



EnviroRisk

APPROVALS - SUSTAINABILITY - COMPLIANCE

INDEPENDENT AUDIT REPORT Planning and Environmental Compliance Oberon NSW

NOVEMBER 2024

for

Highland Pine Products Pty Ltd

AUDITING METHOD

This audit report is based on a representative sample of systems and information using the ‘*evidence and risk based approach*’ as provided for in AS/NZS ISO 19011:2018 *Guidelines for auditing management systems*. This approach was adopted to verify that environmental risks are being systematically addressed in accordance with the audit criteria as specified in the audit scope section of this report. Information presented within the Report relies on:

- the completeness and accuracy of information provided by those personnel available for interview (after reasonable professional interrogation of the accuracy of such information)
- the condition of the site as observed during the day(s) of the site inspection (noting the inspection was many months after the audit period ending 2023); and
- the completeness and accuracy of records, monitoring data and previous reports that were within the system or made available to support Audit enquiries (where applicable).

It is emphasised that this Audit is a ‘snapshot in time’ and environmental conditions, business operations and/or management practices may vary at times following the audit period. The detail provided within the audit report largely reports by exception; discussing areas identified for improvement far more than when commendable practices were observed and/or verified. This approach is considered to provide a more concise report, with a focus on continuous improvement. The Audit Report is intended for those named on the distribution list. The Audit report should only be reproduced and distributed in full.

GENERAL INFORMATION

ITEM	DESCRIPTION
Audit No:	241126
Audit Title:	Independent Planning and Environment Audit
Location:	Site 2, Gate 3 Albion Street, Oberon
Audit Period:	1 January 2021 – 31 December 2023
Audit Completed By:	Stephen Jenkins - CEnvP #179, EPA Appointed Industrial Facilities Auditor (Vic)
Audit Team Members:	Lok Nethercott – CEnvP #344, Exemplar Global Certified Environmental Auditor
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Report Distribution:	Lok Nethercott - EnviroRisk Pty Ltd (Master Copy) Michael Bitzer - General Manager, Highland Pine Products

DOCUMENT CONTROL

REVISION NO.	SUMMARY OF AMENDMENTS	REVIEWED BY	ISSUED BY	ISSUE DATE
R0		S Jenkins	L Nethercott	13 December 2024



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ABBREVIATIONS

ABBREVIATION	DESCRIPTION
AEMR	Annual Environmental Management Report
AS/NZS	Australian and New Zealand Standard
CEnvP	Certified Environmental Practitioner
DA	Development Application
DC	Development Consent (issued by DUA&P) – now DPE
DPE	NSW Department of Planning and Environment
EMP	Environmental Management Plan
EPA	NSW Environment Protection Authority
EP&A	Environmental Planning and Assessment
EPL	Environment Protection Licence (issued by EPA)
IAR	Independent Audit Report
LMP	Landscape Management Plan
OFI	Opportunity for Improvement
OH&S	Occupational Health and Safety
ML	Megalitre
PM	Preventative Maintenance
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act, 1997 (NSW)
PPE	Personal Protection Equipment
SEPP	State Environmental Planning Policy
SOP	Standard Operating Procedure
SWMP	Stormwater Management Plan
WMP	Waste Management Plan

EXECUTIVE SUMMARY

EnviroRisk Pty Ltd (EnviroRisk) was engaged by Highland Pine Products Pty Ltd (HPP) to undertake an independent audit of environmental performance and compliance with conditions of their Development Application (DA) (#403-11-00) and Environment Protection Licence (EPL) 11229 for their Site 2 sawmill facility located off Gate 3 Albion Street, Oberon NSW.

An independent audit is required every three years under Condition 6.3(a) – (f) of the Development Application issued by the NSW Minister for Urban Affairs and Planning in 2001.

The temporal period covered for the audit was from the 1 January 2021 to 31 December 2023¹. The site component of the audit was conducted between Tuesday 26 to Thursday 28 (inclusive) November 2024. The audit was conducted generally in accordance with AS/NZS ISO 19011:2019 *Guidelines for auditing management systems*.

The audit team held particular expertise in air, waste and noise. During the audit, site personnel were interviewed, documentary evidence such as reports, data, records and procedures were sought and examined², and an inspection of the site and surrounds via physical inspection was conducted. Further evidence was provided prior to the site visit and during the week following.

After consideration of the audit objectives and based on the findings (as detailed in the audit protocol attached at **Appendix 3**), the following conclusions were made:

AREA	FINDINGS
Compliance	<ul style="list-style-type: none"> There are five (5) Development Application conditions and four (4) EPL conditions where strict compliance could not be demonstrated. <p>Although non-compliances exist, the site operations are substantially compliant with conditions of the Development Application and Environmental Protection Licence relating to pollution control and amenity protection.</p> <p>Recommendations for improvements to resolve compliance aspects are provided in the Table E1 below.</p>
Air Emissions	<p>Stack testing of emissions by independent monitoring company Ektimo in July 2021, September 2022 and October 2023 reported particulate matter (PM) concentrations of 220 mg/m³, 240 mg/m³ and 250 mg/m³ which are equal to or below the 250 mg/m³ EPA Licence limit.</p> <p>Correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure.</p> <p>Commendably, the site has a number of SOPs in place to improve compliance assurance into the future.</p>
Noise	<p>A site inspection revealed a door along the Drymill wall being open and thereby contributing to noise emissions. However the site inspection also revealed that since the 2021 IEA the rubber curtain at the Drymill re-entry sticker conveyor has been replaced with a physical wall thereby improving noise attenuation at the site.</p> <p>A long-term noise reduction program continues to be implemented as is required under the EPL.</p>

¹ It is noted that the audit was commissioned by HPP some 11 months following the end of the audit period. It is considered that efforts should be made by HPP for future audits to be commissioned within a couple of months of the end of the audit period.

² Where multiple records or data reports were available, a sample was examined using standard audit evidence sampling methods.

Noise reports conducted in 2021, 2022 and 2023 reveal that the site complies with the EPL limits specified. However during the audit period the estimated HPP contribution (LA10) to measure the timber complex noise was estimated to be above the DA-403-11-00 specified measurement criteria of 41 dB LA10 15min for the night period at locations 26 Cunynghame Street West and 12 Herborn Street. It should be noted that in early February 2024 the DA-403-11-00 was updated such that noise criteria under the DA now align with the EPL limits. Whilst this change to the DA technically occurred outside the audit period (i.e. 1 January 2021 – 31 December 2023) the change means that the 2021 – 2023 noise emission would comply with the DA.

No current complaint remains open with regard to noise and a single noise complaint was received by the community during the audit period (which was resolved in a prompt manner) suggesting the site overall is doing a commendable job to control nuisance noises such as impulsive, intermittent and tonal occurrences at the sawmill.

Waste

Significant waste management practices are undertaken at the site in accordance with the waste hierarchy. A system continues to be in place for management and control of H2 timber waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber continues to be captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill. Furthermore boiler ash continues to be used as a soil reconditioner avoiding sending the ash to landfill.

However, the site inspection revealed a significant number of waste oil drums and containers from the HPP Site 2 that are stored on HPP Site 1 until they are collected. These waste drums and containers were not stored in a secondary containment facility. Furthermore, Site 2 and Site 1 operate under separate EPLs (11229 and 887 respectively) and technically the Site 1 EPL does not allow for waste to be received from Site 2. Therefore Site 1 is technically storing waste at a facility not licenced to receive that waste.

Environmental Systems and Plans

A number of commendable efforts aligned with improvements to environmental systems and plans have included:

- The management team undertaking pollution incident management response training and comprehensive training in SOPs specific to managing environmental risk issue at the site;
- Management understanding of the environmental policy, systems and procedures and commitments to improving environmental performance;
- Management meetings where environmental items are addressed and corrective actions implemented;
- Entering of environmental compliance items into the site Risk Manager™ online platform and capturing of preventive maintenance associated with environmental pollution control infrastructure in MEX to ensure these items are actioned, followed up and closed out.

Environmental Performance

Environmental performance has been assessed against the objectives contained within the EMP. Using a subjective 1-5 scale rating system for each objective, the audit has found that the site has achieved an overall environmental performance score of 87%.

Recommendations for Improvement

Improvement recommendations are summarised in **Table E1** below. The recommendation numbering has been structured to identify whether the recommendation arises from the Development Application, the Environmental Protection Licence or a systems element. To assist in the illustration of some recommendations, a pictorial summary of observations is provided, including many commendable practices observed.

TABLE E1: 2021 – 2023 INDEPENDENT ENVIRONMENTAL AUDIT RECOMMENDATIONS

No.	RECOMMENDATIONS	DA / EPL REFERENCE	PRIORITY ¹
DA 403-11-00			
DA-1	Prior to the conclusion of the next audit period HPP to certify in writing, to the satisfaction of the Director-General, that it has obtained all the necessary approvals for operations and complied with all the relevant conditions of this consent and/or any other statutory requirements associated with the extension to the Greenmill and any other developments during the audit period.	DA 2.4	High
DA-2	Ensure that exit doors along the Drymill are closed when not being used and explore engineering or similar solutions to ensure these doors do not remain open following egress to assist with noise attenuation.	DC 4.3	High
DA-3	Repair the damaged cyclone on the Greenmill roof to mitigate dust build up on the roof.	DA 4.4	High
DA-4	Ensure that issues that are identified with potential to impact on the environment (i.e. damaged cyclone) are raised and addressed through the site Incident management system.	DA 4.4	High
DA-5	Update the HPP Waste Management Plan to include the beneficial reuse of the boiler ash as a soil conditioner on farming land.	DA 4.10	Low
DA-6	Maintain vegetation on the southern noise bund wall to be consistent with species and maintenance requirements specified within the Landscape Management Plan	DA 4.19	High
DA-7	Future independent audits should be commissioned shortly after the auditing period (i.e. within 3 months) to optimise the relevance of site visit observations and currency of monitoring data.	DA 6.3 a-f	Low
EPL 11229			
EPL-1	Waste drums and containers should be stored on the HPP Site 2 within a secondary containment facility until collected and/or confirm with the EPA if they can be stored on Site 1 under that sites licence.	EPL O1.1	High
EPL-2	EPL-2: Given the last review of SOP HP-S-KI-BO-62 'Correct a Smoking Boiler' was undertaken in 2019 (i.e. over 5 years ago) undertake another review to ensure it still meets current operational processes and compliance requirements.	EPL 02.1	Low
EPL-3	Ensure that all log trucks leaving the premises have been appropriately swept off before leaving the site to avoid bark and debris being trailed onto roads.	EPL O3.2	High
EPL-4	Whilst not specifically required under the current EPL, update the EMP to include details for monitoring of the new bore adjacent to the treatment line.	EPL M3.2	Medium
ENVIRONMENTAL SYSTEM IMPROVEMENTS			
EMS-1	Keep all SDSs updated and only store as part of the site central SDS folder system (i.e. at Gatehouse, Stores and Drymill).	-	Low
EMS-2	Arrange for waste drums and containers to be removed from the site on a regular basis in accordance with applicable regulations and arrange for the waste drums and containers to be stored in a secondary containment area whilst they await collection.	-	High

EMS-3	Investigate options for appropriate decommissioning of the old bulk diesel tank in accordance with applicable regulations.	-	Low
EMS-4	Add appropriate storage of gas cylinders in accordance with applicable regulations to inductions/training and checking of appropriate storage in accordance with applicable regulations to an internal audit checklist and undertake regular audits.	-	High
EMS-5	Consolidate spill response management into a single procedure/process to avoid confusion.	-	Medium
EMS-6	Ensure that waste aerosol cans are placed in the correct bins for disposal.	-	Medium
EMS-7	Develop a documented process that demonstrates that IBCs that are triple rinsed are suitable for collection (i.e. documented evidence of number of IBC's that meet triple rinse requirements and that are collected).	-	Medium

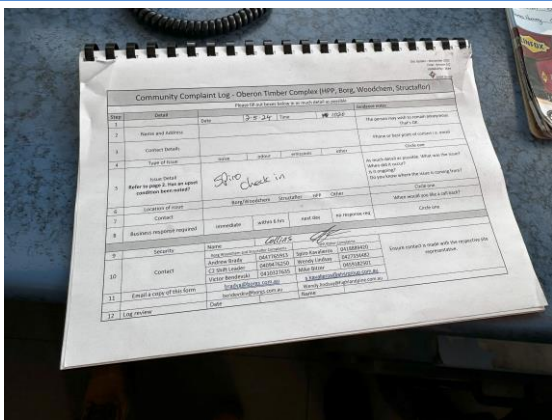
1. **Priority** is rated as follows: **High** - to be completed over the next 3 months; **Medium** – to be completed over the next 12-18 months; **Low** – to be completed before the next triennial audit.

Opportunities for improvement (OFI) have been rated as a Low priority. Compliance items have been rated either a High or Medium priority for action. Refer to Audit Protocol for detail as to the applicable compliance item and the rationale behind each recommendation.

PICTORIAL SUMMARY



1. Community complaint signage – called the number and found to be operational



2. On site complaint book was observed to be in use and kept at the Gatehouse.



3. Bulk oil store used for Site 2 operations was observed to be bunded and clean and located on Site 1 (noting that site 1 has a separate EPL).



4. Waste drums from Site 2 are stored on Site 1 (noting that site 1 has a separate EPL) and not stored in a secondary containment system.



5a & b. New HAZCHEM signage at site entry points



6a & b. SDS's – 3 full sets across site – 1 in gatehouse, 1 in Maint Workshop and 1 in Dry Mill control room – Updated annually. Out of date SDSs were observed in a folder in the green mill that was not part of the site central SDS folder system



7. The site inspection identified a door was open on the dry mill southern boundary thereby limiting effective noise attenuation.



8. Whilst it was sighted that log truck trailers are swept off before leaving the site, a truck was also sighted coming into Gate 2 with bark material that had not been appropriately swept off prior to leaving the site.



9a – d. H2 treatment batch plant observed to be in a generally tidy condition. The plant is bunded and maintained. Hoses kept within bunded area. A down gradient groundwater bore has been installed. Currently epoxy coating and floor joints appear in reasonable condition.



