



**Application number SSD 7424**

**Benedict Recycling Pty Ltd**

**52 Anderson Rd, Smeaton Grange**

**Annual Review (Condition C8)**

**1 January 2025 – 31 December 2025**

## Site information

<b>Project Name</b>	<b>Smeaton Grange Waste Recycling and Transfer Facility</b>
Address	52 Anderson Road, Smeaton Grange, 2567
Project Approval	SSD 7424
Environment Protection Licence	EPL 21328

## Company information

<b>Name</b>	<b>Benedict Recycling Pty Ltd</b>
Registered Address	33-39 Riverside Road, Chipping Norton, NSW 2170
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## Document information

<b>Author (Company)</b>	<b>Date</b>	<b>Changes</b>	<b>Reviewer (Company)</b>	<b>ID</b>
Rhys Thompson (4Pillars Environmental Consulting)	26/03/2026	N/A	Mick Williams (Benedict Recycling)	V1.0

# Compliance Report Declaration Form

<b>Project Name</b>	Smeaton Grange Waste Recycling and Transfer Facility
<b>Project Application No.</b>	SSD 7424
<b>Description of Project</b>	Construction and operation of a resource recovery facility to process up to 140,000 tpa of general solid waste (non-putrescible)
<b>Project Address</b>	52 Anderson Road, Smeaton Grange
<b>Proponent</b>	Benedict Recycling Pty Ltd
<b>Title of Compliance Report</b>	2025 Annual Review
<b>Date</b>	26/03/2026
<b>Document Version</b>	1.0

I **Mick Williams** certify that this Operational Compliance Report is a true and accurate record of the compliance status of Development Consent SSD 7424 for the period 1 January 2025 – 31 December 2025 and that I am authorised to make this statement on behalf of Benedict Recycling Pty Ltd.

I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

- i. the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- ii. the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;
- iii. the findings of the Compliance Report are reported truthfully, accurately and completely;
- iv. due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- v. the Compliance Report is an accurate summary of the compliance status of the development.

Notes:

- 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) 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
- 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).

<b>Name of authorised reporting officer(s)</b>	Mick Williams
<b>Title</b>	General Manager - Recycling
<b>Signature</b>	
<b>Qualification</b>	MBA
<b>Company</b>	Benedict Recycling Pty Ltd
<b>Company Address</b>	33-39 Riverside Road, Chipping Norton, NSW 2170

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# 1. Introduction

## 1.1 The Project

Development consent for the Smeaton Grange Waste Recycling and Transfer Facility (the Facility) at 52 Anderson Road, Smeaton Grange, was granted on 22 December 2017 by the Planning Secretary (SSD 7424). Since this time, three modifications have been approved, as below:

1. SSD-7424-Mod-1 determined 10/09/2018– allowing modifications to boundary fencing and driveway access.
2. SSD-7424-Mod-2 determined 12/12/2023– allowing design change to install concrete walls instead of metal and increase height and altered fall for the roof over the holding bays and picking line.
3. SSD-7424-Mod-3 determined 01/08/2024– allowing repositioning of the weighbridges, wheel wash and office, changes to the system of stormwater management and utilities, and changes to construction of perimeter walls.

A fourth modification (SSD-7424-Mod-4) is currently in the stage “Prepare Mod Report”.

Operations commenced onsite on 9 July 2024 and continued throughout the period of this report, being 1 January 2025 – 31 December 2025 (the reporting period).

This Annual Review was prepared as required by Condition C8 of SSD-7424-Mod-3 (the Consent), in accordance with the NSW Department of Planning, Industry and Environment’s May 2020 *Compliance Reporting Post Approval Requirements*.

## 1.2 Summary of project activities

Waste material was received, sorted and exported during the reporting period. No construction was undertaken during the reporting period.

Condition A6 of the Consent restricts operations at the Facility to the receipt or on-site processing of no more than 140,000 t of general solid waste (non-putrescible) per year. Table 1 below, presents the total quantity of waste received/processed at the Facility during the reporting period, compared to the previous reporting period.

Table 1: Waste quantities.

Year	Quantity of waste received/processed (t)
2024 (9/7/24 – 31/12/24)	15,633.62
2025	70,842.06

### 1.3 Figures

The figures presented below show a recent aerial image of the Facility (Figure 1) and the site context with surrounding land zonings (Figure 2). As shown in Figure 2, the Facility is located in an area of general industrial zoning, with the nearest residential zoning (low density), approx. 100 m to the east, separated by a creek and vegetation.



Legend:

 Site  Lot boundaries


0 10 20 m  


Date produced: 26/03/2026  
CRS: EPSG:3857  
Basemap imagery: Nearmap  
(16/03/2026)  
Drawn by: Rhys Thompson


Figure 1: Recent imagery of the Facility, dated 16/03/2026.



**Legend:**

- |  |  |
|--|--|
| Land Zoning  |  Site |
|  Lot boundaries                               |  |
|  C2 - Environmental Conservation / Management |  |
|  C4 - Environmental Living                    |  |
|  E3 - Productivity Support                    |  |
|  E4 - General Industrial                      |  |
|  R1 - General Residential                     |  |
|  R2 - Low Density Residential                 |  |
|  R3 - Medium Density Residential              |  |

0 100 200 m



Date produced: 11/02/2026  
 CRS: EPSG:3857  
 Basemap imagery: Nearmap  
 Drawn by: Rhys Thompson

Figure 2: Site context.

## 1.4 Key Personnel

The key personnel with regard to environmental/compliance management of the development are presented in Table 2, below.

Table 2: Key personnel with regard to environmental/compliance management.

Name	Position
Nicholas Toole	Site Manager – Smeaton Grange
Mick Williams	General Manager – Recycling

## 2. Actions

### 2.1 Actions proposed in previous reporting period

Actions proposed in the previous reporting period (2024) have been presented in Table 3, below, along with their current status.

Table 3: Status of actions proposed in previous reporting period.

Source	Condition	Action Proposed	Proposed Completion Date	Status	Action Completed
2024 Annual Review	C12, C13	The Independent Environmental Audit will be conducted within 12 months of the commencement of operations.	09/07/2025 (Operations commenced on 9 July 2024)	Completed	Independent Environmental Audit (IEA) covering the period from 9 July 2024 to 8 July 2025 was conducted by Ian Swane & Associates, with the site inspection conducted on 7 August 2025 and the IEA Report submitted on 28 November 2025.
2024 Annual Review	C7	All strategies, plans and programs will be reviewed within 3 months of approval of this annual review.	27/09/2025 (2024 Annual Review approved on 27 June 2025)	Completed	The OEMP including all sub-plans was reviewed following the approval of the 2024 Annual Review, with a revised version (v4) submitted to DPHI for approval on 8 September 2025.  The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.

## 2.1 Future Actions

Actions proposed for 2026 are as follows:

- Continue to receive and process permitted materials, up to the 140,000 tpa limit.
- Undertake quarterly noise monitoring, in accordance with approved Operational Noise and Vibration Management Plan.
- Conduct inspections and maintenance in accordance with approved Landscape Management Plan.
- Undertake surface monitoring, in accordance with approved Water Management Plan.
- Review all strategies, plans and programs within 3 months of approval of this Annual Review as per Condition C7, and make any revisions as necessary.
- Construct permanent bunding around the diesel AST filling area and update refuelling procedures in a revised OEMP (as per IEA recommendation).
- Revise and obtain approval for OEMP to include appropriate protocols / procedures for the outside unloading of VENM / ENM (as per IEA recommendation).
- Complete the PRP surface water sampling program and associated assessment / reporting, as required by EPL Condition U1 (as per IEA recommendation).

## 3. Independent Environmental Audit

As required by Conditions C12 and C13 of the Consent, an Independent Environmental Audit (IEA) covering the period from 9 July 2024 (commencement of operations) to 8 July 2025 (the Audit Period) was conducted by Ian Swane & Associates, with the site inspection conducted on 7 August 2025 and the IEA Report submitted on 28 November 2025.

### 3.1 Conclusions

The following conclusions were presented in the IEA:

- The Facility is being well managed generally in accordance with statutory approvals and licences.
- No non-compliances were identified during the Audit Period
- All audit issues identified carried a negligible risk level.
  - Likely compliances associated with a negligible risk were identified for three of the 176 conditions (1.7%).
- Operations at the Facility have been well managed over the Audit Period and an acceptable level of environmental performance achieved.

### 3.2 Recommendations

The following recommendations were presented in the IEA, for improvements that need to be made to address issues concerning the environmental performance of the Facility:

- Construct permanent bunding around the diesel AST filling area and update refuelling procedures in a revised OEMP.
- It is reasonable for VENM / ENM to be unloaded outside covered areas at the Facility when necessary, provided appropriate protocols / procedures are included in a revised OEMP that is subject to review and approval by the DPHI.
- Complete the PRP surface water sampling program in the next couple of months.
- Assess the current performance of the surface water management and leachate collection systems when the surface water monitoring required for the PRP has been completed, including the preparation and issuing of a report to the EPA, as required by EPL 21328 Condition U1.4.
  - Use the results of the assessment to identify the need, if any, for improvements to these systems
- A revised OEMP has been submitted by Benedict to the DPHI for their review and approval, with revisions to the OEMP recommended by the Auditor.

General environmental improvement opportunities for the site were also identified, corresponding to:

- Use of technological advances in recycling processes.
- Continue to upgrade equipment when feasible.
- Other opportunities identified through regular review of site operations.

## 4. Compliance status summary

The compliance status of each condition of the Consent is represented in the Compliance Table in Section 8. A summary is presented in Table 4, below. As shown, the majority conditions were Compliant or Not Triggered during the reporting period, with just three conditions considered Non-compliant (3% of total conditions). The three non-compliances are discussed below.

Table 4: Compliance status summary, 2025.

Status	Count	Percentage
Compliant	61	61%
Non-compliant	3	3%
Not Triggered	36	36%
Total	100	

## 4.1 Condition B5 – Noise criteria

Details about the non-compliance with Condition B5 are provided in Table 5, below.

Table 5: Non-compliance details: Condition B5.

Condition	B5								
Aspect	Noise criteria								
Requirement	<p><i>The Applicant must ensure that noise generated by operation of the Development does not exceed the noise criteria in Table 4:</i></p> <p><i>Table 4: Noise Criteria dB(A)</i></p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day L<sub>Aeq</sub>(15 minute)</th> <th>Evening L<sub>Aeq</sub>(15 minute)</th> <th>Night L<sub>Aeq</sub>(15 minute)</th> </tr> </thead> <tbody> <tr> <td>All residential receivers</td> <td>40</td> <td>40</td> <td>40</td> </tr> </tbody> </table>	Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	All residential receivers	40	40	40
Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)						
All residential receivers	40	40	40						
Details	<p>Noise from the Site complied with relevant limits at all monitoring locations during noise monitoring sessions conducted during the reporting period, excepting during the 29 July 2025 Day session at receiver R22, where a 2 dB exceedance with the limit (40 dB(A)) was identified. It was noted in the noise monitoring report prepared that the Site was audible throughout the measurement, including impact noise from site and vehicle movements, but that an exceedance of 2 dB is considered negligible in the Noise Policy for Industry (NSW EPA, 2017), being not discernible by the average listener and therefore not warranting receiver-based treatments or controls.</p>								
Reporting	<p>No specific report was issued in relation to the exceedance; however, the information was included in the Verification Noise Monitoring Report published to the Benedict website.</p>								
Action taken by Regulators	None.								
Action taken by Proponent	<p>Noting that the exceedance was considered “negligible”, and that all other results of monitoring were compliant, no specific actions were taken. No complaints were received.</p>								

## 4.1 Condition C9 – Incident notification

Details about the non-compliance with Condition C9 are provided in Table 6, below.

