





VEOLIA AUSTRALIA AND NEW ZEALAND

2021 INDEPENDENT
ENVIRONMENTAL AUDIT REPORT
- CLYDE WASTE TRANSFER
TERMINAL

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EXECUTIVE SUMMARY

Epic Environmental Pty Ltd (Epic) was engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde waste transfer terminal (CTT) (the site). This document outlines the method, findings and recommendations of the 2021 IEA. The IEA was undertaken between 6 December to 13 January 2022. The IEA scope included activities undertaken at the site during the period January 2021 to December 2021.

The purpose of the IEA was to address the requirements of Condition 60 of the development consent (DA 205-08-01) and assess overall compliance and environmental performance of the site. In accordance with Condition 60 b) of the Development Consent, the IEA team was approved by the Director-General.

The IEA criteria which the site was assessed against for this IEA included:

- Findings of the 2020 IEA (Epic Environmental, 2020)
- Conditions of DA 205-08-01
- Conditions of EPL 11763
- Requirements within the CTT draft Operational Environmental Management Plan (the OEMP) and associated sub-plans

The IEA comprised of an opening meeting, IEA interviews, site inspection and closing meeting. A suite of evidence and material was provided by Veolia to verify the findings of the IEA.

IEA Findings

Overall, Veolia achieved **99%** compliance against all of the IEA criteria for the 2021 IEA. A total of 286 individual requirements / conditions were audited across the IEA criteria, with 89 requirements / conditions determined to be not triggered at the time of the IEA. A total of two audited requirements / conditions were identified to be non-compliant during the IEA.

In addition to the high level of compliance / conformance demonstrated by Veolia, Epic identified multiple positive observations during the IEA. These included the high level of training provided to staff and drivers, comprehensive management plan, active stakeholder engagement, effective management of the environmental risks on-site and evidence of continual improvements between 2020 and 2021. The key non-compliances identified during the IEA include:

- The Traffic Management Plan (TMP) did not include all the required content of the development consent
- No specific training program for rail operators to minimise potential noise nuisance was observed



IEA Recommendations

Based on the IEA findings a variety of recommendations have been provided to address the non-compliances or to improve overall environmental management. The key recommendations to address the non-compliances included:

- Prepare and lodge a modification to Condition 50 of the development consent that:
 - removes the requirement for Veolia to enforce punitive measures to customers not complying with the "left hand turn" requirements from Parramatta road
 - requires Veolia to provide further training for drivers not complying with the "left hand turn" requirements from Parramatta road
 - removes the requirements for Veolia to identify and record any non-complying vehicle and provides an alternative selective monitoring program
- Prepare and lodge a modification to Condition 114 of the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties
- Discuss and verify the training provided by Pacific National to its drivers to ensure sufficient to meet the requirements of the proposed modified condition

All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted, this should be documented and assessed at the subsequent IEA.



1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde Transfer Terminal (CTT). The IEA was undertaken between 6 December to 13 January 2022¹. This document outlines the method, findings and recommendations of the 2021 IEA undertaken at the CTT.

1.1 BACKGROUND

Veolia operates the CTT at 322A Parramatta Road, Auburn, New South Wales (the site). The site operates under Development Consent (DA 205-08-01) and Environment Protection Licence (EPL 11763). The site is approved to receive up to 600,000 tonnes of mixed household and commercial waste per annum, which is transported by rail to Veolia's site at Woodlawn, near Tarago NSW, for treatment and resource recovery.

The site 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 connecting to Parramatta Road
- Weighbridge office and weighbridge
- A stormwater oil/silt separator and retention pond

1.2 IEA TEAM

The IEA team members are listed in **Table 1**. In accordance with Condition 60 b) of the Development Consent, the IEA team has been approved by the Director-General (refer **Appendix A**). The auditors confirm their independence and the signed Independent Environmental Audit Declaration Form has been provided in **Appendix B**.

Table 1: IEA team

Person	Role	Years' Experience	Qualifications
Romin Nejad	Lead Auditor	16	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), Gcert Env Mgmt, Gcert Carbon Mgmt, MBA
Gary Bagwell	Site Inspector	25	BEng (Chemical), Grad.Mgmt, LLM (Env)
Priya Nair	Auditing Assistant	4	BEng (Chem & Env)

¹ The IEA site inspection was undertaken in January 2022 as a result of impacts of the COVID pandemic. Despite this IEA interview were completed in 2021.



1.3 IEA OBJECTIVE

As per Condition 60 of the development consent for the site, an IEA is required to be undertaken every year to independently verify compliance of environmental obligations at the site.

The key objective of this IEA was to:

- Determine the status of recommendations from the previous IEA (Epic, 2020)
- Assess whether the site is operated in compliance with the approval conditions listed under the:
 - Development consent (DA 205-08-01)
 - Environment protection licence (EPL 11763)
- Assess whether the site is being operated in accordance with current practice and standards
- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors
- Review the adequacy and implementation of management plans developed in accordance with the approval conditions
- Provide recommendations for the overall improvement of environmental performance of the site

1.4 IEA PERIOD

The IEA period is between January 2021 to December 2021. Any activity or evidence that was not within this IEA period was not included in the scope of the audit.

1.5 IEA SCOPE

The IEA scope included activities undertaken during the IEA period at the site in relation to the operation of the terminal with respect to the development consent, EPL, (draft) Operational Environmental Management Plan (OEMP) and relevant environmental sub-plans.



2 IEA METHOD

2.1 METHOD DEVELOPMENT

The IEA method was developed with reference to:

- Independent Audit Post Approval Requirements (DPI&E, 2020)
- ISO 19011 Guidelines for Auditing Management Systems

2.2 IEA PROGRAM

The IEA was undertaken in accordance with the program provided in **Table 2**.

Table 2: IEA program

Date	Who				
IEA Preparation	IEA Preparation				
9/11/21	Provision of IEA Plan to Veolia	Epic			
15/11/21	Undertook the preliminary document review	Epic			
15/11/21	Developed the IEA tools	Epic			
11/11/21 & 12/11/22	Approval of the IEA team	DPIE			
IEA Phase					
6/12/21	Opening Meeting	Epic & Veolia			
7/12/21 – 10/12/21	IEA interviews	Epic & Veolia			
13/01/22	Site inspection	Epic & Veolia			
25/01/22	Closing Meeting	Epic & Veolia			
IEA Reporting					
14/01/22	Provision of additional evidence not obtained during the IEA	Veolia			
	interviews				
14/01/22 - 28/01/22	Completed the evidence review and prepared the draft IEA	Epic			
	report				
10/02/22	Veolia provided comments on draft IEA report &	Veolia			
	recommendations				
14/02/22	Issued the final IEA report to Veolia	Epic			

2.3 PRE-AUDIT CONSULTATION

Upon engagement the IEA team held a kick-off meeting with Veolia to discuss the IEA process, expectations and detail information requirements prior to undertaking the IEA.

2.4 IEA TOOLS

The following IEA tools were used during the IEA. These tools assisted in defining the scope of the IEA, captured any issues identified during the IEA and allowed for the discussion of potential recommendations on how these items can be rectified. The tools included:

- IEA plan (Appendix C)
- Opening meeting agenda and minutes
- Independent environmental audit table (Appendix D) and interview questions



2.5 IEA CRITERIA

The IEA criteria are the requirements against which the site was assessed. The IEA criteria for the site included:

- Findings of the 2020 IEA (Epic, 2020)
- Conditions of DA 205-08-01
- Conditions of EPL 11763
- Requirements within the Clyde Waste Transfer Terminal draft Operational Environmental Management Plan (the OEMP) and the following sub-plans²:
 - Environmental monitoring program (EMP)
 - Waste management plan (WMP)
 - Air quality management plan (AQMP)
 - Traffic management plan (TMP)
 - Vermin and pest control plan (VCMP)
 - Stormwater management plan (SMP)
 - Site contamination management plan (SCMP)
 - Noise management plan (NMP)
 - Emergency response plan (ERP)

2.6 IEA COMPLIANCE RATING

The compliance assessment ratings used in the IEA assessment are outlined in Table 3.

Table 3: IEA compliance ratings

IEA Rating	Abbreviation	Definition
Compliant	С	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied/conformed with within the scope of the IEA.
Non-compliant	NC	The auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied/conformed with within the scope of the IEA.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

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² At the time of audit, Veolia had prepared the draft OEMP and associated sub-plans which had been reviewed by the Department of Planning, Industry and Environment (DPIE). Approval for the OEMP and associated sub-plans is expected following resubmission of the plans addressing the comments from the DPIE. Veolia intend to implement the draft OEMP and associated sub-plans in the near future and supersede the existing approved OEMP. Therefore to provide the greatest value of the IEA to Veolia it was determined the audit criteria should verify conformance with the draft OEMP and sub-plans.



2.7 IEA INTERVIEWS

A number of key staff were interviewed during the IEA, including:

- Site Manager Rod Jones
- Environmental Team Ramona Bachu, Anae Ressos, Nicole Boukarim and Mary Wong
- Leading Hands Sioi Mataele

Interviews were undertaken via teleconference.

2.8 SITE INSPECTIONS

A site inspection was undertaken following the IEA interviews to visually verify those aspects that could not be confirmed during the IEA interviews. Weather on the day of the site inspection was overcast, with a low of 19°C with a high of 25 °C (BOM, 2022). Approximately 22 mm of rain fell on the day of inspection at the Paramatta weather station. During the seven days prior to the site inspection Parramatta weather station recorded 77.6 mm of rain. The IEA team were escorted by Veolia representatives during the site inspection. The IEA team were provided unrestricted access to the site to verify compliance.

2.9 IEA EVIDENCE

A comprehensive suite of evidence and material was provided by Veolia to verify the findings of the IEA. The list of material provided and reviewed during the IEA included:

- The OEMP, including the draft sub-plans
- 2020 & 2021 annual environmental management reports (AEMRs)
- Clyde odour audit reports
- 2020 & 2021 annual truck noise measurements
- Clyde independent audit final report 2019 & 2020
- 2021 Annual Returns
- Waste Records for 2021
- Weekly and monthly inspection records for 2021
- Site induction, driver induction and training records
- Environmental incident records for the IEA
- Weighbridge calibration records
- 2021 extraction fan maintenance records
- 2021 Weather station service records
- 2021 community newsletters
- Waste levy reporting records
- Vermin and pest contractor reports



- Veolia waste classification flowchart
- The following work instructions and procedures:
 - Weighbridge operators work instruction
 - Waste shed dust suppression system
 - Exceedances notification work instruction
 - Compactor pit operations
 - Control of non-conforming waste procedure
- DPI&E approval of the environmental management representative
- Position description of the environmental management representative and facility manager
- SHEQ objectives
- Evidence of ERP testing in 2021

All other evidence noted during the IEA not listed above was observed on the CTT website or visually observed during the IEA interviews.



3 IEA FINDINGS

3.1 OVERALL IEA RESULTS

A total of 286 individual requirements / conditions were audited across the IEA criteria, with 89 requirements / conditions determined to be not triggered at the time of the IEA. Of the applicable requirements and conditions, Veolia demonstrated compliance against **99%** of the all IEA criteria. This equated to a total of two audited requirements / conditions that were identified as NC.

The overall IEA results have been shown in Figure 1.

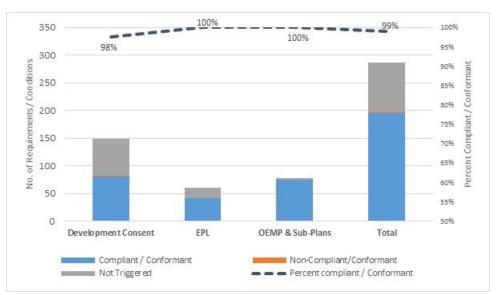


Figure 1: Overall IEA results

The subsequent sections will provide a summary of the findings with the complete independent IEA table provided in **Appendix D**.

3.1.1 Positive Observations

A number of positive observations were noted during the IEA including:

- Examples of on-going continual improvements were observed between the IEA 2020 and IEA
 2021
- Veolia demonstrated 100% compliance with the EPL, OEMP and associated sub-plans
- The OEMP and associated sub-plans were comprehensive and well written
- Good examples of stakeholder engagement were observed during the IEA, including issuing community newsletters
- Record management was of a high level and all evidence was easily identified by the environmental team
- No areas of concern were observed during the site inspection. Notably:



- No odour was noted outside the terminal building
- External areas of the site were clean with no evidence of litter observed (see Plates 1 & 2, Appendix E)
- Stormwater systems were well maintained (see Plate 3, Appendix E)
- Training material for identification of asbestos was available (see Plate 4, Appendix E)
- Facilities were provided for the collection of non-conforming and recyclable waste (see Plates 5 & 6, **Appendix E**)
- CCTV footage of the terminal building floor being cleaned at the end of the day was observed (see Plate 7, Appendix E)
- A high level of environmental governance was demonstrated

3.2 SUMMARY OF AGENCY NOTICES, ORDERS, PENALTY NOTICES OR PROSECUTIONS

No agency notices, orders, penalty notices and prosecutions were noted for the site during the IEA period.

3.3 STATUS OF 2020 IEA FINDINGS

The 2020 IEA provided fourteen recommendations related to three NCs and eleven opportunities for improvement. Of the fourteen recommendations, the 2021 IEA identified nine that were completely addressed, four that were open and had evidence of substantial progress, and one that was ot yet resolved.

The status of each of the 2020 IEA recommendations is provided in **Table 4**.

Table 4: Status of 2020 IEA recommendations

Reference	Recommendation (2020 IEA)	Findings (2021 IEA)	Status
Condition 50	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to nonconforming customers. As part of the modification Veolia should consider a revised condition that requires Veolia to provide further training with offending drivers and remove access authorisation for drivers that are repeat offenders.	1. Veolia had a meeting in August 2021 with DPIE to discuss modifying this condition 2. The DPIE indicated they would consider a modification to this condition if Veolia proposed additional proactive measures, they would implement instead of enforcement of punitive measures 3. An updated trial online driver induction program has been implemented with certain customers 4. Veolia will be regularly sending letters to customers reminding them of the site entry requirements 5. No action was observed that would demonstrate sufficient closure of the non-compliance	Open, evidence of substantial progress was observed



Reference	Recommendation (2020 IEA)	Findings (2021 IEA)	Status
Condition 57	Write to the DPI&E and seek written approval for the monitoring consultant (the Odour Unit) as required under condition 57.	A letter has been sent to the DPIE seeking approval for the Odour Unit as the monitoring consultant. DPIE provided approval for the consultant in a written response.	Addressed and no further action required
Condition 87	Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.	At the time of this IEA a Modification had not yet been lodged. Veolia advised during the audit this Modification will be sent with Request for Modification of Condition 50 and 136. This recommendation will remain for Veolia.	Open, evidence of substantial progress was observed
Condition 113	Develop and implement a process to undertake annual verifications of driver induction training completion. The process could be in the form of annual checks of all drivers against training records provided by the customer.	The auditor observed that Veolia have prepared an online induction (electronic) for tracking driver inductions. This online induction has been rolled out on a trial basis to certain customers. This online induction will be rolled out across all customers at the end of the rial period in 2022.	Open, evidence of substantial progress was observed
Condition 114	Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties.	A modification to outline these obligations under the Safety Interface Agreement had not been lodged at the time of the IEA. This recommendation will remain for Veolia.	Not resolved
Condition 126	Update the emergency response plan to include an annual cost estimate for implementation of the plan.	Section 2.1 of the ERP was observed during the IEA to be updated and included a cost to implement the plan.	Addressed and no further action required
Condition 130	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	During the IEA, the audit observed a letter which was sent to Cumberland Council in December 2020 and followed up in April 2021. The auditor had been advised no response had been received to date. Based on the efforts of Veolia during the IEA period, this matter has been assessed as closed.	Addressed and no further action required
Condition 131	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	As above	Addressed and no further action required



Reference	Recommendation (2020 IEA)	Findings (2021 IEA)	Status
Condition 132	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	As above	Addressed and no further action required
Condition 136	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee that could not be established.	The auditor was supplied meeting minutes from a meeting with the DPIE in August 2021. From the meeting it was concluded the DPIE would consider an amendment to this condition which would remove the requirement for a trust fund (whilst a CCC is not in place). If community interest is regained and a CCC is restarted then the trust fund would be required. At the time of the IEA the condition had not been modified, therefore the 2020	Open, evidence of substantial progress was observed
s4.3.2	A list of interested parties (i.e., stakeholders) contact details should be prepared for the site. At a minimum this should include: § All neighbouring properties; § Relevant local community members; § Respondents to the development consent modifications; and § The Local Councillor. These parties should be invited to any community open day.	An email distribution list of relevant interested parties was observed during the IEA.	Addressed and no further action required
s5.1.2	Remove any reference to Auburn Council across the OEMP and associated sub-plans.	During the IEA it was observed that the OEMP and all supplementary plans have been updated to remove the reference to Auburn Council.	Addressed and no further action required
s5.2	Prepare and implement a formal management review process in accordance with s5.2 of the OEMP.	During the IEA it was observed that the OEMP and supplementary plans had been uploaded to the Veolia Business Management System (BMS). The BMS included a requirement for review of the document. Workflow within the BMS shows status of all documents (e.g. approved, review completed and review scheduled).	Addressed and no further action required
s4.1	Update s4.1 of the Dust Management Plan to remove the requirement for certain adverse weather conditions to trigger a risk assessment. Existing mitigation measures are considered suitable for management of dust risks from the site.	The Air Quality Management Plan (inclusive of the previous dust management plan) was observed during the IEA and mitigation triggers for adverse weather conditions had been removed.	Addressed and no further action required



3.4 DEVELOPMENT CONSENT

Veolia was found to be 98% compliant with the conditions of the DA 205-08-01. Notable observations of compliance included:

- Monitoring (including noise, odour and waste monitoring) required by the conditions of consent were up to date and complete
- Monitoring reports, IEA reports, AEMRs and the OEMP were available on the Veolia website for CTT
- Community engagement had been undertaken
- Key equipment maintenance records were complete
- The required waste records were maintained and up to date
- Stormwater management on the site was undertaken in accordance with the conditions
- Comprehensive training was provided to personnel and drivers

A total of two non-compliances were identified during the IEA, including:

- Condition 50: The TMP was reviewed and largely addressed the consent condition, with the exception of Veolia not having:
 - 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. The TMP only provides for sporadic spot checks of trucks entering or leaving the CTT. The auditor understands a continuous monitoring for non-complying trucks would be impossible for Veolia, as the weighbridge does not have a proper line of site to the intersection with Parramatta Road and the 'legal' right turn from Parramatta Road is utilised by trucks that are associated with the neighbouring industrial tenancies.
 - An enforcement program including the imposition of identified punitive measures
 against any driver or vehicle owner whenever the above restrictions are breached. The
 auditor understands punitive measures would be difficult for a commercial business to
 enforce. Veolia stated at the time of the IEA that they prefer to re-train offending
 parties
- National (rail operator) for all train drivers and other rail staff. This program should emphasise noise mitigation measures through "Good Neighbour" rail techniques and shall form an integral part of the operational noise management plan. During the IEA, a training program developed alongside Pacific National was not observed. The NMP did not include specifications for such a training program. It is understood Pacific National has internal training processes for "Good Neighbour" rail techniques that may be sufficient to address this condition, however it was beyond the scope of this IEA to verify that this is the case.



