tr>
</table></td>
<td>EPL Annual Return 2022</td>
<td>No exceedances have occurred for discharges from points 9 or 10.</td>
<td>Compliant</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>L4.2</td>
<td>For each discharge point specified below (by a point number), the volume of emissions to air must not exceed the volume limit specified for that discharge point.
<table>
<tr><th>Point</th><th>Units of Measure</th><th>90 percentile volume limit</th><th>100 percentile volume limit</th></tr>
<tr><td>1</td><td>Nm3/s</td><td>90.5</td><td>100</td></tr>
</table></td>
<td>EPL Annual Return 2022</td>
<td>The mean flow in cubic metres per second was 80.76 and the peak was 94.31 (limit100).</td>
<td>Compliant</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>L5.1</td>
<td>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.</td>
<td>EPL Annual Return 2022
ECMR 2022
Site observations</td>
<td>Recycled paper is accepted on site - cardboard boxes, paper clippings & commons. Wood residues from mills. No waste is being disposed of at the premises.</td>
<td>Compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L5.2</td>
<td>The following wastes may be received at the premises:
(a) waste paper or cardboard for reprocessing into recycled paper;
(b) wood residues for pulping;
(c) standard fuels;
(d) non standard fuels.</td>
<td>EPL Annual Return 2022
ECMR 2022
Site observations</td>
<td>As per L5.1</td>
<td>Compliant</td>
<td></td>
<td></td>
</tr>
</table>

L6.1	Noise from the premises must not exceed the sound pressure level (noise) limits presented in the table below. Note: the limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table. Note: For the purpose of the above condition L6.1 (*) refers to Residences identified in "Visy Pulp and Paper, Proposed Mill Expansion Tumut NSW, final Environmental Assessment" dated January 2007. **Location** / **Day LAeq (15 minute)** / **Evening LAeq (15 minute)** / **Night LAeq (15 minute)** / **Night LAmax** "Pleasant View" (*) / 40 / 40 / 40 / 45 "Deep Creek" (*) / 39 / 39 / 39 / 45 "Reka" and "Glengarry" (*) / 36 / 36 / 36 / 45 Any other residence / 35 / 35 / 35 / 45		Some estimated site contribution noise readings were below the required limits, however almost all measurements were invalidated due to wind speed or recorded where a negotiated agreement exists. It is noted that negotiated agreements have been completed with all sensitive receivers as of March 2021. Visy altered the monitoring period to February 2022 but was unable to avoid wind speed effects on monitoring. It is noted that site noise was inaudible at various monitoring points and times during the monitoring event.	Compliant	Visy to discuss modifying EPL with EPA to align with Mod 4 (Aug 2020). Negotiated agreements.	
L6.2	For the purpose of Condition L6.1 above Day is defined as 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays; Evening is defined as 6pm to 10pm on day day; and Night is defined as 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays	ECMR 2022 EPL Annual Return 2022	The approved operating hours are 24h/day 7 days per week. As a result of 2019/20 summer fires chipper now operation 24hrs /day.	Compliant	N/A	
L6.3	For the purpose of assessment of noise contributions specified under condition L6.1 of this licence, noise from the project shall be: a) assessed at any point within the residential boundary, or at any point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary; and b) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable. Notwithstanding, should either i) direct measurement of noise from the project be impractical, the licencee may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)); or ii) it is not possible to access a residence in accordance with the requirements of Point (a) above, measurement may be taken at the property boundary closest to the licensed premise, and the noise impact at the resident determined by calculation.	ECMR 2022 (Appendix 4)	EMM have completed attended noise monitoring at adjacent sensitive receivers. Visy altered the monitoring period to February 2022. Visy were able to avoid temperature inversions, however wind speeds were exceeded during approximately one third of monitoring results. EMM used an alternative approach to calculate the Visy contribution to noise at sensitive receivers to account for noise impacts in accordance with the NPI (2017).	Compliant		
L6.4	The noise emission limits identified in Condition L6.1 apply under meteorological conditions of wind speed up to 3 metres per second at 10 metres above ground level, and under temperature inversion conditions (3°C/100m) and wind speeds up to 2m/s.	ECMR 2022 (Appendix 4)	Multiple monitoring points and times invalidated by wind speeds during the reporting period.	Compliant		
L7.1	Only the following materials may be used as fuel within the power boiler:- - Standard Fuel; and - Non-standard Fuel.	ECMR 2022 EPL Annual Return 2022	Non-standard fuels are not used on site.	Compliant	A review of fuel used on site against the NSW EPA Eligible *Waste Fuels Guideline* Dec 2016 is in progress. This may require alteration to the EPL.	
L7.2	The total mass of Non-standard Fuel, excluding the sub-category of "Known Fuel not Requiring Further Testing", used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler	ECMR 2022 EPL Annual Return 2022	Non-standard fuels are not used on site.	Not triggered		
L7.3	The minimum exit velocity for Stack 2 when the recovery boiler is operating at or above 70% of the applicable design firing rate is as follows in table below. For the purpose of this condition, tds/day is tonnes dry solids per day for the new recovery boiler. **Phase** / **Equipment discharging to Stack 2** / **Minimum exit velocity m/s @ 750tds/day** / **Minimum exit velocity m/s @ 900tds/day** 1a / New recovery boiler (NRB) / 18.4 / 22.1	Previous audit report (NGH, 2016)	As per 2016 audit. As of 2016, the current sampling point is located approximately halfway up the stack where the diameter is larger and velocity is lower. The Visy process engineers have used current readings to calculate the velocity at the top where the stack. Based on these calculations the main stack velocity is approximately 24.8m/s which is above 70% of the applicable firing rate.	Compliant	N/A	
Operating Conditions						
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site observations Site environmental management plans	Materials handling, manufacturing and waste management is planned, monitored and reviewed in a competent and on going manner. Monitoring results indicate that environmental performance is largely compliant and continues to improve were required.	Compliant	N/A	
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Site observations Site environmental management plans	Plant and equipment are maintained using a systematic planned maintenance system and a range of contractors and internal staff. Planned maintenance shutdowns occur annually and unplanned shut downs are used to complete maintenance listed in order of priority.	Compliant	N/A	