10. Diesel Bulk Storage tank – Self bunded tank on Site 1 but used by mobile plant from Site 2.



11. There is a cyclone on the roof of the Greenmill that is damaged and is causing dust build up on the roof. Furthermore this issue was not sighted as being raised as an incident in the incident reporting system.

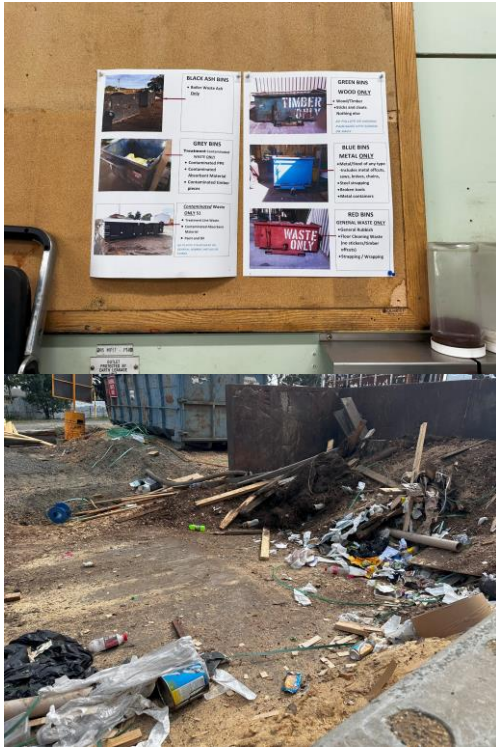


12a & b. Boiler appeared to be in good operation during site inspection

Opacity monitor correlation between opacity and particulate concentration adjusted. However it is still only a guide not a compliance measure.



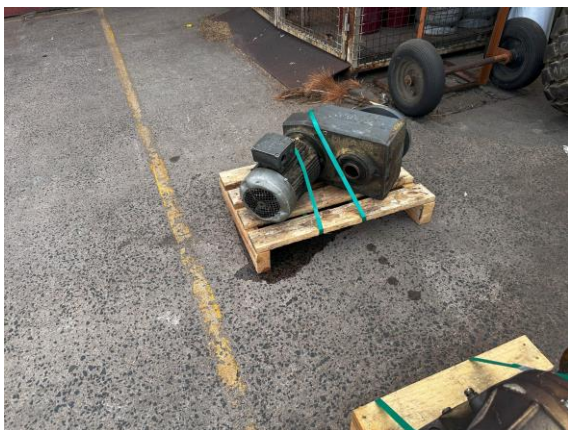
13. Aerosols were observed to be placed in the wrong bin.



14. Waste Bins posters list 'Paint and Oil' to go in contaminated waste bins. This should be corrected to avoid any confusion as paint and oil should not be placed in bins. A can of paint with some liquid inside was observed in a bulk general waste area on Site 1 with waste from Site 2 (noting that site 1 has a separate EPL).



15a & b. Gas bottles stored in caged area however were not all chained. A single gas bottle was also observed in the Holtec shed and not chained.



16. Maintenance yard with parts leaking oil onto ground.



17. Sighted the repaired wall at the Dry-mill re-entry sticker conveyor to contribute to noise attenuation from this area.

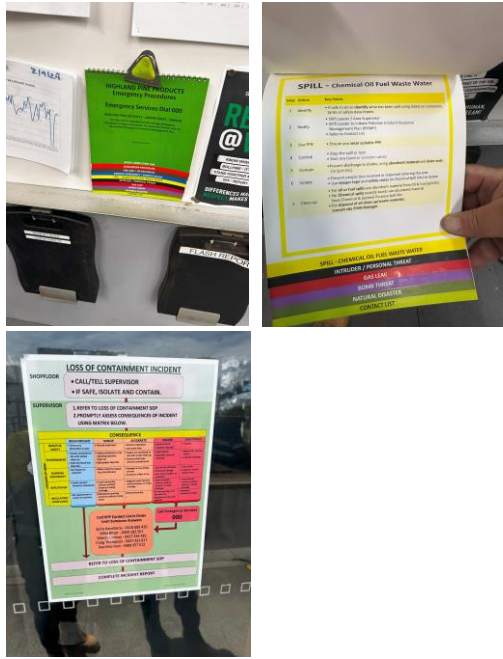


18. The triple rinsing of IBCs at the treatment line and their recycling is to be commended. A documented process should be established demonstrating that IBCs that are triple rinsed meet cleaning quality requirements and are suitable to be collected so there is documented evidence of what is taken from the site.



19a & b. Vegetation along the southern noise bund wall needs to be maintained to be in accordance with the site Landscape Management Plan





20a – c. Sighted an Emergency Response Flipchart that includes spill response and nearby the PIRMP spill incident response procedure chart. They specify different procedures for responding to reporting a spill incident.



21a & b. Noise attenuation panelling incorporated into the construction of the shed enclosing the Extended Length Infeed (ELI) Greenmill extension. Further noise attenuation achieved via the installation of the Spiral Helix Infeed system replacing the noisier step feeder infeed system.



22. Stormwater gate to stop discharge from the site. Gate can be controlled from the gatehouse.

1.0 INTRODUCTION

EnviroRisk Pty Ltd (EnviroRisk) was engaged by Highland Pine Products Pty Ltd (HPP) to undertake an independent audit of environmental performance and compliance with conditions of their Development Application (DA) (#403-11-00) and Environment Protection Licence (EPL) 11229 for their Site 2 sawmill facility located off Gate 3 Albion Street, Oberon NSW.

The audit is to be undertaken every three years as required under Condition 6.3 (a) – (f) of the Development Application (DA) issued by the NSW Minister for Urban Affairs Planning in 2001. Condition 6.3 (a) – (f) states:

Within 12 months of conclusion of commissioning of the development, and every three years thereafter, unless the Director-General otherwise directs, the Applicant must commission and pay the full cost of an Independent Environmental Audit. The Independent Environmental Audit must:

- (a) Be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Director-General;*
- (b) be consistent with ISO 14010 - Guidelines and General Principals for Environmental Auditing, and ISO 14011-Procedures for Environmental Auditing, or updated versions of these guidelines/manuals;*
- (c) Assess the environmental performance of the development, and its effects on the surrounding environment;*
- (d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;*
- (e) review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring Program; and if necessary,*
- (f) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.*

EnviroRisk conducted a previous compliance audit in October 2021. The objective of this 2024 independent audit was therefore to meet the “three years thereafter” audit requirement, and to address consent Conditions 6.3(a) – (f) above.

A copy of the endorsement by the Director General of the auditor to commence the audit and the audit team’s independence statement is attached within **Appendix 1 and 2**.

Exclusions: Site 1, which is not located within the development consent area.

2.0 AUDIT OBJECTIVES

The objectives of the audit were to:

- a) assess the environmental performance of the project;
- b) assess whether the site is complying with the conditions of the DA and the EPL;
- c) review the adequacy of any system, plan or programme required under the DA; and

- d) recommend measures or actions to improve the environmental performance of the site and any system, plan or programme reviewed in c) above;

The audit was conducted generally in accordance with AS/NZS ISO19011:2019 *Guidelines for auditing management systems* and the NSW guidelines *Independent Audit – Post Approval Requirements, June 2018* issued by the Department of Planning and Environment.

3.0 SCOPE OF WORKS

The audit (as defined under AS/NZS ISO19011:2019) includes the sawmilling and timber treatment operations on Site 2 of the Albion Street, Oberon timber complex owned and operated by HPP. It includes associated facilities (boiler, log yard, storage, H2 Bifenthrin treatment plant, greenmill, drymill etc.), activities (training, monitoring, maintenance) and surroundings where included within the Development Application (DA) and Environment Protection Licence (EPL).

The temporal period covered is from the 1 January 2021 to 31 December 2023. It is noted that the audit was commissioned by HPP some 11 months following the end of the audit period. It is considered that for future audits efforts should be made by HPP to commission the audit within a couple of months of the end of the audit period.

The Audit was undertaken as per the following scope of works:

1. Desktop documentation review: relevant documents were obtained for review, including copies of the most recent versions of plans prepared as required under the DA, and the included modifications referred to in the previous section of this report;
2. Audit Preparation: a draft audit plan setting out the work schedule of the audit was prepared for client review and finalisation; an audit protocol (checklist) was prepared that identified and tabulated all the audit criteria to be used by the audit team during the audit;
3. Site Component: an opening meeting with relevant client personnel was convened onsite; a site inspection was conducted via specific photographic evidence requested by the auditor and provided by the site to familiarise the audit team with the sawmill and associated areas; interviews with key operational personnel were conducted via web video and verifiable evidence sought against all audit criteria listed in the protocol; following an audit team review meeting draft findings and recommendations were provided to HPP management for review and discussion of any other relevant matters;
4. Reporting: a draft audit report was prepared detailing all relevant information concerning the audit, including the attached completed audit protocol, reference to evidence sighted, photographs where applicable, and tabulated non-compliances/improvement opportunities and recommendations for improvement;
5. Quality Reviews: the draft audit report was quality-reviewed before issue for review/comment by the client; and
6. Finalisation: the finalised audit report issued.

4.0 AUDIT TEAM

The audit team comprised:

Mr Stephen Jenkins BAppSci, GradDipMgt (Project Director, Lead Auditor).

Stephen is a Certified Environmental Practitioner and a Vic EPA-appointed Environmental (Industry Facility) Auditor (appointed pursuant to the Environment Protection Act, 2017). Stephen was formerly an operations scientist with the Victorian EPA (1980's) and worked as an environmental risk manager with Richard Oliver Risk Managers. He has conducted systems/risk audits of a large variety of sites including timber, waste, food processing, chemical, building and construction, automotive parts manufacturers, plastics, extractive and related industries.

Mr Lok Nethercott, BAppSci – EnvMgt, Exemplar Global certified Environmental Auditor Lok is the Director of EnviroRisk Pty Ltd and is a Certified Environmental Practitioner and an Exemplar Global Certified Environmental Auditor. He has over 23 years of environmental management experience; first as an Environmental Project Officer with both the Department for Environment and Heritage SA and City of Charles Sturt Council, and later as the Business Environmental Manager for a large timber manufacturing company throughout NSW, VIC and SA. He has also conducted systems / risk / compliance-based audits throughout Australia and across a range of industries including timber manufacturing, building and construction, port facilities and stock feed manufacturers.

Details of the audit team's capabilities were provided to the DPE with endorsement provided prior to the audit commencing and attached within **Appendix 1**.

5.0 METHODOLOGY

The following methodology was adopted for the audit:

5.1 AUDIT PLAN

A draft Audit Plan was prepared and sent to HPP. The Plan detailed the objectives, scope, team and criteria for the audit, along with a proposed schedule. Some administrative matters were also covered, and a list of documents for review prior to the site component was requested.

Many of the requested documents were provided for EnviroRisk review prior to the site inspection component, with more provided as requested during the site component of the audit and some post site inspection.

5.2 SITE COMPONENT

A site inspection was undertaken as part of the audit on Tuesday 26 and Wednesday 27 November 2024.

The site component also involved working with site personnel to engage in interviews, sighting of documentary evidence presented by HPP to verify compliance with the audit criteria (listed in the Protocols within **Appendix 3**), and physical inspections of relevant parts of the site. The following parts of the site were inspected:

- Storage and handling areas;

- Drymill and Green mill operations (including the new extension to the Greenmill);
- Blue frame (H2 Bifenthrin) timber preservative storage, blending and application;
- Boiler, fuel shed and kiln activities;
- Gatehouse areas;
- Noise walls and building enclosures, roofed areas of the fuel shed and the Drymill;
- Log yard and wood fuel storage;
- Maintenance workshop and greasers shed;
- Car parking areas
- Oil storage shed,
- Waste drum storage area; and
- Surface water drainage channels and ponds.

Evidence gathering progressed by identifying and evaluating available documentation and records relating to environmental performance and DA and EPL Licence conditions.

This entailed discussions with site personnel and review of written and communicated processes. It also included the review of monitoring activities and establishing the veracity and completeness of obtained records, reports, data, drawings, etc.

Where multiple records of similar format were available as evidence, judgement-based sampling was employed as appropriate. Where deficiencies were identified in the availability of data, plans or information to adequately perform the audit, and where such information was vital to completing the audit report, additional data were sought where reasonable to do so.

External stakeholders within the community were not contacted for this audit.

The environmental auditor in consultation with the lead auditor completed the process of interviews, evidence sighting and evidence review of specific areas. At the completion of the audit draft preliminary findings of the audit team were provided by the Audit team to HPP management for review and feedback. Commendably, HPP's management representatives (including the site manager) and the site's environment consultant attended the briefing.

Further documentation was provided and reviewed over subsequent weeks during which the audit report was prepared. A draft of the report was provided for review prior to finalisation and submission.

6.0 AUDIT CRITERIA

The audit protocol (**Appendix 3**) lists the audit criteria in the first and second columns of the Tables. The primary criteria are the applicable conditions contained within the DA (DA-403-11-00) and EPL No. 11229 (version: 13 August 2024³). Secondary criteria against which checks were made during the audit include legal and other requirements, Regulations or

³ Noting there were 2 variations to the licence during the audit period on 17 Dec 2021 and 18 Dec 2023 and then outside the audit period on 17 Jun 2024 and 13 Aug 2024

guidelines not otherwise referred to in the DA and EPL and which apply in the context of compliant environmental practice.

The other columns in the table list the auditor’s findings comprising in turn:

- the evidence sighted,
- the auditor’s findings and recommendations, and
- a determination of compliance against each approval/licence condition⁴.

Those items verified through direct observation are displayed in the Pictorial Summary (following the Executive Summary above). Photographs may also indicate observations for which improvement recommendations have been made, and examples of commendable environmental practice observed.

7.0 FINDINGS

The following sub-sections summarise the audit findings for each significant environmental category requested to be canvassed by stakeholders during initial communications.