Table 6: Non-compliance details: Condition C9.

Condition	C9
Aspect	Incident notification
Requirement	<p><i>Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report must be supplied to the Department outlining the basic facts. A further detailed report must be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Planning Secretary no later than 14 days after the incident or potential incident.</i></p>
Details	<p>A fire occurred on the Site on Monday 22 December 2025, outside of operating hours – further details are provided in Section 5 of this Annual Review.</p>

	<p>The fire was extinguished, and all debris and associated firewater were captured and removed by licensed contractors, with no water allowed to escape the Site.</p> <p>Thorough reporting of the incident was undertaken, including the preparation and provision of an R3 Report to the NSW EPA as required by the EPL.</p> <p>Although communications were maintained with the NSW EPA, a notification to the Department in accordance with Condition C9 was not undertaken.</p>
Reporting	<ul style="list-style-type: none"> <li>• An internal incident report was prepared.</li> <li>• The incident was reported to the NSW EPA.</li> <li>• At the request of the NSW EPA, in accordance with Condition R3 of the EPL, a comprehensive report was prepared and issued to the NSW EPA.</li> </ul>
Action taken by Regulators	None, with the exception of request for reports by the NSW EPA, detailed above.
Action taken by Proponent	<ul style="list-style-type: none"> <li>• On-site prevention of environmental harm.</li> <li>• Comprehensive reporting to NSW EPA.</li> <li>• Toolbox talks with site staff to prevent future incidents.</li> <li>• Review of administrative processes, to ensure that future notifications are also directed towards the Department, as required.</li> </ul>

## 4.2 Condition C13 – Audit reporting timeframe

Details about the non-compliance with Condition C13 are provided in Table 7, below.

Table 7: Non-compliance details: Condition C13.

Condition	C13
Aspect	Audit reporting timeframe
Requirement	<i>Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Planning Secretary.</i>
Details	The IEA Report was submitted with responses to recommendations on 28 November 2025. However, this was greater than the 3-month timeframe.
Reporting	None.
Action taken by Regulators	<p>None.</p> <p>Letter received from the Department on 9 February 2026 (ref: SSD-7424-PA-18) considered “<i>the IEA report to generally satisfy the reporting requirements of the Consent</i>”.</p> <p>Department noted that “<i>The IEA report and RAR for future IEA’s must be submitted to the Department within three months of undertaking the audit site inspection.</i>”.</p>
Action taken by Proponent	Reporting procedures reviewed to ensure that future IEA Reports are submitted compliant with required timeframes.

## 5. Incidents

One incident consistent with the definition in the Consent occurred during the reporting period, discussed below.

This is a slight increase on the previous reporting period (2024), during which no significant incidents or lost time incidents occurred.

### *22 December 2025 – Fire*

On Monday 22 December 2025, a fire occurred in a pile of light waste on the Site, outside of operating hours. The smoke alarm and sprinkler system were triggered by this fire, causing the attendance of emergency services who extinguished the fire. Staff members also attended the Site, once aware of the incident, and following the extinguishing of the fire, the waste pile was pulled apart to determine the cause of the fire, which was suspected to be a battery.

All firewater associated with the incident was prevented from escaping the Site and removed by a licensed contractor. A street sweeper was also engaged to remove any ash and fire debris.

Thorough reporting of the incident was undertaken, including the preparation and provision of an R3 Report to the NSW EPA as required by the EPL.

## 6. Complaints

One complaint was received during the reporting period, as presented in Table 8, below. This is a slight increase on the previous reporting period (2024), during which no complaints were received. It is noted that the nature of the complaint received was investigated and could not be attributed to the Site.

Table 8: Complaints, 2025.

Location	Nature	Actions taken
Goode Pl, Currans Hill (approx. 250 m SE of Site)	Noise	Location was attended the following day, elevated noise levels attributed to demolition of old Coles warehouse next door, not to the Site. Attempt to contact complainant undertaken.

A complaints register is maintained and updated monthly, available on the Benedict Recycling website: <https://www.benedictrecycling.com.au/about/policies-compliance/>.

# 7. Environmental Performance

## 7.1 Monitoring

Condition C8(b) requires that the Annual Review includes

*“a comprehensive review of the monitoring results ... of the development over the previous calendar year, which includes a comparison of these results against the:*

- i) the relevant statutory requirements, limits or performance measures/criteria*
- ii) requirements of any plan or program required under this consent*
- iii) the monitoring results of previous reporting years; and*
- iv) the relevant predictions in the EIS”*

### 7.1.1 Water Monitoring

Condition M2.2 of the EPL requires water monitoring to be undertaken as presented in Table 9, below. Special Frequency 1 means less than 24 hours prior to any dewatering of the sediment dam.

Table 9: Water Monitoring Requirements as per Condition M2.2 of EPL 21328.

Pollutant	Units of measure	Frequency	Sampling Method
pH	pH	Special Frequency 1	Probe
TSS	milligrams per litre	Special Frequency 1	Grab sample

Condition L2.4 of the EPL defines the limits for which the concentration of a pollutant within discharged water must not exceed. These are reproduced in Table 10, below.

Table 10: Water Concentration Limits as per Condition L2.4 of EPL 21328.

Pollutant	Units of measure	100 percentile concentration limit
pH	pH	6.5-8.5
TSS	milligrams per litre	50

It is noted that these limits do not apply to overflows from the sediment dam in rainfall events which exceed the adopted design rainfall (i.e. - 13.6 mm over 2 days).

No discharge events occurred during the reporting period, and accordingly, no samples were obtained.

Water monitoring results are available on the Benedict Recycling website:

<https://www.benedictrecycling.com.au/about/policies-compliance/>.

#### *Comparison to previous years*

Consistent with this reporting period, no discharge events occurred during the 2024 reporting period, and accordingly, no samples were obtained.

### Comparison to predictions in the EIS

Noting the lack of data, considering that no discharge occurred and accordingly, no samples were obtained, a comparison of results to predictions made in the EIS is not possible for this reporting period.

#### 7.1.2 Noise Monitoring

Noise Monitoring was conducted on two occasions during the reporting period, on 8 April 2025 and 29 July 2025. Monitoring was conducted in accordance with the then-current Operational Noise and Vibration Management Plan (ONVMP), dated March 2018, and assessed against the then-current EPL, dated 3 July 2024. The relevant noise criteria, as defined in Table 4 of Condition B5 of the Consent, has been reproduced in Table 11, below.

Table 11: Noise Criteria (dB(A)), as per Table 4 of Condition B5 of the Consent.

Location	Day	Evening	Night
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)
All residential receivers	40	40	40

During both monitoring events, attended noise monitoring was conducted at two locations representative of surrounding receivers (R9 and R22), during both the morning shoulder and day periods. The duration of each monitoring session was 15 minutes, and atmospheric conditions during each session were recorded. The results from the monitoring conducted are presented in Table 12, below. Noise from the Site complied with relevant limits at all monitoring locations during the sessions, excepting during the 29 July 2025 Day session at receiver R22, where a 2 dB exceedance with the limit (40 dB(A)) was identified. It was noted in the noise monitoring report prepared that the Site was audible throughout the measurement, including impact noise from site and vehicle movements, but that an exceedance of 2 dB is considered negligible in the Noise Policy for Industry (NSW EPA, 2017), being not discernible by the average listener and therefore not warranting receiver-based treatments or controls.

Table 12: Noise Monitoring Results, 2025.

Date	Session Start	Monitoring Period	Location	Site L <sub>Aeq</sub> (15 minute)	Compliance Assessment
8 April 2025	06:22	Morning Shoulder	R22	Inaudible	Compliant
8 April 2025	06:45	Morning Shoulder	R9	31	Compliant
8 April 2025	07:03	Day	R9	39	Compliant
8 April 2025	07:30	Day	R22	38	Compliant
29 July 2025	06:15	Morning Shoulder	R22	38	Compliant

29 July 2025	06:45	Morning Shoulder	R9	32	Compliant
29 July 2025	07:01	Day	R9	28	Compliant
29 July 2025	07:24	Day	R22	42	Minor Exceedance*  *Exceedance of 2 dB considered negligible in the 2017 Noise Policy for Industry, as not discernible by the average listener and would not warrant receiver-based treatments or controls.

Noise monitoring reports are made available on the Benedict Recycling website:  
<https://www.benedictrecycling.com.au/about/policies-compliance/>.

#### *Comparison to previous years*

Noise Monitoring was conducted on one occasion during the previous reporting period (2024), on 19 November 2024. Results of this monitoring are presented in Table 13, below. Monitoring results from 2025 are generally consistent with the previous reporting period.

Table 13: Noise Monitoring Results, 2024

Date	Session Start	Monitoring Period	Location	Site LAeq(15 minute)	Compliance Assessment
19/11/ 2024	06:19	Morning Shoulder	R22	Inaudible	Compliant
19/11/ 2024	06:43	Morning Shoulder	R9	38	Compliant
19/11/ 2024	07:00	Day	R9	38	Compliant
19/11/ 2024	07:25	Day	R22	37	Compliant

#### *Comparison to predictions in the EIS*

Noise Impacts are discussed in Section 6.4.3 of the EIS, with operational noise levels assessed for the daytime/evening, morning shoulder and nighttime periods during calm and adverse weather conditions. The conservative assumption was made that all plant would operate simultaneously for the proposed operations, thereby reflecting the worst-case scenario.

Operational noise emission levels were predicted to meet the relevant criteria at all assessment locations for calm conditions during the daytime, evening, night and morning shoulder periods. During the presence of a temperature inversion during the night and morning shoulder periods, a minor exceedance of up to 1 dB is predicted to occur at one assessment location.

For the locations assessed in the attended monitoring undertaken during the reporting period, the following maximum predicted noise levels – taken from Table 6.7 of the EIS – were expected, as reproduced in Table 14, below.

Table 14: Operational noise modelling results, as reproduced from Table 6.7 of the EIS.

Assessment Location	Predicted operational noise level, dB			Target noise level, dB LAeq(15-min)
	Daytime/evening	Morning Shoulder		
	Calm	Calm	Inversion	
R9	40	37	38	41 – daytime 40 – evening 39 – morning shoulder
R22	40	37	40	

As shown in Section 7.1.2, monitoring results from 2025 are generally consistent with the predictions presented in the EIS.