O2.2	Equipment used to conduct any monitoring required by this licence must: (a) be properly calibrated to ensure that it measures as accurately as possible; and (b) be maintained and serviced at least as often as often is recommended by the manufacturer or supplier.	ECMR 2022 Ecotech, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A	
O2.3	Where maintenance, calibration or operation are detailed as part of the standards listed in the licence limit or monitoring sections of this licence, then the maintenance, calibration or operation must be undertaken in accordance with the standard.	ECMR 2022 Ecotech, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A	
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise dust at the boundary of the premises.	Site observations Interview M O'Donovan	Access roads to the site and most internal access roads are sealed. Unsealed roads are sheeted with hard roadbase. The chip piles and logs are sprayed to reduce dust emissions.	Compliant	N/A	
O4.1	Effluent resulting from the operation of the premises must only be applied to the defined irrigation area.	ECMR 2022 EPL Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022	Farm and Envrionental Monitoring Report indicates that 851.52 megalitres of effluent was irrigated over 110.86ha of land via five centre pivots and a soft hose travelling irrigator. It is noted that this is the highest irrigation amount since monitoring began in 2002.	Compliant	N/A	
O4.2	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' include the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.	Farm and Environmental Monitoring Report 2021 - 2022	The effluent and solids applied the farm soils are sampled tested and assessed. The soils are similarly assessed. The soils are not showing any elevated parameters relating to the key waste characteristics. Overall soil health is improving over the long-term use of the site.	Compliant	N/A	
O4.3	Effluent application must not occur in a manner that causes surface runoff.	Farm and Environmental Monitoring Report 2021 - 2022	Real time soil moisture is monitored to schedule irrigation so soil does not become over saturated. Higher than average rainfall was recorded during 2021/22 and monthly rainfall was above average except August, December, February, March and June. Evaporation for the reporting period was generally lower than average. No runoff reported during the reporting period.	Compliant	N/A	
O4.4	Spray from effluent application must not drift beyond the boundary of the premises.	Farm and Environmental Monitoring Report 2021 - 2022	No complaints regarding spray drift were recorded. No spray drift was noted by farm manager during irrigation. Centre pivots have coarse nozzle size to minimise small droplets.	Compliant	N/A	
O4.5	Effluent liquid waste pipelines and fittings must be clearly identified. Standard watertaps, hoses and valves must not be fitted to the pipelines of the effluent system. The effluent system must not be connected to other pipelines. Lockable valves or removable handles must be used where there is public access to the effluent.	Farm and Environmental Monitoring Report 2021 - 2022 Site observations Interview M O'Donovan	Lockable valves are used for the irrigation of effluent. Water pipes and valves are labelled coming from wastewater plant. No significant changes made to fittings or pipelines during the reporting period.	Compliant	N/A	
O4.6	Public access to any effluent utilisation area must be denied during effluent application and until the effluent application area has dried.	ECMR 2022 Site observations Interview M O'Donovan	The irrigation area is located on private property. The irrigation area is located 6.5 km from the closest centre of population. The irrigation area is fenced and has a lockable gate.	Compliant	N/A	
O4.7	Adequate notices, warning the public not to drink or otherwise use the treated effluent, must be erected on the site. These notices must be legible English and in any other languages as may be necessary, and must indicate at least that the water in use is "Reclaimed Water - Unfit for Drinking".	ECMR 2022 Site observations Interview M O'Donovan	Public do not have access to site. Signage on access the effluent application area requires replacement.	Compliant	N/A	
O4.8	Prior to any discharge to Sandy Creek, approval in writing must be obtained from the EPA. This application for discharge must be submitted to the EPA at least two weeks before the requested start date for discharge.	ECMR 2022 EPL Annual Return 2022	No discharges to Sandy creek have occurred in the reporting period.	Compliant	N/A	
O4.9	The application for discharge must be accompanied by supporting documentation, which includes: (a) Volume of effluent generated, the volume of effluent reused, and the percentage capacity of the holding dam, for both the system as designed and the actual volumes for the previous 12 months. This information is to be presented in both text and graphical form. (b) Details of reasons for the discharge in the event that it is proposed to discharge in a year when the rainfall has been less than the wettest year in ten.	ECMR 2022 EPL Annual Return 2022	No discharges to Sandy creek have occurred in the reporting period.	Compliant	N/A	