Compliance findings, along with a description of the Auditors findings against the evidence presented, were made against each line-item condition of the DA and the EPL and are provided in the Audit Protocol (refer **Appendix 3**). In determining compliance, reference was made to the content and implementation of associated plans and the implementation of systems necessary to action these plans e.g. EMP, PIRMP, SWMP, WMP and LMP plus management system elements such as preventative maintenance plans, training programs, records etc.

Compliance was determined applying the methods provided in the ‘Independent Audit-Post Approval Requirements’ guidelines.

The audit report documents where strict compliance with DA and EPL conditions could not be demonstrated. The audit found that whilst strict non-compliances exist, site operations are substantially compliant with the pollution control and amenity- based conditions of both the DA and EPL.

Recommendations for improvements to resolve compliance aspects have been listed as a line-item within the Audit Protocol. Recommendations have been extracted and are tabulated against the relevant consent, licence or system element within **Table E1 – refer to Executive Summary**), along with an opinion made by the Auditor as to the priority for rectification action.

It is expected HPP will include recommendations into their Risk Manager™ online platform (or equivalent) to track implementation and enable close out when complete.

7.1 DEVELOPMENT APPLICATION ADMINISTRATIVE ITEMS

⁴ Where a condition does not apply at the time of the audit, a “Not Applicable” compliance status is entered

7.1.1 Legacy Development Consent Conditions

The 2015 IAR identified DA conditions that should have been addressed within the initial years of the approval. HPP acted on a recommendation within that audit and requested DPE to review and provide guidance on whether outstanding legacy conditions were still relevant. DPE responded via letter dated 17/8/16 clarifying some aspects of the DA conditions were relevant and suggesting that HPP progress an amendment via a S75W application in order to resolve some compliance issues.

Following the previous Audit Recommendations (EnviroRisk 2015 and EnviroRisk 2019), HPP further liaised with DPE in late 2019 / early 2020 regarding the modification of consent conditions. Reportedly, these discussions were prolonged and seeking a modification of consent conditions at that time was parked due to the challenges associated with COVID 19.

The DA has since been updated in Feb 2024 (noting this falls outside the audit period) to include some additional conditions as follows:

- condition 'f' now refers to an additional drawing “Highland Pine Products Combined Site Layout Proposed, Revision A” prepared by MICV Engineering Services Pty Ltd, Drawing No. HPP-CS-001, dated 12 April 2001, as amended by site drawing – “Highland Pine products Pty Ltd Proposed Storage Area Site 1 & 2 Layout”, prepared by George Pabis, Drawing No. HPP07501, dated 3 June 2002”.
- condition 'h' has been modified to capture the ELI extension to the Greenmill and now states 'modification application DA 403-11-00-Mod-2, including Modification Report titled 'Section 4.55 Modification Report, Details of Proposed Development' prepared by ESHR Group Pty Ltd dated 2023 and all accompanying documents including Request for Information responses.'
- conditions 'i' and 'j' have also been slightly modified to also capture 'prescribed conditions in clause 98 of the *Environmental Planning & Assessment Regulation 2000*'.
- condition 4.1 has been amended to state 'The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits outlined in the EPA Licence (EPL-11229) for the development'.

As these changes occurred outside the audit period, compliance with the requirement of these changed conditions will need to be reviewed as part of the next Independent Environmental Audit. These changes, however, inform how the DA would have been enforced over the audit period.

The DPE have also advised HPP that the existing standard conditions would not be removed from the DA.

7.2 AIR EMISSIONS

7.2.1 Products of Combustion – Particulates and Smoke

Air emission compliance was again a focus of the audit. Since installation and commissioning in around June 2017, the overfired air system has improved emissions demonstrated by independent stack monitoring undertaken by Ektimo in July 2021,

September 2022 and October 2023 which reported concentrations of 220 mg/m³, 240 mg/m³ and 250 mg/m³ respectively, which are equal to or below the 250 mg/m³ EPA Licence limit.

Correlation between the opacity monitor and particulate emissions still only serves as a guide and is not a compliance measure. In correspondence from Ektimo (dated 21 April 2021), a correlation calculation formula between the Continuous Emissions Monitoring System and PM concentrations (dry STP stack CO₂) was provided. Based on these formulas it indicates that the CEMS concentration of approximately 229 mg/m³ equates to 250 mg/m³ from the stack. The CEMS is therefore providing a reasonably accurate means to assess compliance, albeit underestimating emissions by approximately 8%. This margin was recognised by the site and CEMS action trigger levels of under 20% opacity were being applied.

Commendably, the site has a number of SOPs in place to improve compliance assurance. (refer to section 7.2.3 below).

7.2.2 Products of Combustion – Nitrogen Oxides (NO_x)

Stack testing over the past 3 years July 2021, September 2022 and October 2023 reveals NO_x concentrations of 100 mg/m³, 120 mg/m³ and 100 mg/m³ which are all well below the EPL limit of 2,500 mg/m³.

7.2.3 Boiler Combustion Efficiency Assessment

This 2021 – 2023 IEA reviewed again the boiler operations and revealed commendable efforts in reviewing and implementing controls to improve boiler efficiencies including:

- A review of the boiler control system was undertaken with managers and boiler operators to determine what was needed to be displayed on the boiler control system screen to enable operators to effectively manage controls.
- The SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019) was also reviewed with the boiler operator and an associated training register showing those operators that are competent in this SOP. Given the last review of this SOP was in 2019 (i.e. over 5 years ago) undertaking another review is recommended to ensure it still meets current operational processes and compliance requirements.
- Emissions from the boiler appeared to be in good order during the audit site inspection.
- The ability to adjust the mix of under-fire and overfire air in relation to percentage of the feed rate is available through the boiler control system screen.
- boiler ash continues to be used as a soil reconditioner avoiding sending the ash to landfill.

7.2.4 Dust

Physical inspection of the site revealed yard dust and wood dust/ shavings were largely controlled with limited risk of being blown beyond site boundaries. The boiler fuel bunker revealed woodchip is largely contained within the fuel bunker area.

A cyclone on the roof of the Greenmill appears to be damaged and is causing dust build up on the roof. This will need to be repaired to mitigate fugitive dust impacts.

7.3 NOISE

7.3.1 Onsite observations

The site inspection revealed a door along the Drymill wall was open thereby limiting effective noise attenuation.

However the site inspection also revealed that since the 2021 IEA the rubber curtain at the Drymill re-entry sticker conveyor has been replaced with a physical wall thereby improving noise attenuation at the site.

Noise reports conducted in 2021, 2022 and 2023 reveal that the site complies with the EPL limits specified. However during the audit period the estimated HPP contribution (LA10) to measure the timber complex noise was estimated to be above the DA-403-11-00 specified measurement criteria of 41 dB LA10 15min for the night period at locations 26 Cunynghame Street West and 12 Herborn Street.

It should be noted that in early February 2024 the DA-403-11-00 was updated such that noise criteria under the DA now align with the EPL limits. Whilst this change to the DA technically occurred outside the audit period (i.e. 1 January 2021 – 31 December 2023) the change means that the 2021 – 2023 noise emission would unlikely now result in a compliance issue.

No current complaint remains open with regard to noise and a single complaint was received by the community during the audit period (which was resolved in a prompt manner) suggesting the site overall is doing a commendable job to control nuisance noises such as impulsive, intermittent and tonal occurrences at the sawmill.

7.4 ENVIRONMENTAL SYSTEMS AND PERFORMANCE AGAINST MANAGEMENT PLANS

A review was made of each of the plans [Environmental Management Plan (EMP), Pollution Incident Response Management Plan (PIRMP), Stormwater Management Plan (SWMP), Waste Management Plan (WMP), Landscape Management Plan (LMP)] during the audit as they related to compliance, including a sampling of implementation as a compliance check.

The site has made commendable efforts to update the EMP, SWMP, WMP and develop an LMP.

The EMP has been reviewed and updated again with the latest version dated May 2023. The EMP builds on earlier versions and caters for Site 2 activities (and the other sites managed by HPP). It contains an amendment record on iterations over the years.

There have been no PIRMP notifications during the audit period. Also sighted a detail training program for the management team on the PIRMP and its requirements. Spill response training is also undertaken at the site.

Other commendable efforts aligned with the plans have included:

- The management team undertaking pollution incident management response training and comprehensive training in SOPs specific to managing environmental risk issue at the site;
- Management understanding of the environmental policy, systems and procedures and commitments to improving environmental performance;
- Management meetings where environmental items are addressed and corrective actions implemented;

Entering of environmental compliance items into the site Risk Manager™ system and capturing of preventive maintenance associated with environmental pollution control infrastructure in MEX to ensure these items are actioned, followed up and closed out.

7.5 PREVIOUS AUDIT: REVIEW OF RECOMMENDATIONS

A review of the 2021 Audit recommendations found commendable progress in actioning previous recommendations with all but two (2) recommendations still to be closed out and one (1) is still in progress relating to the following:

- Update the EMP to include the current version of EML 11229 (noting that the EMP was last updated Feb 2023 and the latest EPA licence is dated 13 August 2024);
- Arrange for drums be removed from the empty drum storage; and
- Ensure that all gas bottles are chained.

These recommendations have been captured in this Audit report (refer to **Table E1 in the Executive Summary**).

7.6 INCIDENT REPORTING

The site's internal incident reporting and recording system was in the main effective in identifying, documenting and rectifying environmental incidents occurring during operational activities. The system followed a procedure outlined in the PIRMP which, under interrogation, was found to be known, utilised by staff with documented records available.

7.7 ANNUAL REPORTING

Annual environmental management reports (2021, 2022 and 2023) and annual returns (2020-21, 2021-22, 2022-23 and 2023-24) were noted to have been issued to both DPE and EPA respectively each year over the audit period. No inconsistencies were identified in the Annual reports issued during the audit period that could represent a concern as to the accuracy or completeness of information contained.

7.8 COMPLAINT MANAGEMENT

The site provided evidence that it receives and acts on environmental complaints in a timely and effective manner. There were three (3) air related complaints in 2021 and a noise complaint in 2022. All complaints were resolved in a prompt manner.

An environmental hotline number is displayed at the site entry to facilitate reporting. This number was tested during the audit and found to be operational.

A community consultation committee had typically been operating quarterly but Covid-19 and change in site management has meant that meetings had not been happening regularly with only one meeting in 2021. However meetings commenced again in 2022. A review of a selection of meeting minutes (Nov 2022, Mar 2023 and Aug 2023) revealed that a number of environmental issues are raised including use of boiler ash as a soil conditioner on farming land and the 2022 noise complaint from sonic horn.

8.0 CONCLUSIONS

After consideration of the audit objectives and all the findings summarised in the preceding sub-sections, the audit conclusions are set out under the following three sub-sections.

8.1 COMPLIANCE

The audit found that the site is substantially compliant with the pollution control and amenity conditions of the DA and EPL. The audit has identified:

- five (5) specific line item conditions of the Development Application where strict compliance could not be demonstrated; and
- four (4) line item conditions of the EPL where strict compliance could not be demonstrated. However, two (2) of these conditions related to similar elements under the DA relating to noise and dust compliance. Therefore, **only two (2)** specific different items were identified relating to a non-compliant determination.

8.2 ENVIRONMENTAL PERFORMANCE

To evaluate environmental performance the criteria and objectives in **Table 1** have been adopted and are considered appropriate for demonstrating good environmental practice and an assessment of their achievement has been based on the findings of the audit.

Using a subjective 1-5 scale rating system for each objective, the audit has found that the site has achieved an overall environmental performance score of 87%.

TABLE 1: ENVIRONMENTAL PERFORMANCE RATING

PERFORMANCE CRITERIA AND OBJECTIVES	COMMENT	RATING (1 – 5)				
		1	2	3	4	5
HPP's operations will comply with all controlling environmental regulations, licences and consent conditions.	Compliance issues identified					
Environmental impacts will be controlled within accepted limits as defined by regulatory agencies including Environmental Protection Agency (EPA) and the DPE NSW	Control improvements have been identified					
In the event of a failure to achieve objectives, frank and expeditious remedial action is implemented so impacts can be contained and operations corrected to prevent future failure	HPP issues in the main have been expeditiously and frankly rectified although there are still some to be resolved.					

8.3 RECOMMENDATIONS FOR IMPROVEMENT

Improvement recommendations have been set out within the Protocol and within this report and have been extracted, prioritised and then sequentially listed against consent and licence requirements within **Table E1 (refer to Executive Summary)**.

9.0 REFERENCES

In addition to the documentary evidence listed in column 3 of the audit protocol at **Appendix 3**, the following references are cited in this report:

1. Independent Audit Post Approval Requirements Department of Planning and Environment, May 2020
2. Communication NSW Planning & Environment, Highland Pine Products (DA 403-11-00) Independent Environmental Audit 2021 – 2024 team endorsement request, 13/11/2024⁵.
3. Environment Protection Licence 11229, 13 August 2024, NSW EPA.
4. Schedule 4, Standards of Concentration for scheduled premises: general activities and plant, Protection of Environment Operations (Clean Air) Regulations, 2010.
5. Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, EPA, September 2022.
6. AS/NZS 2843.1:2006 Timber preservation plants Part 1: Timber preservation plant site design.
7. AS/NZS 2843.2:2006 Timber preservation plants Part 2: Treatment area operation.
8. Load Calculation Protocol, DECC, June 2009

⁵ Noting that the Audit period was for the 1 January 2021 – 31 January 2023, however the audit was commissioned by HPP in November 2024.

APPENDIX 1 - AUDIT TEAM ENDORSEMENT

NSW Planning ref: DA403-11-001-PA-14

Mr Spiros Kavalieros
Environment Manager
HIGHLAND PINE PRODUCTS PTY LIMITED
51 QUEEN STREET
OBERON New South Wales 2787
13/11/2024

Sent via the Major Projects Portal only

**Subject: Highland Pine Products (DA 403-11-00)
Independent Environmental Audit 2021 –2024 team endorsement request**

Dear Mr Kavalieros

Reference is made to your post approval matter, DA403-11-001-PA-14, request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit (IEA) of Highland Pine Products (the development), in accordance with Schedule 2, Condition 6.3 of the development consent DA 403-11-00, as modified (the consent), submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 4 November 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent. Consequently, in accordance with Schedule 2, Condition 6.3 of the consent as nominee of the Planning Secretary, I approve the appointment of:

Mr Stephen Jenkins, Lead Auditor;
Mr Lok Nethercott, Assistant Auditor;

to undertake the IEA and prepare the IEA report audit. This approval is conditional on the audit team being independent of the development and maintaining a current Exemplar Global Certification.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may wish to have regard to the Independent Audit Post Approval Requirements dated May 2020. A copy of the requirements can be located at <http://planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>.