Recommendations to address the non-compliances and other identified opportunities for improvement have been provided in **Section 4**.

3.5 ENVIRONMENTAL PROTECTION LICENCE

Veolia was found to be 100% compliant with the conditions of the EPL 11763. Notable observations of compliance included:

- No evidence of unauthorised environmental harm was observed during the audit
- Systems to ensure only conformant waste is received and sent to Veolia's Woodlawn facility were observed
- Comprehensive training was provided to personnel and drivers
- The site inspection and maintenance records demonstrated plant and equipment is being maintained in a proper and efficient manner
- The emergency response drills were undertaken in accordance with the EPL
- Monitoring (including noise, odour and waste monitoring) required by the conditions of consent were up to date and complete

No recommendations for improvement were identified.

3.6 OEMP & ASSOCIATED SUB-PLANS

To verify implementation of the draft OEMP and associated sub-plans, the IEA verified conformance with 78 selected requirements within these documents. Veolia was found to be 100% conformant with the audited requirements of the OEMP and associated sub-plans.

Notable observations of conformance included:

- The documented training records are in accordance with the training required in the OEMP and associated sub-plans
- Incident investigation records provided reflect the incident investigation requirements in the OEMP
- The site inspection and maintenance records demonstrated plant and equipment is being maintained in a proper and efficient manner
- On-site waste management on site are undertaken in accordance with the documented waste management plan
- Monitoring records were complete and up to date.

A recommendation to address identified areas for improvement have been provided in Section 4.



3.7 ENVIRONMENTAL PERFORMANCE

Monitoring records were observed for the IEA period and demonstrated a high level of environmental performance across the site. The high-level of environmental performance was further verified during the site inspection.

3.8 COMPLAINTS

No complaints were received during the IEA period.

3.9 INCIDENTS

Two environmental incidents were noted during the IEA period. Both incidents related to hot loads being received from the customers. Both incidents did not result in any off-site environmental harm being caused.

Under Veolia's incident investigation process such incidents are defined as minor and only required a short incident report to be completed. The incident records were observed and deemed to be appropriate for the severity of the incident.



4 RECOMMENDATIONS

4.1 NON-COMPLIANCES

A total of two NCs were identified during the IEA. Recommended actions to the address each of these matters has been provided in **Table 5**. Veolia should consider these recommendations and implement as appropriate or propose alternative actions to address identified NCs.

Table 5: Recommendations to resolve identified NCs

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-NC-01	Development Consent Condition 50	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should propose a revised condition that requires Veolia to provide further training with offending drivers. In addition a modification should propose an alternative to recording any non-complying vehicle as it is unreasonable for
		Veolia to provide constant monitoring of the intersection. The alternative should require Veolia to propose a sample event monitoring program at regular reoccurrences (e.g. attended monitoring for four continuous hours, once every three months to record the number of trucks complying with the "left hand turn" requirements. For non-complying trucks Veolia should be providing additional training to those trucking companies.
CTT-DA-NC-02	Development Consent Condition 114	Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties. Discuss and verify the training provided by Pacific National to its drivers to ensure sufficient to meet the requirements of the condition.

4.2 OPPORTUNITIES FOR IMPROVEMENT

A total of eleven opportunities for improvement were identified during the IEA. These opportunities for improvement have been listed as recommendations in **Table 6**. Veolia should consider and implement these recommendations, as appropriate, to improve the overall environmental performance of the site.

Table 6: Recommendations for opportunities for improvements

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-OFI-01	Development Consent	Provide a copy of the Noise Management Plan to Pacific
CTT-DA-OFI-01	Condition 54	National and Cumberland Council for review and comment.
CTT DA OEL 03	Development Consent	Prepare and lodge a modification to the development consent
CTT-DA-OFI-02	Condition 63	that adjusts the condition to contemporary guideline references.



Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-OFI-03	Development Consent Condition 87	Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.
CTT-DA-OFI-04	Development Consent Condition 113	Implement the online driver induction process across the CTT customer base.
CTT-DA-OFI-05	Development Consent Condition 136	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee.
CTT-MP-OFI-01	OEMP s4.2.2.1	Update the OEMP to have a 2-yearly re-training program for any site-specific environmental training. Remove the requirement to have site-specific training reassessed twice in the first year.
CTT-MP-OFI-02	WMP s4.3	Remove the commitment to identify waste material that is odorous or dusty and prioritise such waste for compaction.
CTT-MP-OFI-03	WMP s4.4.1	Remove the commitment for the weighbridge attendant to have printed material available for provision to drivers.
CTT-MP-OFI-04	WMP s4.4.1.1	Update the section of the WMP to reflect the actual process for measures taken in the event of breaches of waste acceptance criteria, including notifying offending companies.
CTT-MP-OFI-05	NMP s4.2.3	Remove the requirement for Veolia to have any responsibility for assets that are under the operational control of other organisations.
CTT-MP-OFI-06	EMP s2	Update the EMP to include the surface water monitoring program implemented at the CTT.



5 CONCLUSION

This document outlines the method, findings and recommendations of the 2021 IEA undertaken by Epic at the CTT. The IEA was undertaken in accordance with Condition 60 & 61 of the Development Consent (DA 205-08-01). The IEA was conducted to:

- Assess the level of compliance against the conditions of approval
- Assess whether current practices and standards are being implemented
- Evaluation the overall environmental performance of the site
- Assess the adequacy and implementation of management plans
- Identify recommendations for the overall improvement of environmental performance

The IEA was undertaken between 6 December to 13 January 2022 and captured evidence for the period January 2021 to December 2021. The IEA criteria used for the IEA, including the findings of the 2020 IEA, Conditions of DA 205-08-01, Conditions of EPL 11763, the OEMP, and the associated sub-plans. A total of 286 individual requirements / conditions were audited across the IEA criteria, with 89 determined to not be triggered at the time of IEA and two non-compliances. Veolia demonstrated compliance against 99% the IEA criteria.

The key non-compliances identified during the IEA include:

- The TMP did not include all the required content of the development consent
- No specific training program for rail operators to minimise potential noise nuisance was observed

Recommendations to assist Veolia in addressing the findings of this IEA have been provided. All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted, this should be documented and assessed at the subsequent IEA.

Finally, the IEA team would like to thank all of the IEA participants for their time, assistance and cooperation in undertaking this audit.



6 REFERENCES

Department of Planning, Industry and the Environment, 2020, Requirement 2, Independent Audit - Post Approval Requirements, Sydney, New South Wales

Epic Environmental Pty Ltd, 2020, *Clyde 2020 Independent Audit Report - Clyde Waste Transfer Terminal*, Sydney, New South Wales

International Organization for Standardization, 2018, ISO 19011:2018 Guidelines For Auditing Management Systems

Jackson Environment and Planning Pty Ltd, 2019, 2019 Independent Environmental Audit Veolia Environmental Services Australia Clyde Transfer Terminal, Sydney, New South Wales



7 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Veolia Australia and New Zealand Pty Ltd (Client) and for the singular purpose of detailing the findings of the 2021 Independent Environmental Audit of the Clyde Transfer Terminal located in Clyde NSW. All interpretations, finding or recommendations outlined in this report should be read and relied upon only in the context of the report.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report; and
- d. provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report.

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- d. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database or software.

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APPENDIX A – PLANNING SECRETARY IEA TEAM APPROVAL



ENVIRONMENTAL COORDINATOR VEOLIA ENVIRONMENTAL SERVICES (AUS) P/L ALAMEIN U3, 106 CRIMEA ROAD MARSFIELD NSW 2122

Email: anae.ressos@veolia.com

11/11/2021

Attention: Anae Ressos

Clyde Waste Transfer Terminal (DA205-08-01) Independent Audit Team Approval

I refer to your request (DA205-08-01-PA-18) for the Secretary's approval of suitably qualified persons to prepare the Independent Audit for the Clyde Waste Transfer Terminal (DA205-08-01).

The Department of Planning, Industry and Environment (the '**Department**') has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the referenced experts to prepare the Independent Audit.

In accordance with Condition 60 of DA205-08-01, as modified (the '**Consent**') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team from Epic Environmental Pty Ltd:

- · Romin Nejad as lead auditor; and
- Priya Nair as assistant auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request

is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156.

Yours sincerely

Julia Pope

Team Leader Compliance - Metro

Compliance

As nominee of the Planning Secretary



ENVIRONMENTAL COORDINATOR VEOLIA ENVIRONMENTAL SERVICES (AUS) P/L ALAMEIN U3, 106 CRIMEA ROAD MARSFIELD NSW 2122

Email: anae.ressos@veolia.com

12/01/2022

Attention: Anae Ressos

Clyde Waste Transfer Terminal (DA205-08-01) Independent Audit Team Approval

I refer to your request (DA205-08-01-PA-20) for amendment to the Secretary's approval of suitably qualified persons to prepare the Independent Audit for the Clyde Waste Transfer Terminal (DA205-08-01).

The Department of Planning and Environment (the '**Department**') has reviewed the additional nomination and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the referenced experts to prepare the Independent Audit.

In accordance with Condition 60 of DA205-08-01, as modified (the '**Consent**') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team from Epic Environmental Pty Ltd:

- Romin Nejad as lead auditor
- Gary Bagwell; and
- Priya Nair as assistant auditors.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156.

Yours sincerely

Shelley McPhee

Compliance Team Leader

Compliance

As nominee of the Planning Secretary



APPENDIX B – INDEPENDENT AUDITOR DECLARATION FORM



Memo

To: Veolia Australia & New	From: Romin Nejad	Attention: Planning
Zealand		Secretary
Project: Clyde Waste Transfer	erminal – 2021 Independent	Environmental Audit
Project No: SC200058.01	Date: 28 January 2022	
Subject: Independent Audit R	eport Declaration	1

Project Name	Clyde Waste Transfer Station – 2021 Independent Environmental Audit
Consent Number	205-08-01
Description of Project	Waste Transfer Terminal - The terminal is licensed to accept general solid wastes (both putrescible and non-putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to Veolia's Woodlawn Bioreactor.
Project Address	322 Parramatta Road, Clyde, NSW 2124
Proponent	Veolia Australia and New Zealand
Title of Audit	Independent Environmental Audit
Date	28 January 2022

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

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

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information maximum penalty 2 years imprisonment or 200 penalty units, or both)

Suite 4.01, 55 Miller Street, Telephone: 1800 779 363 www.epicenvironmental.com.au

Pyrmont, NSW 2009 Email: enquiries@epicenvironmental.com.au

ABN: 54 169 579 275 ACN: 169 579 275

Subject: Independent Audit Report Declaration

Date: 28 January 2022



Name of Auditor	Romin Nejad
Role in IEA	Lead Auditor
Signature	Mojad
Qualification	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), Gcert Env Mgmt, Gcert Carbon Mgmt, MBA
Company	Epic Environmental Pty Ltd
Company Address	Suite 4.01, Miller Street, Pyrmont, NSW, 2009

Name of Auditor	Gary Bagwell
Role in IEA	Site Inspector
Signature	
Qualification	BEng (Chemical), Grad.Mgmt, LLM (Env)
Company	Epic Environmental Pty Ltd
Company Address	Suite 4.01, Miller Street, Pyrmont, NSW, 2009



APPENDIX C – IEA PLAN







VEOLIA AUSTRALIA AND NEW ZEALAND

2021 INDEPENDENT ENVIRONMENTAL AUDIT PLAN

10 NOVEMBER 2021

CLYDE WASTE TRANSFER TERMINAL

EPIC ENVIRONMENTAL PTY LTD

Suite 4.01, 55 Miller Street, Pyrmont, NSW 2009

Email: enquiries@epicenvironmental.com.au

www.epicenvironmental.com. au

ABN: 54 169 579 275 ACN: 169 579 275



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Project manager:	Priya Nair
Client:	VEOLIA AUSTRALIA AND NEW ZEALAND
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1

1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde, waste transfer terminal (the site). This document provides a detailed IEA plan to guide the execution and reporting of the 2021 IEA. The IEA plan should be reviewed by Veolia and issued to relevant auditees prior to the execution of the IEA.

1.1 PURPOSE

As per Condition 60 of the development consent (DA 205-08-01) for the site, an IEA is required to be undertaken every year to ensure ongoing compliance of environmental obligations at the site. This IEA has been undertaken to address Condition 60 and evaluate compliance with the development consent conditions.

1.2 SCOPE

The IEA scope will include activities undertaken at the site, in relation to the operation of the waste transfer terminal.

1.2.1 IEA PERIOD

The IEA period will be between January 2021 to December 2021 with respect to the IEA criteria. Any activity or evidence that is not within this IEA period will not be included in the scope of the IEA.

1.3 OBJECTIVES

The key objectives of this IEA are to:

- Assess whether the site is operated in compliance with the approval conditions listed under the:
 - Development consent (DA 205-08-01)
 - Environment protection licence (EPL 11763)
- Assess whether the site is being operated in accordance with current practice and standards, including (but not limited to):
 - Waste management
 - Waste-water management and treatment
 - Odour management
 - Stormwater management
 - Noise mitigation
 - Hazardous chemical storage and handling



- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors
- Review the adequacy and implementation of procedures and management plans developed in accordance with the approval conditions
- Provide recommendations for the overall improvement of environmental performance of the site

1.4 IEA CRITERIA

The IEA criteria are the requirements which the site will be assessed against. The IEA criteria for the site will be as follows:

- Findings of the 2020 IEA (Epic 2020)
- Conditions of the DA 205-08-01
- Commitments within the Clyde Waste Transfer Terminal Operational Environmental Management Plan (the OEMP) and the following sub-plans:
 - Environmental monitoring program.
 - Waste management plan.
 - Odour management plan.
 - Dust management plan.
 - Traffic management plan.
 - Vermin and pest control plan.
 - Stormwater management plan.
 - Site contamination management plan.
 - Noise management plan.
 - Incident response plan.
- Conditions of the EPL 11763



2 IEA PLANNING

2.1 IEA TEAM

The IEA team members have been provided in **Table 1**. In accordance with Condition 60 b) of the development consent. A request for approval of the IEA team has recently been submitted with the Director-General.

Table 1: IEA Team

Person	Role	Years' Experience	Qualifications
Romin Nejad	Lead Auditor	17	Lead auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA
Priya Nair	Auditing Assistant	4	BEng (Chem & Env)

2.2 VEOLIA STAFF PARTICIPATION REQUIREMENTS

2.2.1 Veolia Representative

Anae Ressos (Environmental Coordinator) will act as Veolia's representative during the completion of this IEA. Anae will be responsible for organising meeting times, interview attendees and site inspection times.

2.2.2 Opening Meeting

The opening meeting will be held via teleconference. The meeting will be facilitated by Romin Nejad (Epic) and will be attended by Priya Nair (Epic) and select Veolia personnel. Veolia's representative will be responsible for organising suitable time for undertaking the opening meeting.

2.2.3 Interviews

A number of key staff will be required to be interviewed during the IEA. The team members that may interviewed for the IEA will include:

- Site Manager Rod Jones
- Environmental Team Ramona Bachu, Anae Ressos and/or Mary Wong
- Leading Hands Sioi Mataele and/or Sydney Afeaki

Interviews will be held via teleconference. A separate interview session will be scheduled with each interviewee. The Veolia IEA representative will be responsible for organising suitable times for undertaking the IEA interviews.



2.2.4 Site Inspection

Following the IEA interviews, a site inspection will be undertaken by Epic to visually verify compliance of certain conditions. It is understood a Veolia representative will liaise with relevant parties to obtain access and will be available to escort the IEA team inspector around relevant areas of the site.