## 7.2 Trends in monitoring data

Condition C8(d) requires that the Annual Review identifies

*“any trends in the monitoring data over the life of the Development”.*

As the Site has only been operational since July 2024, it is too early to identify any trends in the monitoring data. However, a comparison of the data to the previous reporting period is discussed in the previous sections, showing that the data is generally consistent so far.

## 7.3 Discrepancies between predicted and actual impacts

Condition C8(e) requires that the Annual Review identifies

*“any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies”.*

As discussed in the previous sections, the gathered data has been seen to be generally consistent with the predictions as expected. No significant discrepancies have been identified. The lack of complaints received since the commencement of operations reinforces this, suggesting that the implemented mitigation measures are effective at managing the predicted impacts.

## 7.4 Environmental improvement measures

Condition C8(f) requires that the Annual Review describes

*“what measures will be implemented over the next reporting period to improve the environmental performance of the Development”.*

Consistent with the commitments made in the 2024 Annual Review, the following measures will be implemented, to maintain/improve the environmental performance of the Development, where possible:

- Continue to adhere to all management strategies and control measures as outlined in the Operational Environmental Management Plan, Consent and EPL.

- Review – and where necessary, revise to the satisfaction of the Planning Secretary – all strategies, plans and programs within three months of any triggers as defined in Condition C7, including the approval of this Annual Review.

## 8. Compliance Table – 2025

Condition	Requirement	Assessment	Status
<b>A1</b>	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.	Management Measures are documented in Chapter 4 of the OEMP.	Compliant
<b>A2</b>	The Development may only be carried out in: (a) in compliance with the conditions of this consent; (b) in accordance with the directions of the Planning Secretary; (c) in accordance with the EIS and RTS; (d) In accordance with Modification Assessments; (e) in accordance with development layout plans in Appendix A; and (f) in accordance with the Management and Mitigation Measures (see Appendix B).	Updated OEMP (v4, dated 9/9/25), approved by the Department 17 September 2025 ensures that compliance with this Condition is maintained. Non-compliances with individual conditions are not counted as causing a non-compliance with this Condition as well, to avoid double-ups.	Compliant
<b>A3</b>	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Noted. No inconsistencies were identified during the reporting period.	Not Triggered
<b>A4</b>	The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent (including any stages of these documents); and (b) the implementation of any actions or measures contained within these documents	The Department's 17 September 2025 approval of the v4 OEMP required that the OEMP be made publicly available on the project website. This direction was complied with, and the OEMP is available through the following link: <a href="https://www.benedictrecycling.com.au/about/policies-compliance/">https://www.benedictrecycling.com.au/about/policies-compliance/</a> .  No other written requirement(s) of the Planning Secretary were received during the reporting period.	Compliant
<b>A5</b>	This consent lapses five years after the date from which it was granted, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act	Noted. This timeframe has passed, and the Development commenced appropriately.	Not Triggered
<b>A6</b>	The Applicant must not receive or process on site more than 140,000 tonnes per year of general solid waste (non-putrescible).	Weighbridge records show that 70,842.06 t GSW were received/processed during the reporting period.	Compliant

Condition	Requirement	Assessment	Status																																													
<p><b>A7</b></p>	<p>The Applicant must not exceed the following maximum stockpile volumes detailed in Table 1 on the site at any time, unless otherwise agreed in writing by the Planning Secretary.</p> <p><i>Table 1: Maximum Stockpile Sizes</i></p> <table border="1" data-bbox="322 261 904 603"> <thead> <tr> <th>Stockpile</th> <th>Waste Type</th> <th>Maximum Volume</th> </tr> </thead> <tbody> <tr> <td>Bay 1</td> <td>Fines (particles of less than 8 mm diameter)</td> <td>100 m<sup>3</sup></td> </tr> <tr> <td>Bay 2</td> <td>Hand-picked light waste</td> <td>80 m<sup>3</sup></td> </tr> <tr> <td>Bay 3</td> <td>Timber</td> <td>80 m<sup>3</sup></td> </tr> <tr> <td>Bay 4</td> <td>Masonry</td> <td>220 m<sup>3</sup></td> </tr> <tr> <td>Bay 5</td> <td>Masonry</td> <td>220 m<sup>3</sup></td> </tr> <tr> <td>Bay 6</td> <td>Timber</td> <td>200 m<sup>3</sup></td> </tr> <tr> <td>Bay 7</td> <td>VENM/ENM</td> <td>300 m<sup>3</sup></td> </tr> <tr> <td>Skip Bin adjacent Bay 1</td> <td>Ferrous waste</td> <td>9 m<sup>3</sup></td> </tr> <tr> <td>Skip Bin adjacent Bay 1</td> <td>Non-ferrous waste</td> <td>2 m<sup>3</sup></td> </tr> <tr> <td>Processing shed – west</td> <td>Bulk light waste</td> <td>550 m<sup>3</sup></td> </tr> <tr> <td>Processing shed – west</td> <td>Coarse vegetation</td> <td>150 m<sup>3</sup></td> </tr> <tr> <td>Processing shed – central</td> <td>Mixed demolition with a 20% combustible light weight component</td> <td>1,100 m<sup>3</sup></td> </tr> <tr> <td>Processing shed – east</td> <td>Plant feed with a 5% combustible light waste component</td> <td>1,100 m<sup>3</sup></td> </tr> <tr> <td><b>Total</b></td> <td></td> <td><b>4,141 m<sup>3</sup></b></td> </tr> </tbody> </table>	Stockpile	Waste Type	Maximum Volume	Bay 1	Fines (particles of less than 8 mm diameter)	100 m <sup>3</sup>	Bay 2	Hand-picked light waste	80 m <sup>3</sup>	Bay 3	Timber	80 m <sup>3</sup>	Bay 4	Masonry	220 m <sup>3</sup>	Bay 5	Masonry	220 m <sup>3</sup>	Bay 6	Timber	200 m <sup>3</sup>	Bay 7	VENM/ENM	300 m <sup>3</sup>	Skip Bin adjacent Bay 1	Ferrous waste	9 m <sup>3</sup>	Skip Bin adjacent Bay 1	Non-ferrous waste	2 m <sup>3</sup>	Processing shed – west	Bulk light waste	550 m <sup>3</sup>	Processing shed – west	Coarse vegetation	150 m <sup>3</sup>	Processing shed – central	Mixed demolition with a 20% combustible light weight component	1,100 m <sup>3</sup>	Processing shed – east	Plant feed with a 5% combustible light waste component	1,100 m <sup>3</sup>	<b>Total</b>		<b>4,141 m<sup>3</sup></b>	<p>The maximum stockpile volumes as listed were not exceeded during the reporting period.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• Ian Swane &amp; Associates Pty Ltd 9 September 2025 <i>Benedict Smeaton Grange Recycling Facility 52 Anderson Road, Smeaton Grange INDEPENDENT ENVIRONMENTAL AUDIT</i> report (2025 IEA) <ul style="list-style-type: none"> <li>○ Auditor's site inspection found the bin sizes for individual waste types relatively small &amp; prevented stockpiles exceeding Consent volume limits (photos included in 2025 IEA Report Appendix F).</li> <li>○ Auditor estimated stockpile volumes on-site were within the stockpile limits.</li> <li>○ Benedict Site Manager advises that waste materials generally processed and moved within a few days</li> </ul> </li> <li>• December 2025 Site Safety &amp; Compliance Inspection Report.</li> </ul>	<p>Compliant</p>
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<p><b>A8</b></p>	<p>The maximum height of all structures and buildings on site must be no more than 11 m from natural ground level.</p>	<p>All structures and buildings on site comply with this requirement.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ Design drawings in the EMM (October 2024) CEMP showed the maximum height of structures &amp; buildings on site was 10.53 m.</li> <li>○ These design drawings were included in the MOD3 application which was approved by DPHI and a Consent was issued</li> <li>○ The Auditor observed no changes to the main buildings at the time of the site inspection (photos included in 2025 IEA Report Appendix F).</li> </ul> </li> <li>• No further structures / buildings were constructed since the 2025 IEA inspection.</li> </ul>	<p>Compliant</p>																																													

Condition	Requirement	Assessment	Status
<b>A9</b>	<p>With the approval of the Planning Secretary, the applicant may:</p> <p>(a) Submit any strategy, plan or program required by this consent on a progressive basis; and/or</p> <p>(b) Combine any strategy, plan or program required by this consent</p>	<p>No strategy, plan or program was submitted on a progressive basis during the reporting period.</p> <p>No strategy, plan or program was combined during the reporting period – the OEMP is taken as an exception to this requirement, noting that all conditions relating to sub-plans explicitly require that they “<i>must form part of the OEMP</i>”.</p>	Not Triggered
<b>A10</b>	<p>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated</p>	Not triggered, as above.	Not Triggered
<b>A11</b>	<p>The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or the EPA.</p>	<p>All weighbridge records are recorded and maintained digitally, with Waste Contribution Monthly Reports (WCMRs) presenting a summary of these records uploaded monthly to the NSW EPA’s Waste and Resource Reporting Portal (WARRP) as required.</p> <p>No request by the Planning Secretary and/or the EPA for these records was received during the reporting period.</p>	Compliant
<b>A12</b>	<p>The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary</p>	<p>All waste classification reports for received and exported wastes are retained digitally, or manually on-site, as relevant.</p> <p>No request by the Planning Secretary and/or the EPA for these records was received during the reporting period.</p>	Compliant
<b>A13</b>	<p>Where consultation with any public authority is required by the conditions of this consent, the Applicant must:</p> <p>(a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the certifying authority for approval;</p> <p>(b) submit evidence of such consultation as part of the relevant documentation required by the conditions of this consent;</p>	No consultation with public authorities was required during the reporting period.	Not Triggered

Condition	Requirement	Assessment	Status
	(c) describe how matters raised by the public authority have been addressed and identify matters that have not been resolved; and (d) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant		
<b>A14</b>	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents	Evidenced by: <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ Legislative &amp; other statutory requirements listed in Section 3 of EMM (October 2024) CEMP.</li> <li>○ EPL &amp; Consent obtained. No other licences, permits, approvals/ consents considered necessary.</li> </ul> </li> </ul>	Compliant
<b>A15</b>	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.  <i>Note: Under Part 4A of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the Development</i>	No new buildings and structures were constructed during the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>A16</b>	The external walls of the building including attachments must comply with the relevant requirements of the NCC. Prior to the issue of a Construction Certificate and Occupation Certificate the Certifying Authority must: (a) be satisfied that suitable evidence is provided to demonstrate that the products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the relevant requirements of the NCC; and (b) ensure that the documentation relied upon in the approval processes include an appropriate level of detail to demonstrate compliance with the NCC as proposed and as built	No new buildings and structures were constructed during the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>A17</b>	A copy of the documentation required under (b) must be provided to the Planning Secretary within 7 days of being accepted by the Certifying Authority	No new buildings and structures were constructed during the reporting period.	Not Triggered

