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ENVIRONMENT AND PLANNING
STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT



2019 Independent Environmental Audit Veolia Environmental Services Australia Clyde Transfer Terminal

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The 2019 Independent Environmental Audit Report has been prepared by the following Staff / Contractors of Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060:

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We declare that:

The report contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the audit is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft	R. Loemker, Dr M. Jackson, A. Parsons	16/12/19	A.Parsons	Dr. M.Jackson	17/12/19
Final	R.Loemker, Dr M. Jackson	24/01/20	A.Parsons	Dr. M.Jackson	24/01/20

Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of the Clyde Transfer Terminal, located at 322 Parramatta Road, Clyde NSW for the period January 2018 to January 2019. This site is operated by Veolia Environmental Services Australia.

The audit was conducted by Jackson Environment and Planning Pty Ltd in November 2019, as required under Condition 60 of the Development Consent for the Site (DA 205-08-01). The scope of the Audit was limited to the period between January 2018 and January 2019 and was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification of the terminals odour control system (Mod 1);
- Modification to truck noise assessment (Mod 2);
- Modification to dust and noise monitoring requirements (Mod 3); and
- Modification to permanently increase waste acceptance (Mod 4).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (11763) for the same period, however, this is not specifically required under Condition 60 of DA 205-08-01. We note that the Mod 5 approval to increase waste receipt to 600,000 tonnes per annum (among other changes) was not included in the scope of this Audit, as it was approved on 29th April 2019, outside of the audit period. Compliance with this consent will need to be assessed as part of the 2020 audit, should the consent be activated.

The audit involved a desktop assessment of evidence to demonstrate compliance with conditions of consent and EPA licence. A meeting and site audit with the management team of the Clyde Transfer Terminal was done on 26th November 2019 to gather further evidence of compliance. An audit debrief and overall assessment of environmental compliance was provided for the management team, including a discussion on areas of improvement (and documented in this report). Follow up evidence was sought to assess the overall compliance of the facility. The audit also included an assessment of the three non-compliances found in the 2018 Audit, and progress to date to close these non-compliances.

Two of the three non-compliances found in the 2018 Audit were satisfactorily resolved and are now compliant. Observations made during the site audit and inspection found that the enhanced pest management program, including nets and an Electric Bird Deterrent System (Avishock) installed early in 2019 were effective in reducing the presence of birds (particularly Ibis) in the Waste Transfer Building. However, it is noted that this system has moved the birds to other external areas of the site. Condition 117 of DA 205-08-01 requires the applicant to take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests. The Auditors found that Veolia has taken all practicable measures to prevent the attraction and infestation of the premises with vermin and pests. The non-compliance of Condition 119 in the 2018 audit remains non-complaint as a number of vehicles has been identified turning right off Parramatta Road into the Site.

The 2019 audit found one non-compliance, summarised as follows:

- Condition 119 requires that no vehicle entering the development shall turn right off Parramatta Road. Whilst there is no data available within the reporting period that allows the Auditors to determine whether Veolia was compliant or non-complaint on this matter, a traffic survey conducted on 11 and 12 March 2019 observed over 160 vehicles turning right off Parramatta Road into the Site. In order to address this, during the reporting period Veolia implemented a new driver induction program to educate drivers on correct procedures for entering the site. Furthermore, it is understood that as part of Development Modification 5, which has been

approved by the DPIE but not yet activated, condition 119 has been modified to enable vehicles to turn right off Parramatta Road into the Site following the completion of road intersection upgrade works. Veolia has been liaising with Roads and Maritime Services and Cumberland Council to progress these works.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. There were no complaints or environmental incidents during the audit period which demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

CONTENTS

Executive Summary	3
1. Introduction	6
1.1. About the site.....	6
1.2. Site changes and upgrades	6
1.3. Operational Environmental Management.....	7
2. Independent Environmental Audit	8
2.1. Legislative Requirements	8
2.2. Audit Scope and Objectives	8
2.3. Audit Team	9
2.4. Methodology.....	9
2.4.1. Compliance Assessment Criteria.....	10
3. Audit Findings	11
3.1. Agency and community consultation	11
3.2. Review of non-compliances from the 2018 audit.....	11
3.3. Compliance checklists	12
3.4. Compliance with management plan requirements	12
3.5. Compliance assessment summary	13
3.6. Non-Compliances	13
3.7. Compliance with environmental assessment documentation	13
3.8. Incidents.....	16
3.9. Overview and discussion of environmental performance	17
3.10. Continuous improvement opportunities	17
4. Conclusions	18
5. Independent Audit Certification	20
Appendix A – Development Consent Compliance Table	21
Appendix B – Environment Protection Licence Compliance Table	61
Appendix C – Audit Team Letter of Approval	73

1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in November 2019. Veolia Environmental Services Australia (Veolia) commissioned JEP to conduct the Audit and assess the environmental performance of Clyde Transfer Terminal, located at 322 Parramatta Road, Clyde NSW for the period between January 2018 and January 2019.

On 20th September 2019, the Department of Planning, Industry and Environment approved the audit team to undertake the audit (refer to Appendix C).

1.1. About the site

Operating under Development Consent (DA 205-08-01) (Modification 4 for the audit period) and Environment Protection Licence (EPL) No. 11763, the Site is approved for the receipt of up to 500,000 tonnes of mixed household and commercial waste per annum¹. Waste that is received at the Site is compacted and containerised for transport, by rail, for resource recovery and treatment at Veolia's Woodlawn Bioreactor.

The Woodlawn Bioreactor, which is located 30 kilometres south of Goulburn and 240 kilometres southwest of Sydney, currently provides a solution for the management of approximately 20% of Sydney's putrescible waste via the Clyde Transfer Terminal.

The Clyde Transfer Terminal consists of the following:

- Transfer Building including waste compactors, leachate containment and odour controls;
- Bitumen hardstand area for container storage;
- Rail siding for loading/unloading containers to/from trains;
- Office and Amenities;
- Entrance/Exit Road;
- Weighbridge Office and Weighbridge; and
- A stormwater oil/silt separator and retention pond.

1.2. Site changes and upgrades

Since the 2018 Independent Environmental Audit, the following changes / upgrades were made to the Facility and its operations:

- A new compactor was commissioned to replace an older model;
- Bird nets and an Electric Bird Deterrent System were installed on the processing warehouse;
- A new leading hand was employed to cover both the morning and afternoon shifts to improve consistency in operations between the two shifts; and
- A new exhaust fan operational warning display and alarm system was fitted to the western side of the processing shed opposite the office to provide staff with instant feedback as to when the ventilation system is not functioning. This new alarm system assists site management to respond quickly to any malfunctions in the ventilation system, helping to avoid odour leaving the facility and impacting on receptors.

¹ Note that on 29th April 2019, development consent for Mod 5 was issued by the Department of Planning, Industry and Environment. This approval allows the facility to increase receipt of waste to 600,000 tonnes per year. This approval was obtained outside of the audit period and has not been considered as part of the 2019 Independent Environmental Audit.

1.3. Operational Environmental Management

Veolia manages the environmental performance of the Site the under Operation Environmental Management Plan (OEMP) which has been prepared in conjunction with the Environmental Protection Licence to fulfil the requirements of the Development Conditions of Consent (COCs).

The OEMP includes the following management plans:

- Waste Management Plan;
- Odour Management Plan;
- Dust Management Plan;
- Traffic Management Plan;
- Vermin and Pest Control Plan;
- Stormwater Management Plan;
- Site Contamination Management Plan;
- Incident Response Plan; and
- Noise Management Plan.

The objectives of the OEMP are to:

- Provide a working environmental management tool for the operation of the site including commissioning and operation of the modified odour control system;
- Provide a means of identifying and concentrating on the key environmental, operational issues;
- Provide a summary of monitoring and reporting regimes;
- Provide a guide for the interaction with relevant Government authorities, and other stakeholders including the members of the community; and
- Comply with the Conditions of Consent relating to the operation of the development and the odour control system modification.

2. Independent Environmental Audit

2.1. Legislative Requirements

As required under Condition 60 of the Development Consent (DA 205-08-01), an Independent Environmental Audit report is to be submitted to the Department of Planning, Industry and Environment. Specifically, Condition 60 states:

Every year following the date of this consent, or at periods otherwise agreed to by the Secretary, and until such time as agreed to by the Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:

- *Be conducted pursuant to ISO 14010 guidelines and General Principals for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specification of the Secretary;*
- *Be conducted by a suitably qualified independent person approved by the secretary;*
- *Assess compliance with the requirements of this consent;*
- *Assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and*
- *Be carried out at the Applicants' expense*

The audits shall be submitted to the Secretary. The Applicant shall comply with all reasonable requirements of the Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Secretary.

2.2. Audit Scope and Objectives

The scope of the Audit was limited to assessing the environmental performance of the Site, in accordance the conditions of Development Consent DA 205-08-01 for the period between January 2018 and January 2019. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit included the following development modifications:

- Modification of the Terminals odour control system (Mod 1);
- Modification to truck noise assessment (Mod 2);
- Modification to dust and noise monitoring requirements (Mod 3); and
- Modification to permanently increase waste acceptance (Mod 4).

Records reviewed fell within this period; however, some observations made by the Auditors relate to the site inspection and audit conducted on 26th November 2019.

The audit did not include the conditions of consent for development modification 5, which was issued on 29th April 2019, and falls outside the audit period. These conditions will need to be audited in the 2020 Independent Environmental Audit.

The audit was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*.

The Audit also included environmental performance requirements under Environmental Protection Licence (11763) for the same period, however this is not specifically required under Condition 60 of DA 205-08-01.

An assessment of the Actions recommended in the 2018 Independent Environmental Audit conducted Jackson Environment and Planning Pty Ltd (report dated February 2019) were also carried out during the Audit.

2.3. Audit Team

In accordance with Condition 60b of DA 205-08-01 and Section 3 of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) (the Independent Audit Requirements), Veolia presented the Audit Team to the Department of Planning, Industry and Environment and sought approval for the team put forward.

The Audit team from Jackson Environment and Planning Pty Ltd included Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

Approval for the independent audit team was provided to Veolia on 20th September 2019. The letter of approval is provided in Appendix C.

2.4. Methodology

The Independent Environmental Audit was conducted in accordance with the Independent Audit Requirements and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The Audit involved the following stages.

- **Audit initiation** – Documents relating to the Audit period between January 2018 and January 2019 as well as the findings of previous audit were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Veolia were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

2.4.1. Compliance Assessment Criteria

Compliance has been assessed using the Independent Audit Requirements (Table 2.1).

Table 2.1. Compliance assessment criteria (Source: DPE [2018] *Independent Audit Post Approval Requirements*).

Assessment	Criteria
Compliant	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	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	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

3. Audit Findings

3.1. Agency and community consultation

Veolia conducts ongoing consultation with relevant agencies and the community.

Veolia continues to have issues re-establishing the Community Consultative Committee (CCC) due to lack of interest from the community, despite steps taken to engage the community, including:

- Letter dropouts in December 2017 for expressions of interest for the CCC;
- A notification in the Public Notices section of the *Auburn Review* on 31 July 2018 regarding a community meeting on 8 August 2018;
- A community meeting held on 8 August 2018 to provide an update on the CCC;
- An advertisement in the *Auburn Review* on 11 December 2018, 18 December 2018, 8 January 2019 and 15 January 2019; and
- An advertisement in the *Parramatta Advertiser* on 9 January 2019, 16 January 2019 and 23 January 2019.

Veolia continue to liaise with the Department of Planning, Industry and Environment on establishing the Community Consultative Committee.

Veolia will be required to work closely with Cumberland Council and the Roads and Maritime Service (RMS) regarding the upgrade of the intersection on Parramatta Road (as approved under Mod 5 on 29th April 2019).

3.2. Review of non-compliances from the 2018 audit

As part of this audit, we reviewed progress made to close non-compliances found during the 2018 audit. During the 2018 audit, three non-compliances were found, and measures taken to close these non-compliances and to bring them into a compliant state is shown in Table 3.1.

Evidence suggests that Veolia Environmental Services has resolved two of the three non-compliances found in the 2018 audit. Details are provided below.

Table 3.1. Compliance assessment of the actions recommended in the 2018 Independent Environmental Audit conducted Jackson Environment and Planning Pty Ltd.