2.2.5 Closing Meeting

Within a week of the site inspection a closing meeting will be held via teleconference. The meeting will be facilitated by Romin Nejad (Epic) and should be attended by Priya Nair (Epic) and all Veolia interviewees. The Veolia IEA representative will be responsible for organising suitable time for undertaking the closing meeting.

2.3 IEA PROGRAM

The proposed program to execute the IEA will be as detailed in **Table 2**. Should the precise time/dates require amending, these can be accommodated through discussions with the Lead Auditor.

Table 2: Proposed program for the IEA

Proposed Time (NSW Time)	Proposed Task Description		Locations	Who
Pre-IEA Preparation	ons			
17:00	9/11/21	Preparation and provision of IEA Plan to Veolia	Email	Epic
17:00	11/11/21	Provision of management plans required for the IEA	Email	Veolia
09:00 - 17:00	15/11/21	Undertake a preliminary document review	Epic Offices	Epic
09:00 - 17:00	15/11/21	Develop the IEA tools	Epic Offices	Epic
IEA Phase				
11:00 - 11:30	6/12/21	Opening Meeting	Teleconference	All
All day	7/12/21 – 10/12/21	IEA Interviews	Teleconference	Epic & Veolia
09:00 - 16:00	16/12/21	Site inspection	Site	Epic & Veolia
11:00 - 11:30	17/12/21	Closing Meeting	Teleconference	All
IEA Reporting				
17:00	20/12/21	Provision of additional evidence not obtained during the IEA.	Email	Veolia
09:00 – 17:00	21/12/21 – 13/12/21	Prepare the draft IEA report	Epic Offices	Epic
-	24/12/21 – 10/01/22	Christmas Shutdown	-	-
17:00	14/01/22	Issue the draft IEA report to Veolia	Email	Epic
17:00	22/01/22	Veolia provides comments on draft IEA report	Email	Veolia
17:00	29/01/22	Issue the final IEA report to Veolia	Email	Epic

2.4 COMMUNICATIONS PLAN

All communications regarding the planning of the IEA, information requirements and IEA execution will be either by email or phone to the Veolia IEA representative.



3 IEA EXECUTION

The following IEA methodology has been prepared with reference to the *Hazardous Industry Planning Advisory Paper No 5 Hazard IEA Guidelines* (January 2011).

3.1 IEA SCORING CRITERIA

The proposed compliance assessment rating to be used in the IEA are outlined in **Table 3** below.

Table 3: IEA Scoring Criteria

IEA Rating	Abbreviatio	Definition		
	n			
Compliant	С	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied with within the scope of the IEA.		
Non-compliant	NC	The Auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied with within the scope of the IEA.		
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.		

3.2 DEVELOP TOOLS

The following tools will be utilised as part of the IEA program. These tools will assist in defining the scope of the IEA and will capture any issues identified during the IEA and allow discussion of potential recommendations on how these items can be rectified. The tools include:

- Opening meeting agenda and minutes
- Closing meeting agenda and minutes
- IEA checklist and interview questions

3.3 UNDERTAKING THE IEA

3.3.1 Document Review

With regards to the operations undertaken at the site, documentation provided by Veolia prior to the IEA, will be reviewed to determine preliminary findings. These findings will be clarified with the Veolia representatives during the IEA interviews (if required).



3.3.2 Conduct an Opening Meeting

An opening meeting will be conducted at the start of the IEA. The opening meeting will:

- Introduce the IEA team
- Confirm the IEA objectives, scope and criteria
- Confirm communications channels
- Outline the IEA process and schedule
- Identify and set expectations and requirements
- Address Health and Safety requirements and confidentiality

Meeting minutes will be maintained and issued by Epic following the meeting.

3.3.3 Undertake Interviews

IEA interviews will be undertaken by the lead auditor via teleconference. Questions delivered during the IEA interviews will be based on condition or requirements applicable to the interviews area of responsibility. The Veolia representative will be responsible for scheduling the IEA interviews with Veolia personnel.

If any items of non-compliance are identified during the interview they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

3.3.4 Site Inspection

A Veolia representative will be required to accompany the IEA team member on the site inspection. Photographs and measurements (where appropriate) will be taken of items of interest or items requiring corrective action. If any items of non-compliance are identified, they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

3.3.5 Conduct the Closing Meeting

A closing meeting will be conducted with Veolia at the end of the IEA. It will provide an opportunity for Epic to outline positive and negative findings identified during the IEA, Veolia to respond or clarify any findings, and the Epic to confirm the process following the IEA. Meeting minutes will be maintained and issued by Epic following the meeting.



3.3.6 IEA Findings

The findings of the document review and interviews will be assessed and each finding assigned a rating within the IEA checklist. Once complete the IEA checklist will be provided (in excel format) to Veolia for a review and response to each finding. Each Veolia response to a non-compliance must also specify actions and the completion timing (dd/mm/yyyy) of such actions that are to be taken in response to the non-compliance. For each opportunity for improvement Veolia must provide reasons if they propose not to implement any measures or make any changes in response.

3.3.7 Independent IEA Report

Once the findings are assessed, rated and reviewed, an independent IEA report will be prepared. The independent IEA report will include:

- Introduction, including:
 - Background of the site
 - The IEA team
 - The objectives of the IEA
 - The IEA scope
 - The IEA period
- The IEA method, including
 - Development of IEA scope was developed
 - A summary of the IEA process adopted to determine the compliance status and assess
 - A list of the approvals and documents reviewed
 - Details of personnel interviewed including their name and position title
 - Details of site inspections undertaken
 - A summary of the consultation undertaken prior to the IEA
 - Meanings of compliance status descriptors used, as set out in this document
- The IEA findings, including
 - A summary of the assessment of compliance
 - Details of notices, orders, penalty notices or prosecutions issued in relation to the consent during the IEA period
 - Exception reporting of all non-compliances identified during the IEA period
 - A discussion of the status of actions arising from previous IEAs and the progress or outcomes of each action
 - A discussion of whether the OEMP, Sub-plans and compliance documents are adequate and implemented
 - A discussion of other matters considered relevant during the IEA
 - A summary of complaints, and the adequacy of the response to, and management of complaints



- Details of any incidents and the adequacy of the response to, and management of such incidents
- An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment
- Evidence collected through site inspections undertaken during the IEA
- Any continual environmental management improvement opportunities identified as part of the IEA
- Positive observations identified by the Auditor related to environmental management and performance
- Recommendations and opportunities for improvement
- The following appendices:
 - Complete IEA checklist including responses to findings
 - A copy of documentation from the Planning Secretary agreeing to the IEA Team
 - Documentation detailing consultation with the Department, and other agencies or stakeholders
 - Completed and signed Independent IEA Declaration Form
 - Site inspection photographs



4 GENERAL IEA MATTERS

4.1 LOGISTICAL ARRANGEMENTS FOR THE IEA

Transport to and from the site will be organised by Epic. Teleconference arrangements will be organized by the Veolia representative.

4.2 GENERAL IEA MATTERS

The IEA team will have completed any Veolia health and safety inductions prior to undertaking the site inspection. The IEA team will be escorted at all times by a Veolia representative.

In accordance with the site requirements, the following PPE will be worn by the IEA team members:

- Long Pants
- Long sleeve shirt
- Steel cap work boots
- Protective eyewear

4.3 MATTERS RELATED TO CONFIDENTIALITY

All information supplied, sighted and disclosed as part of this IEA will remain confidential. Outcomes of the IEA will be provided to Veolia.

4.4 AUDITORS CODE OF CONDUCT

All certified Auditors have an obligation to improve the standing of their profession by observing the Exemplar Global Code of Conduct (Code). Compliance with the Code is a condition of certification and all Auditors have signed an agreement to comply with the Code and are required to confirm that they have complied with the Code at each period of surveillance and re-certification.

Code of Conduct

- Auditors will act professionally, accurately and in an unbiased manner.
- Auditors will strive to increase the competency and prestige of the profession.
- Auditors will assist those in their employ or under their supervision in developing their professional competency.
- Auditors will not undertake any assignments that they are not competent to perform.
- Auditors will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence their judgment.
- Auditors will not discuss or disclose any information relating to any assignment unless required by law or authorised in writing by the client and/or their employing organization.



- Auditors will not accept any inducement, commission, gift or any other benefit from client organizations, their employees or any interested party or knowingly allow colleagues to do so.
- Auditors will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process.
- Auditors will comply with Exemplar Global Certification Requirements, procedures and advisories which are relevant to their profession or certification.
- Auditors will not act in any way that would prejudice the reputation of Exemplar Global or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code.

4.5 KEY CONTACTS

Table 4: Key Contacts

Name	Company and Position	Phone	Email
Anae Ressos	Veolia Representative	0409 638 436	anae.ressos@veolia.com
Romin Nejad	Epic, Environmental Lead auditor	0403 116 766	rnejad@epicenvironmental.com.au
Priya Nair	Epic, Project Manager and IEA Assistant	0412 851 337	pnair@epicenvironmental.com.au



5 LIMITATIONS AND DISCLAIMER

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- b. used or relied upon by any other party; or
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This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
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6 REFERENCES

NSW Government 2020, *Independent IEA Post Approval Requirements* (Department of Planning, Industry and Environment)

AS/NZS ISO 19011:2019 - Guidelines for IEAing management systems.



The Epic team provides a wide range of skills and experience on numerous environmental management issues, across a wide range of public, commercial and industrial projects. At Epic, we focus on the practical aspects of environmental planning, engineering and science, offering comprehensive services in:

- Strategic advice and project support;
- Contaminated site assessment, management and remediation;
- Asbestos assessment and advisory;
- Naturally Occurring Radiological Material assessment and management;
- Contaminated land IEAing services (QLD –Contaminated Land IEAor; NSW Contaminated Site IEAor);
- Statutory planning and impact assessment covering QLD, NSW and Commonwealth legislation;
- Environmental approvals and permitting full array;
- Ecological (fauna, flora and habitat) site assessments;
- Site suitability assessments;
- Environmental offset assessments and development of management strategies;
- Waste IEAing and management;
- Landfill design and management;
- Compliance and IEAing;
- Erosion sediment control; and
- Hydrogeology.

CONTACT

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APPENDIX D – INDEPENDENT ENVIRONMENTAL AUDIT TABLE



CONFIDENTIAL

IEA Date:

Veolia Australia & New Zealand Clyde Transfer Terminal – 2021 Independent Environmental Audit – Audit Table

Auditor:	Romin Nejad	Mojad	14/02/2022 Date
	(Name)	(Sign)	

Key for Compliance Assessment

6 -17 December 2021

Audit Rating	Rating	Definition
Compliant	С	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or OEMP requirement have been complied/conformed with within the scope of the audit.
Non compliant	NC	The auditor has determined that one or more specific elements of the conditions or OEMP requirements have not been complied/conformed with within the scope of the audit.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

Clyde Transfer Terminal 2021 Independent Environmental Audit Verification of 2020 IEA Findings

Document / Condition Ref	2020 Non-Compliance or Non-Conformance	Recommendations	2020 Audit Result	Verification of Status	2021 Status
50	The TMP was reviewed and addressed the requirements, with the exception of: (e) nenforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached (f) ontracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances. (g) easures 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. The auditor understands punitive measures would be difficult for a commercial business to enforce. Veolia stated they prefer to re-train offending parties. Therefore it is recommended a modification to the consent to remove the requirement to enforce punitive damages.	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should consider a revised condition that requires Veolia to provide further training with offending drivers and remove access authorisation for drivers that are repeat offenders.	NC	1. Veolia had a meeting in August 2021 with DPIE to discuss modifying this condition 2. The DPIE indicated they would consider a modification to this condition if Veolia proposed additional proactive measures they would implement instead of enforcement of punitive measures 3. An updated trial online driver induction program has been implemented with certain customers 4. Veolia will be regularly sending letters to customers reminding them of the site entry requirements 5. No action was observed that would demonstrate sufficient closure of the non-compliance.	Open, evidence of substantial progress was observed
57	All monitoring undertaken at the site is undertaken by personnel or contractors that are suitably qualified. The monitoring records for odour monitoring include detailed method statements that are consistent with Australian Standards (AS/NZS 4392.3:2001). Condition 57(a) also requires the persons undertaking the monitoring are approved by the Director-General. This written approval was unable to be supplied during the audit. It is likely the approval was sought in 2004 and may not have been filed electronically. However due to the monitoring reports being supplied to the department for many years and published online without issue, compliance is inferred.	Write to the DPI&E and seek written approval for the monitoring consultant (the Odour Unit) as required under condition 57.	С	A letter has been sent to the DPIE seeking approval for the Odour Unit as the monitoring consultant. DPIE provided approval for the consultant in a written response.	Addressed and no further action required
87	AEMRs for the audit period were reviewed and demonstrated monitoring was undertaking in accordance with the EPL. It should be noted the EPL does not specify monitoring of the forced ventilation system.	Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.	С	At the time of this IEA a Modification had not yet been lodged. Veolia advised during the audit this Modification will be sent with Request for Modification of Condition 50 and 136. This recommendation will remain for Veolia.	Open, evidence of substantial progress was observed

Clyde Transfer Terminal 2021 Independent Environmental Audit Verification of 2020 IEA Findings

Document / Condition Ref	2020 Non-Compliance or Non-Conformance	Recommendations	2020 Audit Result	Verification of Status	2021 Status
113	An induction program for drivers was observed during the audit. It was advised during the audit this is delivered to the customer via the Site Manager attending the site and delivering a train the trainers presentation. This process has a reliance on the customers being proactive in delivering the training. Records of drivers having completed the training are provided to Veolia for filing. No verification of customers drivers being completed (e.g. spot audit or annual review) was observed during the audit.	Develop and implement a process to undertake annual verifications of driver induction training completion. The process could be in the form of annual checks of all drivers against training records provided by the customer.	С	The auditor observed that Veolia have prepared an online induction (electronic) for tracking driver inductions. This online induction has been rolled out on a trial basis to certain customers. This online induction will be rolled out across all customers at the end of the rial period in 2022.	Open, evidence of substantial progress was observed
114	Whilst the auditor was advised training has been supplied to the rail operator, no training records were available at the time of audit. It is understood Pacific National has internal training processes for "Good Neighbour" rail techniques that may be sufficient to address this condition however it was beyond the scope of this audit to verify this.	Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties.	С	At the time of the IEA the auditor observed a Safety Interface Agreement between Veolia and Pacific National. The Safety Interface Agreement outlines relevant safety aspects and each party's responsibilities in relation to training in the CTT. The safety interface agreement reviewed during the IEA did not include specific requirements around training processes for a "Good Neighbour". A modification to outline these obligations under the Safety Interface Agreement had not been lodged at the time of the IEA. This recommendation will remain for Veolia.	Not resolved
126	The Emergency Response Plan was reviewed as part of the audit and the document addresses the requirements of the condition with the exception of: (c) an estimate of the cost of implementation	Update the emergency response plan to include an annual cost estimate for implementation of the plan.	NC	Section 2.1 of the ERP was observed during the IEA to be updated and included a cost to implement the plan.	Addressed and no further action required
130	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	С	During the IEA, the audit observed a letter which was sent to Cumberland Council in December 2020 and followed up in April 2021. The auditor had been advised no response had been received to date. Based on the efforts of Veolia during the IEA period, this matter has been assessed as closed.	Addressed and no further action required
131	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	С	As above	Addressed and no further action required

Clyde Transfer Terminal 2021 Independent Environmental Audit Verification of 2020 IEA Findings

Document / Condition Ref	2020 Non-Compliance or Non-Conformance	Recommendations	2020 Audit Result	Verification of Status	2021 Status
132	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.	С	As above	Addressed and no further action required
136	The condition requires Veolia to establish and maintain a trust fund to facilitate the functioning of the Community Consultative Committee. During the audit it was determined Veolia had not established such a fund. Whilst it is understood a community consultative committee has not been able to be established, the requirement for payment to a trust fund as required by this condition has not been removed. Therefore Veolia has not demonstrated reasonable compliance with this condition.	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and	NC	The auditor was supplied meeting minutes from a meeting with the DPIE in August 2021. From the meeting it was concluded the DPIE would consider an amendment to this condition which would remove the requirement for a trust fund (whilst a CCC is not in place). If community interest is regained and a CCC is restarted then the trust fund would be required. At the time of the IEA the condition had not been modified, therefore the 2020 IEA finding will remain.	Open, evidence of substantial progress was observed
4.3.2	Veolia demonstrated the systems are available to achieve conformance with the commitments made to DPIE as listed in the OEMP. Despite this, during the site inspection it was noted only 2 stakeholder contact details had been recorded on the site (including Boral and Manildra).	A list of interested parties (i.e., stakeholders) contact details should be prepared for the site. At a minimum this should include: ② All neighbouring properties; ③ Relevant local community members; ③ Respondents to the development consent modifications; and ③ The Local Councillor. These parties should be invited to any community open day.	С	An email distribution list of relevant interested parties was observed during the IEA.	Addressed and no further action required
5.1.2	No exceedance was observed during the audit period. It is noted the OEMP still makes reference to the now superseded Auburn Council.	Remove any reference to Auburn Council across the OEMP and associated sub-plans.	С	During the IEA it was observed that the OEMP and all supplementary plans have been updated to remove the reference to Auburn Council.	Addressed and no further action required
5.2	Various meeting invites for management meetings that include discussion of environmental performance elements was observed. The wording of the OEMP section suggests there is a formal management review that is undertaken on an annual basis focusing on the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. During the audit it was identified there is no such process formally implemented.	Prepare and implement a formal management review process in accordance with s5.2 of the OEMP.	С	During the IEA is was observed that the OEMP and supplementary plans had been uploaded to the Veolia Business Management System (BMS). The BMS included a requirement for review of the document. Workflow within the BMS shows status of all documents (e.g. approved, review completed and review scheduled).	Addressed and no further action required