Condition	Requirement	Assessment	Status
		This Condition was considered Compliant in the 2025 IEA Report.	
<b>A18</b>	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers	No utility works associated with the Development were constructed during the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>A19</b>	Prior to the commencement of construction, all approved plans must be submitted to the Sydney Water “Tap In” service to determine if the development will have any impacts on Sydney Water assets	No construction undertaken during the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>A20</b>	Prior to operation of the Development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i>	The timeframe for this Condition has passed, as the Development commenced operation prior to the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>A21</b>	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of this report to the Planning Secretary and Council	The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: <ul style="list-style-type: none"> <li>• Refer dilapidation report prepared by John M. Daly &amp; Associates Pty Ltd dated 4 July 2018. The Auditor found the Facility was in a good condition when inspected on 7 August 2025 (photos included in 2025 IEA Report Appendix F).</li> </ul>	Not Triggered
<b>A22</b>	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated due to the Development	The subject of this Condition did not arise during the reporting period.	Not Triggered

Condition	Requirement	Assessment	Status
<b>A23</b>	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities	<p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• Section 5.2 of the OEMP (v4, 2025) details training requirements of employees and subcontractors (as necessary), including in “<i>consent condition compliance</i>”.</li> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ Legislative &amp; other statutory requirements listed in Section 3 of EMM (October 2024) CEMP. Section 5.2 of the Benedict (2019) OEMP requires all of the Facility’s employees and subcontractors to receive environmental training, to ensure they are aware of their responsibilities and have the necessary knowledge and skills to carry out their work. Environmental requirements are to be explained to employees as part of Benedict’s corporate and site inductions. Training is to be ongoing as required. All inductions and ongoing training are to be recorded.</li> <li>○ A copy of the training register for the Facility was provided by Benedict (20/08/25 email).</li> </ul> </li> </ul>	Compliant
<b>A24</b>	Prior to the issue of the final Occupation Certificate, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the PCA.	<p>The timeframe for this Condition has passed, as the Development commenced operation prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report.</p>	Not Triggered
<b>A25</b>	The Applicant must ensure that only the plant and equipment listed in Table 2 is used on site	<p>Only the permitted plant and equipment were used on site during the reporting period.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ The Auditor observed that only the equipment and plant listed in Table 2</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status																								
	<p><b>Table 2: Equipment and Activities</b></p> <table border="1"> <thead> <tr> <th>Plant (or equivalent)</th> <th>Number</th> <th>Typical activities</th> </tr> </thead> <tbody> <tr> <td colspan="3"><b>Equipment used across the site</b></td> </tr> <tr> <td>Front end loader (e.g. Volvo L150 or equivalent)</td> <td>1</td> <td>Unloading and loading trucks Moving waste and products</td> </tr> <tr> <td>Trucks (customers)</td> <td>5</td> <td>Delivering waste and dispatching products Returning to/leaving the site</td> </tr> <tr> <td colspan="3"><b>Equipment used in main shed</b></td> </tr> <tr> <td>13 t excavator</td> <td>1</td> <td>Sorting waste using a variety of excavator attachments Loading trucks</td> </tr> <tr> <td>Screening plant inside shed</td> <td>1</td> <td>Sorting co-mingled waste</td> </tr> <tr> <td>Picking line</td> <td>1</td> <td>Sorting co-mingled waste from screening plant</td> </tr> </tbody> </table>	Plant (or equivalent)	Number	Typical activities	<b>Equipment used across the site</b>			Front end loader (e.g. Volvo L150 or equivalent)	1	Unloading and loading trucks Moving waste and products	Trucks (customers)	5	Delivering waste and dispatching products Returning to/leaving the site	<b>Equipment used in main shed</b>			13 t excavator	1	Sorting waste using a variety of excavator attachments Loading trucks	Screening plant inside shed	1	Sorting co-mingled waste	Picking line	1	Sorting co-mingled waste from screening plant	<ul style="list-style-type: none"> <li>○ was present at the Facility at the time of the site inspection (photos included in 2025 IEA Report Appendix F).</li> </ul> <p>No change in plant and equipment occurred since the 2025 IEA inspection.</p>	
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<b>A26</b>	<p>The Applicant must ensure that all plant and equipment used for the Development is:</p> <p>(a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner</p>	<p>All plant and equipment used for the Development is maintained and operated in a proper and efficient condition and manner.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ Benedict advised that all machines are serviced every few months by suppliers who hold maintenance records. Simple repairs are performed by Benedict on-site personnel. The Auditor observed all site equipment was operational and in good condition (photos included in 2025 IEA Report Appendix F).</li> </ul> </li> <li>• December 2025 Site Safety &amp; Compliance Inspection Report. <ul style="list-style-type: none"> <li>○ “Pass” results achieved for various inspection aspects related to plant / equipment condition and maintenance.</li> </ul> </li> <li>• Lack of complaints received during the reporting period suggests that plant and equipment have been operated in a proper and efficient manner.</li> </ul>	Compliant																								
<b>B1</b>	<p>The Applicant must comply with the hours of work detailed in Table 3 unless otherwise agreed in writing by the Planning Secretary</p> <p><b>Table 3: Hours of Work</b></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Accept waste deliveries and dispatch</td> <td>Monday – Friday</td> <td>6 am to 10 pm</td> </tr> <tr> <td>Saturday</td> <td>6 am to 5 pm</td> </tr> <tr> <td>Sunday</td> <td>8 am to 4 pm</td> </tr> <tr> <td rowspan="2">Waste processing</td> <td>Monday – Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>7 am to 4 pm</td> </tr> </tbody> </table>	Activity	Day	Time	Accept waste deliveries and dispatch	Monday – Friday	6 am to 10 pm	Saturday	6 am to 5 pm	Sunday	8 am to 4 pm	Waste processing	Monday – Friday	7 am to 6 pm	Saturday	7 am to 4 pm	<p>All permitted work hours were complied with during the reporting period.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ Auditor checked compliance by reviewing working hours listed on website and observing working hours listed on main gate</li> </ul> </li> </ul>	Compliant									
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Condition	Requirement	Assessment	Status
		<p>signage as 6:00am-4:30pm Mon-Fri and 6:00am-2:00pm Sat.</p> <ul style="list-style-type: none"> <li>○ Benedict reports indicate that no noise complaints were received during the audit period.</li> <li>○ Noise was not an issue raised by regulatory authorities during consultation.</li> </ul> <ul style="list-style-type: none"> <li>● OEMP v4 <ul style="list-style-type: none"> <li>○ Section 3.5 details the permitted hours of operation for the facility.</li> </ul> </li> </ul>	
<b>B2</b>	<p>Works outside of the hours identified in Condition B1 may be undertaken in the following circumstances:</p> <p>(a) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</p> <p>(b) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.</p>	<p>Activities were undertaken on site outside of operating hours only when directly associated with the fire incident occurring on Monday 22 December 2025. Further details are provided in Section 5 of this Annual Review.</p>	Compliant
<b>B3</b>	<p>Prior to the commencement of construction, the Applicant must prepare a Construction Noise and Vibration Management Plan (CNVMP) for the development to manage high noise generating works to the satisfaction of the Planning Secretary. The CNVMP shall form part of the CEMP required by Condition C1 and must:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) be approved by the Planning Secretary prior to the commencement of construction the Development;</p> <p>(c) describe the management and mitigation measures and procedures for achieving the noise management levels in the EPA's Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009);</p> <p>(d) identify high emission generating construction activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities;</p> <p>(e) include strategies that have been developed with the community for managing high noise generating works;</p>	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Refer Section 5.2, EMM (Sept. 2024) CEMP stating that "A CNVMP has been prepared, guided by the policies and guidelines listed in Section 3.1.2, to address the requirements of Condition B3 of SSD 7424. The CNVMP specifies that the nearest noise sensitive receivers most likely to be affected by construction noise from the site are residences located approximately 120 m to the south-east of the facility. The closest residences are in Linton Road and Chapman Circuit, followed by Ashford Circuit and Downes Crescent (see Figure 2.2 in Appendix B). There are also</li> </ul>	Not Triggered

Condition	Requirement	Assessment	Status								
	(f) describe the community consultation undertaken to develop the strategies in (e) above; and (g) include a complaints management system that would be implemented for the duration of the Development	adjacent industrial premises including an existing large industrial warehouse on the adjacent lot to the south-west and a light industrial building to the north. ○ A copy of the CNVMP is provided in Appendix B of the CEMP and in Appendix G of the OEMP.									
<b>B4</b>	The Applicant must: (a) not commence construction until the CNVMP required by Condition B3 is approved by the Planning Secretary; and (b) The Applicant must ensure the CNVMP (as required and approved by the Planning Secretary from time to time) is implemented during construction of the Development	The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: ○ The CNVMP provided in Appendix G of the OEMP was approved by DPHI in a letter dated 21 October 2019; ○ Benedict reports indicate that no noise complaints were received during the audit period; and ○ Noise was not an issue raised by regulatory authorities during consultation.	Compliant								
<b>B5</b>	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise criteria in Table 4  <i>Table 4: Noise Criteria dB(A)</i> <table border="1" data-bbox="344 954 1133 1023"> <thead> <tr> <th data-bbox="344 959 539 991">Location</th> <th data-bbox="539 959 741 991">Day L<sub>Aeq</sub>(15 minute)</th> <th data-bbox="741 959 943 991">Evening L<sub>Aeq</sub>(15 minute)</th> <th data-bbox="943 959 1133 991">Night L<sub>Aeq</sub>(15 minute)</th> </tr> </thead> <tbody> <tr> <td data-bbox="344 991 539 1023">All residential receivers</td> <td data-bbox="539 991 741 1023">40</td> <td data-bbox="741 991 943 1023">40</td> <td data-bbox="943 991 1133 1023">40</td> </tr> </tbody> </table>	Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	All residential receivers	40	40	40	Assessment against these criteria is discussed in Section 7.1.2 of this Annual Review, with monitoring undertaken in April and July of 2025.  The assessments determined that noise from the Site complied with relevant limits at all monitoring locations during the sessions, excepting during the 29 July 2025 Day session at receiver R22, where a 2 dB exceedance with the limit (40 dB(A)) was identified. It was noted in the 13 August 2025 <i>Verification Noise Monitoring Report</i> prepared by EMM (report ref: E241087 RP#3) that the Site was audible throughout the measurement, including impact noise from site and vehicle movements, but that an exceedance of 2 dB is considered negligible in the Noise Policy for Industry	Non-compliant
Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)								
All residential receivers	40	40	40								