The audit report is to include the following:

- consultation with the relevant agencies;

- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- assess the environmental performance of the development, and its effects on the surrounding environment;
- assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;
- review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring Program; and, if necessary,
- recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.
- identify opportunities for improved environmental management and performance.

Failure to meet these requirements may require revision and resubmission.

Within two months of commissioning this audit, Highland Pine is to submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Highland Pine review the report to ensure it complies with the relevant consent condition.

NSW Planning advises that Highland Pine will require to nominate a different audit team for the Secretary's consideration for the next audit (2027).

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

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

APPENDIX 2 - AUDITOR DECLARATION

APPENDIX 2 – INDEPENDENT AUDIT DECLARATION FORM

Independent Audit Declaration Form

Project Name	Highland Pine Products Sawmill Upgrade
Consent Number	DA 403-111-00
Description of Project	Extension of log yard, upgrade to green and dry mills
Project Address	Gate 2, Albion Street, Oberon NSW 2787
Proponent	Highland Pine Products Pty Ltd
Title of Audit	INDEPENDENT AUDIT REPORT – Planning and Environmental Compliance, Oberon NSW, OCTOBER 2021
Date	26 November 2024

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 Post Approval Requirements (Department 2018)*;
- 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)

Name of Auditor	Stephen John Jenkins
Signature	
Qualification	BAppSci, GradDipMgt, CEnvP
Company	EnviroRisk Management Pty Ltd
Company Address	30 Kees Road, Lara VIC 3212

APPENDIX 3 – COMPLETED 2021 – 2023 INDEPENDENT ENVIRONMENTAL AUDIT PROTOCOL

DEVELOPMENT CONSENT - DA 403-11-00



AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD, OBERON

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
Legal Lot Description/ Identification	DA Lot 10 DP 855384; Lot 86 DP 574012	Previous 2015 audit outcome confirmed as still being current. Written communication DPE, 17/8/16. DPE letter stated not necessary to update. DA (February 2024)	Property descriptors changed in early 2000's with a subdivision. Legal Description should read Lot 10 DP 1017456 rather than Lot 10 DP 855384. However DA has been updated in Feb 2024 and still shows Lot 10 DP 855384; Lot 86 DP 574012. As per previous audit comments the department have stated it is not necessary to update.	C	
GENERAL - Obligation to Minimise Harm to the Environment	1.1 Applicant must implement all practical measures to prevent or minimise any harm to the environment.	Observation, Interviews, Documentation review, Data assessment.	This remains a broad statement. If there are non-compliances identified this condition must also be a NC. In the main, the auditor did not observe any material risk of harm to the environment. There are however further practical measures that can be actioned to minimise harm.	mnc	
Terms of Approval	1.2 The Applicant must carry out the development generally in accordance with:	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Previous Audit found many items in compliance with a number held over for review as to applicability given the 18 years since approval was granted.	C	
	(a) DA No. 403-11-00 submitted to the Department of Urban Affairs and Planning;	Written communication DPE, 17/8/16. (Ref DA 403-11-00) DA (February 2024)	HPP wrote to DPE in 2015 (19/11/15, S. Kavaleros) and received a reply 17/8/16 (C.Ritchie, Director, Industry Assessment) stating what items may be closed out and what still remained unresolved. However the DA has been updated in Feb 2024 (outside the audit period) to include some additional conditions. However the department advised that the existing standard conditions would not be removed from the DA.	C	
	(b) SEE, titled "Statement of Environmental Effects- Highland Pine Joint Venture – Oberon, NSW", dated November 2000 and prepared by Highland Pine Products;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in previous audits and letter from DPE 2016.	C	
	(c) Additional information, dated 12 April 2001, regarding issues at "Oorong" supplied to the Department by Highland Pine Products on 17 April 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in letter from DPE 2016	C	
	(d) Additional information, dated 12 April 2001 regarding predicted traffic movements for the proposed development, supplied to the Department by Highland Pine Products on 17 April 2001	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in letter from DPE 2016	C	
	(e) Additional information. Dated 12 April 2001, regarding the construction schedule for the proposed development, supplied to the Department by Highland Pine Products on 17 April 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Letter DPE 2016	C	
	(f) Site drawing- "Highland Pine Products Combined Site Layout Proposed Revision A" prepared by MICV Engineering Services Pty Ltd, Drawing No. HPP-CS001, dated 12 April 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00) DA (February 2024)	DA has been updated in Feb 2024 (outside the audit period) to make modifications to condition 'F' and now refers to an additional drawing "Highland Pine Products Combined Site Layout Proposed, Revision A" prepared by MICV Engineering Services Pty Ltd, Drawing No. HPP-CS-001, dated 12 April 2001, as amended by site drawing – "Highland Pine products Pty Ltd Proposed Storage Area Site 1 & 2 Layout", prepared by George Pabis, Drawing No. HPP07501, dated 3 June 2002". It is acknowledged this change occurred outside the audit period yet it indicates that Planning NSW was satisfied with compliance during the audit period.	C	
	(g) Additional information. Dated 11 May 2001, regarding noise emissions limits for the proposed development, supplied to the Department by Highland Pine Products on 15 May 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00) DA (February 2024)	Letter DPE 2016 had previously addressed this requirement. However the DA has been updated in Feb 2024 (outside the audit period) which has amended condition 4.1 to state 'The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits outlined in the EPA Licence (EPL-11229) for the development'. It is acknowledged this change occurred outside the audit period yet it indicates that Planning NSW was satisfied with compliance during the audit period.	C	


	(h) relevant prescribed conditions in clause 98 of the Environmental Planning & Assessment Regulation 2000; and (98 Compliance with Building Code of Australia and insurance requirements under the Home Building Act 1989)	Written communication DPE, 17/8/16. (Ref DA 403-11-00) DA (February 2024)	Letter DPE 2016 had previously addressed this requirement. However, the DA has been updated in Feb 2024 (outside the audit period) with condition 'h' modified to capture the ELI extension to the Greenmill and now states 'modification application DA 403-11-00-Mod-2, including Modification Report titled 'Section 4.55 Modification Report, Details of Proposed Development' prepared by ESHR Group Pty Ltd dated 2023 and all accompanying documents including Request for Information responses.' It is acknowledged this change occurred outside the audit period yet it indicates that Planning NSW are satisfied with compliance during the audit period.	C
	(i) the conditions specified in Schedule 2 of this consent.	Various, Site interview, Observations	The DA has been updated in Feb 2024 (outside the audit period) with conditions 'i' and 'j' modified. As this change occurred outside the audit period, compliance with the requirement of these changed conditions will need to be reviewed as part of the next Independent Environmental Audit	C
Licensing Variation	1.3 Prior to commencement of any construction activities, the Applicant must apply to the EPA for a license variation for the development	Environmental Protection Licence 11229, 14/08/2024	Pre- 2010 requirement. However, reviewed copy of licence, see comments further within protocol. HPP also provide the EPA with a copy of the DA proposal for the ELI extension to the Greenmill. The EPA responded advising that it does not change the EPL for the site.	C
Surrender of DA 27/95	1.4 Within twelve months following the conclusion of commissioning of the development, the Applicant must submit an application to the Minister to surrender Development Consent DA 27/95 in accordance with Section 80A(1)(b) of the EP&A Act, in so far as that consent applies to the land covered by this consent	Refer DPE Letter 2018	Addressed in previous audit (EnviroRisk, 2015)	C
Restriction to Operations	1.5 Timber production shall be limited to a total of 265,980 m3 per year	AEMRs 2021, 2022, 2023	Timber production confirmed under 265,980m3/year with 234,535 m3, 226,000 m3 208,820 m3 in 2021, 2022 and 2023 respectively.	C
	Structural Adequacy (note items 1.6 - 1.11 Construction related and no longer relevant)	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Previously confirmed as in compliance by DPE	C
	1.10 Before the commencement of construction work on any aspect of the development, the Applicant must obtain a construction certificate for this aspect of the development from the Principal Certifying Authority.	Written communication DPE, 17/8/16. (Ref DA 403-11-00) Sighted Letter from HPP to DPE dated 08 Oct 2019 Sighted email communication with DPE dated 15 Oct 2019 Notice of Determination for Construction Certificate - 10 May 2024	Construction completed in early 2000's. Following the previous Audit Recommendations (EnviroRisk 2015 and EnviroRisk 2019), HPP further liaised with DPE in late 2019 / early 2020 regarding the modification of consent conditions (sighted letter from HPP to DPE dated 8 oct 2019 and email dated 15 Oct 2019 to and from DPE). Reportedly, these discussions went backwards and forwards and due to the challenges associated with COVID 19 nothing further has been progressed. However the department has since advised that the existing standard conditions would not be removed from the DA. Furthermore a development application was commenced in late 2023 for the ELI extension to the Greenmill and although outside this audit period a construction certificate was provided for the development in May 2024.	C
	1.11 Before commencement of operations permitted by this consent, the Applicant must obtain an occupation certificate for the buildings and structures which comprise the development, from the Principal Certifying Authority.	As above	As above and as outside audit period occupation certificate to be addressed as part of next audit.	C
Compliance Reporting	2.1 Throughout the life of the development, the Applicant must secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	Observation, Interviews, Documentation review, Data assessment.	The requirement is broad. Non-compliances have been identified and as such this condition is also non-compliant.	mnc
	2.2 Construction related - No longer applicable	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Compliance Agreed by DPE	C


	2.3 Construction related - No longer applicable	as above	Compliance Agreed by DPE	C	
	2.4 Prior to commencement of operations of the development, the Applicant must certify in writing, to the satisfaction of the Director-General, that it has obtained all the necessary approvals for operations, and complied with all the relevant conditions of this consent and/or any other statutory requirements for this development.	as above	Addressed in previous audit (EnviroRisk, 2015). Compliance agreed by DPE. However will need to address this condition during the next audit period relative to the ELI Greenmill Extension.	C-OFI	DA-1: Prior to the conclusion of the next audit period HPP to certify in writing, to the satisfaction of the Director-General, that it has obtained all the necessary approvals for operations, and complied with all the relevant conditions of this consent and/or any other statutory requirements associated with the extension to the Greenmill and any other developments during the audit period.
Environmental Management Plan	3.3 The Applicant must prepare and implement an Environmental Management Plan for all operations at the site. This plan must:	Sighted HPP EMP - May 2023. Conformance with the EMP was assessed via interview, site video inspection and sighting of relevant documents.	The EMP builds on earlier versions and had been updated in May 2023 to incorporate identified gaps from the previous audit. It caters for Site 2 activities (and the other sites managed by HPP). It contains an amendment record on iterations over the years.	C	
	(a) Describe the operations	Sighted HPP EMP - May 2023.	Section 1.2 of the EMP provides a description of the operations	C	
	(b) Identify relevant statutory requirements that apply to the operation of the development;	Sighted HPP EMP - May 2023.	Section 2.3 of the EMP makes reference to the DA and EPL requirements specified. A Shared Services Agreement is also referenced in section 3.3 of the EMP for water discharge to neighbours for treatment and re-use. The References provide a list of various regulations and guidelines.	C	
	(c) Set standards and performance measures for each of the relevant environmental issues.	Sighted HPP EMP - May 2023.	Section 3 of the EMP outlines standards and performance measures	C	
	(d) Describe what actions and measures will be implemented to mitigate the potential impacts of the development, and to ensure that the development meets these standards and performance measures;	Sighted HPP EMP - May 2023.	Section 3 of the EMP outlines Strategic Plans that specify management tasks to ensure compliance.	C	
	(e) Describe what measures and procedures will be implemented to:				
	• Register and respond to complaints	Sighted HPP EMP - May 2023 plus PIRMP (July 2022, Aug 2023) Sighted Community Complaints Register relating to HPP Sighted onsite Community complaint log book for the Oberon Timber complex	Section 2.8 of the EMP details how to respond to any complaints, issues or concerns raised by the public. The register was sighted and demonstrates no HPP related complaints have been made since the previous Audit. Also sighted the onsite Community complaint log book for the Oberon Timber complex showing this is in use	C	
	• Ensure the operational health and safety of workers	Sighted HPP EMP - May 2023 plus PIRMP (July 2022, Aug 2023)	Section 2.4 of the EMP states that the EMP will describe what measures and procedures will be implemented to ensure operational health and safety of workers. However the only reference to safety in the EMP is with regard to pursuing environmental goals in a way that acknowledges safety goals in environmental awareness training. Safety is included in the PIRMP. However there is a separate safety and health management system that addresses OHS. OHS systems were available and being implemented. OHS was not subject to a detailed audit given this audit being an environmental audit.	C	
• respond to potential emergencies, such as plant failure;	Sighted HPP EMP - May 2023 plus PIRMP (July 2022, Aug 2023)	Section 2.11 of the EMP provides guidance on emergency preparedness and also references the PIRMP	C		
(f) Describe the role, responsibilities, authority, and accountability of all the key personnel involved in the operation of the development.	Sighted HPP EMP - May 2023	Section 2.5 and throughout Section 3 of the EMP describes the roles, responsibilities, authority and accountability of personnel involved in the operation and management of environmental issues.	C		