Clyde Transfer Terminal 2021 Independent Environmental Audit

Document / Condition Ref	2020 Non-Compliance or Non-Conformance	Recommendations	2020 Audit Result	Verification of Status	2021 Status
4.1	interviews demonstrated there is no specific system for assessing adverse meteorological conditions has been established. Site personnel were unsure what would constitute	Update s4.1 of the Dust Management Plan to remove the requirement for certain adverse weather conditions to trigger a risk assessment. Existing mitigation measures are considered suitable for management of dust risks from the site.	С	The Air Quality Management Plan (inclusive of the previous dust management plan) was observed during the IEA and mitigation triggers for adverse weather conditions had been removed.	Addressed and no further action required

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
1	General Conditions Development shall be carried out in accordance with: (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: Noise Mitigation Details provided to the EPA by Vipac Engineers & Scientists Ltd by facsimile dated 15 February 2002; Stormwater Outlet Design, dated 18 February 2002, provided to the Department by Maunsell Australia Pty Ltd; Information on traffic, odour and noise, dated 9 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; Information on the construction EMP, stormwater drainage, site contamination, landscaping and rehabilitation of Duck River, and the property boundary, dated 10 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; Information on odour management, Duck River cycleway, and traffic management, dated 10 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; Information on the property boundary, dated 17 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; Information on modifications to pipeline, pipe outlet, scour protection works, detention basin, weighbridge and noise barrier, dated 19 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; Information on a proposed community consultative committee and possible community enhancement projects, dated 4 June 2002, provided to the Department by the Applicant; Information on Parramatta Road plans and odour control procedure, dated 12 June 2002, provided to the Department by Maunsell Australia Pty Ltd; Information on Parramatta Road plans and odour control procedure, dated 12 June 2	C	1. The findings of this IEA	The auditor did not identify any major issues that would indicate non-compliance with this condition.	Identification
2	(i) modification application DA-05-08-01-MOD-5 and accompanying Environmental Assessment prepared by SG Haddad Advisory and CM Stateoic Plannian Sentings and dated 30 March 2017. In the event of any inconsistency between; (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	NT	N/A	This is a note only not auditable	
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.	С	Letter between DPIE and Veolia Evidence of submission of the OEMP	During the IEA the auditor observed correspondence between the DPIE and Veolia regarding the requirement to align the IEA scope with the approved OEMP and subplans. The IEA observed evidence that Veolia was complying with the request through resubmission of the updated OEMP and sub-plans.	
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	С	Letter between DPIE and Veolia Evidence of submission of the OEMP	Evidence of updated OEMP and sub-plans being provided to the DPIE was observed during the IEA.	
	Compliance				
3	It shall be the ultimate responsibility of the Applicant to ensure compliance with these conditions	С	The findings of this IEA	The auditor did not identify any major issues that would indicate non-compliance with this condition.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
4	The conditions do not relieve the Applicant of the obligation to obtain all other approvals and licenses from all relevant authorities required under any other Act.	NT	N/A	This is a note only not auditable	
5	The Applicant shall comply or ensure compliance with all the requirements of the Director-General in respect of the implementation of any measures arising from these Conditions.	С	1. The findings of this IEA	The auditor did not identify any major issues that would indicate non-compliance with this condition.	
6	The Applicant must bring to the attention of the Director-General any matter that may require further investigation, or the issuing of instructions from the Director-General, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by the Director-General to enable compliance with these Conditions.	NT	N/A	Veolia advised there have been no issues identified by the Director General during the IEA period. The auditor was unable to be verify this during the IEA and therefore this is NT.	
	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 Director-General 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.	С	Odour reports Noise monitoring data AEMR	Based on a review of monitoring results no exceedances were identified during the IEA period.	
	Waste Volumes				
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.	C	1. Waste Records 2021	It was confirmed during the IEA all waste received on the site is transported to Woodlawn. The exception to this is small quantities of non-conforming waste (gas bottles or large steel) which is sent to other facilities.	
9	Condition was deleted - Mod 4				
10	The Proponent must ensure that no more than 600,000 tonnes per annum of waste is received at the development in any calendar year.	С	Annual Environmental Management Report - Clyde Transfer Terminal 2020 - 2021	Waste records for the IEA period were observed during the IEA and confirmed 438,258 tonnes of waste was processed through CTT.	
10A	The Proponent must ensure that no more than 500 tonnes of waste is present on the terminal floor at any one time, except under the limited circumstances detailed in the Operational Contingency Management Plan for the development, required by condition 54A and approved by the Development Secretary.	С	1. Site inspection	At the time of inspection less than 500 T was observed on the terminal floor. Site personnel interviewed stated the terminal building was cleared of waste at the end of each day. Video evidence observed during the site inspection demonstrated the waste floor is cleared at the end of each day.	
	Fit and Proper Person				
11	The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s.83 of that Act.	С	Environment Protection Licence (EPL)	The EPA has issued an EPL thereby deeming the Licensee a fit and proper person to hold a licence. No regulatory action were noted in the reporting period.	
	Obligation to Prevent and Minimise Harm to the Environment				
12	The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	C	I. Inspection forms completed and online system (Sphera).	A during the IEA site inspection no apparent unauthorised environmental harm was observed. Furthermore records for the weekly and half yearly inspection undertaken by Veolia's personnel were observed during the IEA and included the sufficient checks for actual/potential environmental harm.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
13	If at any time the Director-General 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 Director-General may request the Applicant to cease the activities causing the impact.	С	Observed the incident management system	No regulatory actions were noted during the IEA period. Veolia stated that no issues have been identified by the Director-General during the IEA period (however this was unable to be verified during the IEA). The online incident system (Sphere) was reviewed during the IEA and two minor incidents occurred that did not result in environmental harm were also noted.	
14	The Applicant may recommence the activities that were ceased, upon written advice by the Director-General that those concerns have been satisfactorily addressed.	NT	N/A	Condition was not triggered within the IEA period.	
	Date of Commencement				
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 Director-General before commencement of the development.	NT	N/A	Condition was not triggered within the IEA period.	
	Pre-Construction Compliance Report				
16	At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General 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: (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	NT	N/A	Condition was not triggered within the IEA period.	
	Pre-Operation Compliance Report				
17	At least one month prior to the receipt of containerised waste at the premises (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities. The report shall include, but not necessarily be limited to: (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	NT	N/A	Condition was not triggered within the IEA period.	
	Dispute Resolution				
18	The Applicant shall endeavour to resolve any dispute arising out of the implementation of these Conditions.	NT	N/A	Condition was not triggered within the IEA period.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 Director-General for resolution and, if not resolved, to the Minister. The Minister's determination of the disagreement shall be final and binding on all parties.	NT	N/A	Condition was not triggered within the IEA period.	
	Monitoring Records				
20	The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the Protection of the Environment Operations Act 1997, in relation to the development, must be recorded and retained as specified in this Consent.	С	Odour Audit XXXVII Annual Truck Noise Measurements Report 15	All monitoring records were observed to be maintained on Veolia's internal drive and were observed for 2020 - 2021.	
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.	С	1. Veolia CTT website 2. 2017 IEA 3. 2017 Odour Audit.	All data from 2017 was available on Veolia's internal drives and observed during the IEA.	
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.	С	Odour Audit XXXVII Annual Truck Noise Measurements Report 15	Odour monitoring and truck noise measurement reports reviewed during the IEA included the required records.	
	GENERAL ENVIRONMENTAL MANAGEMENT Site Contamination				
23	The applicant shall obtain an environmental report prepared by a site auditor accredited under the Contaminated Land Management Act 1997 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 offsite personnel.	NT	N/A	Condition was not triggered within the IEA period.	
24	Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.	NT	N/A	Condition was not triggered within the IEA period.	
	Environmental Management Plan (EMP) (Construction Stage)				
25	The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.	NT	N/A	Condition was not triggered within the IEA period.	
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.	NT	N/A	Condition was not triggered within the IEA period.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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.	NT	N/A	Condition was not triggered within the IEA period.	
27	The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
28	The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
29	The EMP (Construction Stage) shall be made publicly available.	NT	N/A	Condition was not triggered within the IEA period.	
	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	NT	N/A	Condition was not triggered within the IEA period.	
31	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).	NT	N/A	Condition was not triggered within the IEA period.	
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).	NT	N/A	Condition was not triggered within the IEA period.	
33	The Soil and Water Management Plan (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 Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).	NT	N/A	Condition was not triggered within the IEA period.	
34	The Construction Noise Management Plan 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.	NT	N/A	Condition was not triggered within the IEA period.	
35	The Dust Management Plan 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.	NT	N/A	Condition was not triggered within the IEA period.	
36	The Construction Waste Management Plan 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.	NT	N/A	Condition was not triggered within the IEA period.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
37	The Site Contamination Management Plan 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.	NT	N/A	Condition was not triggered within the IEA period.	
38	The Landscaping Plan 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.	NT	N/A	Condition was not triggered within the IEA period.	
	Environmental Management Plan (EMP) (Operation Stage)				
39	The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.	С	Operational Environmental Management Plan for Clyde Transfer Terminal (OEMP) - 2021	Previous OEMP (2010) still the current one as the DPIE has not approved the 2021 OEMP. Comments received from the DPIE on the 2021 version were observed during the IEA and had been addressed by Veolia.	
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.	С	1. OEMP - 2021	The 2021 OEMP was reviewed as part of the IEA, the auditor did not identify any inconsistencies with the Conditions of this Consent, relevant Acts and Regulations and accepted best practice management procedures.	
41	The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans: (a) Waste Management Plan (b) Odour Management Plan (c) Dust Management Plan (d) Traffic Management Plan (e) Vermin and Pest Control Plan (f) Stormwater Management Plan (g) Site Contamination Management Plan (h) Incident Response Plan (i) Noise Management Plan (j) Operational Contingency Management Plan	С	1. OEMP - 2021 2. OEMP Sub-Plans - 2021	The scope of the 2021 OEMP and item sub-plans covered the required content listed in this condition.	
42	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).	С	1. OEMP - 2021 2. OEMP Sub-Plans - 2021	The 2021 OEMP addresses the relevant elements in Attachment 1 of the consent.	
43	The Applicant must not accept any uncontainerised waste at the premises until the EMP (Operation Stage) has been approved by the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
44	The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Director-General.	NT	N/A	This IEA included a review of the 2021 OEMP and its sub-plans to certify the documents are in accordance with the consent.	

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Condition Re	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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).	С		Training records for inducted staff members were provided and reviewed and demonstrated a robust training process at Veolia.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
46	The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	С	1. Veolia CTT website	The OEMP (2010) was observed to be available on the Veolia website.	
47	The Waste Management Plan must address, but is not necessarily limited to, the following issues: (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.	С	1. Waste Management Plan (WMP) - 2021	The WMP was reviewed and addressed the requirements of the consent.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
48	The Odour Management Plan must address, but is not necessarily limited to, the following issues: (a) Procedures for the management of waste at the premises at all times to minimise the generation of odours. (b) Protocols for the operation of the odour control mechanisms for the terminal building, including the forced air extraction and odour filtration system, to minimise the risk of any adverse impact on surrounding commercial and residential areas. (c) Procedures for the maintenance and repair of the forced air extraction and odour filtration system on the terminal building, including the replacement of the dust filters and odour adsorption material (d) Criteria to be utilised to determine when the replacement of dust filters and odour adsorption material for the terminal building is to be carried out. (e) An emission monitoring program designed to determine the odour generation rates from the waste in the terminal building and to establish the capture and removal efficiency of the forced air extraction and odour filtration system and appropriate equipment maintenance schedules for replacement of dust filters and odour adsorption material. 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 with and without each component of the forced air extraction and odour filtration system in operation. (f) 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, and 6-monthly thereafter, unless otherwise approved in writing by the Director-General. (g) 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 i	C	1. Air Quality Management Plan (AQMP) - 2021	The revised OEMP sub-plans have combined the odour and dust management plan (Condition 48 and 49, respectively) into a single management titled the AQMP. The AQMP reviewed during the IEA, addressed the requirements of this condition.	
49	The Dust Management Plan shall include but not necessarily limited to, control strategies to achieve compliance with any dust emission limits in this consent and any applicable environment protection license. 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 Statement of Environmental Effects Modification to the Termination Building Forced Ventilation System Clyde Waste Transfer Station (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	С	1. AQMP - 2021	The revised OEMP sub-plans have combined the odour and dust management plan (Condition 48 and 49, respectively) into a single management titled the AQMP. The AQMP reviewed during the IEA, addressed the requirements of this condition.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
50	The Traffic Management Plan must address, but is not necessarily limited to, the following issues: (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.	NC	1. Traffic Management Plan (TMP) - TMP	The TMP was reviewed during the IEA and addressed the condition, with the exception of: (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. (e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached. In terms of (b) the TMP only provides for sporadic spot checks of trucks entering or leaving the CTT. The auditor understands from the site inspection, a continuous monitoring for non-complying trucks would be impossible for Veolia, as the weighbridge does not have a proper line of site to the intersection with Parramatta Road and the 'legal' right turn from Parramatta Road is utilised by trucks that are associated with the neighbouring industrial tenancies. Furthermore, it is understood that Rawsons Road is being closed by the owner and this will increase the number of trucks going into the CTT access road from Parramatta Road. In terms of (e) the auditor understands punitive measures would be difficult for a commercial business to enforce. Veolia stated they prefer to re-train offending parties. Therefore it is recommended a modification to the consent to remove the requirement to enforce punitive damages.	CTT-DA-NC-01
51	The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues: (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.	c	1. Vermin and Pest Control Plan (VPCP) - 2021	The VPCP was reviewed as part of the IEA and addressed the requirements of the condition.	
52	The Stormwater Management Plan 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.	С	1. Stormwater Management Plan (SMP) - 2021	The SMP was reviewed as part of the IEA and addressed the requirements of the condition.	
53	The Site Contamination Management Plan must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	С	Site Contamination Management Plan (SCMP) - 2021	The SCMP was reviewed as part of the IEA and addressed the requirements of the condition.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
54	The Noise Management Plan 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: 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.	С	Noise Management Plan (NMP) - 2021	The condition requires the NMP to be developed in consultation with the rail operator and the Council. The 2010 NMP was reviewed and provided to the Council and rail operator in 2010. No evidence of the draft NMP being provided to Pacific National or Cumberland Council was observed during the IEA. The NMP was reviewed as part of the IEA and addressed the requirements of the condition.	CTT-DA-OFI-01
54A	Prior to the commencement of expanded operations under DA No. 205-08-01 MOD 5, the Proponent must prepare an Operational Contingency Management Plan (OCMP) to the satisfaction of the Planning Secretary. The OCMP must form part of the EMP (Operation) required by condition 41. The OCMP must: (a) be prepared by a suitably qualified and experience person(s); (b) be prepared in consultation with the EPA; (c) detail the exception circumstances when the amount of waste in the terminal building would exceed 500 tonnes at any one time (d) describe the measures in place to minimise the number of instances of these exceedances; (e) identify all potential impacts arising from these instances; (f) characterise these impacts, such as effects, duration, receptors, level of impact; (g) detail appropriate mitigation measures; (h) describe the monitoring of potential environmental impacts during exceptional circumstances; and (i) describe reporting to the appropriate regulatory authorities	C	WMP - 2021 Business Continuity Plan	The operational contingency management plan were incorporated into the WMP (s4.5.5) and the business continuity plan addressed the requirements of this condition.	
548	The Proponent must (a) not commence expanded operations until the OCMP required by condition 54A is approved by the Planning Secretary; and (b) implement the most recent version of the OCMP approved by the Planning Secretary for the duration of the development.	С	1. WMP - 2021	The WMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation during the audit.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
	Environmental Management Representative (EMR)				
55	The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall: (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	c	DPIE approval of EMR dated 21/12/18 & Position Description for the Operations Project Manage	DPIE approval for the nominated EMR was provided in 2018. The Position Description for the Operations Project Manager (nominated as EMR) includes these responsibilities.	
	Environmental Monitoring Program				
56	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: (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 Director-General and other relevant authorities (e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.	c	Environmental Monitoring Program (EMP) - 2021 WIS-8466-CTT - Exceedances Notification Work Instruction	The EMP was reviewed and it address the requirements of the condition. The Work Instruction is applied where an exceedance is identified.	
57	All monitoring required by this Consent must be: (a) conducted by suitably qualified persons approved by the Director-General (b) conducted in accordance with established standards and protocols (c) reported annually in the Annual Environmental Management Report.	c	1. Odour Audits (2020 - 2021) 2. AEMR (2020 - 2021) 3. Approval Letter from the Director-General (dated xxx)	All monitoring undertaken at the site is undertaken by personnel or contractors that are suitably qualified. The monitoring records for odour monitoring include detailed method statements that are consistent with Australian Standards (AS/NZS 4392.3:2001). Condition 57(a) also requires the persons undertaking the monitoring are approved by the Director-General. This written approval was provided during the IEA.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 measures of the development (c) identify any emerging trends in the data over the life of the development (d) include a copy of the detailed monitoring results as an attachment.	C	1. AEMR (2020 - 2021)	The AEMR was reviewed during the IEA and was determined to address the requirement of the condition	
	Annual Environmental Management Report				
59	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 Director-General, 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. The report must: (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.	c	1. AEMR (2020 - 2021)	The AEMR was reviewed during the IEA and was determined to address the requirement of the condition	
	Independent Environmental Audits				
	Every year following the date of this consent, or at periods otherwise agreed to by the Director-General, and until such time as agreed to by the Director-General, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall: (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 Director-General; (b)Be conducted by a suitably qualified independent person approved by the Director-General; (c)Besses compliance with the requirements of this consent; (d)Besses 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.	C	1. 2020 IEA (Epic Environmental)	The 2020 IEA prepared by Epic Environmental was reviewed as part of the IEA and addressed the requirements of this condition.	
	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 Director-General	С	1. Veolia CTT website	Monitoring records were available online at the time of audit.	
	WASTE MANAGEMENT Waste Receipt and Removal				
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.	С	IEA of the EPL	No evidence of non-compliance with this condition was observed during the IEA.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 Protection of the Environment Operations Act 1997 or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999).	C	Site Inspection Records for incoming waste	All the waste is brought under a contract. The weighbridge checks the waste type from the contractor. At the tipping floor, terminal personnel check waste is conformant. The site inspection demonstrated there were sufficient facilities available at the site to remove and dispose of non-conforming waste. It is noted the condition references guidelines that are redundant (i.e. Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999)). This is because Schedule 1 of the Protection of the Environment Operations Act 1997 has pre-classified general solid waste.	CTT-DA-OFI-02
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.	С	Site Inspection Records for outgoing waste	No evidence of non-compliance with this condition was observed during the site inspection or the records reviewed	
65	The Applicant shall implement the approved Waste Management Plan to the satisfaction of the Director-General.	С	1. WMP - 2021	The WMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
	Asbestos Waste				
66	The Applicant will not accept asbestos at the premises. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premises and for the proper and safe disposal of any asbestos so identified.	C	Site inspection, Training records (asbestos training)	Training records were observed that demonstrated the site manager and leading hands were trained in asbestos identification. Posters noted during the site inspection showed there was communication to personnel to assist with the identification of asbestos.	
	Waste Management and Record Keeping				