Condition	Requirement	Assessment	Status
		(NSW EPA, 2017), being not discernible by the average listener and therefore not warranting receiver-based treatments or controls. Based on the above conclusion, the non-compliance is considered minor.	
<b>B6</b>	The Applicant must construct the fencing shown in Appendix A prior to the commencement of construction of any part of the Development	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor inspected the site and observed large concrete acoustic walls along the eastern, southern and western boundary consistent with design drawings above by the Consent;</li> <li>○ Benedict reports indicate that no noise complaints were received during the audit period.</li> <li>○ Noise was not an issue raised by regulatory authorities during consultation.</li> </ul>	Not Triggered
<b>B7</b>	To ensure the external appearance of the development is suitable and contributes to the visual character of the surrounding area, the boundary fencing shall be of a visually attractive material and colour that has been agreed to by the Planning Secretary	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor inspected the site and observed large concrete acoustic walls along the eastern, southern and western boundary consistent with design drawings above by the Consent;</li> <li>○ Benedict reports indicate that no noise complaints were received during the audit period.</li> <li>○ Noise was not an issue raised by regulatory authorities during consultation.</li> </ul>	Not Triggered

Condition	Requirement	Assessment	Status
<b>B8</b>	Detailed drawings and further details of the boundary fencing shown in Appendix A shall be submitted to and be approved in writing by the Planning Secretary prior to commencement of construction of any part of the Development. The detail thereby approved must be carried out in accordance with that approval.	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Not Triggered
<b>B9</b>	<p>Prior to the commencement of operation, the Applicant must prepare an Operational Noise Management Plan (ONVMP) for the Development to the satisfaction of the Planning Secretary. The ONVMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The ONVMP must:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe all noise sources from the Development;</p> <p>(c) describe the measures that will be implemented to minimise the noise emissions in the area including:</p> <p>(i) the management and mitigation measures to be employed on site;</p> <p>(ii) how the noise impacts of the Development will be minimised during any adverse meteorological conditions or extraordinary events;</p> <p>(iii) identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; and</p> <p>(d) until the Planning Secretary directs otherwise, include a quarterly monitoring program that evaluates and reports on:</p> <p>(i) compliance with the noise criteria specified in Condition B5;</p> <p>(ii) the management actions to be taken to address any exceedances of the criteria specified in Condition B5; and</p> <p>(iii) the contingency measures that will be implemented in the event management actions are not effective in reducing noise levels to an acceptable level;</p> <p>(e) identify the control measures that that will be implemented for each emission source; and</p>	<ul style="list-style-type: none"> <li>• An ONVMP is provided in Appendix G of the revised (current) v4 OEMP.</li> <li>• The ONVMP was prepared by EMM.</li> <li>• The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.</li> </ul> <p>Evidence of status prior to 17 September 2025:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ An ONVMP is provided in Appendix G of the OEMP.</li> <li>○ The ONVMP was prepared by EMM.</li> <li>○ The OEMP was approved by DPHI in a letter dated 21 October 2019.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	(f) defines what constitutes a noise incident, and includes a protocol for identifying noise incidents and notifying the Department and relevant stakeholders of any such incident.		
<b>B10</b>	If in the opinion of the Planning Secretary the monitoring program required by Condition B9(d) demonstrates systemic exceedances of the noise criteria in Condition B5, the Applicant shall not be permitted to operate on the site between the hours of 10 pm and 7 am	<p>No correspondence from the Planning Secretary expressing such an opinion was received during the reporting period. No systemic exceedances of the noise criteria in Condition B5 were identified during the reporting period. No exceedances of the noise criteria in Condition B5 between the hours of 10 pm and 7 am were identified during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ DPHI did not raise noise as a matter of concern during consultation.</li> <li>○ The EMM (2024, 2025) noise monitoring reports did not measure noise exceedances.</li> <li>○ Benedict reports indicate that no noise complaints were received during the audit period.</li> <li>○ Noise was not an issue raised by regulatory authorities during consultation.</li> </ul>	Compliant
<b>B11</b>	<p>The Applicant must:</p> <p>(a) not commence operation until the ONVMP required by Condition B9 is approved by the Planning Secretary; and</p> <p>(b) ensure the ONVMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development.</p>	<p>a) The commencement of operation occurred prior to the reporting period.</p> <p>b) The current ONVMP implemented on site is included in Appendix G of the v4 OEMP, which was approved by DPHI in a letter dated 17 September 2025.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ An ONVMP is provided in Appendix G of the OEMP.</li> <li>○ The ONVMP was prepared by EMM.</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		<ul style="list-style-type: none"> <li>○ The OEMP was approved by DPHI in a letter dated 21 October 2019.</li> <li>○ Benedict reports indicate that no noise complaints were received during the audit period.</li> <li>○ Noise was not an issue raised by regulatory authorities during consultation.</li> </ul>	
<b>B12</b>	<p>Prior to the commencement of construction, the Applicant must prepare a Driver Code of Conduct and induction training for the Development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the Development.</p>	<p>The commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ A Driver Code of Conduct was prepared by EMM and included in the CEMP prepared by EMM dated September 2024.</li> <li>○ No complaints were recorded by Benedict in their log for the audit period.</li> <li>○ Traffic nor on-site construction vehicles were not an issue raised by regulatory authorities during consultation.</li> <li>● A Driver Code of Conduct is included in the Operational Traffic Management Plan in Appendix F of the v4 OEMP, which was approved by DPHI in a letter dated 17 September 2025.</li> </ul>	Compliant
<b>B13</b>	<p>The Applicant must ensure that all its vehicles are fitted with a broadband reversing alarm</p>	<p>All vehicles on site comply with this requirement.</p> <p>Evidenced by:</p> <ul style="list-style-type: none"> <li>● 2025 IEA Report <ul style="list-style-type: none"> <li>○ The Auditor found during the site inspection that mobile plant or equipment used on the premises were likely fitted with a non-tonal alternative such as a "squawker" or broadband alarm or reversing camera or in-cabin proximity alarm or combination of these, since no beeper type alarms were noticed.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		<ul style="list-style-type: none"> <li>○ The documents indicate that no noise complaints were received during the audit period.</li> </ul> <p>Vehicles on site are unchanged since the 2025 IEA inspection.</p>	
<b>B14</b>	<p>Vibration caused by construction at any residence or structure outside the site must be limited to:</p> <p>(a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures; and</p> <p>(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (Department of Environment and Conservation, 2006).</p>	<p>The timeframe for this Condition has passed, as the construction occurred prior to the reporting period. No construction occurred during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Facility does not use a crusher or vibrating screen machinery.</li> <li>○ The Auditor inspected the Facility and observed no plant or equipment present that had the potential to generate unacceptable vibrations.</li> <li>○ Section 5.1.3 of the EMM (2024) CEMP provided vibration management and control measures.</li> <li>○ Appendix B of the CEMP provided Construction Noise and Vibration Management Plans.</li> <li>○ Benedict reports indicate that no vibration complaints were received during the audit period.</li> <li>○ Vibration was not an issue raised by regulatory authorities during consultation.</li> </ul>	Not Triggered
<b>B15</b>	<p>The vibration limits in Condition B14 apply unless an alternative is outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by Condition C1 of this consent</p>	<p>See response to Condition B14, above.</p>	Not Triggered
<b>B16</b>	<p>Prior to the commencement of operation, the Applicant must provide 8 parking spaces for staff and 2 parking spaces for visitors on site (including one accessible parking space) to ensure that traffic associated with the Development does not utilise public and residential streets or public parking facilities. Parking areas must be constructed in accordance with the latest version of AS 2890</p>	<p>The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>During the reporting period, the Development did not utilise public and residential streets or public parking facilities.</p>	Not Triggered