Item No.	Reference	Observation / Non-compliance	Action taken	Evidence	Date Completed
Development Consent DA 205-08-01					
1	Condition 98	Non-compliance			
	Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	It is noted that a previous Audit Action “The stack discharge velocity should be measured at least once within a 6-month period as part of a routine service visit” remains outstanding.	Discharge velocity check was completed	The Auditors sighted the Odour Audit Report - May 2019	27 March 2019
2	Condition 117	Non-compliance			
	The Applicant must take all practicable measures to prevent the attraction	During the on-site audit a large number of Ibis were identified.	A bird control program was implemented which includes bird netting and	The Auditors sighted the updated version of the	June 2019

Item No.	Reference	Observation / Non-compliance	Action taken	Evidence	Date Completed
	and infestation of the premises with vermin and pests.	A small number of cats were also identified.	electric shock system was installed June 2019; The revised Vermin and Pest Control Plan (dated July 2019) includes new pest mitigation measures	Vermin and Pest Control Plan (dated July 2019). Additional measures were observed during the site visit.	
3	Condition 119	Non-compliance			
	No vehicle entering the development shall turn right off Parramatta Road.	<p>One non-compliance relating to the restriction on waste vehicles turning right from Parramatta Road into the Terminal access road was identified during the reporting period.</p> <p>Two non-compliances relating to the restriction on waste vehicles turning right from Parramatta Road into the Terminal access road were observed during the onsite audit.</p>	<p>As part of Development Modification 5, Veolia have requested that Consent Condition 119 be deleted. In the interim, Veolia have conducted a traffic survey to assess compliance.</p> <p>A driver induction program commenced in May 2018 to educate drivers on correct procedures for access to the site.</p> <p>A traffic survey was carried out on the 11th and 12th March 2019 over 160 vehicles were observed turning right off Parramatta Road into the Site.</p>	<p>Traffic Survey</p> <p>Driver induction program commenced in May 2018</p>	Completed March 2019

3.3. Compliance checklists

Compliance checklists were developed based on the conditions of consent for DA 205-08-01, the conditions of EPL 11763 and in accordance with the *Independent Audit Guideline* and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The detailed list of compliance conditions is provided in Appendix A (DA 205-08-01) and B (EPL 11763). The compliance assessment summary is provided in Section 3.4 below.

3.4. Compliance with management plan requirements

Overall, the site is compliant with the management plans under the OEMP. This is summarised in Table 3.2.

Table 3.2. Compliance with management plan requirements.

Management Plan	Compliance
Waste management	Compliant
Odour management	Compliant
Dust management	Compliant

Management Plan	Compliance
Water management	Compliant
Site contamination	Compliant
Noise management	Compliant
Vermin and pest management	Compliant
Traffic management	Non-compliant (Condition 119)
Emergency management	Compliant

3.5. Compliance assessment summary

Veolia has demonstrated good overall compliance with the conditions of consent of DA 205-08-01 (as well as conditions of EPL 11763). During the 2019 Audit, which covers the period between January 2018 and January 2019, one non-compliance was identified.

3.6. Non-Compliances

Condition 119 requires that no vehicle entering the development shall turn right off Parramatta Road. Whilst there is no data available within the reporting period that allows the Auditors to determine whether Veolia was compliant or non-compliant on this matter, a traffic survey conducted on 11 and 12 March 2019 observed over 160 vehicles turning right off Parramatta Road into the Site.

In order to address this, during the reporting period Veolia implemented a new driver induction program to educate drivers on correct procedures for entering the site. Furthermore, it is understood that as part of Development Modification 5, which has been approved by the DPIE but not yet activated, condition 119 has been modified to enable vehicles to turn right off Parramatta Road into the Site following the completion of road intersection upgrade works. Veolia has been liaising with Roads and Maritime Services and Cumberland Council to progress these works.

3.7. Compliance with environmental assessment documentation

A summary of compliance predictions in the Environmental Impact Statement documentation and in subsequent modifications is provided in Table 3.3. Overall the Site was compliant with the requirements of the Environmental Impact Statement documentation.

Table 3.3. Compliance with Environmental Impact Statement documentation.

Compliance Parameter	Compliance	Comment
EIS prepared as part of DA205-08-01 (original approval for the Clyde Waste Transfer Terminal)		
No more than 500,000 tonnes per annum of waste to be received at the development in any calendar year.	Compliant	The amount of waste accepted at the Terminal in the 2018 calendar year totaled 437,501 tonnes
The authorised amount of waste permitted on the premises cannot exceed 4,000 tonnes at any one time.	Compliant	The Contingency Plan notes this limit on the amount of waste permitted on the

Compliance Parameter	Compliance	Comment
		premises and includes measures, such as diverting waste to other facilities, in the event that the site cannot process waste and remain under the limit (e.g. due to an interruption to rail services).
A meteorological station must be sited and operated at the premises in accordance with the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> . The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table specified in Condition 91	Compliant	The onsite meteorological station was operated continuously for the period between January 2018 to January 2019. Meteorological data for the year was cited by the auditors.
The Applicant must ensure no trucks or other heavy vehicles enter or exit the premises between the hours 10pm to 5am Mondays to Saturdays and 10pm to 7am Sundays and public holidays, unless otherwise provided in the Traffic Management Plan approved by the Secretary.	Compliant	Traffic Survey
Noise generated at the premises must not exceed the noise limits presented in the tables specified in EIS and shown below:	Compliant	<p>Truck noise monitoring was conducted on 16 August 2018 between 8:01 am and 12:35 pm. One truck noise measurement exceeded noise criteria of Australian Design Rule 28/01 - External Noise of Motor Vehicles, with reading of 88.1dBA, though the noise level was still within the conditions of consent. The customer was contacted and the offending vehicle was placed on a register.</p> <p>No noise complaints were received by the facility during the Audit period.</p>

Table 7.2.6 Proposed Noise Sources: Mobile and Stationary Plant and Equipment for Site Operations.

Source	Source Type	Effective Sound Power Level LAeq,15min (dBA)	Comment
DAY 7:00 am – 6:00 pm			
Delivery trucks	line	108	Total 111 dBA, 2 sources each 108 dBA (corresponding to 10 vehicles per hour peak)
Front end loader	point	111.4	Inside building
Sweeper	point	106	Inside building
Slug Packer	point	90	Continuous operation
NIGHT 10:00 pm - 7:00 am			
Delivery trucks	line	103.2	As above, one truck for 5 mins every 15 minutes (corresponding to 2 vehicles per hour)
Front end loader	point	111.4	Inside building
Sweeper	point	106	Inside building
Slug Packer	point	90	Continuous operation.

Compliance Parameter		Compliance		Comment																																																																														
<table><tr><th colspan="8">Table 7.2.7 SoundPLAN Single Point Receiver Predictions</th></tr><tr><th rowspan="2">Receiver</th><th colspan="2">Predicted L_{Aeq} 15 min</th><th colspan="2">INP -Project Specific Noise Levels</th><th rowspan="2">Auburn DCP (modified)</th><th colspan="2">Compliance with Criteria</th></tr><tr><th>Day</th><th>Night</th><th>Day</th><th>Night</th><th>Day</th><th>Night</th></tr><tr><td>1</td><td>38.1</td><td>39.1</td><td>48.1</td><td>44</td><td>42</td><td>YES</td><td>YES</td></tr><tr><td>2</td><td>29.6</td><td>29.9</td><td>46.7</td><td>43.7</td><td>42</td><td>YES</td><td>YES</td></tr><tr><td>3</td><td>32.5</td><td>32.7</td><td>51.7</td><td>42</td><td>42</td><td>YES</td><td>YES</td></tr><tr><td>4</td><td>26.0</td><td>26.3</td><td>46.7</td><td>43</td><td>42</td><td>YES</td><td>YES</td></tr><tr><td>5</td><td>28.5</td><td>29.3</td><td>46.6</td><td>42</td><td>42</td><td>YES</td><td>YES</td></tr><tr><td>6</td><td>62.0</td><td>N/A</td><td colspan="2">70 when in use</td><td>67</td><td>YES</td><td>N/A</td></tr><tr><td>7</td><td>57.7</td><td>N/A</td><td colspan="2">65 when in use</td><td>67</td><td>YES</td><td>N/A</td></tr></table>		Table 7.2.7 SoundPLAN Single Point Receiver Predictions								Receiver	Predicted L _{Aeq} 15 min		INP -Project Specific Noise Levels		Auburn DCP (modified)	Compliance with Criteria		Day	Night	Day	Night	Day	Night	1	38.1	39.1	48.1	44	42	YES	YES	2	29.6	29.9	46.7	43.7	42	YES	YES	3	32.5	32.7	51.7	42	42	YES	YES	4	26.0	26.3	46.7	43	42	YES	YES	5	28.5	29.3	46.6	42	42	YES	YES	6	62.0	N/A	70 when in use		67	YES	N/A	7	57.7	N/A	65 when in use		67	YES	N/A			
Table 7.2.7 SoundPLAN Single Point Receiver Predictions																																																																																		
Receiver	Predicted L _{Aeq} 15 min		INP -Project Specific Noise Levels		Auburn DCP (modified)	Compliance with Criteria																																																																												
	Day	Night	Day	Night		Day	Night																																																																											
1	38.1	39.1	48.1	44	42	YES	YES																																																																											
2	29.6	29.9	46.7	43.7	42	YES	YES																																																																											
3	32.5	32.7	51.7	42	42	YES	YES																																																																											
4	26.0	26.3	46.7	43	42	YES	YES																																																																											
5	28.5	29.3	46.6	42	42	YES	YES																																																																											
6	62.0	N/A	70 when in use		67	YES	N/A																																																																											
7	57.7	N/A	65 when in use		67	YES	N/A																																																																											
Truck movements are expected to be less than approximately 40 vehicles in and 40 vehicles out during peak hour periods and would be constrained by the noise criteria.		Compliant	A traffic assessment was carried out by Colston Budd Rogers & Kafes Pty Ltd in January 2018. The report found that: <ul style="list-style-type: none">in the morning peak hour, the waste transfer terminal generated 75 vehicles per hour (two way). This comprised some 5 cars and 70 truck movements with the split some 50% in and 50% out; andin the afternoon peak hour, the waste transfer terminal generated 21 vehicles per hour (two way). This comprised some 3 cars and 18 truck movements. The split was some 25% in and 75% out.																																																																															
Daily (24 hour) average and annual average PM10 dust concentration at the nearest sensitive receivers and site boundary are presented below:		Not Triggered	No dust monitoring is required to be undertaken. No dust compliants were made during the Audit period. The site inspection did not show any indication to the audit team that there is a dust issue on site. All roads on site are effectively sealed and well maintained.																																																																															