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 pre-packaged shipping containers or for onsite containerisation.	c	Waste records for incoming waste Site Inspection	The weighbridge system observed during the site inspection enabled the required records to be inputted into the system. Waste records for incoming waste were observed during the IEA and demonstrated these records were maintained for each load.	
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.	С	Waste records for outgoing waste Site Inspection	The weighbridge system observed during the site inspection enabled the required records to be inputted into the system. Waste records for outgoing waste were observed during the IEA and demonstrated these records were maintained for each load.	
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.	С	Waste records for outgoing waste	Records of non-compliant waste received at CTT and transported off-site were observed. This included gas bottles and steel waste.	
	ODOUR MANAGEMENT				
70	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 Addendum to Final Report — Odour Mitigation Study — Clyde Waste Transfer Terminal — Collex Pty Ltd prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 tilted Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layout Details 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; Minimum Stack Height (meters above existing ground level) Minimum Stack Height above the top of the roof (meters) Minimum Stack Diameter (meters) 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 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 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 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)	NT	N/A	Condition was not triggered within the IEA period.	
71	Construction of the Terminal Building force 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.	NT	N/A	Condition was not triggered within the IEA period.	
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.	NT	N/A	Condition was not triggered within the IEA period.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
73	The Applicant shall implement the approved Odour Management Plan to the satisfaction of the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
74	The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the Protection of the Environment Operations Act 1997.	С	Site inspection Complaint records Weekly inspection records	No noticeable odour was noted outside of the terminal building at the time of the site inspection. The weekly inspection included an item for checking noticeable odour. No odour complaints have been received for the CTT during the IEA period. Complaints are recorded on hardcopy and then transferred to REVO. During the site inspection no discernible odour was noted at the following locations: 1. at Parramatta Road driveway entrance (north, upwind), 2. Berry St near Clyde station (west/ crosswind) or 3. neighbouring Clyde Railway Stabling yard, 144 Marsden Rd, Auburn (south, downwind).	
75	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 mitigation any off-site impacts that may be anticipated or identified from such investigations	C	Hardcopy maintenance records for forced ventilation system	Maintenance records of the forced ventilation system were observed and demonstrated the system is functioning (undertaken by Independent Air Flow Services). During the site inspection it appeared the forced ventilation system was operational.	
76	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 Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA, January 2007); and (b) odour dispersion modelling for the stack odour discharge conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, August 2005) and the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW (EPA, November 2006).	NT	N/A	Condition was not triggered within the IEA period.	
77	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.	NT	N/A	Condition was not triggered within the IEA period.	
78	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.	NT	N/A	Condition was not triggered within the IEA period.	
79	The results of any odour performance testing conducted in accordance with the conditions of this Consent may be submitted to the Director-General together with a proposal to vary the continuous operation of the forced air extraction and odour filtration system. The proposal must be prepared in consultation with the Community Consultative Committee and the EPA. Any variation to the continuous operation of the forced air extraction and odour filtration system must not be carried out except with the written approval of the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
80	All odour monitoring and management plans shall be made available to the public on request to the Applicant.	С	1. Veolia CTT website	All odour monitoring records were observed to be published online.	
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.	С	1 Site inspection	All waste containers observed during the site inspection were sealed and the pressure release was observed to be directed via a filtration system. Maintenance tags for selected containers observed during the site inspection appeared to be up to date.	
X /	The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Director-General prior to the acceptance of any uncontainerised waste at the premises.	NT	N/A	Condition was not triggered within the IEA period.	
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.	С	1. Site inspection	All waste containers observed during the site inspection were sealed and the pressure release was observed to be directed via a filtration system. Maintenance tags for selected containers observed during the site inspection appeared to be up to date.	
84	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
85	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	_
86	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
87	The Applicant shall carry out monitoring the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be required under any Environment Protection License. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.	С	1. Clyde Waste Transfer Terminal Odour Audit (XXXVI & XXXVII) 2. AEMR 2020 - 2021	AEMR for the IEA period was reviewed and demonstrated monitoring was undertaking in accordance with the EPL. It should be noted the EPL does not specify monitoring of the forced ventilation system. Maintenance records (prepared by Independent Air Flow Services in December 2021) were observed for the ventilation system.	CTT-DA-OFI-03

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
88	Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with: (a) any methodology which is required by or under the Protection of the Environment Operations Act 1997 to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997, 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 Protection of the Environment Operations Act 1997 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.		Odour Audit (XXXVI & XXXVII)	Discussions with the odour monitoring consultant (The Odour Unit) have confirmed the methods adopted for ambient odour monitoring are consistent with the methods EPA utilises for its monitoring.	
89	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
90	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 License.	NT	N/A	Condition has been removed.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
	A meteorological station must be sited and operated at the premises in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. 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.				
91	Parameter Units of measure Averaging Period Method* Frequency Wind Speed @ 10 m m/s 1 hour AM-2 & AM-4 Continuous Wind Speed @ 10 m " 1 hour AM-2 & AM-4 Continuous Sigma Theta @ 10 m " 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 With* 1 hour AM-4 Continuous Rainfall mm 24 hours AM-4 Continuous Rainfall mm 24 hours AM-4 Continuous Evoporation mm 24 hours AM-4 Continuous Method* Sign Additional Requirements Method* Meth	c	Meteorological station data	Observed the meteorological station and the data required was included in the monitoring report.	
	Note: 2 Method approved by the EPA in writing.				
92	DUST MANAGEMENT The Applicant shall implement the Dust Management Plan (Construction Stage) and the approved Dust Management Plan (Operation Stage) to the satisfaction of the Director-General.	С	1. AQMP - 2021	The AQMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
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.	С	1. Site inspection	No evidence of dust generating activities occurring at CTT were observed during the site inspection.	
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.	C	1. Site inspection	The site was in a clean condition during the site inspection. Weekly and monthly inspection records included the inspection of litter. A street sweeper was available at the time of inspection for daily sweeps of the site.	
95	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading. (EPA)	C	Site inspection Driver induction	No trucks were observed entering or exiting the site with their tailgate open. CCTV footage for the previous week was also viewed during the site inspection and no evidence of non-compliance with this condition was observed. It was also observed the truck driver induction includes a requirement to keep the tail gate closed when entering or leaving the site.	
96	The Applicant must prepare and implement an Ambient Air Quality Monitoring Plan. 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.	C	1. EMP - 2021 2. AQMP - 2021	The monitoring programs that address this condition are described within: - AQMP - EMP	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
97	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.	
98	AIR MONITORING 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.	С	Odour Audit XXXVI	Operating conditions in the terminal building at the time of monitoring are documented within the odour audit report.	
	WATER MANAGEMENT			documented within the ododr dddt report.	
99	Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation of the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with and in connection with the carrying out of the development.	С	1. Site Inspection 2. SMP - 2021	No evidence of potential stormwater contamination was observed during the site inspection. The documented SMP was reflected and adequately implemented during the audit.	
100	Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	С	1. Site Inspection 2. SMP - 2021	All leachate waste observed to be directed to a leachate collection system which was taken off-site as liquid waste (observed in the outgoing waste records).	
101	The approved Soil and Water Management Plan must be implemented prior to and for the duration of the construction stage of the development.	NT	N/A	Condition was not triggered within the IEA period.	
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 Managing Urban Stormwater: Council Handbook (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table: Development component Minimum level of stormwater treatment	С	1. Site Inspection 2. SMP - 2021	The SMP reviewed during the IEA addressed this condition. The site inspection was consistent with the SMP.	
	SITE CONTAMINATION				
103	The Site Contamination Management Plan must be implemented to the satisfaction of the Director-General, prior to and for the duration of the development	С	1. SCMP - 2021	The SCMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
	NOISE MANAGEMENT				
104	The Applicant shall implement the approved Construction Noise Management Plan, to the satisfaction of the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
105	The Applicant shall implement the Noise Management Plan, to the satisfaction of the Director-General.	С	1. NMP - 2021	The NMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
106	All construction work at the premises that creates audible noise at residential premises must 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 environment protection licence.	NT	N/A	Condition was not triggered within the IEA period.	
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.	NT	N/A	Condition was not triggered within the IEA period.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
108	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.	
109	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.	
110	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.	
111	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.	
112	The Applicant shall implement a Heavy Vehicle Noise Monitoring Management Program for the development to the satisfaction of the Planning Secretary. This program must; (a) monitor heavy vehicle noise on 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 a 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	c	1. EMP - 2021 2. Annual Truck Noise Measurements (Report 14 & 15)	The EMP for the site includes an annual noise monitoring program and noise limits for heavy vehicles. The Annual Truck Noise Measurements Clyde Transfer Terminal was reviewed and addressed the requirements of this condition.	
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.	C	Online induction program Training records	The auditor observed during the IEA, that Veolia had rolled out a trial online driver induction program with certain customers. This online program was intended to be rolled out to all customers later in the year. The online induction program provides the ability for Veolia to have up to date training records from its customers. At the time of IEA, the auditor observed records of drivers having completed training being maintained by Veolia.	CTT-DA-OFI-04

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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.	NC	1. Email from Veolia to Pacific National 2. Safety Interface Agreement	The condition requires Veolia to implement an induction program with Pacific National (rail operator) for all train drivers and other rail staff. This program should emphasise noise mitigation measures through "Good Neighbour" rail techniques and shall form an integral part of the operational noise management plan. During the IEA no training program developed with Pacific National was observed. The NMP did not include specifications for such a training program. It is understood Pacific National has internal training processes for "Good Neighbour" rail techniques that may be sufficient to address this condition, however it was beyond the scope of this IEA to verify this. During the IEA, the auditor observed record of an email from Veolia to Pacific National requesting training evidence being supplied. To date no response has been received by Veolia. At the time of the IEA the auditor observed a Safety Interface Agreement between Veolia and Pacific National. The Safety Interface Agreement outlines relevant safety aspects and each party's responsibilities in relation to training. The safety interface agreement reviewed during the IEA did not include specific requirements around training processes for a "Good Neighbour" or noise mitigation.	CTT-DA-NC-02
	VERMIN AND PEST MANAGEMENT				
115	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: (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.	NT	N/A	Condition was not triggered within the IEA period.	
116	The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	С	1. VPCP-2021	The VPCP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
117	The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests. **TRAFFIC MANAGEMENT**	C	Pest contractor inspection records VPCP - 2021	All reasonable and practical measures for preventing the attraction of vermin and pests was observed during the IEA.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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	С	1. Site Inspection	During the site inspection it was observed all vehicles were entering and exiting via the sealed access road from Parramatta Road. This requirement was also reflected in the site induction and traffic management plan.	
119	No vehicle is permitted to turn right into the site off Parramatta Road until the intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS).	С	1. Site Inspection	During the site inspection no vehicles were observed to be turning right into the site off Parramatta Road. This requirement was also reflected in the site induction and traffic management plan. It is noted however through discussions with Veolia, the upgrades to the intersection (e.g. traffic lights) proposed under this condition may cause greater traffic impacts due to the number of vehicles that turn right at the intersection to access neighbouring proprieties	
119A	Prior to the commencement of construction of the intersection upgrade works, the design of the intersection must be prepared in consultation with and to the satisfaction of Cumberland Council and RMS. The intersection design must accommodate the largest vehicle associated with the development as follows: (a) turning right into the development from Parramatta Road (e.g. 12.5 metre rigid waste trucks); (b) turning left into the development from Parramatta Road (e.g. semi trailers); and (c) turning left out of the development onto Parramatta Road (e.g. semi trailers).	NT	N/A	Condition was not triggered within the IEA period.	
119B	All intersection works must be to the full cost of the Proponent and at no cost to RMS or Cumberland Council	NT	N/A	Condition was not triggered within the IEA period.	
119C	The intersection upgrade works along Parramatta Road/private access road must be designed to meet RMS requirements, and endorsed by a suitable qualified practitioner. The design requirements must be in accordance with AUSTROADS and other Australian Codes of Practice. The certified copies of the civil design plans must be submitted to RMS for consideration and approval prior to the release of the Construction Certificate by the Principle Certifying Authority and commencement of road works	NT	N/A	Condition was not triggered within the IEA period.	
119D	The Proponent is required to enter into a Work Authorisation Deed (WAD) for the intersection works.	NT	N/A	Condition was not triggered within the IEA period.	
119E	Within 6 months of commencement of right-turn movements into the site, a road safety audit (RSA) must be undertaken for the intersection of Parramatta Road and the private access road by a suitably qualified, independent professional. The results of the RSA, including a program for the implementation of any audit recommendations, must be submitted to Cumberland Council and RMS for consideration and review within 60 days of completion of the audit.	NT	N/A	Condition was not triggered within the IEA period.	
120	No vehicle exiting the development shall turn right onto Parramatta Road.	С	1. Site Inspection	During the site inspection no vehicles were observed to be turning right from the site off Parramatta Road.	
121	The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	C	1. TMP - 2021	The TMP formed part of the scope of the IEA and Veolia demonstrated sufficient level of implementation.	
122	Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Director-General, 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.	NT	N/A	Condition was not triggered within the IEA period.	
123	Deleted Condition (DA-205-08-01-MOD-5)	NT	N/A	Condition has been removed.	
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 Director-General 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.	NT	N/A	Condition was not triggered within the IEA period.	
	EMERGENCY MANAGEMENT				
	Emergency Management Plan				

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
	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.	С	1. Emergency Response Plan (ERP) - 2021	The ERP includes an identification of the events that could result in a significant pollution event.	
126	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: (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.	c	1. ERP - 2021	The ERP was reviewed as part of the IEA and the document addresses the requirements of the condition.	
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.	NT	N/A	Condition has been removed.	
	LANDSCAPING				
128	The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Director- General.	NT	N/A	Condition was not triggered within the IEA period.	
	DEVELOPMENT SETBACK				
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 multipurpose recreation path.	NT	N/A	Condition was not triggered within the IEA period.	
	RIPARIAN RESTORATION				
	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.	С	1. Email to Cumberland Council	During the IEA an email from Veolia to the Cumberland Council was observed. This email invited Cumberland Council to collaborate on the Duck River riparian management. No interest on collaboration has been expressed to date.	
	DUCK RIVER ACCESSWAY				
131	The Applicant shall facilitate as appropriate and as required by the Director-General, 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.	С	1. Email to Cumberland Council	During the IEA an email from Veolia to the Cumberland Council was observed. This email invited Cumberland Council to collaborate on the Duck River riparian management. No interest on collaboration has been expressed to date.	
	LAND DEDICATION				
132	The Applicant shall facilitate as appropriate and as required by the Director-General 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.	С	1. Email to Cumberland Council	During the IEA an email from Veolia to the Cumberland Council was observed. This email invited Cumberland Council to collaborate on the Duck River riparian management. No interest on collaboration has been expressed to date.	
	HERITAGE				

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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.	NT	N/A	Condition was not triggered within the IEA period.	
	COMMUNITY LIASON				
	Community Consultative Committee				
134	The Proponent must make all reasonable attempts to establish and maintain a Community Consultative Committee generally in accordance with the Community Consultative Committee Guidelines for State Significant Projects, unless otherwise agreed to in writing by the Planning Secretary. The Proponent must submit a report to the Department every 12 months documenting its progress in establishing and maintaining the Community Consultative Committee over time.	c	Veolia CTT website Email distribution list Newsletter	Since receipt of the conditions of consent Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: • Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage. • Inviting community members to an Open Day at Clyde Transfer Terminal. • Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. • Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council.	
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.	NT	N/A	Condition was not triggered within the IEA period.	

