

F Compliance with conditions

Table 1 Assessment of compliance with Minister's Conditions of Approval: MP 05_0120

Number	Condition	Action
SCHEDULE 2: ADMINISTRATIVE CONDITIONS		
Obligation to Minimise Harm to the Environment		
1	The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the project.	Noted
Terms of Approval		
2	The Proponent shall carry out the project generally in accordance with the:	
a)	EA;	Noted
b)	site plan contained in Appendix A;	Noted
c)	submissions report;	Noted
d)	statement of commitments;	Noted
e)	Modification application 05_0120 Mod 2 with supporting documents titled Environmental Assessment Report: B9 Project – New Paper Mill – Revised Modification # 2, Subdivision and Site Layout, 16 February 2010, prepared by SKM and Response to Submissions from Exhibition of Environmental Assessment Report, May 2010, prepared by SKM;	Noted
f)	Modification request 05_0120 Mod 3 with supporting documents titled New Paper Mill Modification Report #3 – Completion of McCauley Street and Botany Road / McCauley Street Intersection, dated 12 October 2012, and prepared by Sinclair Knight Merz Pty Ltd;	Noted
g)	Modification request 05_0120 Mod 4 with supporting documents titled New Paper Mill Modification Report #4 – Completion of McCauley Street and Botany Road / McCauley Street Intersection and use of B-Doubles on McCauley Street, dated January 2013, and prepared by Sinclair Knight Merz Pty Ltd;	Noted
h)	Modification request 05_0120 Mod 5 with supporting documents titled Modification Report – Demolition of B7 and Minor Subdivision, dated November 2014, prepared by Jacobs Group (Australia) Pty Ltd and Submission Report – Modification #5, dated 29 May 2015, prepared by Jacobs Group (Australia) Pty Ltd and statement of commitments for MP 05_0120 Mod 5 contained in Appendix B; and	Noted
i)	Modification request 05_0120 Mod 6, accompanying Environmental Assessment and plans dated July 2016	Noted

Number	Condition	Action
	and Response to Submissions dated August 2016, both prepared by ConsultInfra.	
j)	Modification request 05_0120 MOD 7 and accompanying Environmental Assessment Report, dated August 2016 and prepared by ConsultInfra.	
3	If there is any inconsistency between the above, and the conditions of this approval, then the most recent documents shall prevail to the extent of the inconsistency.	Noted
4	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:	
a)	any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and	Noted
b)	the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	
Limits of Production		
5	The Proponent shall ensure that the project does not produce more than 425,000 tonnes of paper per annum.	Complies. Current production is less than 425,00 tonnes per annum
Management Plans/Monitoring Programs		
6	With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	Approval granted for a Construction Environmental Management Plan (EMP) and Noise Barrier Design Plan for the container barrier which has been erected and now sought to be extended. A new Noise Barrier Design Plan and updated EMP will be provided prior to works commencing.
Structural Adequacy		
7	The Proponent shall ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA.	A PCA has certified all structures and buildings constructed in accordance with the BCA.
	Notes:	

Number	Condition	Action
	<i>Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</i> <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.</i>	
Demolition		
8	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	All demolition work to date has been undertaken in compliance with standard. Demolition of the B7 Reel Store will also comply with AS 2601-2001: The Demolition of Structures. An amended Demolition Environmental Management Plan (DEMP) will also be provided pre-demolition of the B7 Reel Store Building.
9	The Proponent shall ensure that demolition of buildings does not affect the integrity of the façade of the old finishing mill building, until Condition 15 - Heritage is satisfied.	This condition is no longer relevant as the heritage façade was approved to be demolished by DPE in 2012.
Protection of Public Infrastructure		
10	Prior to commencement of demolition, the Proponent shall:	
a)	prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters, footpaths, etc) in consultation with Council; and	A Dilapidation Report for McCauley Street was produced in consultation with Council under the original application for the Paper Mill. The proposed works will not necessitate a new or revised dilapidation report.
b)	submit a copy of this report to the Secretary	The dilapidation report was provided to the Secretary (or the Director General at the time)
11	The Proponent shall:	