(g) Incorporate the detailed Environmental Monitoring Program (see condition 5.1 below)	Sighted HPP EMP - May 2023	Section 3 of the EMP outlines the Monitoring program and is considered comprehensive to assess environmental impact. An additional groundwater bore has now been installed adjacent the treatment line.	C
(h) Include the following			
<ul style="list-style-type: none"> management strategies for the control of dust, noise and stormwater; 	Sighted HPP EMP - May 2023	Sections 3.1 - 3.7 of the EMP outlines strategies for the control of surface water, groundwater, process water, fire water, dust, air emissions and noise.	C
<ul style="list-style-type: none"> Landscape Management Plan (see 4.19 – 4.21 below) 	Sighted HPP EMP - May 2023	Section 3.8 of the EMP provides comment on landscaping and references and includes an appendix a Landscape Management Plan.	C
<ul style="list-style-type: none"> Waste Management Plan (see 4.11 below) 	Sighted HPP EMP - May 2023	Section 3.10 of the EMP outlines Strategies for Waste and Material Management. A separate Waste Management Plan has also been developed and is attached an appendix to the EMP.	C
3.4 The Applicant must ensure that a copy of EMP is submitted to council and is publicly available.	Sighted HPP EMP - May 2023	AN EMP has been developed and is publicly available on the HPP website (checked and downloaded). Sighted an email to the Oberon Council (dated 11/04/2023) providing a copy of the January 2023 EMP update). The May 2023 update of the EMP made immaterial changes and HPP advised that they don't issue an update to the council for an immaterial change.	C
3.5 The Applicant must review and update the EMP regularly, or as directed by Director-General.	Sighted HPP EMP - May 2023	The EMP includes an amendment register. The Header of the EMP states that the EMP will be reviewed on an annual basis. Section 2.13 states that the EMP will be updated as required when operations at the site are materially altered.	C
3.6 The EMP must be approved by Director-General prior to commissioning of the development.	Sighted HPP EMP - May 2024	Approved in early 2000's. Condition no longer relevant.	NA
4 Environmental Standards			
Noise			
4.1 Noise emissions from the operation of the proposed development must not exceed the levels for the time periods specified in the following table when measured at any residence not owned by or under the control of the Applicant.	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Report - Dec 2021, Sep 2022, Sep 2023		C
The noise limits (e.g. 41 dB(A) night period) in the table:	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Report - Dec 2021, Sep 2022, Sep 2023	<p>Whilst noise limits did exceed the 41dB(A) DA limit during the 2021-2023 audit period [ranging from 36 - 47 dB(A)], it is acknowledged that the DA has been updated in February 2024 such that 'The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits outlined in the EPA Licence (EPL-11229) for the development'.</p> <p>It is acknowledged this change occurred outside the audit period yet it indicates that Planning NSW are satisfied with compliance during the audit period.</p> <p>The night time noise limit in EPL-11229 is 50 dB(A) and therefore the site is now compliant with 2023/24 noise results demonstrating 36 - 46 dB(A) during the night period.</p>	C
<ul style="list-style-type: none"> Apply to noise emissions under prevailing wind condition of up to 3m/s from the south west. but: 	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Reports - Dec 2021, Sep 2022, Sep 2024	Assessments have considered prevailing wind speeds	C
<ul style="list-style-type: none"> May be exceeded at a residence where the applicant can demonstrate to the satisfaction of the Director-General that a negotiated agreement between the Applicant and the owner of the residence has been reached with regard to noise at the affected residence. 		No agreements are reported to be in place	C
4.2 Noise is to be measured at the nearest or most affected residences to determine compliance with Condition 4.1	as above	Noise was measured at locations in accordance with the requirements of EPL 11229 and DA 403-11-00	C

<p>4.3 The noise emissions identified in Condition 4.1 apply for the prevailing meteorological conditions (winds up to 3m/s), except under conditions of temperature inversions. Noise impacts that may be enhanced by temperature inversions must be addressed by:</p> <ul style="list-style-type: none"> • Documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and • Where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under temperature inversion conditions should be developed and implemented. 	<p>as above</p> <p>Sighted Community Complaints Register relating to HPP, AEMR 2021, 2022, 2023</p> <p>Noise reduction plan, Observations</p>	<p>Noise and air complaints have been documented. There were 3 air related complaints in 2021 and a noise complaint in 2022 about noise from the Sonic horns with this complaint being resolved in a prompt manner.</p> <p>No noise complaints received during the audit period that were demonstrated to be attributable to HPP. Sighted the repaired wall at the Dry-mill re-entry sticker conveyor to contribute to noise attenuation from this area.</p> <p>However site observations and Photographic evidence demonstrates exits along the Drymill to not be closed.</p>	<p>C</p> <p>C</p> <p>mnc</p>	<p>DA-2: Ensure that exit doors along the Drymill are closed when not being used and explore engineering or similar solutions to ensure these doors do not remain open following egress to assist with noise attenuation.</p>
<p>Dust</p> <p>4.4 All activities in or on the premises must be carried out in a manner that will minimise the generation or emission of the wind-blown or traffic generated dust from the premises using the measures proposed in the SEE.</p>	<p>Photographic evidence</p> 	<p>Yard dust and wood dust/ shavings were largely controlled with limited risk of being blown beyond site boundaries. Housekeeping at the site is generally in good order and there was a noted improvement in boiler fuel product stored within the bunker area.</p> <p>There is a cyclone on the roof of the green mill that is damaged and is causing dust build up on the roof. Furthermore this issue was not sighted as being raised as an incident in the incident reporting system.</p>	<p>mnc</p>	<p>DA-3: Repair the damaged cyclone on the Greenmill roof to mitigate dust build up on the roof.</p> <p>DA-4: Ensure that issues that are identified with potential to impact on the environment are raised and captured in the sites Incident management system.</p>
<p>4.5 All areas must be maintained in a manner that will minimise the generation or emissions of wind-blown or traffic generated dust from the premises using the measures proposed in the SEE.</p>	<p>Photographic evidence</p>	<p>Roads appeared in the main to be clean. A Water cart and a Bob-cat with sweeper broom/brush are used on an as needs basis to clean internal roads.</p>	<p>C</p>	
<p>4.6 Trucks carrying residues from the site must be covered at all times, except during loading and unloading. Residues are taken to include sawdust, shavings, chips and bark.</p>	<p>Photographic evidence</p> 	<p>Video footage of trucks at site entrance show truck was tarped before leaving the site. Photographic evidence revealed cameras surveillance of trucks is undertaken. EMP clearly outlines this requirement.</p> <p>Sighted additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be covered before leaving the site.</p>	<p>C</p>	

Pollution of Waters	4.7 Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with in and in connection with the carrying out of the development.	Sighted Shared Service Agreement 3459-8588-4932v21 (Aug 27, 2018), Photographic evidence	Water drains to collection pond off log yard or into channel across roof and roadways. All is diverted to Borg under a Shared Services Agreement for treatment and re-use.	C		
	4.8 Prior to construction, the Applicant must prepare an Erosion and Sediment Control Plan which describes what measures will be used to minimise soil erosion and the discharge of sediment and other pollutants to nearby land, water or drains during construction activity. This plan must be prepared in accordance with the requirements for such plans in the Department of Housing's publication "Managing Urban Stormwater: Council Handbook"	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	00)		NA	
	4.9 Prior to operation, the Applicant must prepare a detailed Stormwater Management Plan for the site, which has been prepared in consultation with Council, to mitigate the impacts of stormwater runoff from the development and its operations.	Sighted HPP Stormwater Management Plan - Feb 2023); Observations; Interviews.	A SWMP has been prepared and was reviewed by the Auditor. Sighted email to the Oberon Council (dated 11/04/2023) seeking consultation on the current version of the Stormwater Management Plan. Also sighted email response from the Oberon Council (dated 26/06/2023) advising that Council had no further comments. Sighted the following in accordance with the SWMP: - cleaning of stormwater drians in main stormwater channel - viewed operational Penstock gate valve able to be activated from the Gatehouse - Visually inspected first flush dams and over/under weirs and found them to be operational		C	
Waste Management	4.10 The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the protection of the Environment Operations Act 1997.	Observation, Interviews, Documentation review, Data assessment.	No waste is received on the site. Fuel, in the form of wood material, is infrequently purchased for use in the boiler, generally late winter.	C		
	4.11 The Applicant must prepare and implement a Waste Management Plan for the development in consultation with Council. This plan must describe in detail the waste management system, including:	Sighted Waste Management Plan - Feb 2023 HPP Albion Street, Oberon, NSW 2021	A WMP has been prepared and was provided for review by the Auditor. Sighted email to the Oberon Council (dated 11/04/2023) seeking consultation on the current version of the Waste Management Plan. Also sighted email response from the Oberon Council (dated 26/06/2023) advising that Council had no further comments.	C		
	(a) the types and quantities of the waste which will be generated at the site; and	as above	Section 1 of the WMP identifies the manufacturing process and types of waste that are generated and how they are managed under the waste hierarchy. Section 2 of the WMP identifies estimated volumes of each waste under a waste inventory and description.	C		
	(b) how waste will be stored on-site, transported, and disposed of off-site.	as above	Section 2 of the WMP (waste inventory and description) describes how each identified waste stream will be managed, stored, transported and disposed off-site. The commendable beneficial reuse of the boiler ash as a soil conditioner on farming land should be included in the HPP Waste Managemet Plan (WMP)	C-OFI	DA-5: Update the HPP Waste Management Plan to include the reuse of the boiler ash as a soil conditioner on farming land.	

	4.12 The WMP prepared in accordance with Condition 4.11 must have been approved by the Director-General prior to commissioning of the development.	Sighted Letter from DPE - 23 Nov 2023	Sighted Letter from the Department of Planning and Environment (dated 23 November 2023) advising that 'The Department has reviewed the management plans and concludes the plans address the relevant conditions. As such, the following plans are approved: • Highland Pine Products Waste Management Plan, prepared by Highland Pine Products Pty Ltd, dated February 2023, Revision A	C
	4.13 After reviewing the Waste Management Plan, the Director-General may require the Applicant to address certain matters identified in the plan. The Applicant must comply with any reasonable requirements of the Director-General.	As above	As above.	C
Parking	4.14 The Applicant must design and construct a new parking area for employees and visitors providing a total of no fewer than 150 parking spaces on the site.	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	The car park had plenty of free spaces yet was not sized to provide 150 spaces. However it was noted that there is capacity for approx 120 spaces available across the greater site (including the car park). Reportedly Council have had no concerns over past decade with the car park.	C
	4.15 The carpark design must conform to AS 2890.1-1993.	Interview.	Reportedly Council have had no concerns over past decade with car park.	C
	4.16 Visitor and service vehicle parking spaces must be clearly signposted and designated.	Interview. Photographic evidence. 	Visitor and Disability carparking clearly signposted	C
	4.17 Traffic calming devices must be installed in the car park to the satisfaction of Council.	Interview.	Reportedly Council have had no concerns over past decade with car park.	C
Lighting	4.18 The Applicant must ensure that any external lighting associated with the development is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary.	Observation during night period.	The bund wall and the tree screens to the south are considered to protect against light nuisance. There have been no complaints regarding lighting during the audit period.	C

Landscape Management	<p>4.19 The Applicant must prepare and implement a detailed Landscape Management Plan for the development. This plan must.</p>	<p>Sighted HPP Landscape Management Plan - Feb 2023</p> 	<p>A detailed Landscape Management Plan has been developed. Vegetation along the southern noise bund wall needs to be maintained to be in accordance with the site Landscape Management Plan</p>	<p style="text-align: center; background-color: yellow;">mnc</p>	<p>DA-6: Maintain vegetation on the southern noise bund wall to be consistent with species and maintenance requirements specified within the Landscape Management Plan</p>
	<p>(a) describe in detail existing and future landform of the site.</p>	<p>As above</p>	<p>Describes in detail the existing and ongoing landform of the site</p>		<p style="text-align: center;">C</p>
	<p>(b) describe in detail how the site will be landscaped, including the location and species of all planting; and</p>	<p>As above</p>	<p>Describes in detail the landscaping plan with maintenance schedules, frequency and responsibilities assigned.</p>	<p style="text-align: center;">C</p>	
	<p>(c) explain how this landscaping will be managed and maintained over time.</p>	<p>as above</p>	<p>as above</p>	<p style="text-align: center;">C</p>	
	<p>4.20 The Landscape Management Plan prepared in accordance with Condition 4.19 must have been approved by the Director-General and implemented prior to the commencement of operations.</p>	<p>Sighted Letter from DPE - 23 Nov 2023</p>	<p>Sighted Letter from the Department of Planning and Environment (dated 23 November 2023) advising that 'The Department has reviewed the management plans and concludes the plans address the relevant conditions. As such, the following plans are approved: <ul style="list-style-type: none"> Highland Pine Products Landscape Management Plan, prepared by Highland Pine Products Pty Ltd, dated February 2023, Revision 7. </p>	<p style="text-align: center;">C</p>	
	<p>4.21 After reviewing the Landscape Management Plan. The Director-General may require the Applicant to address certain matters identified in the plan. The Applicant must comply with any reasonable requirements of the Director-General.</p>	<p>As above</p>	<p>As above.</p>	<p style="text-align: center;">C</p>	
5. Environmental Monitoring	<p>5.1 The Applicant must prepare and implement a detailed Environmental Monitoring Program for the development in consultation with the EPA. The program must:</p>	<p>Environmental Protection Licence 11229, 13 August 2024 Sighted HPP EMP - May 2023</p>	<p>Section 3 of the HPP EMP - Feb 2023 outlined the Environmental Monitoring Program prepared in consultation with EPA who have issued via their Environmental Protection Licence.</p>	<p style="text-align: center;">C</p>	
	<p>(a) Identify what environmental issues will be monitored;</p>	<p>as above</p>	<p>see above</p>	<p style="text-align: center;">C</p>	
	<p>(b) set standards and performance measures for these environmental issues;</p>	<p>as above</p>	<p>see above</p>	<p style="text-align: center;">C</p>	
	<p>(c) describe in detail how these issues will be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of this monitoring will be recorded and reported to the Director-General and other relevant authorities;</p>	<p>Sighted HPP EMP - May 2023</p>	<p>The monitoring and associated reporting (i.e. submission of Annual Returns and Annual Environmental Management Reports) has been summarised into the EMP</p>	<p style="text-align: center;">C</p>	