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 Director-General.			The condition requires Veolia to establish and maintain a trust fund to facilitate the functioning of the Community Consultative Committee. During the IEA it was determined Veolia had not established such a fund. Whilst it is understood a community consultative committee has not been able to be established, the requirement for payment to a trust fund as required by this condition has not been removed. Therefore Veolia has not demonstrated reasonable compliance with this condition. The auditor was supplied meeting minutes from a meeting with the DPIE in August 2021. From the meeting it was concluded the DPIE would consider an amendment to this condition which would remove the requirement for a trust fund (whilst a CCC is not in place). If community interest is regained and a CCC is restarted then the trust fund would be required.	CTT-DA-OFI-05
	COMMUNITY ENHANCEMENT PROGRAM				

2021 Independent Environmental Audit

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
137	Prior to the commencement of construction, or as otherwise approved by the Director-General 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: (a) the payment of \$50,000 (unless otherwise agreed to by the Director-General) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards (b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes of: ② the widening of the Western Overbridge; ③ establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge; ③ establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; ④ establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; and ① the 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. (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. Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Director-General concerning community enhancement contribution in light of an independent investigation to establish such contrib	NT	N/A	Condition was not triggered within the IEA period.	
	Elements to be addressed in the Environmental Management Plan (Construction Stage) and the Environmental Management Plan (Operation Stage)				

2021 Independent Environmental Audit

Condition Re	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
Attachment 1	The EMP (Construction Stage) and EMP (Operation Stage) shall address but not be limited to: 1. identification of the statutory and other obligations which the Applicant is required to fulfil during construction stage including all approvals and consultations/agreements required from authorities and other stakeholders, and key legislation and policies which control the Applicant's implementation of the development 2. periodic or otherwise revision of the EMP to address changed or evolving circumstances 3. definition of the role, responsibility, authority, accountability and reporting of all personnel relevant (including sub-contractors) to compliance with the construction EMP 4. measures to avoid the occurrence of adverse environmental impacts 5. induction and training of all personnel (including sub-contractors) to ensure compliance with the construction EMP 6. the role of the EMR 7. measures to provide positive environmental offsets to unavoidable adverse environmental impacts 8. environmental management procedures for all construction processes which are important for the quality of the environment in respect of permanent and/or temporary works 9. monitoring, inspection and test plans for all activities and environmental qualities which are important to the environmental management of the project including performance criteria, specific tests, protocols (e.g., frequency and location) and procedures to follow including procedures for notifying all relevant authorities should non-compliance with any limits or performance standards specified in the construction EMP arise 10. environmental management instructions could be potentially detrimental to the environment 11. requirements to undertake environmental audits to ensure that the construction EMP is working and steps the Applicant intends to take to ensure that all plans and procedures are being complied with 12. delegation of responsibilities for compliance with the EMP and relevant environmental statutes 13. community consultation and notificati	C	1. OEMP - 2021 2. OEMP Sub-Plans - 2021	The 2021 OEMP was reviewed during the IEA and was determined to address the requirement of Attachment 1 of the consent.	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
1	Administrative Conditions				
A1	What the licence authorises and regulates				
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	С	1. Site inspection	Only authorised scheduled activities as detailed in the condition were observed to	
Scheduled Ac Waste processin (non-thermal tre Waste storage	ng Non-thermal treatment of general waste Any annual processing		2. Audit interviews	be undertaken on the site.	
A2	Premises or plant to which this licence applies				
A2.1	The licence applies to the following premises: Premises Details CLYDE TRANSFER TERMINAL PARRAMATTA ROAD CLYDE NSW 2142 PART LOT 201 DP 1007683	c	1. Site inspection	The site is located at the listed premises.	
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 the 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.	C	1. Annual compliance program	Management plans were developed in accordance with the conditions and audited. A compliance program is undertaken annually to verify compliance.	
	Discharges to Air and Water and Applications to Land				
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. Air	C	1. Site inspection	A single air emission point was noted during the IEA on the roof of the waste facility.	
3	Limit Conditions				
L1	Pollution of waters				

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
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.	С	1. Site inspection	No evidence of potential stormwater contamination was observed during the site inspection. The documented stormwater management plan was determined to be adequately implemented during the IEA.	
L2	Waste				
L2.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence. Code Waste Description Activity Other Limits NA General solid waste As defined in Schedule (putrescible) 1 of the POEO Act, in force from time to time force from time to time force from time to time treatment) NA General solid waste As defined in Schedule (non-thermal treatment) Waste storage NA Waste processing NA (non-thermal treatment) Waste storage	c	Site Inspection Waste Records Weighbridge Operators Work Instruction, Control of Non- Conforming Waste Procedure	Only general solid waste was observed to be received at the site during the site inspection and based on a review of the waste records. Further controls observed to minimise non-conforming waste entering the waste stream was the procedure for non-conforming waste, facilities for the removal of non-conforming waste (e.g. gas bottles and steel), signage at the entrance detailing prohibited waste, and work instructions for weighbridge operators detailing actions for non-conforming waste. Training on work instructions was also verified during the audit.	
L2.2	The authorised amount of waste permitted on the premises cannot exceed 4,000 tonnes at any one time.	С	IEA Interview Site inspection	Less than 1,200 T per day is managed by the site. It was estimated during the IEA the capacity for waste at the site would be approx. 3,000 tonnes.	
L3	Noise limits				
L3.1	Location	c	1. Incident records	No noise complaints were received during the IEA period.	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
L3.2	For the purpose of Condition L3.1: 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.	NT	N/A	This is a note only not auditable	
L3.3	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.	NT	N/A	Not relevant to the current IEA period	
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.	NT	N/A	Not relevant to the current IEA period	
L3.5	The noise emission limits identified in condition L3.1 apply under meteorological conditions of: • Wind speeds up to 3 m/s at 10 metres above ground level; and/or • Etemperature inversion conditions of up to 3 degrees Celsius/100m.	NT	N/A	Not relevant to the current IEA period	
L4	Potentially offensive odour				
L4.1	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.	С	Site Inspection Clyde Odour Audits XXXVII	No noticeable odour was identified outside the terminal during the site inspection. Odour monitoring data for 2021 demonstrated the ambient odour levels are below the performance criteria of 2 odour units.	
L5	Other limit conditions				
L5.1	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.	С	1. This IEA	No evidence of non-compliance with the conditions of the EPL or the Protection of the Environment Operations (Waste) Regulation 2014 was observed during the IEA.	
4	Operating Conditions				
01.1	licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	С	Competency records for operators Training needs analysis and records on the intranet IEA interviews	To comply with this condition the following was observed during the IEA: 1. Induction records for all staff 2. Verification of competency assessments 3. Training needs analysis for all roles 4. Work instruction training for all staff to ensure the works are undertaken in a competent manner 5. All training and competency records were observed on the training management system	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
02	Maintenance of plant and equipment				
02.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	с	Maintenance records for the weighbridge Fuel tank audit So tanker leachate test Calibration certificate of the sound level meter Site inspection	Maintenance schedules for fixed plant are managed via SAP. Mobile plant is maintained by the manufacturers in accordance with their specifications. To verify adequate maintenance records for the following plant were requested and verified: - weighbridge calibration - fuel tank audit - ISO tanker leachate test - Sound level meter calibration certificate During the site inspection all plant and equipment was observed to be in good maintenance.	
03	Dust				
03.1	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.	С	1. Site inspection	No evidence of dust generating activities occurring at CTT were observed during the site inspection.	
03.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	С	Site inspection Driver induction	No trucks were observed entering or exiting the site with the tailgate open. It was also observed the truck driver induction includes a requirement to keep the tail gate closed when entering or leaving the site.	
04	Emergency Response				
04.1	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.	c	1. Emergency Response Plan (ERP) - 2021 2. Toolbox examples delivered in 2021 3. Emergency response drill records - Hydraulic oil and leachate spill scenario	An up to date ERP was observed during the IEA and was sufficient to manage the risk of emergency events. To test the ERP, Veolia undertake annual drills. Records for the 2021 drill was observed which involved an environmental spill. To implement the plan, training is provided to personnel including toolbox training and external training for fire response. Note due to the Covid pandemic external training for fire systems could not be provided during the IEA period.	
04.2	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.	С	1. Site Inspection	Adequate fire prevention equipment was observed during the site inspection. Maintenance records for the fire system were observed during the audit.	
05	Processes and management				
05.1	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.	С	Site inspection NSW Resource Recovery Incoming Waste Classification Flowchart & Incoming Weighbridge Report	The weighbridge record system enables appropriate waste classification. Guidance in the form of flowcharts are available to waste attendants to assist with waste classifications. During the site inspection the weighbridge attendant was familiar with the waste classification / acceptance process.	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
05.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately.	С	1. Site Inspection	Only a single waste stream (general waste) is accepted at the facility.	
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.	c	1. Site Inspection	All areas involved in the handling of waste, containers or internal roadways were sealed.	
06.2	Vehicles leaving the premises must not track materials to external surfaces.	С	Site Inspection Daily inspection checklist	No evidence of material tracking to external surfaces was observed during the site inspection. Litter patrols undertaken twice daily and included as part of the daily site inspection. All personnel interviewed were aware to stop trucks with overhanging waste before they exit the site.	
5	Monitoring and Recording Conditions				
M1.1	Monitoring records 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.	С	Veolia CTT website Veolia record management system	Monitoring records were observed to be adequately maintained on the internal record management system and online.	
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.	С	1. Veolia CTT website 2. 2017 IEA 3. 2017 Odour Audit.	All data from 2017 was available on Veolia's internal drives and observed during the IEA.	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample	c	Odour Audit XXXVII Annual Truck Noise Measurements Report 15	Odour monitoring and truck noise measurement reports reviewed during the IEA included the required records.	
M2	Requirement to monitor concentration of pollutants discharged				
M2.1	Air Other Units of Measure Frequency Sampling Method Selection of sampling - TM-1 positions	NT	N/A	Not relevant to the current IEA period	

Clyde Transfer Terminal 2021 Independent Environmental Audit

Environmental Protection License (No. 11763)

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
M3	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.	С	CTT Complaints Recording system (RIVO)	No complaints received within the IEA period. A register of complaints was observed during the audit.	
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.	C	1. CTT Complaints Recording system (RIVO)	Sufficient systems were observed to be in place to take these records. Hardcopy forms available and these are uploaded into RIVO.	
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	NT	N/A	No complaints received within the last 4 years.	
M3.4	The record must be produced to any authorised officer of the EPA who asks to see them.	NT	N/A	Not relevant to the current IEA period	
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.	c	Veolia CTT Website Community complaints line	The condition requires Veolia to maintain an active telephone complaints line for receiving complaints. During the IEA, the community complaints line (02 9841 2600) was rung and confirmed to be active	
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.	С	Veolia CTT Website Community Newsletter (March & August 2021)	The complaints line was communicated on the CTT website, documented on the site entrance and provided to relevant stakeholders via the newsletter.	
M4.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	NT	N/A	Not relevant to the current IEA period	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
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: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices.	c	1. Annual Return 2021	The annual return reviewed were submitted in the approved form.	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	С	1. Annual Return 2021	The submitted 2021 annual report was observed during the IEA.	
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.	NT	N/A	Not relevant to the current IEA period	
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.	NT	N/A	Not relevant to the current IEA period	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	С	Annual Return submission receipts	Submitted the annual return on 11 March 2021. Observed the submission receipts.	
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.	С	1. Annual Return for 2017	Observed the 2017 copy of the annual return.	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	С	1. Annual return 2021	The company secretary is the approved person to sign. Minutes from EPA observed.	
R2	Notice of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	C	1. ERP - 2021	Evidence of a notification for a different site was observed. No relevant incident pertaining to CTT requiring notification was observed during the IEA period. The corporate incident management procedure includes the procedure for notification of the EPA.	
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.	NT	N/A	Not relevant to the current IEA period	
R3	Written report				

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	NT	N/A	Not relevant to the current IEA period	
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.	NT	N/A	Not relevant to the current IEA period	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	NT	N/A	Not relevant to the current IEA period	
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.	NT	N/A	Not relevant to the current IEA period	
7 G1	GENERAL CONDITIONS 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.	С	1. Site Inspection	A hardcopy of the EPL was observed in the site office during the site inspection.	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NT	N/A	Not relevant to the current IEA period	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises				
G2		С	1. Site Inspection	A hardcopy of the EPL was observed in the site office during the site inspection.	
- 52	Other general conditions	С	1. Site Inspection	A hardcopy of the EPL was observed in the site office during the site inspection.	
G2.1		С	Site Inspection 1. Veolia CTT website 2. Email distribution list 3. Newsletter	A hardcopy of the EPL was observed in the site office during the site inspection. Since receipt of the conditions of consent Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: • Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage. • Inviting community members to an Open Day at Clyde Transfer Terminal. • Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. • Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council.	
	Other general conditions 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		Veolia CTT website Email distribution list	Since receipt of the conditions of consent Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: • Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage. • Inviting community members to an Open Day at Clyde Transfer Terminal. • Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. • Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
E1.1	(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) 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). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. (b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) 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). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. Note that this total financial assurance is inclusive of that required in E1.1a). (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).	С	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
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.	С	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
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.	С	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
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.	NT	N/A	Not relevant to the current IEA period	
E1.5	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: (a) the financial assurance required by condition E1.1; or (b) the adjusted financial assurance as required by condition E1.3 and E1.4.	С	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
E2	Environmental obligations of licensee (Works and Programs)				
E2.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: (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. (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. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	С	1. Site Inspection, 2. ERP -2021 3. Non-Conforming Waste Procedure	(a) No evidence of leak or spills of potential contaminants outside of the waste tipping floor was observed during the site inspection. Emergency Response Procedures for spills were observed. (b) Systems for identifying and removing non-conforming waste were observed during the audit. (c) All monitoring data was observed to be available on the CTT website.	