O5.1	After plant commissioning and at least annually thereafter, an odour audit must be carried out. Part of this odour audit must include a leak detection and repair program (LDAR) (as outlined in the MACT Rules) for the entire foul gas and foul condensate collection systems.	ECMR 2022 Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	Odour monitoring and testing including leak detection are carried out twice a year for the reporting period.	Compliant	N/A	
Monitoring & Recording Conditions						
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	ECMR 2022 Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022	All monitoring records are maintained electronically and some in hard copy. The results of monitoring are reported in ECMR 2022, the EPL Annual Return 2022 and the Annual Return Submission 2022.	Compliant	N/A	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Internal electronic monitoring records Reports from external specialist consultants	All records are kept electronically and in legible format.	Compliant	N/A	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	ECMR 2022 (specifically appendices) Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022 Water storage records 2016 - 2022 Weather data	The records sighted included the: date of sampling, time of sampling, point of sampling and the name of person sampling.	Compliant	N/A	
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	ECMR 2022 EPL Annual Return 2022	Monitoring is being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable.	Compliant		
M2.2	Air Monitoring Requirements POINT 1,22 **Pollutant / Units of measure / Frequency / Sampling Method** Chlorine / milligrams per cubic metre / Yearly / TM-7 & TM-8 Flow / normalised cubic metres per second / Continuous / CEM-6 Hydrogen chloride / milligrams per cubic metre / Continuous / TM-8 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / Yearly / TM-3 Sulphur dioxide / milligrams per cubic metre / Continuous / CEM-2 TCDD (equivalent) / nanograms per cubic metre / Yearly / TM-18 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Quarterly / TM-15 TRS (as H2S) / milligrams per cubic metre / Continuous / CEM-5 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Yearly / TM-12, TM-13 & TM-14 POINT 2 **Pollutant / Units of measure / Frequency / Sampling Method** Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Methanol / milligrams per cubic metre / Yearly / TM-35 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Oxygen (O2) / percent / Continuous / CEM-3 Temperature / degrees Celsius / Continuous / TM-2 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 POINT 3 **Pollutant / Units of measure / Frequency / Sampling Method** Cadmium / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Flow / normalised cubic metres per second / Continuous / CEM-6 Mercury / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Moisture / percent / Continuous / TM-22 Nitrogen Oxides / milligrams per cubic metre / Continuous / CEM-2 Opacity / percent Opacity / Continuous / CEM-1 Oxygen (O2) / percent / Continuous / CEM-3 TCDD (equivalent) / milligrams per cubic metre / Special Frequency 2 / TM-18 Temperature / degrees Celsius / Continuous / Other Approved Method 1 Total Solid Particles / milligrams per cubic metre / Yearly / TM-15 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14	ECMR 2022 EPL Annual Return 2022	As per M2.1	Compliant		

POINT 4,21

Pollutant	Units of measure	Frequency	Sampling Method
Carbon monoxide	milligrams per cubic metre	Continuous	CEM-4
Moisture	percent	Continuous	TM-22
Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2
Opacity	percent Opacity	Continuous	CEM-1
Oxygen (O2)	percent	Continuous	CEM-3
Temperature	degrees Celsius	Continuous	TM-2
Total Solid Particles	milligrams per cubic metre	Yearly	TM-15

POINT 16

Pollutant	Units of measure	Frequency	Sampling Method
Type 1 and Type 2 substances in aggregate	milligrams per kilogram	Special Frequency 4	Representative sample

POINT 17

Pollutant	Units of measure	Frequency	Sampling Method
Type 1 and Type 2 substances in aggregate	milligrams per kilogram	Special Frequency 4	Representative sample

POINT 18

Pollutant	Units of measure	Frequency	Sampling Method
Ash	percent	Special Frequency 5	Representative sample
Chlorine	milligrams per kilogram	Special Frequency 5	Representative sample
Copper	milligrams per kilogram	Special Frequency 5	Representative sample
Fluorine	milligrams per kilogram	Special Frequency 5	Representative sample
Organochlorine pesticides	milligrams per kilogram	Special Frequency 5	Representative sample
Organophosphate pesticides	milligrams per kilogram	Special Frequency 5	Representative sample
Type 1 and Type 2 substances in aggregate	milligrams per kilogram	Special Frequency 5	Representative sample

POINT 19

Pollutant	Units of measure	Frequency	Sampling Method
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Special Frequency 4	TM-12, TM-13 & TM-14

POINT 20

Pollutant	Units of measure	Frequency	Sampling Method
Type 1 and Type 2 substances in aggregate	milligrams per kilogram	Special Frequency 4	Representative sample

M2.3

Water and/ or Land Monitoring Requirements

ECMR 2022
EPL Annual Return 2022

As per M2.1

POINT 9

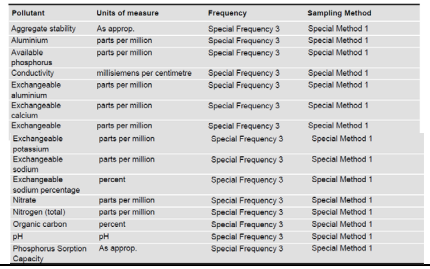
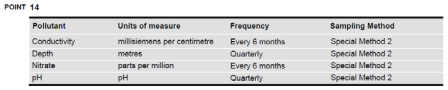
Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	Special Frequency 1	Grab sample
Nitrogen (total)	milligrams per litre	Special Frequency 1	Grab sample
pH	pH	Special Frequency 1	Grab sample
Phosphorus (total)	milligrams per litre	Special Frequency 1	Grab sample
Total dissolved solids	milligrams per litre	Special Frequency 1	Grab sample
Total suspended solids	milligrams per litre	Special Frequency 1	Grab sample
Zinc	milligrams per litre	Special Frequency 1	Grab sample