Number	Condition	Action
a)	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and	During construction no, public infrastructure was damaged.
b)	relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Orora has funded the relocation of any public infrastructure as required.
Compliance Audit		
12	Prior to commissioning the new paper mill, the Proponent shall submit work as executed plans to the Department for all development associated with the project. These plans must be prepared by a suitably qualified and experienced expert and must include plans showing the work as executed plans laid over the approved plans to demonstrate that the development has been carried out in accordance with the approved plans.	The work as executed plans were provided to DPE and approved prior to commissioning of the new Paper mill.
Operation of Plant and Equipment		
13	The Proponent shall ensure that all plant and equipment used on the site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	This is an ongoing requirement and a comprehensive maintenance plan for the site has been developed.
SCHEDULE 3: SPECIFIC ENVIRONMENTAL CONDITIONS		
ODOUR		
1	1. The Proponent shall ensure that the project complies with Section 129 of the Protection of the Environment Operations Act, 1997.	Since the operation of the new B9 Paper Mill commenced in October 2013, the frequency and extent of odour emissions and complaints has significantly decreased. The ongoing operations of the paper mill continues to comply with Section 129 of the Protection of the Environment Operations Act, 1997.
	<i>Notes:</i> <i>Section 129 of the Protection of the Environment Operations Act 1997, provides that the Proponent must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was</i>	

Number	Condition	Action
	<i>emitted in accordance with the conditions of a licence directed at minimising odour.</i>	
1A	Prior to commissioning the upgraded WTP, the Proponent shall submit a Post-Commissioning Monitoring and Testing Program to the EPA to establish that the upgraded WTP performs as described in the Air Quality Impact Assessment (AQIA) submitted with 05_0120 MOD 6. This shall include but is not limited to: a) operation of the desulfurisation scrubber; b) operation of the low-NOx gas engine, and c) operation of the anaerobic digester including assessment of fugitive emissions. The Program shall describe the contingencies that would be implemented, and the timing for implementation, should impacts that exceed the AQIA predictions be identified.	WTP commissioning is not yet complete, therefore the program has been submitted and approved by the EPA but is yet to be completed.
AIR QUALITY		
2	During the life of the project, the Proponent shall carry out all reasonable and feasible measures to minimise the dust generated by the project.	There have been no complaints about dust from the project in the last three years.
SOIL AND WATER		
Discharge Limits		
3	Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the Protection of the Environment Operations Act 1997	Complies. There have been no discharges of water that have not complied Section 120.
Extraction		
4	Prior to the commencement of operation, the Proponent shall ensure that all necessary licences are obtained for the extraction of groundwater for the facility in accordance with the requirements of the DWE.	Licences for groundwater extraction from the Snape Park bore field have been issued to Orora under the Water Management Act and the Water Sharing Plan for the Botany Sands Aquifer.
Flooding		
5	The Proponent shall undertake a detailed flood study of the site in consultation with Council and ensure that the project is designed to ensure that floor levels are a minimum of 300mm above the 1 in 100 year flood level. The study shall be submitted to the Secretary prior to commencement of construction of the paper machine building.	This study was prepared and submitted to the Director-General. All floor levels are at minimum of 300mm above the 1 in 100 year flood level.

Number	Condition	Action
Bunding		
6	All chemicals, fuels and oils shall be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) shall be designed and installed in accordance with:	All fuels, oils and chemicals are stored in appropriately sized bunded areas.
a)	the requirements of all relevant Australian Standards; and	These bunded areas have been designed in reference to the Australian Standards.
b)	the DECC's Environmental Protection Manual Technical Bulletin Bunding and Spill Management	These bunded areas have been designed in reference to the DECC Manual.
Remediation		
7	Prior to commencement of construction, the Proponent shall prepare a Remediation Action Plan (RAP) that has been approved by an accredited site auditor. Prior to construction on land identified in the RAP and the EA, as contaminated, the Proponent shall remediate the land in accordance with the requirements of the Contaminated Land Management Act 1997 and the recommendations of the Remediation Action Plan.	A RAP was prepared and subsequently approved by an accredited site auditor. The RAP was implemented and work has been signed off by a certified auditor.
Erosion and Sediment Control Plan		
8	The Proponent shall prepare and implement an Erosion and Sediment Control Plan for the site, to the satisfaction of the Secretary. The Plan shall be submitted prior to commencement of demolition and construction and shall be prepared in accordance with Landcom's publication Managing Urban Stormwater – Soils and Construction.	An ESCP was prepared and submitted to the (then) Director-General (DG). Approval from the DG was received.
Water Management Plan		
9	The Proponent shall prepare and implement a Water Management Plan for the site to the satisfaction of the Secretary. The Plan shall:	
a)	be submitted to the Secretary for approval prior to commencement of operation;	All three documents were prepared and submitted to the DP&E before operation. Approval for all three documents was provided by the DPE. The subject proposal does not warrant amendment to these reports.
b)	include: » a Water Supply Strategy for the site including a report on the sustainability of groundwater extraction from the Snape Park borefield and the impact on the Botany Sands Aquifer. The strategy should also assess options for alternative water supply, and should be undertaken in consultation with the DWE; » a Stormwater Management Scheme for the site that has been prepared in accordance with the requirements of Sydney Water and Council, and generally in accordance with the Managing Urban	