	(d) indicate what actions will be taken, or procedures followed, if any non-compliance is detected; and if non-conformance detected	Sighted PIRMP - 27/27/22, 01/08/2023, Interview	The PIRMP is considered to fulfil this requirement. Sampling of the PIRMP in the Risk Manager System found the process robust. There have been no PIRMP notifications during the audit period	C
	(e) include Noise Compliance Monitoring Program (see 5.1) to determine the level of compliance with the noise criteria in Condition 4.1.	Sighted HPP EMP - May 2023	Section 3 of the HPP EMP - May 2023 includes a Noise Compliance Monitoring Program to determine the level of compliance with the noise criteria.	C
	5.2 The data obtained from the Environmental Monitoring Program shall be made available for, and where appropriate incorporated into, the broader monitoring program for the Oberon Industrial Area.	Sighted HPP EMP - May 2023 Sighted AEMRs 2021, 2022, 2023	The complex is now separate companies. This provision may be difficult to comply with into the future.	C
Monitoring records	5.3 The results of any monitoring required to be conducted by this consent, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with the load calculations protocol, must be recorded and retained on accordance with EPA requirements, at A2.1.1 and A2.1.2 of Attachment A to this consent.	AEMR AEMRs 2021, 2022, 2023 EPL Annual Return 2020/21, 2021/22, 2022/2023	Monitoring records are retained. A summary of which is provided in the AEMR and EPA Licence Annual returns. Load calculations not applicable.	C
Noise Compliance Monitoring Program	5.4 The Applicant must conduct noise monitoring during the construction phase, at the site boundaries and the nearest potentially affected residential areas. Monitoring must be conducted in accordance with EPA guidelines.			NA
	5.5 The Applicant must conduct noise monitoring during the operation phase to assess compliance with noise limits set out in Condition 4.1. The frequency of monitoring must be as follows:	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Reports - Dec 2021, Sep 2022, Sep 2024	Reports commissioned and conducted at nearest residences in N, W, S directions. Refer to additional comments in 4.1 above	C
	(a) within 3 months of the commencement of commissioning of the development; and		NA	NA
	(b) annually thereafter.	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Reports - Dec 2021, Sep 2022, Sep 2024	Noise monitoring is undertaken annually	C
	5.6 The Environmental Monitoring Program prepared in accordance with Condition 5.1 must have been approved by the Director-General before the development may be commissioned.	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Confirmed by DPE to be in compliance	C
	5.7 After reviewing the Environmental Monitoring Program, the Director-General may require the Applicant to address certain matters identified in the program. The Applicant must comply with any reasonable requirements of the Director-General.			NA
Environmental Reporting	6.1 Twelve months after commissioning of the development, and annually thereafter for the duration of the development, the Applicant must submit an Annual Environmental Report to the Director-General and the Council. This report must:	AEMRs 2021, 2022, 2023	Sighted submitted AEMR's	C
	(a) identify all standards, performance measures and statutory requirements the development is required to comply with;	As above	Section 12 of the 2021, 2022 and 2023 AEMRs identifies and reports on compliance against the standards, performance measures and statutory requirements the development is required to comply with.	C

(b) review environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;	As above	As above	C
(c) identify all the occasions during the previous year when these standards, performance measures, and statutory requirements have not been complied with;	As above	Section 2.1 of the AEMRs summarises any non-compliant operational conditions and actions to resolve them.	C
(d) include a summary of any complaints made about the development, and indicate what actions were taken (or are being taken) to address these complaints;	As above	Section 11 of the AEMRs provides a summary of any complaints. There were 3 complaints in 2021 (Truck partially uncovered, ash fallout believed to be coming from HPP boilers, noise from 2km away) and a single complaint on 2022 (sonic horns audible at receptor). All complaints were actioned and resolved.	C
(e) include the detailed reporting from the Environmental Monitoring Program (see Conditions 5.1-5.6), and identify any trends in the monitoring over the life of the project;	As above	Section 12 of the AEMRs details reporting and performance and identified trends.	C
(f) where non-compliance is occurring, describe what actions are or will be taken to ensure compliance, who will be responsible for carrying out these actions, and when these actions will be implemented;	As above	Non-compliances are identified in the AEMRs and are associated with the previous audit recommendations (status updates have been provided), and which have been reviewed as part of this independent environmental audit.	C
(g) incorporate the requirements of the EPA with regard to the annual Return required by any license under the Protection of the Environment Operation Act 1997. The requirements of the EPA with regard to the Annual Return are at A3 of attachment A to this consent.	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/24	Annual Returns were sighted as being submitted to the EPA	C
6.2 After reviewing the Annual Environmental Management Report, the Director-General may require the Applicant to address certain matters identified in the Report. The Applicant must comply with any reasonable requirements of the Director General.			NA

Independent Environmental Audit	6.3 Within 12 months of conclusion of commissioning of the development, and every three years thereafter, unless the Director-General otherwise directs, the Applicant must commission and pay the full cost of an Independent Environmental Audit. The Independent Environmental Audit must:		Independent Audit currently being undertaken by EnviroRisk Pty Ltd	C
	(a) Be conducted by a suitably qualified, experienced, and independent person who's appointment has been endorsed by the Director-General:		IEA now being undertaken. Auditor endorsed by DPE prior to starting audit.	C
	(b) be consistent with ISO 14010- Guidelines and General Principals for Environmental Auditing, and ISO 14011-Procedures for Environmental Auditing, or updated versions of these guidelines/manuals;		Process consistent with AS/NZS guidelines.	C
	(c) Assess the environmental performance of the development, and its effects on the surrounding environment:		Audit reviewed operational risk and impact on surrounds	C
	(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements:		Compliance has been evaluated.	C
	(e) review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring Program; and if necessary:		Reviewed air emissions, noise monitoring and groundwater monitoring and made comments and recommendations above.	C
	(f) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.		Recommendations have been made	C
6.4 Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the Applicant to address certain matters identified in the Report. The Applicant must comply with any reasonable requirements of the Director-General.	Sighted email to DPE - 15/11/2021		The 2021 Independent Environmental Audit report was submitted to DPE on 15/11/2021	C
Additional Items supporting the DA Protocol	DA References a number of supporting reports.			NA
	SEE 2.2.2 Site Environmental Coordinator will continue to work with the joint venture		The co-ordinator has been replaced by an environmental advisor at Borg and HPPS EHSR advisor aided by the Environmental Consultant.	C
	SEE 6.2.1 Stated it was planned to move a Boiler or install a new Boiler on the CHH site to increase output capacity and this will meet 100.ma/m3.	Inspection	Boiler installed yet not operational	NA
	During Stage 2 a Gas Fired Boiler was installed		Gas fired boiler now has been de-commissioned.	NA
	SEE 3.4.8 Stated Office space for the combined staff will be provided by installing a portable office building at the south west corner of the CHH site on land		Office space now provided on Site 1.	NA




LEGEND	*Compliance is rated as follows (reference NSW DPE, IAPAR, 2018):
C	Compliant - Verified to comply with what is stated;
Nc	Non-compliant - minor actual or potential issue having limited impact; systems implementation or documentation type issue;
NC	Non-Compliant - significant deviation from what is specified with potential or actual significant impact;
O	Observation - opportunity for improving the management system and/or operational controls exists;
NA	Not Applicable – Not Auditable or not in scope (see comments for reason why)
NT	Not Triggered - Condition has an activation or timing trigger or is not able to be verified within the time of the audit


EPA LICENCE NO. 11229 (ISSUED 13 AUGUST 2001)

AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD, OBERON

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
A1.1	Wood Milling >200,000 m3 per annum; timber pre	AEMRs 2021, 2022, 2023	Timber production confirmed under 265,980m3/year with 234,535 m3, 226,000 m3 208,820 m3 in 2021, 2022 and 2023 respectively. An assessment was made against ASNZS 2843.1:2000 Plant Design in previous audits and had confirmed most elements could be substantiated. There has been no substantial material change to plant design since the previous audit.	C	
A3.2	Bifenthrin Part 1 & Part 2 Plant design ASNZ 2843.1:2000	Observations, Interviews	Monitoring of discharge points 1, 7 and 8 occurs in accordance with EPL and locations are shown on a plan in the EMP. Emission testing reports confirmed compliance achieved with specified limits within the EPL. Also confirmed that continuous opacity monitoring is undertaken of discharge point 1.	C	
P1.1	Location of monitoring & discharge points 1, 7 and 8 relating to air/dust deposit (as per Table)	Sighted HPP EMP - May 2023 Sighted Emission Testing Report # R015325 (16/07/2021) Sighted Emission Testing Report # R012989 (09/09/2022) Sighted Emission Testing Report # R015325 (20/10/2023)	Monitoring of discharge points 5 and 6 occurs every 6 months and locations are shown on a plan in the EMP	C	
P1.2	Location of monitoring points 5 and 6 relating to groundwater (as per Table)	Sighted HPP EMP - May 2024 Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/24	The SWMP outlines controls over surface water pollution. All waters are contained within the system that feeds the Borg containment and re-use facility. Monitoring is conducted by Borg on water quality under the Shared Services Agreement. The log yard is contained within the pond to its north-east. This pond is aerated (sighted via photographic evidence) and water pumped to the stormwater transfer system. It is reportedly designed to contain a large rainfall event with pumps sized accordingly for transfer. In the unlikely event of overflow the catchment flows into the Borg stormwater pond which provides further control. Given these conditions would accompany a very large rain event, the risk of pollution from log yard sediment and organics is considered low should this ever occur. In addition there is a stormwater stop vale/gate installed at the stormwater exit of the HPP site.	C	
L1 POLLUTION OF WATERS: L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	EMP - May 2023, SWMP - Feb 2023, WMP - Feb 2023, PIRMP, Interviews, Observation	Confirmed stormwater and process water plans and lines that could be observed from kilns (separate line) and boiler blowdown are directed to Borg. Photographic evidence that large volume of sawdust have been captured in gross pollutant traps along all channel reaches. External vac trucks are engaged to clean out gross pollutant traps.	C	
L1.2	Water Mgt System: Discharge to adjoining premises 3035 for treatment	SWMP - Feb 2023, Photographic evidence	No change in recent times has reportedly occurred. Any alterations would form part of Annual return.	C	
L1.3	Water Mgt System: Notify EPA of any changes to the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035	Interviews, Sighted Shared Service Agreement 3459-8588-4932v21 (Aug 27, 2018)	Annual stack test monitoring undertaken by Ektimo. All concentrations were below concentration limits specified for the pollutants (i.e. TSP and NOx) listed in EPL11229.	C	
L2 CONCENTRATION LIMITS: L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Data Review, Interview Sighted Emission Testing Report # R015325 (16/07/2021) Sighted Emission Testing Report # R012989 (09/09/2022) Sighted Emission Testing Report # R015325 (20/10/2023)		C	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
L2 LOAD LIMITS: L2.2	Air Concentration Limits as per Table: TSP = 250mg/m ³ ; NO _x = 2500 mg/m ³	As above	As above	C	
L3 WASTE L3.1	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 contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence.	Interviews, Observations, AEMR 2021, 2022, 2023	Reportedly there is no waste received at the site. The diversion of treated wood from landfill for reuse at Borg panels under a Resource Recovery Order (RRO) is to be commended. Boiler ash recycling also commenced in July 2022 with it being used as a soil conditioner on local farmland. This has further diverted waste from landfill and is to be commended. Waste wood is received periodically to add to the boiler fuel. It is also noted in the AEMR 2023 that there has been a significant reduction in general waste sent to landfill, which is to be commended.	C	
L4 NOISE LIMITS: L4.1	Noise from the premises must not exceed: a) 55 dB(A) LAeq(15 minute) during the day (7am to 6pm); and b) 50 dB(A) LAeq(15 minute) during the evening (6pm to 10pm); and c) at all other times 50 dB(A) LAeq (15 minute), except as expressly provided by this licence. Where LAeq means the equivalent continuous noise level – the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.	Interviews, Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Reports - Dec 2021, Sep 2022, Sep 2024 Sighted HPP Environmental Noise Audit - June 2023	Estimated HPP contribution (L _{Aeq}) to measured ambient noise is estimated to be below EPL11229 measurement criteria during the day, evening and night periods.	C	
L4.2	To determine compliance with condition L4.1 noise must be measured at, or computed for, at "Oorong" or an other noise sensitive location (such as a residence/school) along Herbourne or West Cunynghame Street, Oberon. A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the "Environmental Noise Management - NSW Industrial Noise Policy (January 2000)".	see above	Noise measurements at Oorong are in compliance with EPL even with a modifying factor of 5 db(A) applied to evening and night time periods	C	
L4.3	The noise emission limits identified in this licence apply under all meteorological conditions except: a) during rain and wind speeds (at 10m height) greater than 3m/s; and b) under "non-significant weather conditions".	see above	Most recent assessments considered to provide detail that this was the case.	C	
L4.4	The noise limits in the above table do not apply where the licensee and an affected resident have reached a negotiated agreement in regard to noise.	Interview	No agreements are in place.	C	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
O1 OPERATING CONDITIONS: Competent Manner O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Observations, EMP - May 2023 	A system has been developed for management and control of H2 waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber is now captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill. Waste oil drums and containers from the HPP Site 2 are stored on HPP site 1 until they are collected. Waste drums and containers were not stored in a secondary containment facility as specified within Section 2 of the HPP Waste Management Plan (WMP). Furthermore, Site 2 and Site 1 operate under separate EPLs (11229 and 887 respectively) and Site 1 is not licensed to receive waste from site 2.	MNC	EPL-1: Waste drums and containers should be stored on the HPP Site 2 within a secondary containment facility until collected and/or confirm with the EPA if they can be stored on Site 1 under that sites licence.
O2: Maintenance of plant and equipment O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Interviews, Observations, Photographic evidence, Opacity read-outs, Monitoring data, MEX Records 	Correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure. Sighted an email (dated 21 April 2021) from Ektimo with correlation calculations formula. Sighted operators Screen. Sighted SOP HP-S-KI-BO-62 'Correct a Smoking Boiler (dated 09/04/2018 and reviewed 19/08/2019)' and sighted a training register showing those operators that are competent in this SOP. Emissions from the boiler appeared to be in good order doing the audit site inspection. Given the last review of this SOP was in 2019 (i.e. over 5 years ago) undertaking another review is recommended to ensure it still meets current operational processes and compliance requirements. The site inspection (via photographic evidence) identified a door was open on the dry mill southern boundary thereby limiting effective noise attenuation.	mnc	Refer to recommendation DA-2 regarding Drymill door EPL-2: Given the last review of SOP HP-S-KI-BO-62 'Correct a Smoking Boiler' was undertaken in 2019 (i.e. over 5 years ago) undertake another review to ensure it still meets current operational processes and compliance requirements.
O3.1 Dust	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.	Photographic evidence, Interviews, Dust Deposition 	Photographic evidence suggest minimal dust was noted outside the site on the roads. The fuel shed roof was clean of sawdust, no complaints have been lodged. There is a cyclone on the roof of the green mill that is damaged and is causing dust build up on the roof	mnc	Refer to recommendation DA-3