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
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 conducting an assessment of and if required remediation of any site contamination.	NT	N/A	Not relevant to the current IEA period	
E3	EPA may claim on a financial assurance				
F3 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.	NT	N/A	Not relevant to the current IEA period	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.1.1	Facility Manager • Approve and implement the OEMP; • Report to senior management on the performance of the system and environmental issues/breaches etc; • Allocate project resources to handle environmental issues; • Take action to resolve major non-conformances; • Ensure suppliers and subcontractors comply with requirements; and • Ensure that site personnel receive appropriate environmental awareness training, in consultation with the EMR.	С	Position Description for the Facility Manager	The position description of the facility manager was reviewed as part of the IEA. The position description aligned with these OEMP responsibilities.	
4.1.2	Environmental Management Representative Report to the Facility Manager on the performance of the system and improvement opportunities; Provide support to the site to ensure they are aware of their environmental obligations and enable them to meet their environmental commitments; Ensure that non-conformances are recorded and actioned; and Prepare the Annual Environmental Management Report.	С	Position Description for the Environmental Management Representative (EMR)	The position description of the EMR was reviewed as part of the IEA. The position description aligned with these OEMP responsibilities.	
4.2	A training matrix has been developed for the CTT, based on Veolia's Training and Development Standard, which requires corporate/site specific inductions, competency based training requirements for operators, as well as administrative, risk and emergency response training.	NT	N/A	Veolia were in a state of transition during the IEA and therefore this item was unable to be audited and verified during the IEA. IT is suggested this be included as part of the next IEA.	
4.2.1	All employees receive a corporate induction which provides an awareness of Veolia's commitment to the environment and sustainability. Components of Veolia's general induction program are as follows: • Veolia corporate induction via LMS online modules; • Safety, health, environment and quality induction As relevant, operational employees receive site specific inductions, including suitable environmental training, to ensure they are aware of their responsibilities and are competent to carry out their work as per the next section.	С	Observed the Corporate Induction	The environmental induction program includes sections on-site licenses, environmental induction, chain of responsibility, sustainability, and overarching legislation.	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.2.2.1	In addition to the general induction, all employees receive site specific training covering the following: OEMP and related documents; Site environmental objectives and targets; Understanding individual authorities and responsibilities; Significant project aspects, impacts and controls; Potential consequences of departure from procedures; Emergency procedure and response; and Understanding the legal obligations. All staff are to be reassessed twice within the first year to ensure they maintain the required level of training, including compliance with relevant procedures.	С	1. IEA Interview	During the IEA it was noted: - Veolia had not formally communicated the OEMP and subplans to personnel. It was noted this will be done once approved - The OEMP is available on the BMS. - Objectives and targets are on the BMS. Monthly reporting against the objectives and targets is being undertaken. - Responsibilities are communicated through toolboxes and work instruction training - The risk assessment is currently being updated - Drills are undertaken to train in emergency response - Legal communications are delivered via toolbox The OEMP section states that all staff will be reassessed twice on site-specific training within the first year to maintain the required level of training. During the IEA, the auditor was advised no reassessment of site-specific training was undertaken with staff in the first year. Furthermore, no process/system was identified that would allow Veolia to document reassessment of personnel twice in the first year.	CTT-MP-OFI-01
4.2.2.3	A compulsory site induction has been established for the customers on how to induct their drivers accessing the site. The driver induction includes but is not limited to the following conditions of entry: • Left turn entry and exit from Parramatta Road; • All Waste Drivers reporting to weighbridge personnel; • Use of Personal Protective Equipment (PPE's); • Visitor restrictions; • No smoking on site except in designated areas; • Obeying traffic signs; • On-Site machinery has right of way; • Following instructions from site staff; • Reporting to Hot Load zone upon arrival if carrying a Hot Load and contacting staff; • Ensuring tailgate is clean and any loose material removed before exiting the waste shed; • Reporting incidents, injuries and spills; • Punitive action for non-compliance with conditions of entry; Following this training program all drivers are required to undertake a questionnaire as proof of induction and to ensure competency.	c	Induction program	The site induction was reviewed during the IEA and was determined to include the content listed in this section of the OEMP.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.3	Internal communication methods include the following, as applicable: • Monthly toolbox meetings; • Annual risk management audit reports; • Non-conformance reports • Noticeboards; • Employee induction and training, refer to Section 4.2.	С	Toolbox examples 2. 2021 compliance audit check	The following items were verified during the IEA: 1. Toolbox talks are undertaken and include OEMP topics (including leaks management, and pest control) 2. Annual Compliance IEA Checks are completed and non-conformance reports are prepared 3. Information is provided on notice boards 4. Lessons learnt SHEQ alerts are issued 5. Employee induction training is undertaken.	
4.3	External communication methods and their respective time frames include the following, as applicable: • Annual regulatory reports • Annual public notices and announcements • Meetings and correspondence with appropriate regulatory authorities, as required • Correspondence with adjoining landowners / neighbours, as required • Prompt response to complaints	С	Annual report Newsletters to the public Meeting minutes with the regulators	The IEA verified communication processes align with the OEMP	
4.3.2	As a result of a decline in community interest, Condition 134 of the COCs was modified to allow for alternate measures of community engagement if a Community Consultative Committee (CCC) cannot be maintained. Alternate measures listed below have been proposed and approved by the DPIE: • Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage (https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station) for all stakeholders to make enquiries, complaints or seek more information. • Inviting community members to an Open Day at Clyde Transfer Terminal including all parties that put submissions to the Development Consent modification application submitted in 2017. • Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. • Sending Clyde Transfer Terminal's Annual Environmental Management Reports (AEMR) to Cumberland Council. • Other means of liaising with the community include local newsletters, leaflets, newspaper advertisements, and community notice boards as deemed appropriate.	С	Veolia CTT website Email distribution list Newsletter	Since receipt of the conditions of consent Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: • Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage. • Inviting community members to an Open Day at Clyde Transfer Terminal. • Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. • Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council.	
4.3.4	Receiving public comments from the impacted community is possible through the 24-hour operated weighbridge office telephone number listed above. The Facility Manager and/or EMR are notified of all public complaints. All public complaints received (either written or verbal) are documented in the online Complaints Register which contains the following information: • the nature and extent of the complaint; • the details of the person lodging the complaint; • details of location, date, time and effects of the complaint; • the action taken to address the complaint including follow up contact with the complainant. The Register is kept updated to ensure any complaints are correctly recorded and addressed.	С	1. IEA interview	The section requires Veolia maintain an active telephone complaints line for receiving complaints. This is interpreted to mean when a complaint contacts the line, the person (on the complaints line) will be able to receive the complaint and document the information. During the IEA, the community complaints line (02 9841 2600) was rung to see whether the person could record a complaint. The person that was spoken with was not aware of the process for lodging complaints and provided another mobile number to the auditor for the regional weighbridge supervisor.	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.4.2.1	Incident notification processes will reflect the extent of the event and the incident classification. Reporting will be in accordance with the Veolia Incident Management Procedure - PRO-317 as summarised in Figure 4.2. This procedure is used for the response, investigation and reporting of incidents that have affected or have the potential to affect the environment or health and safety of a worker, contractor, subcontractor or a visitor to Veolia. Incidents are logged in Rivo and managed in the following sequence: Log incident; Investigate incident; Close incident; If further action is required, an issue can be raised or logged in Rivo. Issues raised are assigned for action to specific Veolia personnel. Corrective action can then be implemented to minimise the risk of recurrence of the incident.	С	Two recent environmental incident reports	Two minor environmental incidents occurred within the IEA period. Both incidents were associated with receival of hot loads and did not result in environmental harm being caused. The incident documentations within Rivo was reviewed during the IEA and determined to follow the steps documented in the OEMP.	
Table 5.1	Regular environmental inspections are undertaken by the CTT personnel to ensure that environmental controls have been implemented, meet specification, and are being maintained in accordance with the NSW Inspecting and Testing Program as summarised in Table 5.1 below.	С	Weekly inspection checklist Weighbridge certifications Weather station calibrations Veolia CTT Website	All inspections listed under the Table 5.1 in the OEMP were observed to be up to date. It was noted during the IEA due to the 2021 pandemic shutdowns some of the checks were not completed. However since the shutdowns have ended, Veolia has commenced rectifying missed inspections.	
Table 5.2	At completion of each inspection, any corrective actions required are to be recorded in Rivo and managed in a timely manner summarised in Table 5.2 below:	С	Weekly inspection checklist Odour audits Rivo	The findings from the weekly inspection checklists and odour audits were observed to be uploaded on to Rivo.	
5.1.2	In the event that any monitoring results demonstrate an exceedance of a limit specified in the COCs, Veolia will submit a report to DPIE and Cumberland Council within 30 days of the monitoring exceedance, 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.	NT	N/A	No exceedance in the last 12 months.	
5.1.3	Audit reports are maintained in Rivo to enable non-conformances and opportunities for improvement, identified through internal and external audit processes at the CTT, to be recorded, reported and responded to.	С	1. 2020 IEA Report 2. Rivo	Recommendations from the 2020 IEA Report were observed to be uploaded onto the Rivo system.	
5.2	Reviews of the CTT OEMP and the environmental performance of the CTT assess the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. The inputs to the management review process will include (but not be limited to): • internal and external audits findings; • incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received; • implementation of all compliance and legislative changes as identified at a corporate level; and • trend analysis on operational data.	С	Meeting invitations Monthly environmental reporting	During the IEA, meeting invites for management reviews were observed. This included meeting invites for review of IEA findings and incident reviews. Trend analysis and reporting to management was observed at a Veolia group scale. Monthly environmental reports were observed to be emailed to the Veolia executive committee which are then communicated the operations through the line managers.	
5.2	Reviews are made periodically of all site specific key performance indicators pertaining to the environment and relevant business systems. This will include reviews, and if necessary, revision of the OEMP and sub-plans following any audit, major incident or series of complaints, or any modifications to the consent.	С	Monthly environmental reporting SHEQ objectives	The section states there will be periodic reviews of site-specific key performance indicators (KPIs). For reviews to be effective KPIs should be documented or communicated to the facility management. During the IEA, no site-specific KPIs were noted in the SHEQ objectives sheet.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
5.2	The following forums will form part of the management review process at the CTT, conducted periodically by the facility management, in conjunction with operators as required: • Meetings; • Toolbox talks; • Hazard review groups; • Serious incident reviews; and • Miscellaneous environmental workshops	С	Meeting invitations Monthly environmental reporting Toolbox talks Incident reviews	Evidence of forums detailed were observed during the IEA.	
5.3	All technical sample analysis for compliance reporting will be performed in a NATA registered laboratory.	NT	N/A	No soil or water sampling was undertaken during the IEA period.	
5.3	Where monitoring and measuring devices are used to provide evidence of conformity of product to determined requirements, these devices will be calibrated in accordance with the manufacturer's recommendations. Records of calibration will be maintained and the calibration status of the device will be clearly communicated	С	Clyde Truck Noise Monitoring - Report 15	Calibration records for the sound level meter were observed during the IEA.	
	Waste Management Plan (WMP)				
1.4.1	The following government agencies will be consulted with in relation the requirements of this WMP: • NSW Department of Planning, Industry and Environment; • NSW Environment Protection Authority; • Cumberland City Council	С	1. DPIE correspondence	Correspondence with the DPIE in relation to the WMP was observed during the IEA. It is understood EPA and Cumberland City Council will be provided a copy of the WMP once approved by the DPIE.	
4.1	All waste transport vehicles entering the CTT are required to go via the incoming weighbridge. The customer information is entered into the Paperless Weighbridge System (PWS) prior to their arrival on site to ensure all customers are aware of conforming and non-conforming waste. The weighbridge operator is responsible for verifying the vehicle's registration number in PWS. Once the customer is verified and the weight is recorded, the weighbridge operator directs the trucks to the transfer terminal building for processing. Waste transport vehicles exiting the site are weighed on the outgoing weighbridge to confirm the weight of waste deposited at the site.	С	Site Inspection Weighbridge Operators work instruction	During the site inspection the weighbridge described the process for customer directions and weight recording and this was consistent with the WMP.	
4.1	All weighbridges on the site are National Measurement Institute (NMI) approved and maintained in proper working order and are certified at least once a year in accordance with the Commonwealth National Measurement Act 1960.	С	Weighbridge Calibration 2021	Weighbridge calibration records from 2021 were observed during the IEA.	
4.1	Records of waste transport are maintained by Veolia for submission to the EPA and quantification of the waste levy payable.	С	Quarterly waste contribution report	The quarterly waste contribution report was observed during the IEA.	
4.2	The CTT is licensed to accept the following waste types and operate 24 hours per day, 7 days per week: General Solid Waste (Putrescible) General Solid Waste (Non-Putrescible) The EPL permits waste processing (non thermal treatment) and waste storage activities at the facility.	С	1. Site Inspection	Only general waste was observed during the site inspection.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.2.2	Hazardous, liquid and industrial waste would not be allowed at the site. The following non-conforming waste types are not accepted at the CTT: Radioactive wastes; Toxic wastes including any; O Material containing arsenic, cyanide or sulphide. O Toxic soluble salts of the following metals: barium, boron, cadmium, copper, chromium, lead, manganese, mercury, selenium, silver or zinc. Pesticide or weedicide, in particular any of the following: O Chlorinated hydrocarbons. Fluorinated hydrocarbons. O Granophosphates. O Carbamates. O Phenols. Soluble acid or alkali or acidic or basic compounds; Liquid wastes; Hazardous wastes e.g. Asbestos; Any flammable liquid or material deriving from grease, oil, tar petroleum, shale or coal; Any sludge or material (unless it can be shown to be innocuous and harmless) being the refuse from any industrial process carried out in any: O Tanning or leather processing plant. O Petroleum or petrochemical plant. O Peint manufacturing plant. O Metal treatment plant. O Wegetable oil or mineral oil processing plant. O Pharmaceutical or drug manufacturing plant. O Medical and quarantine wastes; and O Dead animals	C	Site Inspection Work Instruction for loader operations Work instruction for weighbridge operations	During the IEA no non-conforming waste was observed within the primary waste stream. A nominated area for removal of non-conforming waste was observed. An operator queried during the IEA was familiar with non-conforming waste that should be removed and the process for segregation of such waste. The work instruction for weighbridge operations included instructions for inspection for and removal of non-conforming waste.	
4.2.3	Details of the waste received, including identification of the vehicle, weight, nature and origin of the waste, are recorded at the weighbridge, and inspection of the load is undertaken at the unloading point to verify information provided at the weighbridge.	С	Incoming and outgoing waste records	Waste records observed during the IEA included this information.	
4.3	If a load is identified as offensive (odorous or dusty) it is prioritised for compaction and loading into the sealed containers and recorded using the Incident Management System. This is supplemented with spot checks by the Facility Manager or site personnel.	С	1. IEA interview	Compaction is undertaken continuously to minimise the time that waste material is sitting on the floor. The Facility Manager stated it is not really practical within a putrescible waste stream to identify waste material that is odorous or dusty and prioritise such waste for compaction.	CTT-MP-OFI-02
4.3	Where non conforming waste is detected, this waste would be separated from the general waste stream and set aside for removal offsite to a facility licensed to receive this type of waste for processing, recycling or disposal.	С	1. Site inspection	Facilities are identified for non-conforming wastes at the CTT.	
4.3	The tipping floor and compaction unit areas are cleared on a daily basis, where feasible, to ensure that waste is being processed within a manageable timeframe. These procedures also assist with general housekeeping and cleanliness on site.	С	1. Site inspection	During the site inspection it was observed the tipping floor and compaction area was cleared of waste material at the end of the day. Video evidence observed during the site inspection demonstrated this occurs on a regular basis.	

Reference		Commitment (Exact Wordin	g)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.3.1		=	egregation of recyclables and general waste on site. Forted off site to an appropriately licenced facility	С	1. Site inspection	Receptacles for the most common non-conforming waste (gas bottles) was observed during the site inspection. In terms of recyclables the segregation that is undertaken is removal of steel waste. Receptacles were observed for steel waste.	
4.4.1	in the conditions of site entry. Details re The induction program is supported by a Verbal advice from weighbridge opera Printed material to be handed to the Spot checks by Facility Manager or sit Tool box meetings; and Site entry signage.	egarding this training program are provi the following measures: ator; driver at the weighbridge; e personnel);		С	1. Site inspection	Measures described in this section of WMP were observed during the site inspection. During the IEA no printed material for provision to drivers was observed at the weighbridge.	CTT-MP-OFI-03
4.4.1.1	The following table outlines the measur Offence First Second Third	Action - Veolia employee Verbal warning Written warning and reattendance to induction training session Re-posting to another site or retrenchment	rming Verbal warning aming and re- ue to induction training Written warning and re-attendance to induction training session g to another site or Refused entry to site for driver		1. IEA Interview	This section of the WMP requires site personnel to provide first, second and third breach notices to drivers found to be breaching waste acceptance requirements. During the IEA no non-compliant was observed to verify the effectiveness of the measures. Notwithstanding the above no mechanism to track the warning process allocated to specific drivers was identified. The Facility Manager advised during the IEA, offence notifications are undertaken through the Veolia sales/customer team and generally with the breaching company not the specific driver.	CTT-MP-OFI-04
4.4.3	As part of the site induction requiremer range of waste processing related areas • Waste tracking • Waste classification • Control of non-conforming waste This training ensures that staff receive a other prohibited waste.	including:	ng requirements, employees are also trained in a a second	С	1. Work Instructions	Employees are trained on work instructions that apply to the position. The work instructions for weighbridge and tipping floor operations were reviewed during the IEA and conformed with the WMP.	
4.5.2	Wind blown matter is addressed by usin • All waste is unloaded within the termi • Daily litter patrols of the site are cond Results of the litter patrol, including cor on the Weekly Site Inspection Checklist,	inal building lucted by site personnel rective actions taken to ensure wind blo	own litter does not leave the premises, are recorded	С	Site inspection Daily inspection checklist	The leading hand's daily inspections includes an end of day inspection of the CTT. A sweeper is located on the site to pick up litter. No litter was observed outside of the terminal building during the site inspection.	