Condition	Requirement	Assessment	Status
<b>B17</b>	No parking is not permitted elsewhere on the site except within the designated parking spaces.	<p>During the reporting period, parking occurred only within the designated parking spaces.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Auditor observed 10 vehicles parked in the central and western parts of the Facility (photos included in 2025 IEA Report Appendix F).</li> </ul> <p>Note: The double negative in this condition is ignored, the actual requirement is taken as “<i>No parking is <del>not</del> permitted elsewhere on the site except within the designated parking spaces.</i>”</p>	Compliant
<b>B18</b>	<p>The Applicant must ensure:</p> <p>(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;</p> <p>(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTRROADS guidelines;</p> <p>(c) the Development does not result in any vehicles parking or queuing on the public road network;</p> <p>(d) all vehicles enter and exit the site in a forward direction;</p> <p>(e) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths near the site;</p> <p>(f) all vehicles are wholly contained on site before being required to stop;</p> <p>(g) all loading and unloading of materials is carried out on-site in designated areas;</p> <p>(h) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and</p> <p>(i) vehicle manoeuvring areas must always be kept clear of any obstacles, including parked cars</p>	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed that vehicles moved in a single, clockwise direction after entering the Facility.</li> <li>○ The surface of the site was a concrete slab that was clean.</li> <li>○ A dual wheel wash was located just before the vehicle exit and was in a sound operating condition.</li> <li>○ The Auditor observed no evidence of off-site parking associated with the Facility.</li> <li>○ Benedict reports indicate that no complaints associated with on-site vehicles was received during the audit period.</li> <li>○ Site vehicle operation was not an issue raised by regulatory authorities during consultation</li> <li>○ Photos included in 2025 IEA Report Appendix F.</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		Site conditions are unchanged since the 2025 IEA inspection.	
<b>B19</b>	All trucks leaving the site must depart via a wheel wash facility to prevent mud, dust or debris from being deposited on Council roads. The wheel wash facility must be designed and constructed in consultation with Council and to the satisfaction of the Planning Secretary prior to commencement of operation	<p>Wheel wash facility operating onsite during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed all vehicles leaving the Facility complied with this requirement (Photos included in 2025 IEA Report Appendix F).</li> <li>○ Benedict reports indicate that no complaints associated with on-site vehicles was received during the audit period.</li> <li>○ Site vehicle operation was not an issue raised by regulatory authorities during consultation.</li> </ul>	Compliant
<b>B20</b>	<p>Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The OTMP must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council;</p> <p>(c) detail the measures that are to be implemented to ensure road safety and network efficiency including restricting queuing or parking of vehicles on Anderson Road;</p> <p>(d) detail heavy vehicle routes, access and parking arrangements;</p> <p>(e) include a Driver Code of Conduct to:</p> <p>(i) minimise the impacts on the local and regional road network;</p> <p>(ii) minimise conflicts with other road users;</p> <p>(iii) minimise road traffic noise;</p> <p>(iv) ensure truck drivers use specified routes; and</p> <p>(v) include a program to monitor the effectiveness of these measures.</p> <p>(f) include a Traffic Control Plan (TCP) detailing:</p>	<ul style="list-style-type: none"> <li>● An OTMP is provided in Appendix G of the revised (current) v4 OEMP.</li> <li>● The OTMP was prepared by Traffix Traffic &amp; Transport Planners.</li> <li>● The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.</li> </ul> <p>Evidence of status prior to 17 September 2025:</p> <ul style="list-style-type: none"> <li>● 2025 IEA Report <ul style="list-style-type: none"> <li>○ An OTMP (called an Operational Traffic Management Plan) was prepared by Traffix and provided in Appendix F of the Benedict (2019) OEMP.</li> <li>○ The OTMP details the plan requirements, overview of site conditions, traffic management, driver code of conduct, compliance measures and monitoring, SSD compliance and conclusions.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	(i) the on-site measures to be implemented to control the movement of trucks in and out of the site, as well as onsite; and (ii) provisions for requiring the traffic controller to stop exiting trucks to allow an entering truck to manoeuvre into the site unhindered	<ul style="list-style-type: none"> <li>○ The OEMP that contains the OTMP was approved by DPHI in a letter dated 21 October 2019.</li> </ul>	
<b>B21</b>	The Applicant must: (a) not commence operation until the OTMP required by Condition B20 is approved by the Planning Secretary; and (b) The Applicant must ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development	The 2019 OEMP containing the OTMP was approved by DPHI on 21 October 2019, over four years prior to operations commencing on 9 July 2024.  The current v4 OEMP containing the OTMP was approved by DPHI in a letter dated 17 September 2025.	Compliant
<b>B22</b>	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering (a) all trucks entering or leaving the site with loads have their loads covered; (b) trucks associated with the Development do not track dirt onto the public road network; and (b) public roads used by these trucks are kept clean	The timeframe for this Condition has passed, as the construction occurred prior to the reporting period. No construction occurred during the reporting period.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: <ul style="list-style-type: none"> <li>○ Dust management systems observed by the Auditor included covered sorting areas, misting system installed along roofs, concrete pavement covering entire site, stockpiles protected by 10m high boundary walls, stockpiles limited in height.</li> <li>○ The Auditor observed no dust issues associated with Facility.</li> <li>○ Benedict reports indicate that no dust complaints were received during the audit period.</li> <li>○ Dust generation by site activities was not an issue raised by regulatory authorities during consultation</li> <li>○ Photos included in 2025 IEA Report Appendix F.</li> </ul>	Not Triggered
<b>B23</b>	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to	<ul style="list-style-type: none"> <li>● An AQMP is provided in Appendix E of the revised (current) v4 OEMP.</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	<p>the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The AQMP must:</p> <p>(c) be prepared by a suitably qualified and experienced person(s);</p> <p>(d) detail and rank all emissions from all sources of the Development, including particulate emissions and odour;</p> <p>(e) describe the measures that will be implemented to minimise the potential risks to adverse air quality in the area including:</p> <ul style="list-style-type: none"> <li>- the management and mitigation measures to be employed on site;</li> <li>- plant and equipment being maintained to ensure that it is in good order;</li> <li>- how the air quality impacts of the development will be minimised during any adverse meteorological conditions or extraordinary events;</li> <li>- identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; and</li> <li>- compliance with the relevant conditions of this consent including Condition B25; and</li> </ul> <p>(f) identify the control measures that that will be implemented for each emission source.</p> <p>(g) defines what constitutes an air quality incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents</p>	<ul style="list-style-type: none"> <li>• The AQMP was prepared by Ramboll.</li> <li>• The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.</li> </ul> <p>Evidence of status prior to 17 September 2025:</p> <ul style="list-style-type: none"> <li>• 2025 IEA Report <ul style="list-style-type: none"> <li>○ An AQMP is provided in Appendix E of the OEMP.</li> <li>○ The AQMP was prepared by Ramboll.</li> <li>○ The AQMP provided details on potential emission sources, mitigation measures, monitoring and incident reporting.</li> <li>○ The OEMP, including the AQMP, was approved by DPHI in a letter dated 21 October 2019.</li> </ul> </li> </ul>	
<b>B24</b>	<p>The Applicant must:</p> <p>(a) not commence operation until the AQMP required by Condition B23 is approved by the Planning Secretary; and</p> <p>(b) The Applicant must ensure the AQMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development</p>	<p>The 2019 OEMP containing the AQMP was approved by DPHI on 21 October 2019, over four years prior to operations commencing on 9 July 2024.</p> <p>The current v4 OEMP containing the AQMP was approved by DPHI in a letter dated 17 September 2025.</p>	Compliant
<b>B25</b>	<p>The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).</p>	<p>No odour -related issues arose during the reporting period.</p>	Compliant

Condition	Requirement	Assessment	Status
		<p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Benedict (March 2025) annual report to DPHI advised that no offensive odours occurred during the reporting period.</li> <li>○ The wastes Benedict is allowed to accept at the Facility are to be non-odorous.</li> <li>○ No odour complaints were recorded as having been received during the audit period.</li> <li>○ The Auditor observed no odorous materials at the site.</li> <li>○ No odours were detected off-site during the Auditor's site inspection.</li> </ul>	
<b>B26</b>	<p>Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.</p>	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period. No construction occurred during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ An erosion and sediment control plan was provided in Appendix C of the EMM (Sept. 2024) CEMP.</li> <li>○ The plan required a sediment fencing, a temporary sediment stockpile with silt fence to control runoff, a shaker grid at the site exit, an overland flow diversion mound and silt fence, and gravel filled bags to trap sediment in runoff.</li> <li>○ Benedict reports indicate that no complaints were received during the audit period.</li> <li>○ Erosion and sediment control were not an issue raised by regulatory authorities during consultation.</li> </ul>	<p>Not Triggered</p>

Condition	Requirement	Assessment	Status
<b>B27</b>	<p>Prior to the commencement of operation, the Applicant must design and install a stormwater management system for the Development. The system must:</p> <p>(a) be designed by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be generally in accordance with the conceptual design in the EIS;</p> <p>(c) include a storage tank with bunding to capture leachate from the main shed and waste stockpile areas for offsite disposal and treatment;</p> <p>(d) be designed in accordance with applicable Australian Standards;</p> <p>(e) demonstrate that discharge limits can meet those in the WSUD Guideline;</p> <p>(f) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines (as may be updated or replaced from time to time);</p> <p>(g) direct all sediment laden water in overland flow away from the leachate management system; and</p> <p>(h) prevent cross-contamination of clean and sediment or leachate laden water</p>	<p>The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The stormwater management system concept design approved by DPHI in 10/09/18 consent. The consent issued for SSD-7424-MOD-3 concerned repositioning the weighbridges, wheel wash and office, amendments to the stormwater management system, changes to construction materials &amp; design of site boundary walls. The consent accepted a Modification Report by EMM Consulting (15/03/24) and a Stormwater Management Plan by Mesh Group P/L May 2024.</li> <li>○ The system is generally in accordance with the concept design provided in the EIS (Appendix C).</li> <li>○ The system has been approved by the DPHI as being designed in accordance with Australian Standards (refer Section 4.7.2).</li> <li>○ The system likely to meet the WSUD Guideline &amp; its capacity meets the requirements of ARR 2016 and the EPA (1997) guidelines for the reasons given in Section 4.7.2.</li> <li>○ The conceptual design given in the 2016 EIS and the ‘for construction’ May 2024 drainage plan does not include a bunded storage tank to capture leachate from the main shed and waste stockpile areas for offsite disposal and treatment. Benedict advised there is separate leachate collection at the opening to buildings or open areas of waste stockpiles with a collection pit for leachate storage &amp; regular</li> </ul>	Not Triggered

Condition	Requirement	Assessment	Status
		<p>pump out and transport of leachate off-site to an appropriately licensed landfill or facility. This action has not yet been required to date as the sediment to be pumped out is only now approximately 150mm to 200mm deep, due to the low deposition of material.</p> <ul style="list-style-type: none"> <li>○ All sediment laden water is directed to the sediment basin.</li> </ul>	
<b>B28</b>	<p>Prior to the issue of a Construction Certificate, a certificate must be submitted to the Certifying Authority certifying that:</p> <p>(a) satisfactory arrangements have been made for the disposal of stormwater;</p> <p>(b) the proposed development and alterations to the natural surface contours will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties; and</p> <p>(c) the piped drainage system has been designed to Council's Stormwater Drainage Policy</p>	<p>The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report.</p>	Not Triggered
<b>B29</b>	<p>Prior to the issue of the Final Occupation Certificate, Works-As-Executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved must be submitted to the Certifying Authority</p>	<p>The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report.</p>	Not Triggered
<b>B30</b>	<p>The stormwater drainage generated from the development must be directed to:</p> <p>(a) the drainage easement; and</p> <p>(b) Council's street kerb and gutter</p>	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The stormwater design drawing for the MOD-3 consent shows rainwater from part of the southern roof directed to the large inground rainwater tank, with overflow directed to the large sedimentation / stormwater detention basin in the NE corner.</li> <li>○ The stormwater design drawing also shows rainwater from the remaining roofs and surface</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		<p>water flowing across the concrete ground slab is directed to a dish drain that runs along the eastern side of the Facility and discharges into the large sedimentation / stormwater detention basin in the NE corner of the Facility.</p> <ul style="list-style-type: none"> <li>○ Any overflow from NE tank is directly through an overflow weir through grates, then a gross pollutant trap, then a jelly fish filter prior to being discharged to Council's stormwater system.</li> </ul> <p>Site conditions are unchanged since the 2025 IEA inspection.</p>	
<b>B31</b>	The stormwater management system must be operated and maintained for the duration of the Development	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed the stormwater management system being operated and maintained. A water quality testing programme is currently being undertaken by Benedict for discharges made from the surface water management system.</li> </ul> <p>Site conditions are unchanged since the 2025 IEA inspection.</p>	Compliant
<b>B32</b>	The Development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed that the sediment dam was the only water discharge point from the site (photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		<ul style="list-style-type: none"> <li>○ Surface water monitoring results over the audit period were provided to the EPA. The results over the Audit Period show no discharges.</li> </ul> <p>Site conditions are unchanged since the 2025 IEA inspection.</p>	
<b>B33</b>	<p>Prior to the commencement of construction, the Applicant must prepare a Water Management Plan (WMP) to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The WMP must:</p> <p>(a) be prepared in consultation with the CL&amp;W;</p> <p>(b) detail water use, metering, disposal and management on-site;</p> <p>(c) detail the management of wastewater streams on site;</p> <p>(d) verify the likely groundwater dewatering requirements;</p> <p>(e) contain a Surface Water Management Plan, including;</p> <p>(i) a program to monitor:</p> <ul style="list-style-type: none"> <li>- surface water flows and quality;</li> <li>- surface water storage and use;</li> <li>- discharge limits;</li> <li>- sediment basin operation;</li> </ul> <p>(ii) sediment and erosion control plans;</p> <p>(iii) surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts; and</p> <p>(iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.</p>	<ul style="list-style-type: none"> <li>● A WMP is provided in Appendix D of the revised (current) v4 OEMP.</li> <li>● The WMP was prepared by Tooker + Associates.</li> <li>● The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.</li> </ul> <p>Evidence of status prior to 17 September 2025:</p> <ul style="list-style-type: none"> <li>● 2025 IEA Report <ul style="list-style-type: none"> <li>○ A WMP is provided in Appendix D of the OEMP.</li> <li>○ The WMP was prepared by Tooker &amp; Associates.</li> <li>○ The WMP provides details on surface water and roof water management, surface water management during construction, fire water management, fuel storage, groundwater, sewage disposal, potable water, site water balance, surface water management plan, a summary of mitigation measures.</li> <li>○ The OEMP, including the WMP, was approved by DPHI in a letter dated 21 October 2019.</li> </ul> </li> </ul>	Compliant
<b>B34</b>	<p>The Applicant must:</p> <p>(a) not commence construction until the WMP required by Condition B33 is approved by the Planning Secretary; and</p> <p>(b) The Applicant must ensure the WMP (as required and approved by the Planning Secretary from time to time) is implemented for the life of the Development</p>	<p>a) The commencement of construction occurred prior to the reporting period.</p> <p>b) The current WMP implemented on site is included in Appendix D of the v4 OEMP, which was approved by DPHI in a letter dated 17 September 2025.</p>	Compliant