POINT 10

Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	6 Times a year	Grab sample
Nitrogen (total)	milligrams per litre	6 Times a year	Grab sample
Oil and Grease	milligrams per litre	6 Times a year	Grab sample
pH	pH	6 Times a year	Grab sample
Phosphorus (total)	milligrams per litre	6 Times a year	Grab sample
Sodium Adsorption Ratio	sodium adsorption ratio	6 Times a year	Grab sample
Total dissolved solids	milligrams per litre	6 Times a year	Grab sample
Total suspended solids	milligrams per litre	6 Times a year	Grab sample
Zinc	milligrams per litre	6 Times a year	Grab sample

POINT 11,12

Pollutant	Units of measure	Frequency	Sampling Method
BOD	milligrams per litre	Special Frequency 1	Grab sample
Nitrogen (total)	milligrams per litre	Special Frequency 1	Grab sample
pH	pH	Special Frequency 1	Grab sample
Phosphorus (total)	milligrams per litre	Special Frequency 1	Grab sample
Total dissolved solids	milligrams per litre	Special Frequency 1	Grab sample

	POINT 13  POINT 14 					
M2.4	**Special Frequency Details** Special Frequency 1: On the day discharge of effluent into Sandy Creek commences, and monthly thereafter. Special Frequency 2: Quarterly when non-standard fuels are being burnt in the Power Boiler, and not required at other times. Special Frequency 3: Yearly for topsoils, and every 3 years for the subsoils. Special Frequency 4: a) Sampling and analysis under Special Frequency 4 is not required if only "Standard Fuel" or "Known Fuels Not Requiring Further Testing" is being burnt in the Power Boiler. b) Sampling and analysis must be done once every three months. Sampling of Point 3 (Power Boiler duct downstream of electro-static precipitator), Point 19 (Power Boiler duct upstream of the electro-static precipitator)) and Point 18 (boiler fuel feed) must be done concurrently. c) Sampling of the bottom ash and fly ash from Points 16 and 17 must representative of the ash generated during the time of the sampling at Points 3 and 19. d) Sampling of Point 20 (fluidised bed sand) must be representative of the fluidised bed sand in the Power Boiler during the sampling at Points 3 and 19. Special Frequency 5: a) Sampling and analysis under Special Frequency 5 is not required if only "Standard Fuel" or "Known Fuels Not Requiring Further Testing" is being burnt in the Power Boiler. b) Sampling and analysis must be undertaken every month, except that on every second month the samples are to be taken at the same time as the sampling done at Points 3 and 19 in accordance with Special Frequency 4.	ECMR 2022 EPL Annual Return 2022	As per M2.1	Compliant		
	Special Methods Details Special Method 1: At each soil sampling site, 10 representative samples shall be taken on a 30 metre by 30 metre grid. Special Method 2: Sample to be collected in accordance with the current edition of "A Practical Guide for Groundwater Sampling, NSW Department of Land and Water Conservation".	ECMR 2022 EPL Annual Return 2022	As per M2.1	Compliant		
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	ECMR 2022 Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	Laboratory Reports show that monitoring is being undertaken as required NATA accredited lab for all test methods - 14601	Compliant	N/A	
M3.2	All air emission monitoring points and equipment must be installed and operated strictly in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	Ektimo Emission Testing Reports September 2021 and March 2022 list approved methods in Section 4.	Compliant	N/A	