Compliance Parameter	Compliance	Comment																													
<table><tr><th rowspan="2">Receiver Location</th><th colspan="2">Dust Concentration (µg/m³)</th></tr><tr><th>24 hr Average</th><th>Annual Average⁶</th></tr><tr><td>A Corner of Hamilton St and Arthur St (North of site)</td><td>33.8</td><td>0.2</td></tr><tr><td>B Corner of William St and Factory St (West of site)</td><td>38.4</td><td>0.6</td></tr><tr><td>C End of Seventh St (Southwest of site)</td><td>35.0</td><td>0.2</td></tr><tr><td>D Corner of Chisholm Rd and Manchester Rd (South of site)</td><td>32.8</td><td>0.2</td></tr><tr><td>E Rawson St, between Byrne St & Hampstead Rd (Southeast of site)</td><td>34.0</td><td>0.3</td></tr><tr><td>1 Northern Site Boundary</td><td>41.3</td><td>1.5</td></tr><tr><td>2 Northeastern Site Boundary</td><td>39.3</td><td>1.2</td></tr><tr><td>3 Southeastern Site Boundary</td><td>51.6</td><td>2.4</td></tr></table>	Receiver Location	Dust Concentration (µg/m ³)		24 hr Average	Annual Average ⁶	A Corner of Hamilton St and Arthur St (North of site)	33.8	0.2	B Corner of William St and Factory St (West of site)	38.4	0.6	C End of Seventh St (Southwest of site)	35.0	0.2	D Corner of Chisholm Rd and Manchester Rd (South of site)	32.8	0.2	E Rawson St, between Byrne St & Hampstead Rd (Southeast of site)	34.0	0.3	1 Northern Site Boundary	41.3	1.5	2 Northeastern Site Boundary	39.3	1.2	3 Southeastern Site Boundary	51.6	2.4		
Receiver Location		Dust Concentration (µg/m ³)																													
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3 Southeastern Site Boundary	51.6	2.4																													
The operational phase of the project should comply with the National Environment Protection Measure (NEPM) standard of 50 mg/m ³ (24 hr average) and the NSW Action for Air standard of 30 mg/m ³ (1 year average). Dust deposition rates at the boundary should not exceed 120 mg/m ² /day (as averaged over a one month period).	Not Triggered	No dust monitoring is required to be undertaken																													
Odour levels experienced at the nearest residential receptors are presented in the Table below. <table><tr><th>Receiver Location</th><th>Odour Concentration (OU)</th></tr><tr><td>A Corner of Hamilton St and Arthur St (North of site)</td><td>0.4</td></tr><tr><td>B Corner of William St and Factory St (West of site)</td><td>1.4</td></tr><tr><td>C End of Seventh St (Southwest of site)</td><td>0.6</td></tr><tr><td>D Corner of Chisholm Rd and Manchester Rd (South of site)</td><td>0.4</td></tr><tr><td>E Rawson St, between Byrne St and Hampstead Rd (Southeast of site)</td><td>0.6</td></tr></table>	Receiver Location	Odour Concentration (OU)	A Corner of Hamilton St and Arthur St (North of site)	0.4	B Corner of William St and Factory St (West of site)	1.4	C End of Seventh St (Southwest of site)	0.6	D Corner of Chisholm Rd and Manchester Rd (South of site)	0.4	E Rawson St, between Byrne St and Hampstead Rd (Southeast of site)	0.6	Compliant	No odour complaints were received during the audit period. The Odour Audit found that the operation and maintenance of the odour management system at the Site was satisfactory. There was no evidence to suggest that significant fugitive odour emission release from the Site is occurring.																	
Receiver Location	Odour Concentration (OU)																														
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B Corner of William St and Factory St (West of site)	1.4																														
C End of Seventh St (Southwest of site)	0.6																														
D Corner of Chisholm Rd and Manchester Rd (South of site)	0.4																														
E Rawson St, between Byrne St and Hampstead Rd (Southeast of site)	0.6																														
SEE prepared as part of Mod 1 DA133-11-2006 (Forced air ventilation system)																															
	Not Triggered	No Environmental Impact Assessment was done as part of the approval																													
SEE prepared as part of Mod 2 DA205-08-01 (Modification to truck noise assessment)																															
	Not Triggered	No Environmental Impact Assessment was done as part of the approval																													
SEE prepared as part of Mod 3 DA 205-08-01 (Dust and noise monitoring requirements)																															
	Not Triggered	No Environmental Impact Assessment was done as part of the approval																													
SEE prepared as part of Mod 4 DA 205-08-01 (Permanently increased waste acceptance)																															
	Not Triggered	No Environmental Impact Assessment was done as part of the approval																													

3.8. Incidents

There were no environmental incidents recorded for the period between January 2018 and January 2019.

3.9. Overview and discussion of environmental performance

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. There were no complaints or environment incidents during the audit period which demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

The operation of the facility appeared to be running efficiently and staff members were well trained and experienced, and training records also verified this aspect. During the on-site audit, it was observed that the site was clean and free of litter, there were no signs of waste outside of the processing facility and no excessive noise. The stormwater management system appeared to be in good working order and maintenance requirements are linked to the site planned maintenance system. No odours were identified external to the Waste Transfer Building during the on-site audit.

During the on-site audit, and as previously identified in the 2016, 2017 and 2018 audits, a number of Ibis were identified at the Facility. This issue was partly addressed by mid-2019 with the introduction of the bird netting and Electric Bird Deterrent System (Avishock) however this issue is yet to be fully resolved by Veolia.

3.10. Continuous improvement opportunities

The audit identified a number of areas for improvement.

- Generally, the stormwater management system across the site was in very good condition. However, inspection of the GPT on the western side of the site adjacent to the rail line could not be carried out due to the steel cover in place. The site manager was asked to provide maintenance records for the GPT and these records were not available. It is recommended that the GPT and other stormwater assets on the site, which are maintained by external contractors, are put onto the maintenance register and a record of maintenance activities that have been performed is kept on the site to demonstrate these systems are being serviced.
- On the hardstand area within the container loading area, some hydraulic fluid was observed. This is regularly cleaned up through absorbent material. However, this should be checked more regularly to ensure no residual oil is left on the hardstand which can be transferred into stormwater during wet weather events.
- Some weed growth was observed on the southern side of the site adjacent to the rail corridor. Landscaping and maintenance activities of this area could help improve visual aesthetics and reduce the amount of exposed soil that could move into waterways during a large storm event.
- The western side of the site partly drains towards the stormwater detention pond, with the western corner clearly running off the site without any treatment. Although no waste is handled in this area, waste collection vehicles do drive over this part of the site, and it was recommended that a spill kit be placed on the Western corner to be available to clean up any minor spills that occur from waste collection vehicles.

4. Conclusions

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of the Clyde Transfer Terminal, located at 322 Parramatta Road, Clyde NSW for the period January 2018 to January 2019. This site is operated by Veolia Environmental Services Australia.

The audit was conducted by Jackson Environment and Planning Pty Ltd in November 2019, as required under Condition 60 of the Development Consent for the Site (DA 205-08-01). The scope of the Audit was limited to the period between January 2018 and January 2019 and was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification of the terminals odour control system (Mod 1);
- Modification to truck noise assessment (Mod 2);
- Modification to dust and noise monitoring requirements (Mod 3); and
- Modification to permanently increase waste acceptance (Mod 4).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (11763) for the same period, however, this is not specifically required under Condition 60 of DA 205-08-01. We note that the Mod 5 approval to increase waste receipt to 600,000 tonnes per annum (among other changes) was not included in the scope of this Audit, as it was approved on 29th April 2019, outside of the audit period. Compliance with this consent will need to be assessed as part of the 2020 audit, should the consent be activated.

The audit involved a desktop assessment of evidence to demonstrate compliance with conditions of consent and EPA licence. A meeting and site audit with the management team of the Clyde Transfer Terminal was done on 26th November 2019 to gather further evidence of compliance. An audit debrief and overall assessment of environmental compliance was provided for the management team at the closing meeting, including a discussion on areas of improvement (and documented in this report). Follow up evidence was sought to assess the overall compliance of the facility. The audit also included an assessment of the three non-compliances found in the 2018 Audit, and progress to date to close these non-compliances.

Two of the three non-compliances found in the 2018 Audit were satisfactorily resolved and are now compliant. Observations made during the site audit and inspection found that the enhanced pest management program, including nets and an Electric Bird Deterrent System (Avishock) installed early in 2019 were effective in reducing the presence of birds (particularly Ibis) in the Waste Transfer Building. However, it is noted that this system has moved the birds to other external areas of the site. Condition 117 of DA 205-08-01 requires the applicant to take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests. The Auditors found that Veolia has taken all practicable measures to prevent the attraction and infestation of the premises with vermin and pests. The non-compliance of Condition 119 in the 2018 audit remains non-complaint as a number of vehicles has been identified turning right off Parramatta Road into the Site.


The 2019 audit found one non-compliance, summarised as follows:

- Condition 119 requires that no vehicle entering the development shall turn right off Parramatta Road. Whilst there is no data available within the reporting period that allows the Auditors to determine whether Veolia was compliant or non-complaint on this matter, a traffic survey conducted on 11 and 12 March 2019 observed over 160 vehicles turning right off Parramatta Road into the Site. In order to address this, during the reporting period Veolia implemented a new driver induction program to educate drivers on correct procedures for

entering the site. Furthermore, it is understood that as part of Development Modification 5, which has been approved by the DPIE but not yet activated, condition 119 has been modified to enable vehicles to turn right off Parramatta Road into the Site following the completion of road intersection upgrade works. Veolia has been liaising with Roads and Maritime Services and Cumberland Council to progress these works.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. There were no complaints or environmental incidents during the audit period which demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

5. Independent Audit Certification

Development Name	Clyde Transfer Terminal
Development Consent No.	Development Consent DA 205-08-01
Description of Development	Clyde Transfer Terminal
Development Address	322 Parramatta Road, Clyde NSW
Operator	Veolia Environmental Services (Australia) Pty Ltd
Operator Address	Po Box 171 Granville NSW 2142
Independent Audit	
Title of Audit	2019 Independent Environmental Audit – Clyde Transfer Terminal
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. Immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p>a) <i>The Independent Audit is an ‘environmental audit’ for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead / Principal Auditor	Alan Parsons
Address	1 Power Place, Jindabyne NSW 2627
Email Address	alan.parsons@arprisk.com.au
Auditor Certification	DNV GL Business Assurance
Date	24 January 2020