Number	Condition	Action
	Stormwater: Council Handbook (DECC); » a Wastewater System for the site prepared in accordance with the requirements of Sydney Water. The system should include details of discharge rates, wastewater quality and automated controls for monitoring discharges to the Southern and Western Sydney Ocean Outfall Sewer (SWSOOS).	
9A	The Proponent shall prepare a Surface Water Management Plan for the works associated with 05_0120 MOD 5. The Plan shall:	
a)	be prepared in consultation with NOW and submitted to and approved by the Secretary prior to the commencement of demolition of the B7 Building; and	a Surface Water Management Plan for the works associated with 05_0120 MOD 5 was submitted and approved by DPE. The boundary limit for demolition activities are to the top of slab. Stormwater is captured on-site and treated through Orora's Gross Pollutant Traps.
b)	outline the measures to minimise water entering the demolition area and outline the capture and treatment of any runoff from the demolition area.	See above. An amended report will be provided pre-demolition of the B7 Reel Store Building which will outline mitigation measures to minimise water entering the demolition area and potentially polluted surface water reaching Botany Bay.

NOISE

Noise Limits

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The Proponent shall ensure that noise from operation of the project does not exceed the noise limits presented in Table 1.

Table 1: Project Noise Limits

ID	Location	Day	Evening	Night	Night
		L _{Aeq} (15 minute) dB(A)	L _{Aeq} (15 minute) dB(A)	L _{Aeq} (15 minute) dB(A)	L _{Amax} dB(A)
R1	Cnr. McCauley St and Australia Ave	46	45	43	55

A quarterly noise monitoring report provided with the application which dates back to July 2016 (pre-demolition of B7 building) demonstrates that the project has generally complied with the noise limits in Table 1 post demolition of the B7 building and post construction of the noise barrier.

Number		Condition						Action
		R2	Australia Avenue	45	45	43	55	
		R3	Murrabin Avenue	46	45	43	55	
		R4	Partanna Avenue	42	41	41	55	
		R5	Cnr. Partanna and Moorina Avenues	42	42	39	55	
		R6	Moorina Avenue	43	43	39	55	
		Notes: » <i>Noise from the premises is to be measured at any point within 1 metre of any residential boundary or other noise sensitive areas in the vicinity of the premises to determine compliance with the LAeq(15 minute) noise limits in the above table.</i> » <i>L_{Amax} noise limits apply at one (1) metre from the residential building façade.</i> » <i>Where it can be demonstrated that direct measurement of noise from the development is impractical, the Department and the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy).</i> » <i>The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</i> » <i>The noise limits identified in Table 1 apply under the following meteorological conditions:</i> » <i>wind speeds up to 3 m/s at 10 metres above the ground level; or</i> <i>temperature inversion conditions up to 3oC/100m and wind speeds up to 2 m/s at 10 metres above ground level.</i>						
Noise Mitigation								
10A	Prior to the commencement of operations of the project, the Proponent shall prepare and implement a detailed Noise Barrier Design Plan. The Plan shall:							
a)	be prepared in consultation with Council;							A Stage 1 Noise Barrier Design Plan has been prepared in consultation with RCC, approved by the Secretary and implemented.
b)	be prepared and implemented to the satisfaction of the Secretary;							
c)	demonstrate that the proposed noise barriers are designed with a material density of no less than 15kg/m2, unless otherwise approved by the Secretary;							
d)	include a detailed plan of the layout indicating how the noise barriers would traverse along the north-eastern							