<table>
<tr><td>M3.3</td><td>Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.</td><td>Farm and Environmental Monitoring Report 2021 - 2022</td><td>Specific methodology for various tests are listed throughout the Farm and Environmental Monitoring Report for the reporting period.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>M4</td><td>Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.</td><td>ECMR 2022
EPL Annual Return 2022</td><td>All monitoring data reported in the EPL Annual Return 2022 is used to calculate the load calculations in accordance with the protocol listed in the Administrative Conditions of the EPL.</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>M5.1</td><td>The licensee must collect and analyse meteorological data for the parameters specified for each of the following monitoring point at the frequency and using the method specified for each parameter.</td><td>ECMR 2022</td><td>Two meteorological monitoring stations commissioned in 2014 are located to the southeast of the mill site (Monitoring Point 8) and on top of the Recovery Boiler B building (Monitoring Point 7)</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>M5.2</td><td>Meteorological monitoring at Point 8<table><tr><th>Parameter</th><th>Units of measure</th><th>Averaging period</th><th>Method</th><th>Frequency</th></tr><tr><td>Siting</td><td>NA</td><td>NA</td><td>AM-1</td><td>NA</td></tr><tr><td>Wind speed @ 10 m</td><td>m/s</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Wind direction @ 10 m</td><td>o</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Sigma Theta @ 10 m</td><td>o</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 2m</td><td>oK</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 10 m</td><td>oK</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Total Solar Radiation @ 10 m</td><td>W/m2</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr></table></td><td>ECMR 2022</td><td>As per M5.1</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>M6.1</td><td>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</td><td>ECMR 2022 Appendix 9 - Complaints Register Summary Jul 21 - Jun 22</td><td>All complaints received are entered into the VAULT complaint system when received.
The complaints sighted included the details required in EPL M6.
Refer to CA Condition 4.3</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>M6.2</td><td>The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.</td><td>ECMR 2022 Appendix 9 - Complaints Register Summary Jul 21 - Jun 22</td><td>Complaints register observed to contain all required information.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>M6.3</td><td>The record of a complaint must be kept for at least 4 years after the complaint was made.</td><td>Visy internal complaints records</td><td>Previous records sighted (>4yrs old) in Visy internal electronic systems.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>M6.4</td><td>The record must be produced to any authorised officer of the EPA who asks to see them.</td><td>Noted</td><td>No results requested this reporting period, monitoring results observed as available.</td><td>Not triggered</td><td></td><td></td></tr>
<tr><td>M7.1</td><td>The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.</td><td>https://www.visy.com.au/env-appv-mgmt-plan/
On site observations
Minutes of VCCC meetings</td><td>Details are provided on the Visy website.
Details on sign at front security gate and the gate is staffed 24/7
Details included in VCCC meetings each quarter</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>M7.2</td><td>The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</td><td>https://www.visy.com.au/env-appv-mgmt-plan/</td><td>Website states that number is specifically for complaints. Complaints process also clearly communicated through VCCC meetings.</td><td>Compliant</td><td></td><td></td></tr>
<tr><td>M7.3</td><td>The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.</td><td>Noted</td><td>Noted</td><td>Not triggered</td><td></td><td></td></tr>
<tr><td>M8.1</td><td>For each discharge point or utilisation area specified below, the licensee must monitor:
a) the volume of liquids discharged to water or applied to the area;
b) the mass of solids applied to the area;
c) the mass of pollutants emitted to the air;
at the frequency and using the method and units of measure, specified below.
POINT 9<table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>kilolitres per day</td><td>Flow meter and continuous logger</td></tr></table>POINT 10<table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>kilolitres per day</td><td>Other Approved Method 1</td></tr></table></td><td>ECMR 2022
EPL Annual Return 2022
Farm and Environmental Monitoring Report 2021 - 2022</td><td>Flow meter monitored for Point 9.
Two flow meters used to calculate Point 10 = discharge to wastewater treatment - reclaimed water.
Sludge (472kL in 21/22) applied to land is monitored on application and sampled monthly, and the results recorded and reported.</td><td>Compliant</td><td>N/A</td><td></td></tr>
<tr><td>M8.2</td><td>Other approved method 1 means the sum of individual flow meters for all the various irrigation areas.</td><td>Noted</td><td>Noted</td><td>Not triggered</td><td></td><td></td></tr>
</table>

M9.1	The analysis for the concentration of the specified analytes (for non-standard fuel usage) must be conducted in accordance with the documents as detailed below: **Wood Analysis** **analyte** / **Sample Preparation** / **Analysis Method** Antimony — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Arsenic — AS 1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Beryllium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cadmium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Chromium (VI) — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cobalt — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Lead — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Manganese — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Mercury — USEPA3052 Acid Digestion — USEPA 7470/1 (CVAA) Selenium — AS 1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Tin — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Vanadium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Copper — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) OP — USEPA SW846 — USEPA 8081A (GC) OC — USEPA SW846 — USEPA 8141A (GC) Calorific value — -212 um air dried sample analysed — AS1038.5 (bomb calorimetry) Chlorine — -212 um air dried sample analysed — AS1038.10.0 & based on AS1038.14.3 (WD XRF) Sulfur — -212 um air dried sample analysed — AS1038.6.3.3 (IR) Fluorine — -212 um air dried sample analysed — AS1038.10.4 (ISE) ALTERNATIVE METHOD Antimony, Arsenic, Cadmium, Chromium (VI), Cobalt, Lead, Manganese, Mercury, Nickel, Selenium, Tin, Vanadium and Copper — Pressed Wax Disc — AS1038.10.0 & based on AS1038.14.3 (WD XRF)	ECMR 2022	No non-standard fuels have been used this reporting period or since 2008	Not triggered		
	Fly Ash, Bottom Ash and Fluidised Bed Sand Analysis **Analyte** / **Sample Preparation** / **Analysis method** Antimony — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Arsenic — AS1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Beryllium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cadmium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Chromium (VI) — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Cobalt — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Lead — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Manganese — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Mercury — USEPA3052 Acid Digestion — USEPA 7470/1 (CVAA) Nickel — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Selenium — AS1038.8.1 Eschka Ashing — USEPA 6010B (ICP-AES) Tin — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES) Vanadium — USEPA3052 Acid Digestion — USEPA 6010B (ICP-AES)	ECMR 2022	No non-standard fuels have been used this reporting period or since 2008	Not triggered	N/A	
Reporting Conditions						
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Annual Return 2022 lodgement confirmation Email to DPE, EPA and SVC 22/11/2022, submitting ECMR 2022	The 2021/22 Annual Return included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA. In addition it was accompanied by and Annual Return Submission 2021/22. ECMR 2021/22 was emailed to EPA & DPE.	Compliant	N/A	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	EPL Annual Return 2022	As per R1.1	Compliant		