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
O3.2	Trucks entering and leaving the premises that are carrying loads of material likely to blow off must be covered at all times, except during loading and unloading.	<p>Photographic evidence- security, Closed Circuit TV monitors, Observations, Complaint register</p>  	<p>Minimal dust was noted outside the site on the roads. Photographic evidence of security confirmed a check made on the CCTV screens with trucks being tarped.</p> <p>Sighted additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be covered before leaving the site.</p> <p>Whilst it was sighted that log truck trailers are swept off before leaving the site, a truck was also sighted coming into Gate 2 with bark material that had not been appropriately swept off prior to leaving the site.</p>	mnc	EPL-3: Ensure that all log trucks leaving the premises have been appropriately swept off before leaving the site to avoid bark and debris being trailed onto roads.
O4.1 Process and management	The bifenthrin treatment facility must be operated in accordance with the requirements of Australian/New Zealand Standard, Timber preservation plant safety code, Part 1: Plant design – AS/NZS 2843.1:2000 and Australian/New Zealand Standard, Timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000, except as expressly provided by a condition of this licence	ANZS 2843:1 & 2. Interviews, Photographic evidence, MEX.	An assessment was made against ASNZS 2843.1:2000 Plant Design in previous audits and had confirmed most elements could be substantiated. There has been no substantial material change to plant design since the previous audit.	C	
SECTION 5 MONITORING AND RECORDING CONDITIONS					
M1 MONITORING RECORDS					
M1 MONITORING RECORDS: M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	see below	see below		
M1 MONITORING RECORDS: 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.	Records, Monitoring reports, Interviews	Monitoring is conducted and records retained dating back 4 years as checked for AEMR (sighted 2019 and 2020).	C	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
M1 MONITORING RECORDS: 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.	Records, Observations ALS ES1940307 Dec 2019 ALS ES 2023293 Jul 2020 ALS ES2044287 Dec 2020 ALS ES2124500 Jun 2021	Confirmed that ALS contained the required information in their reports.	C	
TESTING METHODS: Load Limits	<i>Note: Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.</i>		Load limits are not applicable as they are not specified in this Licence.	NA	
M2 REQUIREMENT TO MONITOR CONCENTRATION OF POLLUTANTS DISCHARGED					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns	see below	see below		
M2.2	Air Monitoring Requirements (Tables provided for Point 1) for Pollutants: Point 1 - Yearly and Continuous for Opacity	Data Review, Interview Sighted Emission Testing Report # R015325 (16/07/2021) Sighted Emission Testing Report # R012989 (09/09/2022) Sighted Emission Testing Report # R015325 (20/10/2022)	Annual stack test monitoring undertaken by Ektimo. All concentrations were below concentration limits specified for the pollutants (i.e. TSP and NOx) listed in EPL11229.	C	
M2.3	Water and/ or Land Monitoring requirements (Tables provided for Point 5 & 6) for Pollutants: Every 6 months - Grab samples	Records, Observations Sighted Groundwater monitoring data (Jun 21, Dec 21, Aug 22, Nov 22, Jun 23, Dec 23)	Groundwater was monitored as Licence required with results suggesting an acidic groundwater at approx. pH.=5.35 - 6.09 onsite (Point 6) and pH=4.53 - 5.67 upgradient (background - point 5) and nitrate higher at approx 1.3 mg/L on site compared to upgradient (background of approx 11 mg/L avg).	C	
M3 Testing Methods - Concentration limits					

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Data Review, Interview Sighted Emission Testing Report # R015325 (16/07/2021) Sighted Emission Testing Report # R012989 (09/09/2022) Sighted Emission Testing Report # R015325 (30/10/2023)	Sampling of monitoring techniques and analysis adopted in emission testing reports were confirmed to conform with 'Approved Methods' as specified under EPL 11229.	C	
	Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW"	NA		NA	
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted	Records, Observations ALS ES2241961 Nov 2022 ALS ES2319328 Jun 2023 ALS ES2342870 Dec 2023	Groundwater monitoring is conducted in accordance with EMP using laboratories with NATA certification for analytes under investigation.	C-OFI	EPL-4: Whilst not specifically required under the current EPL, update the EMP to include details for monitoring of the new bore adjacent to the treatment line
M5 RECORDING OF POLLUTION COMPLAINTS					
M4 POLLUTION COMPLAINTS: M4.1	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	EMP, Security Complaints register, Community Complaints Number dial check. Records, Sighted Community Complaints Register book at Gatehouse	There were 3 air related complaints in 2021 and a noise complaint in 2022 about noise from the Sonic horns. The complaints number is listed at the front sign at Gates 2 and 3.	C	
M4 POLLUTION COMPLAINTS: M4.2	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.	As above	As above. For the 2022 noise complaint the date, time, phone number, description of complaint and actions taken were recorded.	C	
M4 POLLUTION COMPLAINTS: M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Risk Manager, Complaints Register at Gatehouse.	Monitoring is conducted and records retained dating back 4 years as checked. Sighted 2019 and 2020 AEMRs showing no complaints in 2019 and 2020 demonstrating that records are kept for at least 4 years.	C	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
M4 POLLUTION COMPLAINTS: M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	NA	Summaries of any complaints are provided in the Annual Environmental Monitoring Reports (AEMRs)	C	
M5 TELEPHONE COMPLAINTS LINE: M5.1	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.	Complaints line test	Complaints line tested and found to be operational	C	
M5 TELEPHONE COMPLAINTS LINE: M5.2	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.	Sign at front gates 2 and 3		C	
M5 TELEPHONE COMPLAINTS LINE: M5.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	NA		NA	
M6 OTHER MONITORING: M6.1	Noise monitoring to determine compliance with condition L4 must be carried out at least once annually during the day, evening, and night time hours specified by condition L4.1 at the locations specified under condition L4.2. The noise monitoring must be undertaken in accordance with Australian Standard AS 2659.1 (1998) Guide to use of sound measuring equipment - portable sound level meters, and the compliance monitoring guidance provided in the NSW Industrial Noise Policy.	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Report - Dec 2021, Sep 2022, Sep 2023	Noise monitoring is undertaken annually.	C	
6 REPORTING CONDITIONS					
R1 ANNUAL RETURN DOCS R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/24	An Annual Return had been made in accordance with Licence Condition R1.1.	C	
R1 ANNUAL RETURN DOCS R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	As above	An annual return has been completed during each reporting period	C	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
R1 ANNUAL RETURN DOCS R1.3 R1.4 (not applicable)	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	As above	No transfer of licence has occurred during the audit period	C	
R1 ANNUAL RETURN DOCS 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').	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/24	Sighted Screenshot of EPA portal showing submission of annual returns during the audit period.	C	
R1 ANNUAL RETURN DOCS R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/25	Checked Annual return for 2018-19 and 2019-20 as sample	C	
R1 ANNUAL RETURN DOCS 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.	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/24	All the annual returns sighted were signed by the company directors	C	
R2 NOTIFICATION OF ENV HARM R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/25	Reportedly there have been no notifications during the audit period as confirmed in the Annual returns	C	
R2 NOTIFICATION OF ENV HARM 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.	As above	As above	C	
R3 Written Report	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.	NA	NA	NA	
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	No request over audit period		NA	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
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.	No request over audit period		NA	
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	NA		NA	
7 GENERAL CONDITIONS					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Sighted EPL 11229	Electronic Copy presented. The EPL can also be accessed via the Highland Pine Products Website	C	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NA	Not asked to be seen during the audit period	NA	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	EPL 11229, Interviews	Hard copy available and may be accessed on web	C	
8 Pollution Studies and Reduction Programs					
U1 Long Term Noise Reduction - Implement mid term options					

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
<p>U1.1 - IMPLEMENT LONG TERM OPTIONS</p>	<p>The licensee must by 30 November 2023 report on completion of the long term noise attenuation actions (1-9 years) of Table 1. The report must include, but not necessarily limited to:</p> <ul style="list-style-type: none"> • details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long term options for attenuation by location (Table 1. 30Jun13), or any subsequent revision from mid-term reporting. • details of noise reduction(s) achieved from various sources (locations) within the premises. • details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations. • any changes proposed to options of attenuation to ensure noise emissions from premises can comply with 45 dB(A) LAeq (15 minute) noise limit by 30 December 2023. <p>By 30 December 2023, the licence must achieve a 5 dB(A) noise reduction from the premises as after 1 January 2024 the EPA will be amending the night time noise limit of licence 11229 by 5 dB(A) to 45 dB(A) LAeq (15 minute).</p>	<p>Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Report - Dec 2021, Sep 2022, Sep 2023</p>	<p>HPP contacted the EPA in late 2023 advising that HPP would not be able to meet the 20 November 2023 deadline. There was ongoing dialogue with the EPA who confirmed on 18 December 2023 that the site could have an extension until the 30 November 2024.</p> <p>Sighted the HPP Noise Attenuation PRP - August 2024 which meets this new submission deadline. The Noise Monitoring Report addresses the requirements of condition U1.1</p> <p>Estimated HPP contribution (LAeq) to measured ambient noise is estimated to be below EPL11229 measurement criteria and as such it is considered that the site meets current compliance limits and based on the short to medium term noise attenuation works undertaken to date is on track to comply with the lower limit (i.e. 45 dB(A) night-time LAeq (15 Min)).</p>	<p>C</p>	
<p><i>Note:</i></p>	<p>Consistent with developing a long term continuous noise improvement program for the Highland Pine Products (HPP) sawmill, the licensee completed and submitted to the EPA the following reports;</p> <ol style="list-style-type: none"> 1) a Survey of Occupational Noise Exposures in Green and Planer Mills (report) by Knox OHS Solutions March 2013 and 2) Table 1: HPP Noise assessment. Short term and long term options for attenuation by location (Table 1 - 30 Jun 13). 				
	<p>By the above condition, the EPA requires the licensee to implement a long term noise improvement program for the HPP sawmill to achieve a 5 dB(A) reduction in noise from the premises within 10 years to be able to meet a night time noise limit of 45 dB(A) LA eq (15 minute).</p>	<p>see above</p>	<p>see above</p>	<p>C</p>	

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	COMPLIANCE* STATUS	RECOMMENDATION
	As the improvement program is for 10 years and HPP Noise Assessment (Table 1) represents "potential" attenuation options at the time of preparation, the licensee is not bound to follow the short-mid-long term works identified for each location under Table 1. The licensee should however use Table 1 as a guide to the implementation and reporting of improvement works (what's been achieved at each interval and what's proposed for the next interval), towards achieving an overall 5 dB(A) noise reduction at the end of the 10 year program.	NA		NA	
	The short-mid-long term approach to noise attenuation in Table 1 is the basis for the 3 Long term Noise Reduction PRP's (conditions U1 to U3(sic)). The licensee may however revise Table 1 at any time provided the revised Table 1 with a date of revision and revision number is provided to the EPA.	NA		NA	
9 Special Conditions					
E1	The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction. To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement. The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M6.1, in a report to be provided to the EPA within three months of the conclusion of each reporting period for the premises.	Sighted HPP Noise Attenuation PRP - August 2024 Sighted Annual Noise Update Report - Dec 2021, Sep 2022, Sep 2023 Annual Return - 13/08/20 - 12/08/21 Annual Return - 13/08/21 - 12/08/22 Annual Return - 13/08/22 - 12/08/23 Annual Return - 13/08/23 - 12/08/25	Reportedly there has been no significant maintenance, modification, upgrading or replacement of plant and equipment operated at the premises that required ongoing noise reduction during the reporting period. However a development application was commenced in late 2023 for the ELI extension to the Greenmill and although outside this audit period noise attenuation works were included as part of this development undertaken in early 2024.	C	

LEGEND	*Compliance is rated as follows (reference NSW
C	Compliant - Verified to comply with what is stated;
Nc	Non-compliant - minor actual or potential issue having limited impact; systems implementation or documentation type issue;
NC	Non-Compliant - significant deviation from what is specified with potential or actual significant impact;
O	Observation - opportunity for improving the management system and/or operational controls exists;
NA	Not Applicable – Not Auditable or not in scope (see comments for reason why)
NT	Not Triggered - Condition has an activation or timing trigger or is not able to be verified within the time of the audit