Number	Condition	Action
	perimeter of the Amcor site and around the waste paper storage yard; and	
e)	Include a detailed design of the barrier, outlining how it would be visually treated to reduce and mitigate any visual impacts, such as the provision of landscaping on its northern side.	
10B	Within three months of completing the demolition of the B7 Building, unless otherwise agreed to by the Secretary, the Proponent shall prepare a detailed Stage 2 Noise Barrier Design Plan. The Plan shall:	
a)	be prepared in consultation with Council and the EPA and submitted to and approved by the Secretary;	Stage 2 Noise Barrier Design was submitted and approved by the DPE with the concurrence of the EPA prior to demolition of the B7 Building in November 2015 and has since been implemented and demolition of the B7 Building is now complete. The subject proposal seeks to extend the approved Stage 2 noise barrier along the remaining length of the north-eastern boundary to offset the demolition of the B7 Reel Store Building, which currently provides operational noise attention to neighbouring properties. A detailed Noise Barrier Design Plan consistent with the requirements of this condition, which has been prepared in consultation with the EPA and Council, has been provided with this application.
b)	demonstrate that compliance with the noise limits in Table 1 of Condition 10 can be achieved; and	Long-term quarterly monitoring has been undertaken and is ongoing which demonstrates general compliance with the noise limits contained in Table 1 of condition 10.
c)	include a detailed design of the barrier, including how it would be visually treated to reduce and mitigate any visual impacts, such as the provision of landscaping on its northern side.	A detailed design of the container noise barrier for stage 2 was provided as required and approved by the Secretary with the concurrence of the EPA in

Number	Condition	Action													
		November 2015.													
	<i>Note: The mitigation of noise associated with the demolition of the B7 Building is addressed under Condition 13A.</i>														
10C	Within nine months of completing the demolition of the B7 Building, unless otherwise agreed to by the Secretary, the Proponent must complete the construction of the Stage 2 Noise Barrier.	Stage 2 construction of the noise barrier has been completed.													
Hours of Work															
11	Unless otherwise agreed with the Secretary, the Proponent shall comply with the demolition, construction and operation hours in Table 2. Table 2: Construction and Operation Hours for the Project <table border="1"> <thead> <tr> <th>Activity</th><th>Day</th><th>Time</th></tr> </thead> <tbody> <tr> <td rowspan="3">Demolition and Construction</td><td>Monday – Friday</td><td>7:00am to 6:00pm</td></tr> <tr> <td>Saturday</td><td>8:00am to 1:00pm</td></tr> <tr> <td>Sunday and Public Holidays</td><td>Nil</td></tr> <tr> <td>Operation</td><td>All days</td><td>Any time</td></tr> </tbody> </table>	Activity	Day	Time	Demolition and Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Operation	All days	Any time	Demolition and construction hours were complied with. Where works were required outside these hours approval from DPE was sought. 24hour operation of the paper mill is permitted seven days a week. Demolition of the B7 Reel Store will also comply with the construction hours of operation contained within Table 2 of condition 11.
Activity	Day	Time													
Demolition and Construction	Monday – Friday	7:00am to 6:00pm													
	Saturday	8:00am to 1:00pm													
	Sunday and Public Holidays	Nil													
Operation	All days	Any time													
	<i>Notes:</i> » <i>Construction activities may be conducted outside the hours in Table 2 provided that the activities are not audible at any residence beyond the boundary of the site</i>														
Operating Conditions															
12	The Proponent shall ensure that noise from reversing alarms is minimised at all times	The use of reversing alarms is minimised wherever possible and practical.													
Construction Noise Management															
13	The Proponent shall prepare and implement for the project to the satisfaction of the Secretary. The plan shall be submitted to the Secretary prior to commencing demolition and construction, and must:	A staged Construction Noise Management													

Number	Condition	Action
a)	identify specific activities to be carried out and the noise generation from these activities;	Plan (CNMP) was approved and for each stage a revised CNMP has been submitted and approved by DPE. Measures within the plan were implemented during construction. A revised CNMP will be provided pre-demolition of the B7 Reel Store Building.
b)	identify all potentially affected sensitive receivers;	
c)	identify all reasonable and feasible mitigation measures to comply with a construction noise limit of LA10(15 minute) 50dB(A) for demolition phases, earthworks and construction of the new paper machine building;	
d)	identify all reasonable and feasible mitigation measures to comply with the operational noise limits in Table 1 for periods of machine construction and commissioning/transition phases;	
e)	provide details of the length of the construction period to the Secretary;	
f)	assess the potential noise impacts against the noise objectives;	
g)	describe monitoring procedures to measure compliance with noise objectives;	
h)	describe procedures for implementing noise mitigation treatments and monitoring their effectiveness in meeting the noise objectives; and	
i)	include procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity, and procedures for managing complaints.	
13A	The Proponent shall update the existing staged Construction Noise Management Plan required by Condition 13 to address the noise associated with the demolition of the B7 Building. The updated Plan shall:	
a)	be prepared in consultation with the EPA;	All of these noise management measures have been implemented during the demolition of the B7 Building which is now complete. Prior to commencing the demolition activities, the existing staged Construction Noise and Vibration Management Plan (CNMP) would be updated to include demolition activities. This would detail how work is to be carried out to minimise the impacts of noise and vibration on adjacent properties.
b)	be submitted to and approved by the Secretary prior to the commencement of demolition of the B7 Building; and	
c)	consider the mitigation measures outlined in the documents submitted in support of 05_0120 MOD 5.	
Operational Noise Management		
13B	The Proponent shall prepare and implement an Operational Noise Management Plan for the project to the satisfaction of the Secretary. The plan shall be	