Appendix A – Development Consent Compliance Table

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
	GENERAL CONDITIONS			
	<i>Adherence to Terms of DA, EIS and SEIS</i>			
1	<p>Development shall be carried out in accordance with:</p> <ul style="list-style-type: none"> (a) DA No. 205-08-01; (b) the EIS prepared for the “Clyde Transfer Terminal” by Maunsell McIntyre Pty Ltd, dated 14 August 2001; (c) the Supplementary EIS prepared for the “Clyde Transfer Terminal” by Maunsell McIntyre Pty Ltd, dated 18 December 2001; (d) all additional information supplied by the Applicant or the Applicant’s consultants or subconsultants to the Department or integrated approval bodies pertaining to the development, including the documents listed (refer to consent); (e) modification application MOD-133-11-2006, accompanied by <i>Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station</i>, prepared by Environ and dated October 2006, the <i>Odour Mitigation Study Clyde Waste Transfer Terminal Addendum to Final Report</i>, prepared by the Odour Unit and dated July 2006, and Veolia Environmental Services’ letter (and attachments) to the Department of Planning dated 15 February 2007; (f) modification application DA-205-08-01-MOD-2; and (g) modification application DA-205-08-01-MOD-3 and accompanying letter dated 14 December 2009; and (h) modification application DA-205-08-01 MOD 4 and accompanying Environmental Assessment letter prepared by Veolia Environmental Services (Australia) Pty Ltd and dated 20 January 2014; <p>except as modified by the following conditions.</p>	The findings of this audit	None	Compliant
2	<p>In the event of any inconsistency between:</p> <ul style="list-style-type: none"> (a) the conditions of this consent and any document listed from condition 1(a) to 1(g) inclusive, the conditions of this consent shall prevail to the extent of the inconsistency; and (b) any document listed from condition 1(a) to 1(g) inclusive, the most recent document shall prevail to the extent of the inconsistency. 	The findings of this audit	None	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
2A	The Proponent shall comply with any reasonable requirements of the Planning Secretary arising from the Department's assessment of: (a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with the conditions of this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.	The findings of this audit	None	Not Triggered
2B	The Proponent shall prepare revisions of any strategies, plans or programs required under this approval if directed to do so by the Planning Secretary. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by, the Planning Secretary.	The findings of this audit	None	Not Triggered
	Compliance			
3	It shall be the ultimate responsibility of the Applicant to ensure compliance with these Conditions.	The findings of this audit	None	Not Triggered
4	These Conditions do not relieve the Applicant of the obligation to obtain all other approvals and licences from all relevant authorities required under any other Act.	The findings of this audit	None	Not Triggered
5	The Applicant shall comply or ensure compliance with all the requirements of the Planning Secretary in respect of the implementation of any measures arising from these Conditions.	The findings of this audit	None	Not Triggered
6	The Applicant must bring to the attention of the Planning Secretary any matter that may require further investigation, or the issuing of instructions from the Planning Secretary, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by the Planning Secretary to enable compliance with these Conditions.	The findings of this audit	None	Not Triggered
7	Where the results of any monitoring demonstrate an exceedance of a limit in this consent, the Applicant shall provide, within 30 days of the monitoring, the monitoring results to the Planning Secretary and Auburn Council stating: (a) The reason for the exceedance; (b) Action taken to ensure the limit is not exceeded in the future; (c) Proposed action to ensure the limit is not exceeded in the future; (d) Timetable for implementing the proposed action in (c); and (e) Results of additional monitoring which has been conducted within 7 days of the action taken in (b) and (c) above, to demonstrate compliance with the limit.	May 2018 odour audit (Odour Audit XXXI dated 14.08.2018) and December 2018 odour audit (Odour Audit XXXII dated 24.01.2019).	The Odour Audit found that the operation and maintenance of the odour management system at the Site was satisfactory. There was no evidence to suggest that significant fugitive odour emission release from the Site is occurring.	Not Triggered
	Waste Volumes			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
8	No waste shall be received at the development except waste to be transported by rail from Clyde to the Crisps Creek Intermodal Facility for disposal or treatment at Woodlawn.	None	None	Not Triggered
9	Deleted			
10	The Proponent must ensure that no more than 500,000 tonnes per annum of waste is received at the development in any calendar year.	Weighbridge Transactions	The amount of waste accepted at the Terminal in the 2018 calendar year totaled 437,501 tonnes.	Compliant
	<i>Fit and Proper Person</i>			
11	The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in s.83 of that Act.	NSW EPA Licence	The EPA has issued an Environment Protection Licence thereby deeming the Licensee a fit and proper person to hold a licence	Compliant
	<i>Obligation to Prevent and Minimise Harm to the Environment</i>			
12	The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	The findings from this audit	None	Compliant
13	If at any time the Planning Secretary is made aware of the occurrence of any impact from the project that poses serious environmental or amenity concerns and is due to the failure of measures required by these Conditions or those measures identified in the documentation referred to in Condition 1 to ameliorate the impact, the Planning Secretary may request the Applicant to cease the activities causing the impact.	None	None	Not Triggered
14	The Applicant may recommence the activities that were ceased, upon written advice by the Planning Secretary that those concerns have been satisfactorily addressed.	None	None	Not Triggered
	<i>Date of Commencement</i>			
15	The date of commencement shall be the date that the Applicant determines to proceed with the development. The Applicant must provide the date of commencement in writing to the Planning Secretary before commencement of the development.	None	This condition is not relevant to the current Audit period.	Not Triggered
	<i>Pre-Construction Compliance Report</i>			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
16	<p>At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Planning Secretary), the Applicant shall submit to the Planning Secretary a report detailing the level of compliance with each Condition of this Consent that relates to pre-construction activities. The report shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) the identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Pre-Operation Compliance Report			
17	<p>At least one month prior to the receipt of uncontainerised waste at the premises (or within such period as otherwise agreed in writing by the Planning Secretary), the Applicant shall submit to the Planning Secretary a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities.</p> <p>The report shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Dispute Resolution			
18	The Applicant shall endeavor to resolve any dispute arising out of the implementation of these Conditions.	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
19	For any unresolved dispute arising out of the implementation of these Conditions between the Applicant and a public authority, company or person (but excluding any dispute between the Applicant and its contractors and/or subcontractors engaged in the construction or operation of the development), in the first instance either party can refer the matter to the Planning Secretary for resolution and, if not resolved, to the Minister. The Minister's determination of the disagreement shall be final and binding on all parties.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Monitoring Records			
20	The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the <i>Protection of the Environment Operations Act 1997</i> , in relation to the development, must be recorded and retained as specified in this Consent.	May 2018 odour audit (Odour Audit XXXI dated 14.08.2018) and December 2018 odour audit (Odour Audit XXXII dated 24.01.2019). Heavy Vehicle Noise Monitoring Management Program Report dated August 2018 (report ref: CTT_TRUCK_0817).	None	Compliant
21	All records required to be kept by this Consent or an environment protection 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) provided in a legible form to the Planning Secretary or any authorised officer of the EPA as soon as practicable after request.	May 2018 odour audit (Odour Audit XXXI dated 14.08.2018) and December 2018 odour audit (Odour Audit XXXII dated 24.01.2019). Heavy Vehicle Noise Monitoring Management Program Report dated August 2018 (report ref: CTT_TRUCK_0817).	One truck noise measurement exceeded noise criteria of ADR 28/01, with reading of 88.1dBA, though the noise level was less than the condition of consent. The customer was contacted and the offending vehicle was placed on a register.	Compliant
22	The following records must be kept in respect of any samples required to be collected: (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.	None	None	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
	GENERAL ENVIRONMENTAL MANAGEMENT			
	<i>Site Contamination</i>			
23	The applicant shall obtain an environmental report prepared by a site auditor accredited under the <i>Contaminated Land Management Act 1997</i> to determine the nature and extent of contamination at the site and any investigation and/or remediation necessary before the land is suitable for commercial/industrial use. Prior to construction the Applicant shall obtain written endorsement from the site auditor for the following aspects of the Site Contamination Management Plan: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust during the construction and operational stages in a manner that protects the health of on-site and off-site personnel.	None	This condition is not relevant to the current Audit period.	Not Triggered
24	Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.	None	This condition is not relevant to the current Audit period.	Not Triggered
	<i>Environmental Management Plan (EMP) (Construction Stage)</i>			
25	The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.	None	This condition is not relevant to the current Audit period.	Not Triggered
25A	Prior to commencement of construction of the odour control system subject to MOD- 133-11-2006, the Applicant shall prepare and obtain approval from the Planning Secretary for a Construction Environmental Management Plan (CEMP) specific to such works. The CEMP, to be submitted to the Planning Secretary and the EPA, shall include (but not necessarily be limited to) measures to be undertaken to minimise environmental impacts during construction with particular emphasis on measures for mitigating odour, dust, noise and traffic impacts on surrounding land uses. The CEMP shall provide details of how the environmental performance of the remediation works will be monitored, what actions will be taken to address identified adverse environmental impacts, and how the relevant requirements of conditions 26 to 38 shall be addressed. The CEMP shall reflect restrictions to construction hours as follows: Monday to Friday from 7am to 6pm, and Saturdays from 8am to 5pm, with no construction work on Sundays and Public Holidays. The CEMP shall be implemented during construction.	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
26	The EMP (Construction Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	None	This condition is not relevant to the current Audit period.	Not Triggered
27	The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Planning Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered
28	The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Planning Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered
29	The EMP (Construction Stage) shall be made publicly available.	None	This condition is not relevant to the current Audit period.	Not Triggered
30	The EMP (Construction Stage) shall include, but is not necessarily limited to, the following plans: (a) Soil and Water Management Plan (b) Construction Noise Management Plan (c) Dust Management Plan (d) Construction Waste Management Plan (e) Site Contamination Management Plan (f) Landscaping Plan	None	This condition is not relevant to the current Audit period.	Not Triggered
31	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).	None	This condition is not relevant to the current Audit period.	Not Triggered
32	All site personnel (including contractors and subcontractors) during the construction stage must be inducted and trained to ensure compliance with the EMP (Construction Stage).	None	This condition is not relevant to the current Audit period.	Not Triggered
33	The <i>Soil and Water Management Plan</i> (SWMP) must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP must be prepared in accordance with the requirements for such plans outlined in <i>Managing Urban Stormwater: Soils and Construction</i> (available from the Department of Housing).	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
34	The <i>Construction Noise Management Plan</i> must address, but is not necessarily limited to, the following issues: (a) compliance standards (b) community consultation (c) complaints handling monitoring/system (d) site contact person to follow up complaints (e) mitigation measures, including details of any noise attenuation measures (f) the design and operation of the proposed mitigation methods demonstrating best practice (g) construction times (h) contingency measures where noise complaints are received (i) monitoring methods and programs.	None	This condition is not relevant to the current Audit period.	Not Triggered
35	The <i>Dust Management Plan</i> must include, but not necessarily be limited to, control strategies to achieve compliance with dust emission limits in this Consent and any environment protection licence.	None	This condition is not relevant to the current Audit period.	Not Triggered
36	The <i>Construction Waste Management Plan</i> must include, but not necessarily be limited to, strategies to ensure any waste generated during the construction stage is recycled, reused or disposed of in a lawful manner.	None	This condition is not relevant to the current Audit period.	Not Triggered
37	The <i>Site Contamination Management Plan</i> must include, but not necessarily be limited to, the following issues that apply to construction stage activities: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust in a manner that protects the health of on-site and off-site personnel.	None	This condition is not relevant to the current Audit period.	Not Triggered
38	The <i>Landscaping Plan</i> must include, but not necessarily be limited to: (a) the recommendations of the Visual Assessment Study in the EIS for landscaping and planting of native species, and (b) commitments by the Applicant for an appropriate financial or in-kind contribution towards landscaping the Parramatta Road frontage to soften and screen the access point as viewed from Parramatta Road.	None	This condition is not relevant to the current Audit period.	Not Triggered
	<i>Environmental Management Plan (EMP) (Operation Stage)</i>			
39	The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.	The Auditors sighted the revised Operational Environmental Management Plan (dated September 2019)	None	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
40	The EMP (Operation Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	The Auditors sighted the revised Operational Environmental Management Plan (dated September 2019)	None	Compliant
41	<p>The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans:</p> <ul style="list-style-type: none"> (a) Waste Management Plan (b) Odour Management Plan (c) Dust Management Plan (d) Traffic Management Plan (includes monitoring and enforcement of “left turn only”) (e) Vermin and Pest Control Plan (includes housekeeping measures) (f) Stormwater Management Plan (g) Site Contamination Management Plan (h) Incident Response Plan (i) Noise Management Plan <p>Prior to commencement of operation of the odour control system subject to MOD-133- 11-2006, the Applicant shall review the EMP (Operation) in order to update procedures, measures and monitoring requirements applicable to the modified odour control system. The revision of the EMP shall cover the relevant plans (a)-(i) outlined above, including (but not necessarily limited to) the Odour Management Plan, the Dust Management Plan and the Noise Management Plan. The revised EMP (Operation) shall be submitted to the EPA and the Planning Secretary. The Planning Secretary’s approval of the revised EMP (Operation) shall be obtained prior to commencement of operation of the odour control system.</p>	<p>The Auditors sighted EMP (Operational Stage) contains a number of supporting management plans including:</p> <ul style="list-style-type: none"> • Waste Management Plan • Odour Management Plan • Dust Management Plan • Traffic Management Plan • Vermin and Pest Control Plan • Stormwater Management Plan • Site Contamination Management Plan • Incident Response Plan • Noise Management Plan 	None	Compliant
42	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).	The Auditors sighted the revised Operational Environmental Management Plan (dated September 2019)	None	Compliant
43	The Applicant must not accept any uncontainerised waste at the premises until the EMP (Operation Stage) has been approved by the Planning Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered
44	The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Planning Secretary	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
45	All site personnel (including contractors and subcontractors) during the operational stage must be inducted and trained to ensure compliance with the approved EMP (Operation Stage).	The induction training package and training records were sighted by the Auditors.	None	Compliant
46	The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	The EMP (Operation Stage) is publicly available here: https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station	None	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)

Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
47	<p>The <i>Waste Management Plan</i> must address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> (a) Procedures for inspecting and recording each load of uncontainerised waste received at the terminal and for separating and disposing of any component of the waste that is not permitted to be accepted (b) Priority waste handling given to the most offensive wastes, otherwise “first in/first out” waste handling (c) Procedures for cleaning vehicles before they leave the premises in a manner that prevents the tracking of waste from the premises (d) An education program for all drivers of waste vehicles using the site, about waste types permitted to be received at the premises and the need to ensure their vehicle does not track waste from the premises (e) The inclusion of conditions in contracts with waste transporters addressing acceptable waste types and punitive measures for non-compliances (f) An enforcement program to be maintained for the duration of the development which includes the imposition of punitive measures for delivering unacceptable waste types (g) Procedures for minimising wind-blown litter from leaving the premises and for regular patrols of surrounding areas to collect any litter that has been carried from the premises (h) Procedures for preventing washdown waters and any other liquid that has been in contact with waste from entering the stormwater system (i) An operational contingency plan to be implemented in the event of equipment failure, industrial action or other situation that prevents the containerisation of waste that has been in the terminal building in excess of 18 hours (j) Fire management procedures including the management of fire water in a manner that will not pollute waters. 	Waste Management Plan (dated February 2010)	The Waste Management Plan complies with the conditions of consent.	Compliant