R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	EPL 10232 Site observations	This EPL has not been transferred or revoked during the reporting period.	Not triggered	N/A	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	EPL 10232 Site observations	The EPL has not been surrendered or revoked during the reporting period.	Not triggered		
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=10232&id=10232&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued	Annual return due by 28th August, marked as received 30th August 2022 on EPA website.	Not-compliant	N/A	
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	EPL Annual Return 2022	The pollutant load was calculated for the AR, submission was late but not due to load calculation issues.	Not triggered	N/A	
R1.7	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	EPL Annual Return 2022	Copy of the signed return was available at the time of the audit. Previous annual returns now stored in the EPA portal.	Compliant	N/A	
R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	EPL Annual Return 2022	Certified by Anthony Joseph Pratt, Director & Robert Andrew Kaye, Company Secretary.	Compliant	N/A	
R1.9	In addition to the documents specified in Clause R1.1, the licensee must supply the following documents to the EPA : (a) A copy of the relevant environmental report/s produced in accordance with the requirements of Conditions 11 and 12 of the Development Consent; and (b) Independent Environmental Audit in accordance with Condition 71 of the Development Consent.	Email to DPE, EPA and SVC 22/11/2022, submitting ECMR 2022	The ECMR 2022 emailed to EPA, DPE and SVC concurrently.	Compliant	N/A	
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Interview M O'Donovan	No notifications made during the reporting period.	Not triggered	N/A	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Interview M O'Donovan	No notifications made during the reporting period.	Not triggered		
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Interview M O'Donovan	A written request from and EPA officer has not occurred in relation to an event during the reporting period.	Not triggered	N/A	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	As per R3.1	As per R3.1	Not triggered		

R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	As per R3.1	As per R3.1	Not triggered		
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	As per R3.1	As per R3.1	Not triggered		
R4.1	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2021 - 2022	Report submitted 26/08/2022	Compliant		
R4.2	The Annual Waste Summary Report must be submitted to the EPA via the online Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2021 - 2022	Report submitted 26/08/2022 (due 29/08/2022)	Compliant	N/A	
General Conditions						
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site observations	An electronic and hard copy of the EPL was held on site and sighted at the time of the audit.	Compliant	N/A	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interview M O'Donovan	No requests made during the reporting period	Not triggered		
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site observations	An electronic and hard copy of the EPL was held on site and sighted at the time of the audit.	Compliant		
Special Conditions						
E1.1	Non-standard fuels must not be burnt unless: a) they comply with the sampling, analysis and quality/source requirement of this licence; or b) have been defined as a Known Fuel Not Requiring Further Testing and the supply source has been assessed in accordance with Clause E1.6.	ECMR 2022 Annual Return 2022	No non-standard fuels have been used this reporting period or since 2008	Not triggered		
E2.1	The maximum concentration of the following contaminants in any sample of Non-standard Fuel must:- i. not exceed 317 mg/kg of hazardous substances calculated in accordance with Equation 1. ii. not exceed 21 mg/kg of Cadmium; iii. not exceed 2 mg/kg of Mercury. Equation 1 is (0.2Sb + 1.09As + 1.49Cd + 2.18Pb + 16.16Hg + Be + 1.4Cr + 0.73Co + 1.07Mn + 1.18Ni + Se + 0.82Sn + 0.09V) Where: Sb is the concentration of Antinomy in the sample in mg/kg; As is the concentration of Arsenic in the sample in mg/kg; Cd is the concentration of Cadmium in the sample in mg/kg; Pb is the concentration of Lead in the sample in mg/kg; Hg is the concentration of Mercury in the sample in mg/kg; Be is the concentration of Beryllium in the sample in mg/kg; Cr is the concentration of Chromium in the sample in mg/kg; Co is the concentration of Cobalt in the sample in mg/kg; Mn is the concentration of Manganese in the sample in mg/kg; Ni is the concentration of Nickel in the sample in mg/kg; Se is the concentration of Selenium in the sample in mg/kg; Sn is the concentration of Tin in the sample in mg/kg; V is the concentration of Vanadium in the sample in mg/kg; and	As above	As above	Not triggered		