Number	Condition	Action
	submitted to the Secretary prior to the commencement of operations, and must:	
a)	identify all potentially affected sensitive receivers;	The Operational Noise Management Plan (ONMP) has been approved by DPE. The ONMP is being implemented on site. All of these noise management measures have been implemented as part of the design and/or management of the site.
b)	specify the relevant noise criteria;	
c)	describe management methods and procedures and specific noise mitigation treatments that will be implemented to control noise emissions,	
d)	detail a noise monitoring program to be prepared by a qualified acoustic consultant and implemented to monitor the effects of the project on the acoustic environment during operation, the effectiveness of all noise control devices and the noise barrier, and monitoring of road traffic noise, with details of procedures to be undertaken if any non- compliance is detected; and	
e)	detail procedures to receive, record and respond to complaints.	
13C	Prior to the commencement of operations, the Proponent shall ensure that all of the following noise mitigation controls are implemented:	
a)	retention and redesign of the B7 reel store to provide acoustic shielding;	The B7 Reel Store building is sought to be demolished under the subject application, thus removal of this condition is sought.
b)	placement of ventilation fans on decks on the south side of the paper machine building;	Complies.
c)	engineering controls on fans and blowers to achieve 85dB(A) at 1m from the outlets;	Complies.
d)	ground floor level wall of the paper machine building facing residential areas to be constructed of concrete and a double clad metal system;	Complies
e)	machine floor level wall of the paper machine building facing residential areas to be constructed of a double steel cladding system;	Complies.
f)	design of the internal road system and traffic flow to prevent sleep disturbance criteria being exceeded; and	Complies.
g)	design of the finished product store to allow trucks to be loaded inside the building and to exit the site via a separate access on McCauley Street further from residential areas.	Complies.
Noise Validation		
14	Within 3 months of the commencement of operations, the Proponent shall submit a Noise Verification Study to the satisfaction of the Secretary to demonstrate compliance with the noise limits in Table 1. This Study shall:	A Noise Verification Study was issued to the DPE when the final works to the Waste Paper Yard were completed and the B5 building was demolished.
a)	be undertaken by a suitably qualified acoustical expert and in accordance with the NSW Industrial Noise Policy;	

Number	Condition	Action
b)	validate the predictions made in the EA;	Noise validation testing is being undertaken through the quarterly noise monitoring as undertaken by the Site and demonstrates Orora’s compliance with the approved noise limits as set out in Table 1 of the approval. Additional comments will be noted regarding the performance of the extended container noise barriers for the noise monitoring event nearest to the completion of the demolition works
c)	demonstrate compliance with the noise limits in Table 1; and	
d)	describe the contingencies that would be implemented, and the timing for implementation, should non-compliances be detected.	
14A	Within three months of the installation of the Stage 2 Noise Barrier, the Proponent shall submit a Noise Verification Study to the Secretary. This study shall:	
a)	be undertaken by a suitably qualified acoustical expert and in accordance with the NSW Industrial Noise Policy;	A Noise Verification Study was issued to the DPE which demonstrates compliance with Table 1 of Condition 10 and approved with the concurrence of the EPA.
b)	validate the predictions made in the EA and supporting documents for 05_0120 MOD 5;	
c)	demonstrate compliance with the noise limits in Table 1 of Condition 10; and	
d)	describe the contingencies that would be implemented, and the timing for implementation, should non-compliances be detected.	
14B	Prior to commissioning the upgraded WTP, the Proponent shall submit a Noise Verification Report to the Secretary identifying the final location and type of equipment associated with the upgraded WTP to verify the sound power level (dB(A)) assumptions in Table 3-1 of the Operational Noise Impact Assessment (ONIA) submitted with 05_0120 MOD 6.	
HERITAGE		
15	Within two months of the date of this approval, the Proponent shall prepare a Heritage Conservation Management Plan, in consultation with Randwick City Council (RCC) and to the satisfaction of the Secretary. The Plan must:	A Heritage Conservation and Management Plan has been prepared in consultation with RCC and approved by DP&E. Notwithstanding, this condition is no longer relevant where the old finishing mill building was approved to be
a)	be prepared by a suitably qualified and experienced person who is to receive the prior approval of the Secretary;	
b)	include details of options for the conservation management of the façade of the old finishing mill, including: » opportunities for maintaining any aspects of the building; or » suggestions for integrating any elements of the heritage item with the new paper mill or the site, to recognise the old finishing mill building in the papermaking history of the site;	