48	<p>The <i>Odour Management Plan</i> shall address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> (a) detailed description of the odour control system subject to MOD-133-11-2006, including (but not necessarily limited to) scaled drawings of the system and its location, technical specifications and operational methods; (b) procedures for the management of waste at the premises at all times to minimise the generation of odours; (c) protocols for the operation of the odour control mechanisms for the (d) terminal building, including the forced air extraction system, to minimise the risk of any adverse impact on surrounding commercial and residential areas; (e) procedures for the maintenance and repair of the forced air extraction system on the terminal building; (f) an emission monitoring program designed to determine compliance with the EPA's odour goal of less than 2OU at the nearest sensitive receiver and to establish the efficiency of the forced air extraction system and appropriate equipment maintenance schedules. The program is to include odour emission monitoring using dynamic olfactometry in such a way as to allow determination of the performance of the odour control system; (g) an odour audit program which provides for a comprehensive odour audit of the premises and nearby commercial and residential areas, by an independent, appropriately qualified and experienced person, to be conducted 3-monthly for the initial 24 months of receiving uncontainerised waste at the terminal, 3-monthly for the 12 months following commissioning the odour control system subject to MOD- 133-11-2006, and 6-monthly thereafter, unless otherwise approved in writing by the Planning Secretary. (h) an operational contingency plan to be initiated in the event of equipment failure, industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 18 hours. Such a plan shall include suspending the acceptance of further uncontainerised waste at the premises; (i) a testing program designed to determine appropriate maintenance schedules for replacement of odour adsorption material in the pressure relief vents of the waste containers; (j) procedures for the maintenance and repair of the odour adsorption and pressure relief vents of the waste containers, including the replacement of the odour adsorption material; and (k) a community consultation program on odour. The community consultation program may include a community survey, to be developed in conjunction with the community consultative committee 	Odour Management Plan (dated February 2010)	<p>The Odour Management Plan complies with the conditions of consent.</p> <p>No odour complaints were received during the audit period.</p>	Compliant
49	<p>The <i>Dust Management Plan</i> shall include, but not necessarily limited to, control strategies to achieve compliance with dust emission limits in this Consent and any</p>	Dust Management Plan (dated February 2010)	The Dust Management Plan complies with the	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
	environment protection licence. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the <i>Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station</i> (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. Following the receipt of any dust related complaints, the Planning Secretary may require the Applicant to undertake further investigations, monitoring or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal.	Complaints Register	conditions of consent. No complaints were received during the Audit period	
50	<p>The <i>Traffic Management Plan</i> must address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> (a) An education program for all drivers and owners of waste vehicles using the site, about the “left turn only” restrictions on entering and leaving the premises via Parramatta Road (b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the “left turn only” restriction upon entering or leaving the premises via Parramatta Road. (c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development (d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes (e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached (f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances. (g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays. 	<p>Traffic Management Plan (dated September 2019)</p> <p>Site Inspection</p>	The Traffic Management Plan complies with the conditions of consent.	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
51	<p>The <i>Vermin and Pest Control Plan</i> must address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> (a) Removing all waste from the tipping areas at the end of each day (b) Cleaning up all waste tipping and handling areas at the end of each day (c) Regular cleaning of catch drains and drainage sumps (d) Minimising onsite waste storage and handling (e) Maintaining any bird deterrent measures such as hanging wires (f) Routine inspection and action for potential vector habitats (g) Using commercial vector control specialists (h) Conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads. 	The Vermin and Pest Control Plan (dated July 2019)	The Vermin and Pest Control Plan complies with the conditions of consent.	Complaint
52	The <i>Stormwater Management Plan</i> must describe the post construction measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	<p>Stormwater Management Plan (dated February 2010)</p> <p>Site inspection</p>	The Stormwater Management Plan complies with the conditions of consent.	Complaint
53	The <i>Site Contamination Management Plan</i> must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	Site Contamination Management Plan (dated February 2010)	The Site Contamination Management Plan complies with the conditions of consent.	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
54	<p>The <i>Noise Management Plan</i> shall be drafted in consultation with the rail operator for operation of the rail siding adjacent to the waste packaging terminal for the rail haulage services for Collex. The plan is to be submitted to Auburn Council. The plan must address the objective of mitigating operational rail noise from operations directly attributable to the loading and unloading of containers and associated rail operation on the siding adjacent to the Collex terminal, relating to the movement of containers from the Collex packing terminal. The plan must also identify reasonable noise mitigation strategies:</p> <ul style="list-style-type: none"> (a) Upgrade to hardstand areas utilised for loading and unloading of trains and rail track upgrade where feasible; (b) Resurfacing of hardstand area with appropriate noise mitigation materials; (c) Track repair and realignment where feasible and appropriate to minimise forklift travel having regard for other rail operations and heritage issues; (d) Container management protocols to minimise movement and handling of containers with an emphasis on noise mitigation; (e) Identification and utilisation of forklifts to minimise noise impacts and implement measures to minimise use of reversing alarms at night; (f) Establishment of a noise complaints procedure; (g) Investigating the scheduling of trains outside critical hours subject to metropolitan curfew, Rail Infrastructure Corporation slot management and rail operational considerations; (h) Ongoing community consultation; and (i) Employee education in noise mitigation practices. 	Noise Management Plan (dated February 2010)	The Noise Management Plan complies with the conditions of consent.	Compliant
	Environmental Management Representative (EMR)			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
55	<p>The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall:</p> <ul style="list-style-type: none"> (a) be the principle person responsible for overseeing environmental management of the development and supervision of environmental services (b) have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur (c) be responsible for the certification of all environmental management plans and procedures (d) be responsible for considering and advising on matters specified in the Conditions of Consent and compliance with such matters (e) oversee the receipt of, and response to, complaints about the environmental performance of the development (f) be present on-site during any critical construction or operational activity as defined in the relevant Environmental Management Plan (g) be a member of the Community Consultative Committee for the development. 	Audit interview	<p>Sara Maddison, Operations Project Manager is listed as the Environmental Management Representative.</p> <p>A Community Consultative Committee is currently not in place.</p>	Compliant
	Environmental Monitoring Program			
56	<p>The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must:</p> <ul style="list-style-type: none"> (a) Identify the environmental issues to be monitored (b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument (c) Set standards and performance measures for each issue (d) Describe in detail how each issue is to be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Planning Secretary and other relevant authorities (e) Indicate the actions taken and procedures to be followed if any non-compliance is detected. 	EMP (Operation Stage)	Environmental Monitoring Program in Section 3.3 of the OEMP.	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
57	All monitoring required by this Consent must be: (a) conducted by suitably qualified persons approved by the Planning Secretary (b) conducted in accordance with established standards and protocols (c) reported annually in the Annual Environmental Management Report.	None	None	Compliant
58	The Applicant shall include a report on the Environmental Monitoring Program in the Annual Environmental Management Report. The report must: (a) summarise the results from the Environmental Monitoring Program over the previous year (b) analyse the results in relation to both past performance, and the relevant standards and performance (c) measures of the development (d) identify any emerging trends in the data over the life of the development (e) include a copy of the detailed monitoring results as an attachment.	Annual Environmental Management Report for the period 15 January 2018 to 14 January 2019 (report dated 15 March 2019). https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2019/04/Clyde%20AEMR%202018-2019.pdf	None	Compliant
	Annual Environmental Management Report			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
59	<p>Between twelve and fourteen months after the issue date of an environment protection licence for the development, and annually thereafter for the duration of the development, the Applicant shall submit an Annual Environmental Management Report to the Planning Secretary, the EPA and the Community Consultative Committee. The report shall be made available to the public on request to the Applicant. The report may be combined with the Annual Return required by the environment protection licence to be submitted to the EPA.</p> <p>The report must:</p> <ul style="list-style-type: none"> (a) identify all the standards, performance measures, and statutory requirements the development is required to comply with (b) review the environmental performance of the development to determine whether it is complying with the standards, performance measures, and statutory requirements (c) identify each occasion during the previous year when the standards, performance measures, or statutory requirements have not been complied with (d) where any non-compliance is identified, describe the actions or measures taken to ensure compliance, who is responsible for carrying out the actions, and when the actions were (or will be) implemented (e) include a summary of any complaints made about the development, and indicate the actions taken to address the complaints (f) include a report on the Environmental Monitoring Program as specified in this Consent. 	<p>Annual Environmental Management Report for the period 15 January 2018 to 14 January 2019 (report dated 15 March 2019)</p>	<p>The Annual Environmental Management Report is publicly available here: https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2019/07/Clyde%20AEMR%202018-2019.pdf</p>	Compliant
	Independent Environmental Audits			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
60	<p>Every year following the date of this consent, or at periods otherwise agreed to by the Planning Secretary, and until such time as agreed to by the Planning Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:</p> <ul style="list-style-type: none"> (a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specifications of the Planning Secretary; (b) be conducted by a suitably qualified independent person approved by the Planning Secretary; (c) assess compliance with the requirements of this consent; (d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and (e) be carried out at the Applicants' expense. (f) The audits shall be submitted to the Planning Secretary. The Applicant shall comply with all reasonable requirements of the Planning Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Planning Secretary. 	Independent Audit Report (report dated 14 February 2019).	<p>An independent audit of the environmental performance of the development audit was conducted on 13th December 2018 and covered the period between January 2017 and January 2018 (report dated 14 February 2019).</p> <p>The current audit, conducted on 26 November 2019 covers the period between January 2018 and January 2019.</p>	Compliant
	Monitoring and audit results to be publicly available			
61	The results of all monitoring and auditing required by this Consent must be made publicly available at the same time they are submitted to the Planning Secretary.	Website	<p>Monitoring and auditing are publicly available here: https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</p>	Compliant
	WASTE MANAGEMENT			
	Waste receipt and removal			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
62	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises unless permitted to do so by an environment protection licence.	Site inspection and audit interview	A large proportion of waste is delivered to the site in sealed front lift or rear lift trucks that cannot be inspected prior to unloading. Procedures are in place to reject or separate non-conforming waste.		Compliant
63	The Applicant must ensure that waste received at the premises is restricted to inert and solid waste as defined in Schedule 1, Part 3 of the <i>Protection of the Environment Operations Act 1997</i> or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the <i>Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i> (EPA, 1999).	None	The waste classifications referred to in this condition are no longer in use. The facility's EPL permits it to accept general solid waste (putrescible) and general solid waste (non-putrescible).		Not Triggered
64	No waste shall be removed from the premises except: (a) construction waste arising from activities during the construction stage of the development (b) waste in sealed shipping containers to be transported by rail for disposal at the Woodlawn Bioreactor (c) small quantities of waste not permitted by the EPL to be received at the terminal, that have been separated out from the incoming waste stream through a documented operational procedure of regular waste inspections and associated control measures: these wastes are to be disposed of to a lawful waste facility (d) waste generated from onsite activities such as plant maintenance and repairs, that is not suitable for acceptance at the Woodlawn Bioreactor: these wastes are to be disposed of to a lawful waste facility (e) wastewater generated onsite: these wastes are to be disposed of to sewer (f) leachate generated from the onsite management of waste: these wastes are to be disposed of to sewer or a lawful liquid waste treatment plant (g) recyclable materials generated from the onsite office: these wastes are to be directed to a suitable recycling facility.	Site inspection and audit interview	The site is not connected to sewer. Liquid wastes other than leachate, including waste from amenities, is removed by a waste contractor. Leachate is either removed by a waste contractor or transferred by rail iso-tanker to the Woodlawn Bio Reactor. Condition O6.6 of EPL 11436 permits the Woodlawn Bio Reactor to receive leachate from the CTT.		Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
65	The Applicant shall implement the approved <i>Waste Management Plan</i> to the satisfaction of the Planning Secretary.	Waste Management Plan (dated February 2010)	The approved Waste Management Plan has been implemented.	Compliant
	Asbestos Waste			
66	The Applicant will not accept asbestos waste at the premise. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premise and for the proper and safe disposal of any asbestos so identified.	Rejected load register	No asbestos was accepted at the Site	Compliant
	Waste Management Record Keeping			
67	Records shall be made and maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of the waste received, and whether the waste was received in prepackaged shipping containers or for on-site containerisation.	Weighbridge records	Veolia maintains records of each load of waste entering the premises, including the identification of the vehicle, weight and nature and origin of the waste received.	Compliant
68	Records shall be made and maintained of any waste leaving the premises by motor vehicle, including the identification of the vehicle, and the weight, classification and destination of the waste.	Weighbridge records	Veolia maintains records of each load of waste leaving the premises, including the identification of the vehicle and weight.	Compliant
69	Records shall be made and maintained of all events involving the removal of any waste received at the premises which is not permitted to be accepted at the premises.	Rejected load register	None	Compliant
	ODOUR MANAGEMENT			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)

Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status														
70	<p>The Applicant shall install a forced ventilation system in the Terminal Building in accordance with MOD-133-11-2006, the design specified in the report <i>Addendum to Final Report – Odour Mitigation Study – Clyde Waste Transfer Terminal – Collex Pty Ltd</i> prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 titled <i>Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layout Details</i> prepared by Turnkey Environmental Systems Pty Ltd. The system shall include a single air exhaust stack to discharge all air from the waste receival and compaction/loading building, in accordance with the following specifications:</p> <table><tr><th>Minimum Stack Height (metres above existing ground level)</th><th><i>Minimum Stack Height above the top of the roof (metres)</i></th><th>Minimum Stack Diameter (metres)</th><th>Minimum Stack Exit Velocity (m/s)</th><th>Minimum Stack Exit Volumetric Flowrate (m³/s)</th><th>Location (X coordinate)</th><th>Location (Y coordinate)</th></tr><tr><td>21</td><td>4</td><td>2.64</td><td>20</td><td>109.48</td><td>317145</td><td>6254129</td></tr></table> <p>The six original fans drawing air from the building through the odour control system shall be replaced with six fans of at least 18kW capacity (each) as per MOD-133-11-2006. The forced air extraction system installed under MOD-133-11-2006 shall be capable of operating in a proper and efficient manner under continuous duty.</p> <p>Any variations of the design and specifications indicated above resulting from the detailed design of the odour control system shall be approved by the Planning Secretary, in consultation with the EPA, prior to the commencement of construction. As part of such approval, the Planning Secretary may require the Applicant to provide information demonstrating that the final design will not result in increased impacts as those predicted in the documents referred to under condition 1(e).</p>	Minimum Stack Height (metres above existing ground level)	<i>Minimum Stack Height above the top of the roof (metres)</i>	Minimum Stack Diameter (metres)	Minimum Stack Exit Velocity (m/s)	Minimum Stack Exit Volumetric Flowrate (m³/s)	Location (X coordinate)	Location (Y coordinate)	21	4	2.64	20	109.48	317145	6254129	None	This condition is not relevant to the current Audit period.	Not Triggered
Minimum Stack Height (metres above existing ground level)	<i>Minimum Stack Height above the top of the roof (metres)</i>	Minimum Stack Diameter (metres)	Minimum Stack Exit Velocity (m/s)	Minimum Stack Exit Volumetric Flowrate (m³/s)	Location (X coordinate)	Location (Y coordinate)												
21	4	2.64	20	109.48	317145	6254129												

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
71	Construction of the Terminal Building forced ventilation system in accordance with MOD-133-11-2006 shall be undertaken under continuous operation of the original forced ventilation system (as per design approved by the Planning Secretary in correspondence to Collex dated 5 January 2003). Forced ventilation in the Terminal Building, by the operation of the original system or the new system subject to MOD-133-11-2006, shall not be interrupted at any time during the period of transferring odour control systems, unless otherwise approved by the Planning Secretary following a written application for temporary stoppage of the ventilation system during that period. Such application shall provide details of stoppage time required, impacts predicted, and proposed mitigation measures and notification requirements. This condition does not apply at times when waste is not contained within the building.	None	This condition is not relevant to the current Audit period.	Not Triggered
72	Prior to commencement of construction of the works required under MOD-133-11-2006, the Applicant shall notify the Planning Secretary, Auburn Council, the EPA and the Community Consultative Committee in writing of the date of commencement of construction, details of the main construction activities and anticipated duration of construction and times of the main construction activities.	None	This condition is not relevant to the current Audit period.	Not Triggered
73	The Applicant shall implement the approved <i>Odour Management Plan</i> to the satisfaction of the Planning Secretary.	Odour Management Plan	The approved Odour Management Plan has been implemented	Compliant
74	The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i> .	None	No odour complaints were received during the Audit period.	Compliant
75	The Applicant is not permitted to use deodorisers for odour control at the premises, unless otherwise approved by the Planning Secretary.	Site inspection	None	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
76	The Applicant shall continuously operate the forced ventilation system subject to MOD-133-11-2006 (and the original forced ventilation system until the system subject to MOD-133-11-2006 becomes operational) whenever waste is contained within the building, unless otherwise approved by the Planning Secretary. As part of such approval, the Planning Secretary may require the Applicant to carry out additional investigations and implement additional measures to mitigate any off-site impacts that may be anticipated or identified from such investigations.	Audit interview	The forced ventilation system operates continuously. A new exhaust fan operational warning display and alarm was fitted to the western side of the processing shed opposite the office to provide staff with instant feedback as to when the ventilation system was not functioning	Compliant
77	Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall conduct: (a) odour emission rate sampling and analysis from the single stack (conducted in accordance with the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> (EPA, January 2007); and (b) odour dispersion modelling for the stack odour discharge conducted in accordance with the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (EPA, August 2005) and the <i>Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW</i> (EPA, November 2006) to confirm whether the operation of the modified stack design meets the EPA's odour goal of less than 2 OU at the nearest sensitive receiver.	None	This condition is not relevant to the current Audit period.	Not Triggered
78	The results of any odour performance testing and modelling conducted in accordance with the conditions of this consent, including those required under condition 77, shall be submitted to the Community Consultative Committee, the EPA, the Planning Secretary and shall be made publicly available, within eight weeks of the testing and modelling having been completed.	None	None	Not triggered
79	Following the review of the investigations required under condition 77, or any other odour related investigations and documentation required under this consent, the Planning Secretary in consultation with the EPA may require the Applicant to carry out additional investigations and implement additional measures to mitigate any identified off-site odour impacts.	None	None	Not triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
80	All odour monitoring and management plans shall be made available to the public on request to the Applicant.	Website	Monitoring and management plans are publicly available here: https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station	Compliant
81	Any containerised waste shall not be exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent	Site inspection	None	Compliant
82	The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Planning Secretary prior to the acceptance of any uncontainerised waste at the premises.	Site inspection	None	Compliant
83	Any waste that has been packed into containers on the site, shall not be re-exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	Site inspection	None	Compliant
84	Deleted			
85	Deleted			
86	Deleted			
87	The Applicant shall carry out monitoring of the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be required under any Environment Protection Licence. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.	None	The EPL does not require monitoring of the forced ventilation system	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
88	<p>Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with:</p> <ul style="list-style-type: none"> (a) any methodology which is required by or under the <i>Protection of the Environment Operations Act 1997</i> to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the <i>Protection of the Environment Operations Act 1997</i>, any methodology which the general terms of approval or a condition of the licence (as the case may be) requires to be used for that testing; or (c) if no such requirement is imposed by or under the <i>Protection of the Environment Operations Act 1997</i> or by the general terms of approval or a condition of the licence (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. (d) Note: <i>The Clean Air (Plant and Equipment) Regulation 1997</i> 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”. 	None	None	Not triggered
89	Deleted			
90	<p>Prior to the installation of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall provide to the EPA, manufacturer’s performance guarantees, demonstrating to the satisfaction of the EPA that the equipment will comply with the design parameters specified in this consent and/or the Environmental Protection Licence</p>	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)																																																																	
Consent Condition	Requirement	Evidence collected		Independent Findings and Recommendations	Audit and	Compliance Status																																																											
91	A meteorological station must be sited and operated at the premises in accordance with the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> . The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table.	Audit interview		The onsite meteorological station was operated continuously for the audit period.	Compliant																																																												
	<table><tr><th>Parameter</th><th>Units of measure</th><th>Averaging Period</th><th>Method</th><th>Frequency</th></tr><tr><td>Wind Speed @ 10 m</td><td>m/s</td><td>1 hour</td><td>AM-2 & AM-4</td><td>Continuous</td></tr><tr><td>Wind Direction @ 10 m</td><td>Deg</td><td>1 hour</td><td>AM-2 & AM-4</td><td>Continuous</td></tr><tr><td>Sigma Theta @ 10 m</td><td>Deg</td><td>1 hour</td><td>AM-2 & AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 10 m</td><td>K</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Temperature @ 2 m</td><td>K</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Solar Radiation</td><td>W/m2</td><td>1 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Rainfall</td><td>mm</td><td>24 hour</td><td>AM-4</td><td>Continuous</td></tr><tr><td>Evaporation</td><td>mm</td><td>24 hour</td><td>Note 2</td><td>Continuous</td></tr><tr><td colspan="2">Additional Requirements</td><td colspan="3">Additional Requirements</td></tr><tr><td colspan="2">Siting</td><td colspan="3">AM-1 & AM-4</td></tr><tr><td colspan="2">Measurement</td><td colspan="3">AM-2 & AM-4</td></tr></table>					Parameter	Units of measure	Averaging Period	Method	Frequency	Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous	Wind Direction @ 10 m	Deg	1 hour	AM-2 & AM-4	Continuous	Sigma Theta @ 10 m	Deg	1 hour	AM-2 & AM-4	Continuous	Temperature @ 10 m	K	1 hour	AM-4	Continuous	Temperature @ 2 m	K	1 hour	AM-4	Continuous	Solar Radiation	W/m2	1 hour	AM-4	Continuous	Rainfall	mm	24 hour	AM-4	Continuous	Evaporation	mm	24 hour	Note 2	Continuous	Additional Requirements		Additional Requirements			Siting		AM-1 & AM-4			Measurement		AM-2 & AM-4		
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DUST MANAGEMENT																																																																	
92	The Applicant shall implement the <i>Dust Management Plan (Construction Stage)</i> and the approved <i>Dust Management Plan (Operation Stage)</i> to the satisfaction of the Planning Secretary.	Dust management Plan (Operation Stage)	The approved Dust Management Plan (Operation Stage) has been implemented	Compliant																																																													
93	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Site inspection	None	Compliant																																																													
94	All trafficable areas and vehicle manoeuvring areas in or on the premises shall be maintained at all times in a condition that will minimise the generation or emission from the premises, of wind-blown or traffic generated dust.	Site inspection	None	Compliant																																																													

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
95	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading. (EPA)	Site inspection	None	Compliant
96	The Applicant must prepare and implement an <i>Ambient Air Quality Monitoring Plan</i> . The Plan must address, but not necessarily be limited to, the following: (a) Monitoring methodologies and standards (sampling and analysis); (b) Monitoring for concentrations of total suspended particulates (TSP) and dust deposition rates; (c) Locations where monitoring will be carried out; (d) Detailed monitoring cycle and the duration of each monitoring cycle; and (e) Reporting.	Ambient Air Quality Monitoring Plan	The Ambient Air Quality Monitoring Plan is contained in the Dust Management Plan. Ambient air quality monitoring is only required on receipt of dust complaints. No dust complaints were received.	Compliant
97	Deleted			
	AIR MONITORING			
98	Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	Odour Audit Report	Operating conditions inside the waste terminal building are recorded as part of the bi-annual odour audits. Odour Extraction System Service Reports are contained in the appendix of the Odour Audit Report. It is noted that a previous Audit Action “The stack discharge velocity should be measured at least once within a 6-month period as part of a routine service visit” has been completed.	Compliant
	WATER MANAGEMENT			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)						
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status	
99	Except as may be expressly provided by a licence under the <i>Protection of the Environment Operations Act 1997</i> in relation of the development, section 120 of the <i>Protection of the Environment Operations Act 1997</i> must be complied with and in connection with the carrying out of the development.	The findings of this audit	None		Compliant	
100	Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	Site inspection	Water from within the waste terminal building and the compactor pit area is collected as leachate.		Compliant	
101	The approved <i>Soil and Water Management Plan</i> must be implemented prior to and for the duration of the construction stage of the development.	None	This condition is not relevant to the current Audit period.		Not Triggered	
102	Stormwater pollution controls must be implemented prior to and for the duration of the operation of the development. The controls shall be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme shall be consistent with the guidance contained in <i>Managing Urban Stormwater: Council Handbook</i> (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table:	Site inspection	None		Compliant	
	Development component					Minimum level of stormwater treatment
	Undeveloped sections of access road					Existing overland flow to Duck River
	Roof water					On-site detention
	Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units					First flush system, GPT, oil and grease separation, on-site detention
	SITE CONTAMINATION					
103	The <i>Site Contamination Management Plan</i> must be implemented to the satisfaction of the Planning Secretary, prior to and for the duration of the development.	Site Contamination Management Plan (Operation Stage)	The approved Site Contamination Management Plan (Operation Stage) has been implemented.		Compliant	
	NOISE MANAGEMENT					
104	The Applicant shall implement the approved <i>Construction Noise Management Plan</i> , to the satisfaction of the Planning Secretary.	None	This condition is not relevant to the current Audit period.		Not Triggered	