E3.1	a) The frequency and sampling collection methodology for Non-standard Fuels must be in accordance with Sampling Protocol, except as noted below. b) If a Non-standard Fuel source is assessed and classified as a Known Fuel Not Requiring Further Testing, it will not require ongoing sampling and analysis unless requested by the EPA. This request may be made either orally or in writing. If a sample is requested, it must be obtained in accordance with Sampling Protocol.	As above	As above	Not triggered		
E4.1	a) All samples of Non-standard Fuels must be analysed for the following parameters: - Hazardous substances - Ash - Copper - Chlorine - Fluorine - Calorific Value b) The first set of samples of Non-standard Fuel from any new supply source must also be analysed for the following contaminants. - Organochlorine Pesticides - Organophosphate Pesticides c) The sample preparation and analytic method shall be in accordance with the	As above	As above	Not triggered		
E5.1	a) All Non-standard Fuels must comply with the following quality assurance control requirements prior to delivery to Visy Pulp and Paper, Tumut; I. Visual inspection and removal of all visible contaminants or treated pieces of wood; II. Sampling and analysis in accordance with the Sampling Protocol, and the conditions E1.3 and E1.4 of this licence, and; III. Assessment of suitability for use as a fuel in accordance with the Fuel Specification. b) Any Non-standard Fuel, which fails to meet the Fuel Specification must:- I. not be blended with any other fuel; II. not be retested. c) Records must be maintained for a period of not less than four (4) years for each of the following:- - the date time and location of each sample of Non-standard Fuel; - the analysis results for each sample taken of Non-standard Fuel; - the approximate volume and mass of each stockpile of Non-standard Fuel sampled; and, - for each stockpile that fails to meet the Fuel Specification, the date and location of its disposal. d) Only Non-standard Fuel that has been sampled, analysed, and complies with the Fuel Specification may be received at the premise.	As above	As above	Not triggered		
E6.1	a) The materials that can be considered for classification under the category of Known Fuel Not Requiring Further Testing are detailed in Column 1 of Schedule VF1. b) Unless noted otherwise, each supply source of a fuel intended to be used as a Known Fuel Not Requiring Further Testing must comply with the following requirements before it is used: 1. Sampling and analysis of representative samples from three (3) separate batches in accordance with the procedures detailed in this licence; 2. Identification of all contaminants other than those listed in Column 2 of Schedule VF1. For all such contaminants, the licensee must submit supporting scientific information and/or analysis that demonstrates the material will not have a significant impact on the environment if burnt; 3. Details of the quality assurance and quality control procedures that will be implemented to ensure the fuel quality will be maintained; 4. The results of the above assessment and quality systems must be forward to EPA for review; Written confirmation is received from the EPA that a particular source may be used. This consent may be withdrawn at any time in writing by the EPA. c) All fuels classified as Known Fuels Not Requiring Further Testing must comply at all times with the Fuel Specification. d) The licensee may make application to EPA to burn other types of homogenous wood or wood fibre material where there is a low risk of contamination in addition to those already	As above	As above	Not triggered		
	Column 1: Description of Fuel / **Column 2: Quality Requirement** / **Comments** Paper machine rejects generated on site — Paper machine rejects, including contaminates removed from recycled paper. — Assessment under subclause E6.1(b) is not required. Particle board — Uncontaminated and untreated, except for the adhesive used in manufacture of the product Medium density fibreboard — Uncontaminated and untreated, except for the adhesive used in manufacture of the product Ply wood — Uncontaminated and untreated, except for the adhesive used in manufacture of the product Timber docking from manufacturing processes — Uncontaminated and untreated Manufactured timber products from manufacturing processes — Uncontaminated and untreated, except for the adhesive used in manufacture of the product	As above	As above	Not triggered		

E7.1	At the completion of 12 months from the date of commencement of authorisation to burn up to 50% Non-standard Fuels, the licensee must prepare a report that reviews the Fuel Specification, based on the results of the testing requirements as detailed in Clause M2. The report shall establish; a) individual partitioning factors for each Hazardous Substance (i.e. relative percentage in the bottom ash, fly and air emissions); b) Assess the accuracy of the assumptions and simplifications contained in the initial fuel specification; c) Develop a revised fuel specification equation. This report must be submitted to the EPA within 60 days from the end of the initial 12-month operational period detailed above.	As above	As above	Not triggered		
E8.1	Sludge from the Wastewater Treatment Plant may be disposed on site in accordance with the document *Wastewater Treatment Plant Sludge Disposal By Land Application On Site - Procedure No: VP9-10-10.4-OP-035* , dated 20/05/08, or as subsequently amended and approved in writing by the EPA.	Previous audit report (NGH, 2021) Farm and Environmental Monitoring Report 2021 - 2022	Sludge is being disposed of as per procedure and spread on farm. The sludge is sampled and tested monthly. No change in procedure since 2021 reporting period, procedure outline in Section 13.1 of Farm and Environmental Monitoring Report.	Compliant	N/A	
Consultation						
NSW EPA						
1	The EPA request that the audit addresses the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to waste generated at the premises.	Resource Recovery Order, The Captains Flat alkaline material trial order 2022 The Woodlawn PHR acid mine tailings trial order 2020 Laboratory Analysis Report - Charles Sturt University, DM McMahon 20 May 2022	Waste that is subject to a resource recovery orders (orders) and resource recovery exemptions (exemptions) has been applied to land under the orders and exemptions. The waste has been used at Woodlawn for the rehabilitation of an acid tailings dam and 5028t of dregs & grits, fly and and boiler sand (total) was sent to Woodlawn during the reporting period. Results sighted during audit detail compliance with Table 1 of the RRO. Additionally, 489t of dregs & grits, fly and boiler sand (total) was sent to Captains Flat mine rehabilitation site during the reporting period. Lab analysis report provided during the audit shows all tested material within limits specified.	Compliant	N/A	

Appendix B DPE auditor approval

Department of Planning and Environment

Mr Matt O'Donovan
HSE Manager
1302 Snowy Mountains Highway
TUMUT NSW 2720

04/11/2022

Dear O'Donovan

Visy Pulp and Paper Tumut Mill (MP 06_0159)
Independent Auditor 2022

I refer to your letter of 6 September 2022 seeking approval of Ms Natasha Arens, Mr Michial Sutherland and Ms Whitney Heiniger of NGH Environmental (the audit team) for the upcoming Independent Environmental Audit of Visy Pulp and Paper Tumut Mill (the development), in accordance with Schedule 2, Condition 3.16 of the project approval MP 06_0159, as modified (the consent).