2021 INDEPENDENT ENVIRONMENTAL AUDIT RECOMMENDATIONS REVIEW

AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD

NO.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY ¹	2024 FOLLOW-UP	OPEN/ CLOSED
DC:21-1	HPP pursue modification of existing planning consents as part of a planning permit application for future proposed works at the facility	DC 1.10	High	A new Development Approval (DA) and associated Construction Management Plan (CMP) was initiated in late 2023 for the extension of the Greenmill. The DA was subsequently updated in Feb 2024 (outside the audit period) to include some additional conditions. However the department advised that the <u>existing standard conditions would not be removed from the DA</u>	CLOSED
DC:21-2	During the next EMP update, review the references section to ensure it specifies relevant Acts and Regulations applicable to the site.	DC 3.3(b)	Low	Sighted the updated EMP (May 2023) which includes updated list of references for applicable Acts and Regulations.	CLOSED
DC:21-3	Update the References list in the EMP to include: - Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018, - Protection of the Environment Operations Act 1997, - Protection of the Environment Operations (Clean Air) Regulation 2021, - Approved methods for the modelling and assessment of air pollutants in NSW 2016, - NSW EPA, Approved methods for the sampling and analysis of air pollutants in New South Wales 2006, - Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017	DC 3.3(b)	Low	Sighted the updated EMP (May 2023) which included updated list of references for applicable Acts and Regulations.	CLOSED
DC:21-4	Update the EMP to include specific units of measurement (consistent with EPL 11229) within the Groundwater Environmental Monitoring Requirements	DC 3.3(c)	Low	Section 3.2 Groundwater within the EMP (May 2023) has been updated to include specific units of measurement (consistent with EPL 11229)	CLOSED
DC:21-5	Update the EMP to include the current version of EML 11229	DC 3.3(c)	Low	The current version of EPL 11229 (13 August 2024) is available and will be attached as an appendix to the May 2023 version of the EMP.	IN PROGRESS
DC:21-6	Undertake annual update of the onsite Community Complaint Logbook	DC 3.3(e)	Low	Sighted updated Community Complaint Logbook (dated November 2023 v4.0) kept at the Gatehouse.	CLOSED
DC:21-7	Update the EMP to reference or link to site safety systems	DC 3.3(e)	Low	Sighted updated EMP (May 2023) which multiple references linking to the site safety system "Risk Manager" (i.e. section 2.6, 2.9 and 3.0).	CLOSED
DC:21-8	Update the EMP to either remove references to the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' if these positions do not exist, or, if the positions do exist to define the roles and responsibilities of the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' and any other roles described in the EMP	DC 3.3(f)	Low	Table 2 Summary of Responsibilities within the EMP (May 2023) has been updated to reflect current positions and responsibilities.	CLOSED
DC:21-9	Issue a copy of the current EMP to Oberon Council	DC 3.4	High	Sighted email to the Oberon Council (dated 11/04/2023) providing a copy of the January 2023 EMP update). The May 2023 update of the EMP made immaterial changes and HPP advised that they don't issue an update to the council for an immaterial change.	CLOSED
DC:21-10	Update the EMP to provide a consistent requirement for review frequency	DC 3.5	Low	The Header in the May 2023 EMP has been updated to reflect an annual review frequency.	CLOSED
DC:21-11	As part of recommendation DC21-1 above seek to have specified noise measurement criteria in the DA aligned with criteria specified in EPL 11229. If this cannot be achieved, develop and implement noise attenuation strategies to bring measured noise from the HPP facility within the DA-403-11-00 specified measurement criteria of '41 LA10 15min dB for the night period	DC 4.1	High	Sighted draft update to DA (February 2024) showing that condition 4.1 to 'The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits outlined in the EPA Licence (EPL-11229) for the development.'	CLOSED

NO.	RECOMMENDATIONS	DC / EPL		2024 FOLLOW-UP	OPEN/ CLOSED
		REFERENCE	PRIORITY ¹		
DC:21-12	Replace the damaged rubber curtain at the Drymill re-entry sticker conveyor to contribute to noise attenuation from this area	DC 4.3	Low	Sighted the repaired wall at the Dry-mill re-entry sticker conveyor to contribute to noise attenuation from this area.	CLOSED
DC:21-13	Ensure that all boiler fuel product is stored inside the bin to reduce impact into adjacent stormwater system.	DC 4.4	Low	Improvements have been made at the time of the audit, it was sighted that boiler fuel was, in the main, confined to within the boiler fuel bunker	CLOSED
DC:21-14	Place additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be tarped before leaving the site.	DC 4.6	Low	Sighted additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be covered before leaving the site.	CLOSED
DC:21-15	Seek consultation from the Oberon Council on the current version of the Stormwater Management Plan	DC 4.9	High	Sighted email to the Oberon Council (dated 11/04/2023) seeking consultation on the current version of the Stormwater Management Plan. Also sighted email response from the Oberon Council (dated 26/06/2023) advising that Council had no further comments.	CLOSED
DC:21-16	Seek DPE approval of the current version of the Waste Management Plan.	DC 4.12	High	Sighted Letter from the Department of Planning and Environment (dated 23 November 2023) advising that 'The Department has reviewed the management plans and concludes the plans address the relevant conditions. As such, the following plans are approved: • Highland Pine Products Waste Management Plan, prepared by Highland Pine Products Pty Ltd, dated February 2023, Revision A	CLOSED
DC:21-17	Seek DPE approval of the current version of the Landscape Management Plan.	DC 4.20	High	Sighted Letter from the Department of Planning and Environment (dated 23 November 2023) advising that 'The Department has reviewed the management plans and concludes the plans address the relevant conditions. As such, the following plans are approved: • Highland Pine Products Landscape Management Plan, prepared by Highland Pine Products Pty Ltd, dated February 2023, Revision 7	CLOSED
DC:21-18	Include in monitoring results tables in the AEMR's the criteria against which monitoring parameters are assessed (i.e. 250 mg/m3 for TSP and 2500 mg/m3 for NOx).	DC 5.1(d)	Low		
EPL:21-1	Engage a contractor as soon as reasonably practicable to clean out the gross pollutant traps	EPL L1.2	Medium	Sighted action captured in 'Risk Manager' to check stormwater system and gross pollutant traps. A Vac truck is brought onto site to clean out the traps. Sighted TDK Vac Truck Services Report 15127671 (dated 31 August 2023)	CLOSED
EPL:21-2	Improve plant design compliance with the ANZS 2843.1 Standard including: a) Part 1 Section 2.4 Water Bodies: Install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps	EPL O4.1	Medium	Sighted a new groundwater monitoring bore (MW8) was installed in late 2022 downslope of the treatment line area by Envirowest Consulting Pty Ltd. Sighted a report titled 'Groundwater Investigation, H2 Plant, Highland Pine, Albion Street, Oberon NSW (14 April 2022)'. The report concluded that 'Bifenthrin was not detected in the in the groundwater sample collected from the monitoring well'.	CLOSED
EMS:21-1	Add HAZCHEM signs to all entry points as per the regulations so that they are clearly visible.		Low	Sighted clearly visible HAZCHEM signs at all entry points as per the regulations.	CLOSED
EMS:21-2	PIRMP signage be secured to wall for easy access		Low	Sighted PIRMP signage secured to wall for easy access	CLOSED
EMS:21-3	Arrange for drums be removed from the empty drum storage as soon as lockdown lifts. Also add signage at the drum storage area that all drums must be stored within the bund.		Medium	A significant number of drums remain onsite and need to be removed in accordance with applicable regulations. All waste drums and chemical containers should also be stored within a secondary containment area.	OPEN
EMS:21-4	Relocate bulk ink containers in the Drymill to be stored in a bunded area		Medium	Sighted bulk ink containers stored within the bunded area of the treatment line.	CLOSED
EMS:21-5	Improve the labelling on greaser lube containers in the Green mill to include pictograms and hazard classifications.		Medium		
EMS:21-6	Add into the preventative maintenance system (MEX) the maintenance of the diesel bulk storage tank, bund pump, alarm system and plate separator		Low	Sighted a work order (W/O No: 576161) within the preventative maintenance system (MEX) for Diesel bowser Sump Pump & diesel tank maintenance checks and cleaning.	CLOSED
EMS:21-7	Add into the preventative maintenance system (MEX) the regular clean out of the oil collection drum under the plate separator at the bulk diesel tank		Low	As above	CLOSED

NO.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY ¹	2024 FOLLOW-UP	OPEN/ CLOSED
EMS:21-8	Provide training to operators that wood waste suitable for recycling is not to be placed in the general waste bin		Low	Training is undertaken at the site. The site is still recycling wood waste. In the main wood waste was sighted to be placed in the correct waste bins. Wood waste is reused as fuel or sold to Borg.	CLOSED
EMS:21-9	Update signage at gas bottle storage areas and ensure that all gas bottles are chained.		Medium	Signage has been updated at gas bottle storage however the gas bottles were not chained. A single gas bottle was also observed to be standing alone and unchained at the Holtec shed.	OPEN
EMS:21-10	Review appropriate disposal option for aerosol cans in accordance with applicable regulations and update the Waste Management Plan (WMP) to include this option.		Low	Disposal options for aerosol cans have been reviewed but council wont accept them for recycling and as such they go to landfill.	CLOSED
EMS:21-11	Review recycling opportunities for waste plastic strapping to avoid disposal through general waste bin and update the Waste Management Plan (WMP) to include this option.		Low	Recycling opportunities have been reviewed and the supplier won't take back the plastic strapping.	CLOSED
EMS:21-12	Update the EMP's objectives to include achieving compliance with applicable legal and other requirements (i.e. the DA and EPL).		Low	EMP's objectives (section 2.2) have been updated to include achieving compliance with applicable legal and other requirements (i.e. the DA and EPL).	CLOSED

1. Priority is rated as follows: **High** - to be completed over the next 3 months; **Medium** – to be completed over the next 12-18 months; **Low** – to be completed before the next triennial audit.


Opportunities for improvement (OFI) have been rated as a Low priority. Compliance items have been rated either a High or Medium priority for action.

Refer to Audit Protocol for detail as to the applicable compliance item and the rationale behind each recommendation.

ENVIRONMENTAL SYSTEMS IMPROVEMENTS

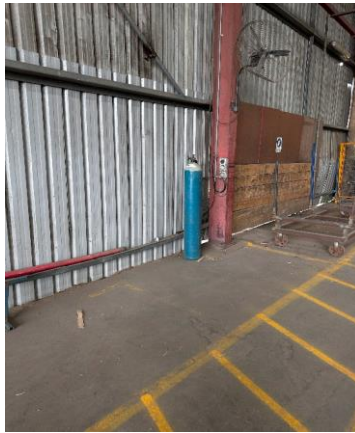
AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD, OBERON

Specific Management System (e.g. EMS, EMP, PIRMP, SWMP, WMP) elements warranting improvement not otherwise captured in compliance elements of the Protocol

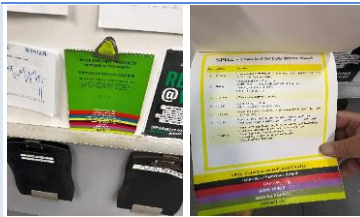
APPROVAL ID AND REQUIREMENT	EVIDENCE COLLECTED	2024 AUDIT FINDINGS	RECOMMENDATION
Training	Sighted Training records	Sighted training records of the Site Management team in the PIRMP testing undertaken in 2023 Sighted H2 Treated Product Disposal SOP (HP-S-PM-TLO-30) and associated training records (assessment 16/08/2022). Sighted Triple Rinse of IBCs SOP (HP-S-PM-TLO-35) and associated training records (assessment 21/05/24) Sighted HPP Induction, PIRMP, Environmental Duty, Spill Kit Response Training and Environmental Policy Sighted Control of Smoking Boiler SOP and associated training records (David Grady 17/10/24 Recognition of Prior Learning) Sighted Switch Back 2024 which included Environmental requirements	
MEX Preventative Maintenance	Observations	Sighted PM4954 for cleaning of sump pump at the diesel tank. Sighted PM4901 for pressure cleaning of treatment line floor. Sighted PM Workorder for Inspection of Greenmill Hydraulic Packs	
Signage	Observations	Sighted clearly visible HAZCHEM signs at all entry points as per the regulations. Sighted additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be covered before leaving the site. Sighted signage with community complaints phone number at Gates 2 and 3.	
Fuel and Chemical Storage	Observations	Bulk oil store was observed to be bunded and clean with spill response equipment available. Current SDS's available at Gatehouse, Stores and Drymill. <u>Out of date SDSs were observed in a folder in the Greenmill that was not part of the site central SDS folder system</u> A significant number of waste drums and containers remain onsite and need to be removed in accordance with applicable regulations. All waste drums and chemical containers should also be stored within a secondary containment area.	EMS-1: Keep all SDSs update and only store as part of the site central SDS folder system (i.e. at Gatehouse, Stores and Drymill). EMS-2: Arrange for waste drums and containers to be removed from the site on a regular basis in accordance with applicable regulations and arrange for the waste drums and containers to be stored in a secondary containment area whilst they await collection.
		Aboveground bulk Diesel storage tank – Self bunded tank – appeared to be in good condition. Old aboveground bulk Diesel storage tank still remain onsite but is no longer used.	EMS-3: Investigate options for appropriate decommissioning of the old bulk diesel tank in accordance with applicable regulations.

Wood waste suitable for recycling was observed to be deposited into the general waste bin

Gas bottles were observed to be stored in caged area with updated signage however the bottles were not all chained. A single gas bottle was also observed to be standing alone and unchained at the Holtec shed.



EMS-4: Add appropriate storage of gas cylinders in accordance with applicable regulations to inductions/training and checking of appropriate storage in accordance with applicable regulations to an internal audit checklist and undertake regular audits.



Sighted an Emergency Response Flipchart that includes spill response and nearby the PIRMP spill incident response procedure chart. They specify different procedures for responding to reporting a spill incident.

EMS-5: Consolidate spill response management into a single procedure/process to avoid confusion



Waste

Observations



Aerosol can was observed to have been deposited into the wrong bin.

EMS-6: Ensure that waste aerosol cans are placed in the correct bins for disposal.



Waste Bins posters list 'Paint and Oil' to go in contaminated waste bins. This should be corrected to avoid any confusion as paint and oil should not be placed in bins. A can of paint with some liquid inside was observed in bulk general waste area.

The triple rinsing of IBCs at the treatment line and their recycling is to be commended. A documented process should be established demonstrating that IBCs that are triple rinsed meet leaching quality requirements and are suitable to be collected so there is documented evidence of what is taken from the site.

EMS-7: Develop a documented process that demonstrates that IBCs that are triple rinsed are suitable for collection (i.e. documented evidence of number of IBC's that meet triple rinse requirements and that are collected).

NPI Reporting	Online evidence	Sighted NPI online portal showing that NPI reports had been submitted during the audit period. NPI has appropriately been issued during the audit period. Sighted screenshot of NGERS portal showing 2022/23 NGERS Report.
EMP	Sighted HPP EMP - May 2023	Sighted HPP EMP - May 2023. Conformance with the EMP was assessed via interview, site video inspection and sighting of relevant documents. The EMP generally aims to achieve compliance with applicable legal and other requirements (i.e. the DA and EPL 11229).