Condition	Requirement	Assessment	Status
		<p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The WMP was approved by DPHI on 21 October 2019, over four years prior to the commencement of MOD-3 construction and operations commencing on 9 July 2024.</li> </ul>	
<b>B35</b>	<p>In the event that groundwater is intersected during construction the Applicant shall:</p> <p>(a) obtain the necessary water licences or approvals from CL&amp;W;</p> <p>(b) develop a Groundwater Management Plan for the testing, dewatering, storage, movement and treatment of any groundwater to the satisfaction of CL&amp;W.</p>	<p>No construction occurred during the reporting period.</p>	<p>Not Triggered</p>
<b>B36</b>	<p>Prior to the commencement of construction, the Applicant must undertake a soil salinity verification study at the site in consultation with Council. The salinity verification study must be undertaken:</p> <p>(a) by a suitably qualified and experienced person(s);</p> <p>(b) in accordance with the Office of Environment and Heritage (OEH) document Site Investigations for urban salinity (2002) or other relevant guideline; and</p> <p>(c) to the satisfaction of PCA prior to the issue of an Occupation Certificate</p>	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period. No construction occurred during the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	<p>Not Triggered</p>
<b>B37</b>	<p>The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning’s Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times</p>	<p>No dangerous goods are stored or handled onsite above these quantities.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Benedict advised that only very minor quantities were stored in the workshop. The Auditor observed this was the case (photos included in 2025 IEA Report Appendix F).</li> </ul>	<p>Compliant</p>
<b>B38</b>	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p>	<p>Dangerous goods are stored or handled in accordance with the specified requirements.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p>	<p>Compliant</p>

Condition	Requirement	Assessment	Status
	<p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA1997).</p> <p>In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirement must prevail to the extent of the inconsistency</p>	<ul style="list-style-type: none"> <li>○ Benedict advised that all Dangerous Goods were placed in bunded areas. The Auditor observed this was the case (photos included in 2025 IEA Report Appendix F).</li> </ul>	
<b>B39</b>	<p>The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook</p>	<p>Dangerous goods are stored or handled in accordance with the specified requirements.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Auditor observed and inspected a self-contained diesel AST (13,350 L capacity) supplied by "Tanks On Site Australia", which located on the eastern side of the site.</li> <li>○ Auditor found no evidence of leaks or diesel spills during site inspection.</li> <li>○ Liquid chemicals stored in workshop stored on bunded pallets.</li> <li>○ Photos included in 2025 IEA Report Appendix F.</li> </ul> <p>Site conditions are unchanged since the 2025 IEA inspection.</p>	Compliant
<b>B40</b>	<p>The fire hydrant system must be installed in accordance with BCA Clause E1.3 (to buildings and open yard). The system shall comply with AS 2419.1:2005 except that the minimum flow rate shall be 50L/s in lieu of that detailed in Table 2.1.</p>	<p>System was installed prior to the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Not Triggered
<b>B41</b>	<p>The final design of the fire hydrant system must be prepared by a suitably qualified fire services engineer and submitted to the Principal Certifying Authority prior to issue of the Construction Certificate</p>	<p>System was installed prior to the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Not Triggered
<b>B42</b>	<p>To provide for storage and collection of contaminated fire water, 180m<sup>3</sup> of storage is to be provided on the site. A design prepared by a suitably</p>	<p>System was installed prior to the reporting period.</p>	Not Triggered

Condition	Requirement	Assessment	Status
	qualified engineer is to be submitted to the Principal Certifying Authority prior to issue of the Construction Certificate	This Condition was considered Not triggered in the 2025 IEA Report, with the following comment: <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	
<b>B43</b>	The Applicant shall incorporate appropriate bush fire protection measures into the detailed design of the Development in accordance with Planning for Bush Fire Protection Guideline (RFS 2006) to the satisfaction of the RFS	Detailed design of the Development occurred prior to the reporting period.  This Condition was considered Not triggered in the 2025 IEA Report, with the following comment: <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Not Triggered
<b>B44</b>	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste	All waste removed from the Site is directed to appropriate facilities and reported through the EPA's WARRP.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: <ul style="list-style-type: none"> <li>○ Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B45</b>	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL	Only permitted materials are accepted to the Site, as reported through the EPA's WARRP.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: <ul style="list-style-type: none"> <li>○ Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B46</b>	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Weighbridge system records quantity of all material (in tonnes) received onsite, reported monthly through the EPA's WARRP.	Compliant

Condition	Requirement	Assessment	Status
		<p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Data captured by weighbridge system and managed by the waste recording system.</li> </ul>	
<b>B47</b>	<p>The Applicant must retain all sampling and waste classification data for the life of the development and keep it readily available for inspection by the EPA and the Planning Secretary.</p>	<p>All sampling and waste classification data is retained. No requests for inspection by the EPA or Planning Secretary were received during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Benedict advised that all data is sent to the Benedict Environmental Compliance Officer (AC) for filing and storage.</li> </ul>	Compliant
<b>B48</b>	<p>The Applicant shall only receive waste on site that is authorised for receipt by an EPL.</p>	<p>Only permitted materials are accepted to the Site, as reported through the EPA's WARRP.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B49</b>	<p>The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept the waste.</p>	<p>No construction occurred during the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Benedict advised that no construction work had occurred at site during audit period. Auditor found no evidence of construction work (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B50</b>	<p>The Applicant shall:  (a) implement auditable procedures to:  (i) ensure the site does not accept wastes that are prohibited;  (ii) screen incoming waste loads; and</p>	<p>Section 5.2 of the OEMP (v4, 2025) details training requirements of staff, which ensures compliance with this Condition.</p>	Compliant

Condition	Requirement	Assessment	Status
	<p>ensure that:</p> <p>(i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site;</p> <p>(ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation;</p> <p>(iii) details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Planning Secretary when requested; and</p> <p>(iv) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>	<p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul>	
<b>B51</b>	<p>The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.</p>	<p>Classification of wastes to be taken offsite is undertaken as required.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Benedict advised that no liquid waste was accepted on-site. All waste received was GSW from known sources and tracked. Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B52</b>	<p>All waste must be stored wholly within the designated waste stockpile areas.</p>	<p>Material is stored only in permitted areas.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed all waste stored wholly within the designated waste stockpile areas - (Photos included in 2025 IEA Report Appendix F).</li> </ul>	Compliant
<b>B53</b>	<p>All waste must be unloaded undercover within the designated unloading areas in the main shed.</p>	<p>Material is unloaded undercover within the designated unloading areas in the main shed only.</p>	Compliant

Condition	Requirement	Assessment	Status
		<p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ The Auditor observed all waste being unloaded within the covered areas along the eastern and southern sides of the Facility (Photos included in 2025 IEA Report Appendix F).</li> </ul>	
<b>B54</b>	The Applicant must maintain the site in a clean and tidy state at all times.	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul> <p>Site conditions are unchanged since the 2025 IEA inspection.</p>	Compliant
<b>B55</b>	All residual waste that is removed from the site must be dispatched outside of peak traffic hours.	<p>Considered compliant during reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ Auditor observed all waste materials were being properly managed (Photos included in 2025 IEA Report Appendix F).</li> </ul> <p>Site activities are unchanged since the 2025 IEA inspection.</p>	Compliant
<b>B56</b>	<p>From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the Development. The program must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>(b) include suitable provision to monitor the:</p> <p>(i) quantity, type and source of waste received on site; and</p> <p>(ii) quantity, type and quality of the outputs produced on site; and</p> <p>(c) ensure that:</p>	<ul style="list-style-type: none"> <li>• A Waste Monitoring Program is provided in Section 5 of Appendix C of the revised (current) v4 OEMP.</li> </ul> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ A WMP was prepared by Benedict and documented in Section 4.2 and Appendix C of the OEMP prepared by Benedict dated September 2019.</li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	<p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p> <p>(ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos .</p>	<ul style="list-style-type: none"> <li>○ The WMP was approved by the DPHI in a letter dated 21 October 2019.</li> <li>○ The Facility is managed by Paul Skinner who had undergone the Benedict training program.</li> <li>○ Waste received by the Facility is measured by the automated weighbridge waste management system.</li> <li>○ The waste is directed and monitored by the site spotter located at the end of the incoming dual weighbridges and by the site manager.</li> <li>○ All staff are trained in the implementation of the WMP.</li> </ul>	
<b>B57</b>	<p>The Applicant must:</p> <p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</p> <p>(b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.</p>	<ul style="list-style-type: none"> <li>● Procedures for the management of pests, vermin and noxious weeds are provided in Section 4.9 of the revised (current) v4 OEMP, approved by DPHI in a letter dated 17 September 2025.</li> <li>● No pests, vermin or declared noxious weeds were identified on the Site during the reporting period.</li> </ul> <p>Evidence of status prior to 17 September 2025:</p> <ul style="list-style-type: none"> <li>● 2025 IEA Report <ul style="list-style-type: none"> <li>○ Procedures for the management of pests, vermin and noxious weeds are provided in Section 4.9 of the OEMP prepared by Benedict dated September 2019.</li> <li>○ The OEMP was approved by the DPHI in a letter dated 21/10/19.</li> <li>○ The Facility is managed by trained staff.</li> <li>○ Benedict advised the Auditor that no pests, vermin or noxious weeds have been detected at the Facility.</li> <li>○ Only inert, non-putrescible, non-odorous waste is accepted.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
		<ul style="list-style-type: none"> <li>○ The entire ground surface is sealed by concrete pavement.</li> <li>○ Waste received is processed and exported in a couple of days.</li> <li>○ Different types of waste are separated stockpiled, with stockpile sizes being relatively small.</li> <li>○ Photos included in 2025 IEA Report Appendix F.</li> </ul> <p>Site activities and conditions are unchanged since the 2025 IEA inspection.</p>	
<b>B58</b>	<p>Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan for the site in consultation with Council to the satisfaction of the Planning Secretary. The plan must form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The plan must:</p> <p>(a) detail the species to be planted on-site;</p> <p>(b) describe the monitoring and maintenance regime for all landscaping components; and</p> <p>(c) be consistent with the Applicant’s Management and Mitigation Measures at Appendix B.</p>	<p>The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul> <p>Notwithstanding the above, a Landscape Management Plan is included in Appendix I of the revised (current) v4 OEMP, approved by DPHI in a letter dated 17 September 2025.</p>	Not Triggered
<b>B59</b>	<p>The Applicant must:</p> <p>(a) not commence operation until the Landscape Management Plan is approved by the Planning Secretary;</p> <p>(b) implement the most recent version of the Landscape Management Plan approved by the Planning Secretary; and</p> <p>(c) maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition B58 for the duration of the development</p>	<p>a) The timeframe for this Condition has passed, as the operation commenced prior to the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul> <p>b) and c) The Landscape Management Plan implemented on site is included in Appendix I of the revised (current) v4 OEMP, approved by DPHI in a letter dated 17 September 2025.</p>	Compliant