Number	Condition	Action
c)	an interpretation strategy prepared in accordance with the NSW Heritage Office guidelines;	demolished in 2012.
d)	justification for selection of the preferred option;	
e)	details of full photographic and archival recording prior to any demolition works. The archival recording must be in accordance with current NSW Heritage Office guidelines/policies;	
f)	consideration of any other Heritage Office guidelines. Once this plan is approved, the Proponent shall implement the plan to the satisfaction of the Secretary.	
LANDSCAPE AND VISUAL		
Building Design		
16	The Proponent shall submit a detailed design plan for the facility that must be approved by the Secretary prior to the commencement of construction of the paper machine building. The plan shall include details of the final design of the paper mill building including colour, signage, external materials and other architectural treatments designed to minimise the visual impact of the bulk and continuous façades along Botany Road and McCauley Street.	A design plan on the external appearance of the B9 paper mill was prepared, approved by DPE and implemented.
17	Prior to the commencement of construction, the Proponent shall provide evidence to the satisfaction of the Secretary, that the Sydney Airports Corporation Limited is satisfied with the proposed height of all temporary and permanent structures associated with the new paper mill and requiring approval under the Civil Aviation (Buildings Control) Regulations.	SACL and CASA approval was obtained for all temporary and permanent structures that may impact the PAN-OPS and OLS. The extension to the existing noise wall will not impact upon the PAN-OPS and OLS
Lighting		
18	The Proponent shall ensure that the lighting associated with the project:	Lighting for the project has been designed in compliance with the relevant guidelines and requirements.
a)	complies with the latest version of Australian Standard AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting; and	
b)	is mounted, screen and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	
Landscaping		
19	The Proponent shall prepare and submit to the Secretary prior to commencement of construction of the paper machine building, a landscape plan, providing details of screening trees to be planted along the site boundaries, other landscape treatments within the site and details of a footpath to be provided along the	A Landscape Plan was prepared in consultation with RCC, approved by DP&E and implemented on site.

Number	Condition	Action
	McCauley Street and Botany Road frontages. The plan shall be prepared in consultation with Council and shall include a program for implementation.	The extension to the existing noise wall will not impact upon the approved Landscape Plan implemented for the site.
TRANSPORT		
Operating Conditions		
20	The Proponent shall ensure that:	
a)	the internal road network and parking on site complies with Australian Standards AS 2890.1:2004 and AS 2890.2:2002;	The internal road network was designed and constructed in compliance with the relevant standards.
b)	site related vehicles do not queue on any public roads;	Queuing on Botany Road or other public streets has been eliminated with relocation of the incoming weighbridge to the centre of the site.
c)	heavy vehicles are restricted from using McCauley Street north of Raymond Avenue; and	Traffic management measures have been incorporated into the design of exits on McCauley Street to limit vehicles movements to south. There have been no complaints about Orora heavy vehicles using McCauley Street north of Raymond Avenue.
d)	any changes to site access, including new access points and closure of existing access points are notified to the Secretary prior to commencement of operation.	The McCauley Street access near Australia Avenue has been relocated further south of the intersection, approved by DPE as part of Modification 5.
McCauley Street Road Upgrade		
20A	The Proponent shall complete the upgrade of McCauley Street between Botany Road and Raymond Avenue by 31 March 2013, to the satisfaction of the Secretary. The Proponent shall:	
a)	submit detailed design of the road upgrade works to Council for approval;	The upgrade of McCauley Street has been completed successfully and in compliance with the relevant sub-conditions.
b)	fund the full cost of the upgrade works;	