Having considered the qualifications and experience of the audit team, the Planning Secretary endorses the appointment of the audit team to undertake the audit and prepare the audit report in accordance with Schedule 2, Condition 3.16 of the consent. This approval is conditional on the audit team being independent of the development.

Please ensure this correspondence, including the independent audit declaration form are appended to the Independent Audit Report.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may wish to have regard to the Independent Audit Post Approval Requirements (Department 2020 or as updated). A copy of this guideline can be located at http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of consent and any relevant EPL;
3. not use the term "partial compliance";
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

Within one month of the completion of the audit, Visy is to submit a copy of the audit report to the Planning Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Planning Secretary, it is recommended that Visy review the report to ensure it complies with the relevant consent condition.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix C Agency consultation

C.1 Department of Planning and Environment

22-441 - Tumut Pulp and Paper Mill - IEA

Michial Sutherland
To DPE PSVC Compliance Mailbox
Cc Matthew O'Donovan; Whitney Heiniger
Bcc cac753dc-3928-4ea3-a177-81943b6fd02e.metaPublish@thehub.nghenvironmental.com.au

NGH request for DPIE consultation Visy Audit 2022.pdf
.pdf File

Hi

Please find attached a request for consultation Re the Tumut Pulp and Paper Mill – IEA.

Kind Regards

Mike

MICHIAL SUTHERLAND
BUSINESS DEVELOPMENT MANAGER NQ
MEIANZ
[redacted]
NSW · ACT · QLD · VIC
WWW.NGHCONSULTING.COM.AU

NGH

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

C.2 NSW Environment Protection Agency

From: Michial Sutherland [redacted]
Sent: Friday, 4 November 2022 1:04 PM
To: EPA West Operations Regional Mailbox <[redacted]
Cc: Matthew O'Donovan [redacted] Whitney Heiniger <[redacted]
Subject: 22-426 - Albury Paper Mill - Independent Environmental Audit

Hi EPA

Please find attached our request for audit input.

Kind Regards

Mike

MICHIAL SUTHERLAND
BUSINESS DEVELOPMENT MANAGER NQ
MEIANZ
[redacted]
NSW · ACT · QLD · VIC
WWW.NGHCONSULTING.COM.AU

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Briohny Seaman [redacted]
Sent: Monday, 28 November 2022 10:25 AM
To: Michial Sutherland [redacted]
Subject: Visy Pulp and Paper Tumut - EPL 10232 - Independent Environmental Audit

Hi Mick,

Thank you for the email.

The EPA would like to request that the audit of Visy Pulp and Paper Tumut address the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to any waste generated at the premises.

Regards,

Briohny Seaman
[redacted]
www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

C.3 NSW Department of Natural Resources Access Regulator

22-441 - Tumut Pulp and Paper Mill - IEA

Michial Sutherland
To nrar.servicedesk@industry.nsw.gov.au
Cc Matthew O'Donovan; Whitney Heiniger
Bcc 65a18e64-7035-46e9-aee4-54f115a6fa76.metaPublish@thehub.nghenvironmental.com.au

NGH request for NRAR consultation Visy Audit 2022.pdf
.pdf File

Hi,

Please find attached a request for consultation regarding the annual Visy DPE Audit.

Kind Regards

Mike

MICHIAL SUTHERLAND
BUSINESS DEVELOPMENT MANAGER NQ
MEIANZ
[redacted]
NSW · ACT · QLD · VIC
WWW.NGHCONSULTING.COM.AU

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C.4 Snowy Valleys Council

22-441 - Tumut Pulp and Paper Mill - IEA

Michial Sutherland
To info@svc.nsw.gov.au
Cc Matthew O'Donovan; Whitney Heiniger
Bcc dd583757-758e-4bce-ab46-2eca9be9da33.metaPublish@thehub.nghenvironmental.com.au

NGH request for SVC consultation Visy Audit 2022.pdf
.pdf File

Hi,

Please find attached a consultation request for the DPE annual Visy Audit.

Kind Regards

Mike

MICHIAL SUTHERLAND
BUSINESS DEVELOPMENT MANAGER NQ
MEIANZ
[redacted]
NSW · ACT · QLD · VIC
WWW.NGHCONSULTING.COM.AU

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

Appendix D Site inspection photos

IBC chemical storage in appropriately bunded and covered area

Segregated waste receptacles on site

Materials stored within new storage shed

Material stockpiled against the north-western boundary of the mill footprint

Temporary water storage pond on site for the maintenance shutdown (empty at time of site inspection)

Material storage within the newly-constructed storage shed (MOD-5)

Material storage behind the newly-constructed storage shed

Excavation area adjacent the waste yard observed during the site inspection

Additional water tanker acquired by Visy during the 2020 – 2021 reporting period

Finished product storage area