Condition	Requirement	Assessment	Status
<b>B60</b>	<p>The Applicant must ensure the lighting associated with the Development:</p> <p>(a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and</p> <p>(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network including at night</p>	<p>Installation of lighting was completed prior to the reporting period. No complaints with regard to lighting were received during the reporting period.</p> <p>This Condition was considered Not triggered in the 2025 IEA Report, with the following comment:</p> <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Compliant
<b>C1</b>	<p>The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must:</p> <p>(a) be approved by the Planning Secretary prior to the commencement of construction;</p> <p>(b) identify the statutory approvals that apply to the Development;</p> <p>(c) outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>(d) include an unexpected finds protocol for heritage items and contaminated material;</p> <p>(e) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;</p> <p>(f) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;</p> <p>(g) incorporate measures to reduce energy consumption;</p> <p>(h) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and</p> <p>(i) include the management plans required under Condition C2 of this consent.</p>	<p>The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.</p> <p>This Condition was considered Compliant in the 2025 IEA Report, with the following evidence:</p> <ul style="list-style-type: none"> <li>○ A CEMP for the MOD-3 work was prepared by EMM and documented in a report dated 4 October 2024. The CEMP provides <ul style="list-style-type: none"> <li>▪ A comprehensive description of environmental management practices needed by the MOD-3 work.</li> <li>▪ An unexpected finds protocol for heritage items (Section 5.5).</li> <li>▪ An unexpected finds protocol for contamination (Section 5.9).</li> <li>▪ A description of construction work (Section 2).</li> <li>▪ Details on how environmental performance of MOD-3 construction work is provided (Section 6.2).</li> <li>▪ Energy management and control measures (Section 5.12.1).</li> <li>▪ Roles &amp; responsibilities (Section 4.1).</li> <li>▪ Management plans required under Condition C2 (Appendix D).</li> </ul> </li> <li>○ The 2024 Annual Review issued by Benedict dated 27/03/25 advised that compliance with</li> </ul>	Not Triggered

Condition	Requirement	Assessment	Status
		this Condition was achieved. The DPHI subsequently approved the 2024 Annual Review report in a letter dated 27/06/25.	
<b>C2</b>	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: (a) a Construction Noise and Vibration Management Plan (see Condition B3); and (b) an Erosion and Sediment Control Plan (see Condition B26).	The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.  This Condition was considered Compliant in the 2025 IEA Report, with the following evidence: <ul style="list-style-type: none"> <li>○ Construction Noise and Vibration Management Plan (Appendix B, CEMP).</li> <li>○ Erosion and Sediment Control Plan (Appendix C, CEMP).</li> </ul>	Not Triggered
<b>C3</b>	The Applicant must: (a) not commence construction of the Development until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the Development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	The timeframe for this Condition has passed, as the commencement of construction occurred prior to the reporting period.  This Condition was considered Compliant in the 2025 IEA Report.	Not Triggered
<b>C4</b>	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must: (a) be submitted to the Planning Secretary for approval prior to the commencement of operation; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the Development; (d) identify the statutory approvals that apply to the Development; (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (f) incorporate measures to reduce energy consumption; (g) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise;	The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.  Evidence of status prior to 17 September 2025: <ul style="list-style-type: none"> <li>● 2025 IEA Report <ul style="list-style-type: none"> <li>○ The OEMP was prepared by EMM dated September 2019. The OEMP was approved by DPHI on 21 October 2019. The MOD-3 consent was issued on 1 August 2024, nearly 5 years after the DPHI approved the OEMP. The 2024 Annual Review issued by Benedict dated 27/03/25 advised that compliance with this Condition was achieved. The DPHI subsequently approved the 2024 Annual Review report in a letter dated 27/06/25.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	(iv) respond to any non-compliance; (v) respond to emergencies (including landowner notification); and (h) include the following environmental management plans: (i) Noise (see Condition B9); (ii) Traffic (see Condition B20); (iii) Air Quality (see Condition B23); and (iv) Water (see Condition B33).		
<b>C5</b>	The Applicant must: (a) not commence operation of the Development until the OEMP is approved by the Planning Secretary; and (b) operate the Development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	The v4 OEMP was approved by DPHI in a letter dated 17 September 2025. The previous OEMP (2019) was approved by DPHI on 21 October 2019.  This Condition was considered Not triggered in the 2025 IEA Report, with the following comment: <ul style="list-style-type: none"> <li>○ Not relevant for the audit period.</li> </ul>	Compliant
<b>C6</b>	The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data; (b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; and NSW Government Department of Planning and Environment 13 Smeaton Grange WRTF (SSD 7424) CONSOLIDATED CONSENT (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; and (ii) effectiveness of any management measures (see (c) above);	The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.  Evidence of status prior to 17 September 2025: <ul style="list-style-type: none"> <li>• 2025 IEA Report.               <ul style="list-style-type: none"> <li>○ The OEMP was prepared by EMM dated September 2019. The OEMP was approved by DPHI on 21 October 2019. The MOD-3 consent was issued on 1 August 2024, nearly 5 years after the DPHI approved the OEMP. The 2024 Annual Review issued by Benedict dated 27/03/25 advised that compliance with this Condition was achieved. The DPHI subsequently approved the 2024 Annual Review report in a letter dated 27/06/25.</li> </ul> </li> </ul>	Compliant

Condition	Requirement	Assessment	Status
	<p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the Development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incidents;</p> <p>(ii) complaints;</p> <p>(iii) non-compliances with statutory requirements; and</p> <p>(iv) exceedances of the impact assessment criteria and/or performance criteria; and</p> <p>(h) a protocol for periodic review of the plan</p>		
<b>C7</b>	<p>Within three months of:</p> <p>(a) approval of a modification;</p> <p>(b) approval of an annual review under Condition C8;</p> <p>(c) submission of an incident report under Condition C9; or</p> <p>(d) completion of an audit under Condition C12,</p> <p>the Applicant must review, and if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p>	<p>The trigger for this Condition during this reporting period was the approval of the 2024 Annual Review, on 27 June 2025.</p> <p>The OEMP including all sub-plans was reviewed following the approval of the 2024 Annual Review, with a revised version (v4) submitted to DPHI for approval on 8 September 2025, compliant with the three-month timeframe (due date 27 September 2025).</p> <p>The v4 OEMP was approved by DPHI in a letter dated 17 September 2025.</p>	Compliant
<b>C8</b>	<p>Within 12 months from the commencement of operation, and each year thereafter, unless otherwise agreed by the Planning Secretary, the Applicant must review the environmental performance of the Development to the satisfaction of the Planning Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous reporting period, and the Development that is proposed to be carried out over the next reporting period;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous reporting period, which includes a comparison of these results against the:</p>	<p>The 2024 Annual Review covering the period of 9 July 2024 (commencement of operations) to 31 December 2024 was provided to DPHI on 27 March 2025. DPHI accepted the report in a letter dated 27 June 2025.</p>	Compliant

Condition	Requirement	Assessment	Status
	(i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous reporting periods; and (iv) the relevant predictions in the EIS; (c) identify any non-compliance over the last reporting period, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next reporting period to improve the environmental performance of the Development		
<b>C9</b>	Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report must be supplied to the Department outlining the basic facts. A further detailed report must be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Planning Secretary no later than 14 days after the incident or potential incident.	<p>A fire occurred on the Site on Monday 22 December 2025, outside of operating hours – further details are provided in Section 5 of this Annual Review.</p> <p>The fire was extinguished, and all debris and associated firewater were captured and removed by licensed contractors, with no water allowed to escape the Site.</p> <p>Thorough reporting of the incident was undertaken, including the preparation and provision of an R3 Report to the NSW EPA as required by the EPL.</p> <p>Although communications were maintained with the NSW EPA, a notification to the Department in accordance with this Condition was not undertaken.</p>	Non-compliant
<b>C10</b>	The Applicant must maintain a register of accidents, incidents and potential incidents. The register must be made available for inspection at any time by the independent Hazard Auditor and the Department	A register is maintained. No requests for inspection by the independent Hazard Auditor or the Department were received during the reporting period.	Compliant
<b>C11</b>	The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the	The required reporting is undertaken via the Benedict Recycling website, which is updated regularly:	Compliant

Condition	Requirement	Assessment	Status
	reporting arrangements in any plans or programs approved under the conditions of this consent	<a href="https://www.benedictrecycling.com.au/about/policies-compliance/">https://www.benedictrecycling.com.au/about/policies-compliance/</a>	
<b>C12</b>	<p>Within one year of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6 of the EP&amp;A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents</p>	An Independent Environmental Audit (IEA) covering the period from 9 July 2024 (commencement of operations) to 8 July 2025 (the Audit Period) was conducted by Ian Swane & Associates, with the site inspection conducted on 7 August 2025 and the IEA Report submitted on 28 November 2025. Further details are provided in Section 3 of this Annual Review.	Compliant
<b>C13</b>	Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Planning Secretary	The IEA Report was submitted with response to recommendations on 28 November 2025. However, this was greater than the 3-month timeframe.	Non-compliant
<b>C14</b>	<p>Prior to the commencement of construction and for the duration of the Development, the Applicant must:</p> <p>(a) make copies of the following publicly available on its website:</p> <p>(i) the documents referred to in Condition A2;</p> <p>(ii) all current statutory approvals for the Development;</p>	<p>The required information/documents are available on the Benedict Recycling website, which is updated regularly:</p> <p><a href="https://www.benedictrecycling.com.au/about/policies-compliance/">https://www.benedictrecycling.com.au/about/policies-compliance/</a></p>	Compliant

Condition	Requirement	Assessment	Status
	(iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) a summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (v) a complaints register updated on a quarterly basis; (vi) the annual reviews of the Development; (vii) any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit; (viii) any other matter required by the Planning Secretary; and (b) keep this information up to date, to the satisfaction of the Planning Secretary		

## 9. Appendices

N/A.