Number	Condition	Action
c)	dedicate a strip of land adjacent to McCauley Street, up to 2 metres wide, to Council as a public road, excluding the heritage wall which is to be retained on Amcor owned land;	
d)	consult Council on design of the shared access on McCauley Street opposite Raymond Avenue;	
e)	consult Council on the most appropriate traffic management measures for limiting heavy vehicle movements north of Raymond Avenue;	
f)	obtain the approval of the RMS for the southbound section of McCauley Street to be designated as a B-double route prior to any B-double vehicles associated with AMCOR using McCauley Street;	
g)	provide traffic/pedestrian controllers along McCauley Street between Botany Road to the south and Raymond Avenue to the north to minimise the impact of any operational traffic upon the surrounding road network and ensure the efficient and safe movement of vehicles and pedestrians. AMCOR shall provide these control measures until all road upgrade works are completed; and	
h)	utilise the access of Botany Road and Bumborah Point Road intersection should road network safety issues or congestion arise prior to the upgrade works being finalised, to the satisfaction of the RMS.	
20B	The Proponent shall complete the upgrade of the intersection of McCauley Street and Botany Road by 31 March 2013, to the satisfaction of the Secretary. The Proponent shall:	
a)	submit detailed design of the intersection upgrade works to the RMS for approval;	The upgrade of McCauley Street/Botany Road intersection has been completed successfully and in compliance with the relevant sub-conditions.
b)	commission an independent Certified Auditor to undertake a Stage 3 Road Safety Audit of the intersection design;	
c)	fund the full cost of the upgrade works, including any utility adjustment or relocation works;	
d)	dedicate land at the intersection, if required, to the RMS as a public road; and	
e)	enter into a Works Authorisation Deed with the RMS for the upgrade works;	
f)	provide traffic/pedestrian controllers along McCauley Street between Botany Road to the south and Raymond Avenue to the north to minimise the impact of any operational traffic upon the surrounding road network and ensure the efficient and safe movement of vehicles and pedestrians. AMCOR shall provide these control measures until all road upgrade works are completed;	
g)	monitor the operation of the Botany Road and McCauley Street intersection on a fortnightly basis. Mitigation measures shall be provided if the use of the intersection for the operation of Amcor Paper Mill results in any adverse impact on the intersection;	
h)	undertake a trial for B-Doubles once the intersection works are complete; and	
i)	utilise the access of Botany Road and Bumborah Point Road intersection should road network safety issues or congestion arise prior to the upgrade works being finalised, to the satisfaction of the RMS.	
20C	Prior to the commencement of construction, the Proponent shall consult the RMS on design of the shared	The shared access on to Botany Road

Number	Condition	Action
	access on Botany Road, to the satisfaction of the Secretary.	was completed in 2012.
20D	The Proponent shall remove the redundant driveway on McCauley Street in consultation with Council and design, construct and maintain the relocated McCauley Street driveway in accordance with AS2890.1.2004 and in consultation with Council.	This relocated access and associated land has been sold and the developer of the land has since constructed access to the site.
Traffic Management Plan		
21	The Proponent shall prepare and implement a Traffic Management Plan, to the satisfaction of the Secretary and in consultation with the RMS, Sydney Ports Corporation and Council. The Plan shall be submitted to the Secretary prior to the commencement of construction and must include:	
a)	a Driver Code of Conduct and training to ensure that noisy practices are not unnecessarily undertaken on site or near sensitive receivers	A Traffic Management Plan was prepared in consultation with the relevant stakeholders and implemented where relevant during construction and operation of the project
b)	details of construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic controls;	
c)	procedures for notifying residents of construction traffic routes and potential disruptions to routes and access	
d)	a description of the parking arrangements during construction;	
e)	detailed analysis of the impact on the road network, where temporary road closures are required;	
f)	procedures to minimise the use of reversing alarms;	
g)	movement scheduling where practicable to reduce impacts during sensitive times of the day; and	
h)	procedures for preventative and corrective action, including disciplinary action for breaches of noise minimisation procedures	
21A.	The Proponent shall update the existing Traffic Management Plan for the site required by Condition 21 to include the demolition activities associated with 05_0120 MOD 5. The Plan shall be prepared in consultation with Council and RMS, and submitted to the Secretary prior to the commencement of demolition of the B7 Building.	An updated Traffic Management Plan was provided to encompass the demolition activities approved under Modifications 5 (Demolition of B7 Building).
HAZARDS		
Construction Hazard Plan		
22.	The Proponent shall prepare and implement a Construction Safety Study to the satisfaction of the	A staged Construction Safety Study was