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
105	The Applicant shall implement the <i>Noise Management Plan</i> , to the satisfaction of the Planning Secretary	Noise Management Plan (Operation Stage)	The approved Noise Management Plan (Operation Stage) has been implemented.	Compliant
106	Except as permitted under condition 25A, all construction work at the premises that creates audible noise at residential premises shall only be conducted between 7:00am and 5:00pm on Mondays to Fridays and between the hours of 8:00am and 5:00pm on Saturdays. There shall be no construction activities on Sundays or public holidays. The allowable construction times may be varied by an environmental protection licence.	None	This condition is not relevant to the current Audit period.	Not Triggered
107	The delivery of construction material outside the hours of construction permitted by this Consent is not permitted except when required by police or other authorities for safety reasons; and/or because the operation, personnel or equipment are endangered. In such circumstances, notification is to be provided to the EPA and affected residents at least 24 hours prior to the delivery, or within a reasonable period in the case of an emergency.	None	This condition is not relevant to the current Audit period.	Not Triggered
108	Deleted			
108A	Deleted			
109	Deleted			
110	Deleted			
111	Deleted			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
112	<p>The Applicant shall implement a Heavy Vehicle Noise Monitoring Management Program for the development to the satisfaction of the Planning Secretary. This program must:</p> <ul style="list-style-type: none"> (a) monitor heavy vehicle noise on the site, in accordance with the methods outlined in the "Truck Noise Monitoring – Proposed Test and Management Plan" prepared by Heggies and dated 26 May 2008; (b) be undertaken quarterly for the first year starting in October 2008, and annually thereafter, unless otherwise agreed by the Planning Secretary; (c) measure at least 25% of the heavy vehicles visiting the site; (d) identify heavy vehicles exceeding the relevant noise criteria specified in Australian Design Rule 28/01, or its successor, and ensure that the owners of these subsequently comply with the relevant noise criteria; (e) report the number of non-compliant heavy vehicles identified and the actions undertaken to address these non-compliances in the Annual Environmental Monitoring Report; and (f) be amended, should the monitoring activities not achieve the aim of the program, to the satisfaction of the Planning Secretary. 	Heavy Vehicle Noise Monitoring Management Program Report dated August 2018 (report ref: CTT_TRUCK_0818).	The Auditors sighted the Heavy Vehicle Noise Monitoring Management Program Report dated August 2018 (report ref: CTT_TRUCK_0818).	Compliant
113	The Applicant shall implement an induction program for all drivers of trucks that deliver waste to the waste terminal with the objective of mitigating noise impacts of trucks entering and leaving the waste terminal, including driving procedures and throttle management. The program is to be designed in consultation with Auburn Council and is to emphasise the importance of noise emission control, driving and operating practices and procedures for night time activities.	Driver training program and training records	The Auditors sighted the driver training program and training records.	Compliant
114	The Applicant shall, in conjunction with the rail operator, implement an induction program for all train drivers and other rail staff dedicated to transporting containers to and from the Collex terminal area by train to Woodlawn. The program is to emphasise noise mitigation measures through "Good Neighbour" rail techniques such as notch control, idling practices, shunting speeds and engine control and shall form an integral part of the operational noise management plan.	Safety Interface Agreement Rail Transport Operator between Pacific National Pty Ltd and Veolia Environmental Services (Australia) Pty Ltd	The Auditors sighted the Safety Interface Agreement Rail Transport Operator between Pacific National Pty Ltd and Veolia Environmental Services (Australia) Pty Ltd.	Compliant
	VERMIN AND PEST MANAGEMENT			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
115	<p>The design of the terminal building and associated waste handling facilities shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures</p> <ul style="list-style-type: none"> (a) sealing surfaces to prevent moisture and odour absorption (b) elimination of crevices where waste, moisture and vermin can accumulate (c) providing screening of the ventilation openings in the building (d) eliminating horizontal surfaces where birds can congregate (e) minimising horizontal ledges where dust and litter can accumulate (f) using fencing and netting to prevent wind-blown litter from escaping. 	None	This condition is not relevant to the current Audit period.	Not Triggered
116	The <i>Vermin and Pest Management Plan</i> must be implemented for the duration of the operation of the development, to the satisfaction of the Planning Secretary.	Approved Vermin and Pest Management Plan	The approved Vermin and Pest Management Plan has been implemented.	Compliant
117	The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.	Site inspection	The approved Vermin and Pest Management Plan has been implemented.	Compliant
	TRAFFIC MANAGEMENT			
118	All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street.	Site inspection	No vehicles were observed entering or exiting the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street.	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
119	No vehicle entering the development shall turn right off Parramatta Road.	Site inspection, audit interview, traffic survey and education pamphlet	A driver education program commenced in May 2018 and a pamphlet was cited to try and address this issue. Traffic survey on 11 and 12 March 2019 was done outside the audit period. Though over two days, 160 vehicles were observed turning right into the development. It is considered probable this non-compliance also occurred in 2018.	Non-compliant
120	No vehicle exiting the development shall turn right onto Parramatta Road.	Site inspection	No vehicles were observed exiting the development turning right onto Parramatta Rd.	Compliant
121	The <i>Traffic Management Plan</i> must be implemented for the duration of the operation of the development, to the satisfaction of the Planning Secretary.	Traffic Management Plan	The approved Traffic Management Plan has been implemented.	Compliant
122	Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Planning Secretary, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	None	This condition is not relevant to the current Audit period.	Not Triggered
123	The Applicant must ensure no trucks or other heavy vehicles enter or exit the premises between the hours 10pm to 5am Mondays to Saturdays and 10pm to 7am Sundays and public holidays, unless otherwise provided in the Traffic Management Plan approved by the Secretary	Audit interview and visual inspection	None	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
124	The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Planning Secretary within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	None	This condition is not relevant to the current Audit period.	Not Triggered
	EMERGENCY MANAGEMENT			
	<i>Emergency Management Plan</i>			
125	In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must: (a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises; (b) determine how these disruptions would impact on operations; and (c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.	Site inspection	None	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
126	<p>In relation to matters identified in the previous condition, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of development. These threats may include fire, overflow, power or other utility failure, natural disaster etc; (b) identification of strategies to minimise and ameliorate the effects of any water pollution identified from the groundwater and surface water monitoring programs; (c) an estimate of the cost of implementation; (d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised; (e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution; and (f) ensuring that all relevant employees are familiar with the emergency management plan. <p>The Applicant should regularly review the adequacy of the plan obtaining expert advice as required.</p> <p><i>Note: When developing this emergency plan, consideration should be given to the possible integration with current emergency management plans for the entire site.</i></p>	Emergency Management Plan (including the Pollution Incident Response Management Plan)	The Auditors sighted the Emergency Management Plan (including the Pollution Incident Response Management Plan). Appropriate training and drills have been conducted.	Compliant
127	The Applicant shall consult with the NSW Fire Brigades and install a fire main and hydrants as required by the Fire Brigades. The system shall comply with AS 2419.	None	This condition is not relevant to the current Audit period.	Not Triggered
	LANDSCAPING			
128	The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Planning Secretary.	Landscaping Plan dated December 2008	A Landscaping Plan dated December 2008 was sighted by the Auditors.	Compliant
	DEVELOPMENT SETBACK			

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
129	The Applicant shall not construct any new buildings, hardstand, storage areas or vehicle manoeuvring areas within 30 metres of the Duck River Mean High Water Mark (as measured horizontally), to allow for the establishment of a viable riparian zone and multi-purpose recreation path.	None	This condition is not relevant to the current Audit period.	Not Triggered
	RIPARIAN RESTORATION			
130	The Applicant shall prepare at its own expense a site-specific Riparian Zone Management Plan to address the issues contained in Auburn's draft Duck River Riparian Management Plan. The Plan shall be submitted to Auburn Council's Director Service Planning prior to the issue of the Occupation Certificate, or as otherwise agreed to by Auburn Council. Any riparian restoration activities undertaken by the Applicant shall, where appropriate, be consistent with but not necessarily limited to the activities listed in Attachment 3.	None	This condition is not relevant to the current Audit period.	Not Triggered
	DUCK RIVER ACCESSWAY			
131	The Applicant shall facilitate as appropriate and as required by the Planning Secretary, the provision of a 3.0-metre-wide reinforced concrete multi-purpose recreation path along the landward side of a 30 metre riparian/public open space dedication zone between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	None	This condition is not relevant to the current Audit period.	Not Triggered
	LAND DEDICATION			
132	The Applicant shall facilitate as appropriate and as required by the Planning Secretary and/or contribute to the dedication to Auburn Council of land incorporating the riparian restoration zone and multi-purpose recreation path between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	None	This condition is not relevant to the current Audit period.	Not Triggered
	HERITAGE			
133	The Applicant shall contribute to the development and installation of heritage interpretation signage in consultation with Auburn Council, regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. The heritage signage is to be approved by Auburn Council and installed within 6 months of commencement of the approved use or as otherwise agreed to by Auburn Council.	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
	COMMUNITY LIAISON			
	Community Consultative Committee			
134	The Applicant shall establish and maintain a Community Consultative Committee for the whole duration of the development and take all reasonable steps to ensure that the first meeting is held prior to commencement of construction. Selection of representatives shall be agreed by the Secretary and the appointment of an independent Chairperson shall be to the satisfaction of the Secretary in consultation with the Applicant, Parramatta City Council and Auburn Council. The Committee shall include two representatives from the Applicant (including the Environmental Officer), four community representatives and a representative from each Council. Representatives from relevant government agencies (including Planning NSW) may be invited to attend meetings of the Committee as required. The Committee may make comments and recommendations about the implementation of the development and draft management plans, environmental plans and/or studies. The Applicant shall ensure that the Committee has access to the necessary plans and/or studies for such purposes. The Applicant shall consider the recommendations and comments of the Committee and provide a response to the Committee and the Secretary.	Audit Interview	Veolia was not successful in facilitating a Community Consultative Committee (CCC) meetings within the Audit period, however, all reasonable steps have been taken to re-establish the committee. An Independent Chair has been appointed by the Department.	Compliant
135	The Applicant shall, at its own expense: (a) provide appropriate facilities for meetings of the Committee; (b) nominate a representative to attend all meetings of the Committee; (c) provide to the Committee regular information on the progress of the work and monitoring results; (d) promptly provide to the Committee such other information as the Chairperson of the Committee may reasonably request concerning the environmental performance of the development; and (e) provide reasonable access for site inspections by the Committee.	Audit Interview	Veolia was not successful in facilitating a Community Consultative Committee (CCC) meetings within the Audit period, however, all reasonable steps have been taken to re-establish the committee. An Independent Chair has been appointed by the Department	Compliant

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
136	The Applicant shall establish a trust fund to be managed by the Chairperson of the Committee to facilitate functioning of the Committee and pay \$2000 per annum to the fund for the duration of the development. The payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute reasonable funds for payment of the independent Chairperson, to the satisfaction of the Planning Secretary.	Audit Interview	Veolia was not successful in facilitating a Community Consultative Committee (CCC) meetings within the Audit period, however, all reasonable steps have been taken to re-establish the committee. An Independent Chair has been appointed by the Department		Compliant
	COMMUNITY ENHANCEMENT PROGRAM				
137	<p>Prior to the commencement of construction, or as otherwise approved by the Planning Secretary in consultation with Auburn Council, the Applicant shall take all reasonable steps to negotiate an agreed outcome with Auburn Council for an appropriate level of contribution (financial or in-kind) towards mitigating the social and community impacts resulting from the construction and operation of the development. The contribution shall provide, but not necessarily be limited to, the following:</p> <p>(a) the payment of \$50,000 (unless otherwise agreed to by the Planning Secretary) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards</p> <p>(b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes of:</p> <ul style="list-style-type: none">the widening of the Western Overbridge;establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge;establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; andthe development and installation of heritage interpretation signage along the multi-purpose recreation path regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development.	None	This condition is not relevant to the current Audit period.		Not Triggered