Reference		c	ommitment (Ex	act Wording)		Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
	Regular inspections are undertaken by the CTT personnel to ensure that environmental controls have been implemented, meet specification, and are being maintained in accordance with the site Inspection and Testing Program as summarised in Table 5.1 below.								
	Item Weighbridge	Type of Inspection / Testing	Frequency of Inspection	Responsibility Plant Maintenance Supervisor			Weighbridge records Compactor calibration		
5.1	weighbridge	calibration	Annual	Plant Maintenance Supervisor		С	Waste records Inspection sheet provided	Records demonstrating conformance with the WMP were observed during the IEA.	
	Compactors 1 & 2 Waste volume monitoring - Storage on site - Annual limit	- Inspection (waste on floor) - Tonnage data review	Daily	Facility Manager, Leading Hand(s)			5. Daily and weekly inspection checklists		
	Site inspection and housekeeping chec	Inspection	Weekly	Leading Hand or nominated person					
	Air Quality Management Pla	n (AOMP)							
4	Mitigation measures have been incorporated into the design of the CTT facility to minimise the risk and consequences associated with the key air quality management issues. Operational activities are undertaken to comply with relevant regulations and guidelines for the handling of dust and odour, and to ensure emissions are minimised. These are: • Handling of the waste: All the waste received at CTT is handled inside the terminal building. • Dust emissions from handling of waste: if required, the deluge system inside the terminal building can be used as a dust suppression system during dust generating activities. • Odour impacts from waste received: a forced air extraction system in the transfer terminal building to capture and disperse odour emissions from the waste handling area						11 Site Inspection	Measures described in the AQMP were observed to be conformed with at the time of the site inspection.	
4.1.2.1				and repair of the odour control ontrol System provided in Appen	•	С	1. Odour Audit XXXVII	Maintenance records for the odour control system were verified within the Odour audit.	
4.1.6	Maintenance schedule for odour control system and ventilation equipment is carried out typically in accordance with the manufacturer's specification and includes monthly mechanical maintenance. Regular inspections are undertaken as per the CTT Environmental Inspection & Testing Schedule, included in Section 5.1.1 of the OEMP.						1. Odour Audit XXXVII	Maintenance records for the odour control and ventilation system were verified within the Odour audit.	
4.1.7	All Veolia sites are required to follow a Housekeeping and Inspection Procedure (PRO-257) which requires that a standard checklist be followed to ensure site safety and hazard reduction is maintained. This checklist has been adapted for the CTT in order to manage odour through the implementation of housekeeping procedures (refer to the Weekly Site Inspection Checklist (TEM-5557)) and compactor cleaning procedures.						Monthly safety and hazard sheet	Monthly safety and hazard inspection sheet observed and completed in RIVO	
Table 4.1	Visual inspection of the site entry and exit points and use of sweeper on public roads if required; - regular cleaning of sealed haul roads including removing litter/spilt material from access roads (sweeper/vacuum cleaner is used)						1. Site inspection	The leading hand's daily inspections includes an end of day inspection of the CTT. A sweeper is located on the site to pick up litter. No litter was observed outside of the terminal building during the site inspection.	
	Traffic Management Plan (T	MP)							

Reference			Commitment (Ex	act Wording)		Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.1.1	trucks are not permitted to turn	with neighbourin right into the site	g users, in regard to e entrance until inte	o traffic sharing on the rig ersection upgrade works h	ht of carriageway. 12.5m rigid waste	С	1. Site inspection	During the site inspection no vehicles were observed to be turning right into the site off Parramatta Road. This requirement was also reflected in the site induction. It is noted however through discussions with Veolia, the upgrades to the intersection (e.g. traffic lights) proposed under this condition may cause greater traffic impacts due to the number of vehicles that turn right at the intersection to access neighbouring properties.	
4.1.4	Traffic congestion is mitigated to congestion does occur onsite, the businesses: The Facility Manager or Weigs scope and/or cause of the congestion of the	ne following action in bridge Operator estion. Soundary will be one moved onto the sfail to relieve confirected away from (or nominee) will	ns will be taken to r will direct the relev rganised so as not t areas of the Clyde ngestion or resolve to the site. contact the waste t	manage any potential trafi ant site personnel to asse to obstruct the traffic mov site pending resolution of the problem in full causin	fic impacts on neighbouring ss the ements of i the g traffic to bank to the Parramatta	c	1. IEA Interview	The Facility Manager described the process for managing congestion during the IEA consistent with the TMP.	
5.1	The measures detailed in Table 5.1 are employed to monitor and record the movement of vehicles accessing the site and adherence to the code of conduct: Parameter						1. IEA Interview	Table 5.1 was consistent with the checks described by the Facility Manager during the IEA.	
	Vermin and Pest Control Plan (VPCP)							
4.1.1	The Facility Manager is respons functions detailed in this plan. I				carrying out the	С	1. 2021 Pest Service Reports	The Facility Manager provided records of licensed pest control contractor engagement during the IEA.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4,1.2	Preventative control measures include, but are not limited to: Bird nets and spikes; Minimising the time waste is spent on the floor of the building; Quarterly inspection of the site by a registered pest controller; Good housekeeping practices as detailed in Section 4.1.3; Placement of rodent bait stations at various locations around the site as follows: O Transfer Terminal; O Compactor Pit; O Site Administration Office; O Weighbridge Office: Training of all staff for recognising potential vector habitats; Border spraying, for the prevention of cockroaches, silverfish, spiders and ants; and, Cockroach gel in office areas.	c	Site inspection IEA interviews Pest Service Reports	Physical preventative controls described in the VPCP were observed during the site inspection. Pest control contractor reports demonstrated pest control inspections are undertaken. Furthermore, a toolbox on pest management was also observed during the IEA.	
4.1.2	The Weekly Site Inspection Checklist is accessible on Veolia's issue management system, Rivo and is used to check and record the site conditions such as drain blockages, litter, evidence of vermin and pests and checks that any actions undertaken to ensure the mitigation measures mentioned above are being implemented effectively.	С	Weekly site inspection checklist	The weekly site inspection checklist was reviewed during the IEA and included checks for evidence of vermin and pests.	
4.1.3.2	The waste floors, dado walls and all loading areas are cleaned regularly, including mechanical sweeping of the building floor following periods of high traffic volumes. All overhead structures and internal roofs are also inspected daily to ensure they are kept clean.	С	1. IEA Interview	The leading hand described the daily checks that are undertaken and these included checks of the waste floors, loading areas, and internal roofs.	
4.1.3.2	The CTT also includes other enhanced pest management controls, including nets and an Electric Bird Deterrent System (Avishock) installed early in 2019. Observations made during the 2019 IEA found that these controls were effective in reducing the presence of birds (particularly ibis) in the CTT.	С	1. Site inspection	Enhanced pest management controls, including nets and an Electric Bird Deterrent System (Avishock) were observed during the site inspection.	
4.1.4	The pest controller is required to use approved chemicals only. A list of chemicals proposed and Safety Data Sheet (SDS) for each are submitted and approved prior to use by the contractor.	С	1. Site inspection	The Facility Manager provided evidence of the approved chemicals being used during the site inspection.	
5.2	Following each quarterly site inspection, the pest controller reports the following details to the Facility Manager: • The level of pest activity noted during inspection; • Actions as part of routine schedule; and • Actions in response to problems noted. As a minimum requirement, all reports include the company name and address, the pest control license number, the date and the areas inspected and areas where action was taken. From time to time, the pest controller may be requested to carry out further investigations. The results of these investigations will be provided in report form.	С	1. 2021 Pest Service Report	The most recent report from the licensed pest control contractor was observed during the IEA addressed the VPCP.	
	Stormwater Management Plan (SMP)				
4.1	Stormwater runoff from the container yard, apron and car park is diverted to a large first flush system. After 10mm of rain, the runoff will then divert into Duck River.	С	Site inspection Site stormwater drainage plans	The site inspection and site stormwater drainage plans confirmed conformance with the SMP.	
4.1	Stormwater runoff from the southern rail line and waste shed roof are diverted to Pond 2 and is treated in an oil/silt separator (humeceptor) located at the North Western side of the CTT's office and amenity buildings prior to discharging into Duck River. Stormwater captured from the roof of the transfer and office/amenity buildings, classified as "clean", is directed straight to the stormwater retention pond or the rainwater tank for reuse on site.	C	Site inspection Site stormwater drainage plans	The site inspection and site stormwater drainage plans confirmed conformance with the SMP.	

Reference		Co	mmitment (Exact Wordii	ng)		Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.1	Stormwater from the hot loa hot load is disposed of in the			I/water separator under normal dicated underground tank.	operation. When a	С	Site inspection Site stormwater drainage plans	The site inspection and site stormwater drainage plans confirmed conformance with the SMP.	
4.1.1	The CTT building floor has be directed to the leachate sum Woodlawn.	,	,			С	Site inspection Site stormwater drainage plans	The site inspection and site stormwater drainage plans confirmed conformance with the SMP.	
4.2	dedicated ISO tanker that is tappropriately licenced facility	transported by rail to the y.	Woodlawn Eco Precinct o	uirements. That is, leachate is eit or into road tankers and transpor	rted to an	С	Waste Records - Outgoing	During the IEA it was confirmed leachate is pumped into the ISO tankers and transported via rail to Woodlawn. Tracked under the rail manifest.	
4.3				place in close proximity to the ta ble in plentiful supply in the area		С	1. Site inspection	During the site inspection it was confirmed: - the diesel tank is self bunded - the diesel pump included an auto cut off - Sufficient spill control equipment was available adjacent to the refuelling area	
4.3	area away from other waste	and where the fire servic t any water used to douse	es have easy access. The	ver suspects fire on-board, are ti area at the CTT site marked "Hot ransported to a licensed facility.	t Load" has a	С	1. Site inspection	During the site inspection it was confirmed a hot load area has been nominated. The area is marked "Hot Load" has a separate storage tank so that any water used to douse a smoulder/fire can be transported to a licensed facility.	
5.1	Parameter Frequency Standard Criteria / Performance Measure / Trigger					С	Site inspection Calibration records May 2021 water quality monitoring results	The most recent water quality monitoring event was undertaken in May 2021 in accordance with the SMP.	
5.1.1	· ·	inspection, or on a progra	ammed basis. Any materi	s and after significant rainfall eve al accumulated within the retent d of in an approved manner.		С	Site Inspection Weekly inspection checklist	During the site inspection the stormwater treatment system appeared well maintained.	
5.1.1	stormwater maintenance pro	ocedure for the CTT. Othe Site Inspection Checklist.	r stormwater maintenan	pumps and retention pond are p ce involves visually inspecting pit eceptor and inspection of culvert	ts and drainage	С	Weekly inspection checklist Humeceptor maintenance records	The weekly inspection checklist includes inspecting the stormwater treatment system. Records of maintenance on the humeceptor were observed during the IEA.	
	Site Contamination Manage	ment Plan (SCMP)							

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.1.1	Records of material taken off site are to be filed, stored and archived in accordance with the relevant document control procedures found on Veolia's Business Management System (BMS). Copies of invoiced weighbridge dockets from waste transported off site are to be filed and provided to the Facility Manager. The following information in relation to the storage, treatment and disposal of waste is recorded in accordance with EPA requirements: • Amount and type of waste transported; • Name and licence plate number of the transporter; • Date of transportation; and • Name and location of the receiving waste facility.		1. Waste Records	Waste records observed during the IEA included this information.	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.1.2	For the duration of the operations undertaken at the CTT, the site will be sealed, unless upgrade works are required to the existing hardstand or any other excavation, thereby minimising the potential for disturbing the soils. If future works are to be undertaken involving disturbing the ground, mitigation measures as outlined in the Construction SCMP provided in Appendix B will be implemented.	С	1. Site Inspection	The site was observed to be sealed and ground surfaces were in good condition.	
	Noise Management Plan (NMP)				
4.1	Trucks enter and exit the site in a forward direction, eliminating the need for reversing alarms outside the terminal building.	С	1. Site Inspection	The site is designed to allow trucks enter and exit in a forward direction.	
4.1	All noise associated with the unloading and compaction of the waste is generated in the building and compaction pits, which acts as additional noise attenuation.	С	1. Site Inspection	All waste unloading and compaction was observed to be occurring within the terminal building	
4.1	A permanent noise barrier on the south-western Terminal boundary minimises noise emissions at the nearest sensitive receivers.	С	1. Site Inspection	A permanent noise barrier was observed along the south-western boundary of the CTT during the site inspection.	
4.1.1	As part of the ongoing maintenance program, the surface of the existing hardstand is inspected on a regular basis. Any areas found to be in need of maintenance works, will undergo further resurfacing works with appropriate construction materials such as asphalt to minimise noise impacts or further deterioration. The most appropriate material will be determined at the time of resurfacing.	С	1. Site Inspection	The site was observed to be sealed and ground surfaces were in good condition.	
4.1.2	Container handling at the CTT is managed to minimise the extent of container movements, thereby minimising the resulting noise emissions from these operations. This protocol aims to provide the most practical and effective means of managing containers in relation to noise impacts. This container management protocol is as follows: Minimising the movement of containers on the hardstand area between containerisation of waste and loading of waste onto trains; Minimising forklift engine idling noise (particularly during evening and night periods) by switching off engine or parking in a well shielded position such as adjacent to the compactors; Minimising forklift movements when unloaded, i.e. forklift never travels empty policy; Ensuring the majority of movements involving the transfer of containers to and from ground stacks are during day-time periods; Loading containers directly from the compaction area onto rail wagons whenever there is a train in the siding; and, Stacking containers in areas adjacent to rail sidings to reduce the distance between the stacking location and rail sidings; Utilising to its maximum efficiency the space available for storage of containers and minimising excess container movement through double handling; and, Designating containers tacking areas to ensure the required clearance for forklift manoeuvring from any structures.	с	1. Site Inspection 2. IEA interviews	During the IEA and during the site inspection, it was confirmed containers handling is managed in accordance with the NMP.	
4.1.3	Measures for forklifts involve a sound reduction package, which includes variable frequency reversing alarms, silencers on exhausts, and sound rated engine covers.	С	1. Site Inspection	During the site inspection the forklifts were confirmed to have variable frequency reversing alarms, silencers on exhausts, and sound rated engine covers.	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
	The state of the s				
4.2.1	For forklift operators, this program involves training in practices such as throttle control, techniques to minimise impacts during grappling and container set down, and use of "real time" noise feedback systems where feasible. This approach has been found to greatly assist operators in minimising emissions from certain types of plant and equipment. Specifications for plant and equipment used for rail operations have consideration for minimising the noise generated by these activities. In addition, the receiving rail siding, Crisps Creek Intermodal Facility (IMF) has noise restrictions on its rail operation which limits the locomotives that can be utilised for this operation to quieter classes.	С	Safety Interface Agreement Site inspection	No non-conformance with this this section was observed during the IEA. The site inspection confirmed forklift operations conformed with these requirements and noise emissions did not appear to cause a nuisance.	
4.2.3	Ongoing maintenance of all operational tracks is essential to ensure the tracks are in good working order and repair. If, as part of the ongoing maintenance program, the tracks were found to be in need of maintenance works, repairs would be undertaken as required.	С	1. IEA Interview	Non-conformance with this requirement is unable to be confirmed as maintenance of the tracks is beyond the operational control of Veolia.	CTT-MP-OFI-05
5.1.2	All acoustic instrumentation employed throughout the monitoring program, where required, are to comply with the specifications of AS/IEC 61672.2-2004, "Electro acoustics - Sound Level Meters" and carry a current NATA or manufacturer calibration certificate. All instrumentation is programmed to record continuous statistical noise level metrics in 15 minute intervals, which may include the LAmax, LA1, LA10, LA90, and the LAeq.	С	Clyde Truck Noise Monitoring - Report 15	Calibration certificate provided by AirMet and included in the Clyde Truck Monitoring Report.	
5.2	A register, compiled of trucks exceeding the noise limits, provides a further system of reporting put in place by Veolia to improve noise management at the CTT. Identifying trucks exceeding the noise limits, both owned and/or operated by Veolia or external contractors, allows Veolia to set out a method of rectifying non conforming vehicles. Initial verbal and written communication is employed to request operators to repair defects before exclusion from the premises as a final stage.	С	Clyde Truck Noise Monitoring - Report 15	No exceedances identified in the 2021 Clyde Truck Monitoring Report.	
	Environmental Monitoring Program (EMP)				
2	Review the monitoring schedule and seek evidence of completed.	С	1. Monitoring records	Evidence of the monitoring reports listed in the EMP were observed during the IEA. It is noted one monitoring type that is undertaken and not listed in the EMP is the surface water monitoring program.	CTT-MP-OFI-06
	Emergency Response Plan (ERP)				
4.1	Hard copies of the ERP are available in the Terminal's site and weighbridge offices, which is communicated to all relevant site workers during training in the requirements of the ERP.	С	1. Site inspection	Hardcopies of the ERP were observed within the terminal and the weighbridge.	
4.2	The ERP will as a minimum be tested annually in accordance with the Emergency Response Procedure and requirements of the PIRMP Guidelines. The ERP must also be tested within one month of any pollution incident occurring. Records of any testing conducted will be maintained. The Incident/Emergency/Crisis Log Template can be used and the corrective actions logged in Rivo as an adhoc inspection.	С	1. October 2021 drill	An emergency drill was undertaken in October 2021.	
4.3.1	The ERP will as a minimum be reviewed or at least annually, and amended as required when any of the following occurs: • Significant operational changes (e.g. addition of new processes to a work area which • introduce new potential emergency situations); • Significant new emergency risks identified; and • On completion of an emergency response. This will ensure the relevance, accuracy and effectiveness of the information provided.	С	1. ERP - 2021	Annual reviews of the ERP were observed to be scheduled in the BMS and team calendars.	

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification
4.3.2	After an emergency where the ERP is activated, the manager/supervisor shall ensure the incident is entered in RIVO and coordinate an emergency response plan review involving key personnel from the site and other stakeholder groups involved in the management of the emergency. The Emergency Response Plan Use Review shall be completed, and where opportunities for improvement or required changes are identified, corrective actions shall be documented, entered in RIVO and the ERP updated to reflect changes.	NT	N/A	ERP was not activated within the IEA period.	



APPENDIX E – SITE INSPECTION PHOTOS



Plate 1: Ground areas between the rail and the container storage



Plate 2: Container storage area



Plate 3: First flush stormwater system





Plate 4: Asbestos training material on noticeboard



Plate 5: Hot load storage area



Plate 6: Steel waste bin



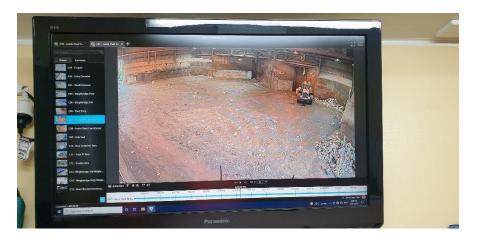


Plate 7: CCTV footage showing cleared terminal building at end of the shift



The Epic team provides a wide range of skills and experience on numerous environmental management issues, across a wide range of public, commercial and industrial projects. At Epic, we focus on the practical aspects of environmental planning, engineering and science, offering comprehensive services in:

- Strategic advice and project support;
- Contaminated site assessment, management and remediation;
- Asbestos assessment and advisory;
- Naturally Occurring Radiological Material assessment and management;
- Contaminated land auditing services (QLD –Contaminated Land Auditor; NSW Contaminated Site Auditor);
- Statutory planning and impact assessment covering QLD, NSW and Commonwealth legislation;
- Environmental approvals and permitting full array;
- Ecological (fauna, flora and habitat) site assessments;
- Site suitability assessments;
- Environmental offset assessments and development of management strategies;
- Waste auditing and management;
- Landfill design and management;
- Compliance and auditing;
- Erosion sediment control; and
- Hydrogeology.

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