Conditions of Development Consent – DA 205-08-01 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
	<p>(c) ongoing or as otherwise agreed to financial contributions proportional to the tonnage throughput of the terminal for the purpose of local community enhancement projects and/or activities in accordance with a community enhancement plan to be prepared by Auburn Council to reflect community priorities and needs.</p> <p>Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Planning Secretary concerning community enhancement contribution in light of an independent investigation to establish such contribution. Such investigation is to be carried out by an independent person(s) to be appointed by the Planning Secretary in consultation with the Applicant and Auburn Council. The commencement of any construction on-site shall not proceed unless the above outcomes have been agreed or otherwise approved by the Planning Secretary in consultation with Auburn Council.</p>			

Appendix B – Environment Protection Licence Compliance Table

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
1	Administrative Conditions			
A1	What the licence authorises and regulates			
A1.1	This license 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 license, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	None	Scale of activity is not limited by this condition. Also see condition L2.2.	Not Triggered
A2	Premises or plant to which this licence applies			
A2.1	The licence applies to the following premises: <i>CLYDE TRANSFER TERMINAL PARRAMATTA ROAD</i> <i>CLYDE NSW 2142</i> <i>PART LOT 201 DP 1007683</i>	Site inspection	None	Compliant
A3	Information supplied to the EPA			
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 inspection	None	Compliant
2	Discharges to Air and Water and Applications to Land			
P1	Location of monitoring/discharge points and areas			
P1.1	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. <i>Refer to EPL for table</i>	None	An air emissions monitoring point is identified; however, the condition does not require any action.	Not Triggered
3	Limit Conditions			
L1	Pollution of waters			
L1.1	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.	The findings of this audit	None	Compliant

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L2	Waste			
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence. <i>Refer to EPL for table</i></p>	Procedures	Wastes referred to are General Solid Waste (putrescible) and General Solid Waste (non-putrescible). Procedures are in place to identify and separate waste that cannot be processed at the facility (e.g. asbestos) or that may cause damage (e.g. gas cylinders).	Compliant
L2.2	The authorised amount of waste permitted on the premises cannot exceed 4,000 tonnes at any one time.	Audit Interview	The Contingency Plan notes this limit on the amount of waste permitted on the premises and includes measures, such as diverting waste to other facilities, in the event that the site cannot process waste and remain under the limit (e.g. due to an interruption to rail services).	Compliant
L3	Noise Limits			
L3.1	Noise generated at the premises must not exceed the noise limits presented in the table below (<i>Refer to EPL for table</i>)	None	No noise complaints were received by the facility during the Audit period.	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L3.2	<p>For the purpose of Condition L3.1:</p> <ul style="list-style-type: none"> (a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays, (b) Evening is defined as the period from 6pm to 10pm (c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays (d) LAeq(15minute) is defined as the equivalent continuous 'A' weighted sound pressure level- the energy average of the noise measured over a 15 minute period. (e) LA1 (1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period. 	None	None	Not Triggered
L3.3	<p>Noise from the Clyde Transfer Terminal premises is to be measured at the most affected point on or within the residential boundary to determine compliance with the LAeq (15 minute) noise limits in condition L3.1.</p> <p>Note: Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy.</p> <p>Note: The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable.</p>	None	None	Not Triggered
L3.4	Noise from the Clyde Transfer Terminal premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1(1 minute) noise limits in condition L3.1	None	None	Not Triggered
L3.5	<p>The noise emission limits identified in condition L3.1 apply under meteorological conditions of:</p> <ul style="list-style-type: none"> • wind speeds up to 3 m/s at 10 metres above ground level; and/or • temperature inversion conditions of up to 3 degrees Celsius/100m. 	None	None	Not Triggered
L4	Potentially Offensive Odour			
L4.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	None	None	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L5	Other limit conditions			
L5.1	<p>Asbestos</p> <p>The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2014.</p>	Procedures	The site is not licensed to accept asbestos. Procedures are in place to separate asbestos if identified in waste delivered to the site. A large proportion of waste is delivered to the site in sealed front lift or rear lift trucks that cannot be inspected prior to unloading.	Not Triggered
4	Operating Conditions			
O1	Activities must be carried out in a competent manner			
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>(a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	NSW EPA Licence and site inspection	None	Compliant
O2	Maintenance of plant and equipment			
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>(a) must be maintained in a proper and efficient condition; and</p> <p>(b) must be operated in a proper and efficient manner.</p>	Site inspection and maintenance records	None	Compliant
O3	Dust			
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust at the boundary of the premises.	Site inspection	None	Compliant
O3.2	Trucks which are entering and leaving the premises and carrying loads must be sealed or covered at all times, except during loading and unloading.	Site inspection	None	Compliant
O4	Emergency Response			

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	PIRMP	The PIRMP was last tested on 9 November 2018. The plan is (hard copy) is available on site for 24hr access by site personnel.	Compliant
O4.2	Firefighting capability The licensee must have adequate fire prevention measures in place and ensure that facility personnel are able to access fire- fighting equipment and manage fire outbreaks at any part of the premises.	Site inspection	None	Compliant
O5	Processes and management			
O5.1	The licensee must ensure that any general solid waste (putrescible) and/or general solid waste (non-putrescible) received for storage or recovery or processing at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time	Site inspection	None	Compliant
O5.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately	Site inspection	None	Compliant
O6	Waste Management			
O6.1	Stormwater and wastewater management – operating phase. All areas that involve the handling of waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed.	Site inspection	None	Compliant
O6.2	Tracking of mud and waste - Vehicles leaving the premises must not track materials to external surfaces.	Site inspection	None	Compliant
5	Monitoring and Recording Conditions			
M1	Monitoring records			
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.	None	The EPL does not require monitoring.	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	None	The EPL does not require monitoring.	Not Triggered
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of (a) this licence; (b) the date(s) on which the sample was taken; (c) the time(s) at which the sample was collected; (d) the point at which the sample was taken; and (e) the name of the person who collected the sample.	None	The EPL does not require monitoring.	Not Triggered
M2	Requirement to monitor concentration of pollutants discharged			
M2.1	Air <i>Refer to tables in EPL</i>	None	The EPL does not require monitoring.	Not Triggered
M5	Recording of pollution complaints			
M3.1	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.	None	The EPL does not require monitoring.	Not Triggered
M3.2	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.	None	None	Not Triggered
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	None	None	Not Triggered
M3.4	The record must be produced to any authorised officer of the EPA who asks to see them.	None	None	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M4	Telephone complaints line			
M4.1	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.	None	None	Not Triggered
M4.2	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.	Site inspection	The complaints line telephone number is posted on a sign at the site entry	Compliant
M4.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	None	None	Not Triggered
6	Reporting Conditions			
R1	Annual return documents			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: (a) a Statement of Compliance; and (b) a Monitoring and Complaints Summary. 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 documentation	Annual Return documentation including a Statement of Compliance; and a Monitoring and Complaints Summary was sighted by the Auditors	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Annual Return documentation	None	Complaint
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	None	None	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	None	None	Not Triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA 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').	Annual Return documentation	None	Compliant
R1.6	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.	Annual Return documentation	None	Compliant
R1.7	Within the Annual Return, the Statement 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.	Annual Return documentation	None	Compliant
R2	Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	None	None	Not Triggered
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. 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.	None	None	Not Triggered
R3	Written report			
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 issued on 10/06/16 in relation to an observation by EPA on 08/06/16 of leachate escaping waste containers may request a written report of the event.	None	None	Not Triggered

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	None	None	Not Triggered
R3.3	The request may require a report which includes any or all of the information (listed in the condition).	None	None	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.	None	None	Not Triggered
7	General Conditions			
G1	Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies (and available for inspection under G1.3).	Site inspection	The licence is available electronically at the site.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	None	None	Not Triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site inspection	The licence is available electronically at the site and a hard copy is posted on a notice board in the office.	Compliant
G2	Other general conditions			
G2.1	The licensee must establish a community environment liaison committee, comprising representatives of the community, the applicant, Parramatta City Council and Auburn Council that will meet at least quarterly. Representatives from relevant NSW Government agencies (including the Department of Planning and the Department of Environment and Climate Change) may be invited to attend meetings as required. Discussion at the meetings must include the progress in implementation of the development consent and other statutory approvals and must provide adequate time for the community to raise matters of concern associated with the environmental impact of the development, with a view to achieving mutually satisfactory solutions.	Audit Interview	Veolia was not successful in facilitating a Community Consultative Committee (CCC) meetings within the Audit period, however, all reasonable steps have been taken to re-establish the committee. An Independent Chair has been appointed by the Department	Compliant
8	Special Conditions			
E1	Financial assurance			

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.1	<p>(a) A financial assurance must be provided to the EPA prior to 30 June 2015. The financial assurance must be in favour of the EPA in the amount of one hundred thousand dollars (\$100,000).</p> <p>(b) A financial assurance must be provided to the EPA by 30 June 2017. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of two hundred thousand dollars (\$200,000). Note that this total financial assurance is inclusive of that required in E1.1a).</p> <p>(c) The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority (APRA).</p>	NSW EPA Correspondence	The Auditors have sighted confirmation from the EPA dated 18 December 2017 that the second stage financial assurance had been received.	Compliant
E1.2	The financial assurance must be maintained during the operation of the premises and thereafter until such time as the EPA is satisfied the premises are environmentally safe.	None	None	Not Triggered
E1.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None	None	Not Triggered
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	None	None	Not Triggered
E1.5	<p>The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of:</p> <p>(a) the financial assurance required by condition E1.1; or</p> <p>(b) the adjusted financial assurance as required by condition E1.3 and E1.4.</p>	None	None	Not Triggered
E2	Environment Obligations of Licensee (Works and Programs)			
E2.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <p>(a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.</p> <p>(b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.</p> <p>(c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</p>	Site inspection	None	Compliant

Conditions of EPL 11763 Clyde Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.2	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: (a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; (b) rehabilitate the site, including assessing and if required, remediation of any site contamination.	None	None	Not Triggered
E3	EPA May Claim on a Financial Assurance			
E3.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None	None	Not Triggered

Appendix C – Audit Team Letter of Approval



Contact: Laura Papoulias
Phone: 02 8289 6879
Email: compliance@planning.nsw.gov.au

Veolia Environmental Services (Australia) Pty Ltd
Cnr Unwin & Shirley Streets
Rosehill NSW 2142

20 September 2019

Attn: Sara Maddison

**Clyde Transfer Terminal (DA-205-08-01)
2019 Independent Environmental Audit Condition 60**

Dear Ms Maddison,

I refer to your email correspondence dated 10 September 2019 seeking the agreement of the Planning Secretary of the Department of Planning, Industry and Environment (**Department**) of the suitability of Mr Alan Parsons, Dr Mark Jackson and Mr Rylan Loemker to undertake an independent environmental audit (IEA) of the Clyde Transfer Terminal.

In accordance with Condition 60 and DA-205-08-01 and the *Independent Audit Guideline* dated October 2015 (**Guideline**), the Department has reviewed your request and considers Mr Alan Parsons is suitably qualified and experienced to undertake the audit as the principal auditor. The Secretary has accordingly approved Mr Jackson and Mr Loemker to assist Mr Parsons during the audit. Please note this approval is conditional upon Mr Parsons, Mr Jackson and Mr Loemker being independent from the project.

The IEA must be prepared, undertaken and finalised in accordance with the Guideline.

Should you have any further enquiries about this matter, please contact Laura Papoulias on (02) 8289 6879 or compliance@planning.nsw.gov.au.

Yours sincerely

Chris Mathieson
Team Leader – Compliance (Metro)
As the Secretary's nominee