Number	Condition	Action
	Secretary. The plan must:	prepared, approved by DP&E and implemented during construction
a)	be prepared by a suitably qualified independent person approved by the Secretary;	
b)	be submitted for approval prior to the commencement of demolition; and	
c)	be prepared in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 7 – Construction Safety Guidelines.	
23.	The Proponent shall prepare and implement a Construction Hazard Plan to the satisfaction of the Secretary. The plan must:	Fire Safety, Hazard and Operability and Final Hazard Studies were prepared, approved by the relevant agencies and have been implemented.
a)	be prepared by a suitably qualified independent person approved by the Secretary;	
b)	be submitted for approval prior to the commencement of construction of the paper machine building; and	
c)	include a: • Fire Safety Study that has been prepared in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines and the NSW Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems and approved by the Commissioner of the NSW Fire Brigades; • Hazard and Operability Study for the paper mill that has been prepared in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 8 – HAZOP Guidelines; • Final Hazard Analysis prepared in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis; and	
Operation Hazard Plan		
24.	The Proponent shall prepare and implement an Operational Hazard Plan for the site to the satisfaction of the Secretary. This plan must:	Project Risk Assessment, Emergency Response Plan and Safety Management Plan were prepared and have been implemented for the ongoing operations on site.
a)	be prepared by a suitably qualified independent person approved by the Secretary;	
b)	be submitted for approval prior to the commencement of commissioning; and	
c)	include a: • Emergency Plan that has been prepared in accordance with Department of Planning’s Hazardous Industry Planning Advisory Paper No. 1 – Industry Emergency Planning Guidelines; and • Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System shall be developed in accordance	

Number	Condition	Action
	with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.	
Upgraded Wastewater Treatment Plant		
24A	<u>Pre-construction</u> The Proponent shall prepare the studies set out under subsections 24A a) to 24A c) (the pre- construction studies). Construction associated with 05_0120 MOD 6, other than preliminary works that are outside the scope of the hazard studies, shall not commence until study recommendations have been considered and, where appropriate, acted upon. The Proponent shall submit the studies to the Secretary no later than one month prior to the commencement of construction of the works associated with 05_0120 MOD 6 (other than preliminary works), or within such further period as the Secretary may agree.	Project Risk Assessment, Emergency Response Plan and Safety Management Plans were updated to reflect the WTP and have been implemented for the ongoing operations on site.
a)	<u>HAZARD AND OPERABILITY STUDY</u> A Hazard and Operability Study for the upgraded WTP, chaired by a qualified person, independent of the project, approved by the Secretary prior to the commencement of the study. The study shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented. The study shall address the hazards and safeguards in relation to the production of biogas from the upgraded WTP and the use of this biogas within the project as a whole. The study shall also address the hazards and safeguards in relation to the operation of the flare stack.	
b)	<u>FINAL HAZARD ANALYSIS</u> The Final Hazard Analysis for the project, which was prepared under Condition 23 c) in Schedule 3, shall be updated to incorporate any changes due to 05_0120 MOD 6. The Final Hazard Analysis shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'.	
c)	<u>CONSTRUCTION SAFETY STUDY</u> A Construction Safety Study for the upgraded WTP, consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety'.	
Pre-commissioning		
24B	Prior to commissioning, the Proponent shall develop and implement the plans and systems set out under subsections a) and b). The Proponent shall submit to the Secretary documentation describing the plans and	Project Risk Assessment, Emergency Response Plan and Safety Management

Number	Condition	Action
	systems no later than two months prior to the commencement of commissioning of the upgraded WTP, or within such further period as the Secretary may agree.	Plan were updated to reflect the WTP and have been implemented for the ongoing operations on site.
a)	<u>EMERGENCY PLAN</u> The Emergency Plan and detailed emergency procedures for the project shall be updated to incorporate any changes due to the upgraded WTP. The plan shall include detailed procedures for the safety of all people outside of the project who may be at risk from the project. The plan shall be in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 1, ‘Industry Emergency Planning Guidelines’.	
b)	<u>SAFETY MANAGEMENT SYSTEM</u> The Safety Management System for the project shall be updated to include any changes due to the upgraded WTP. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept on-site and shall be available for inspection by the Secretary upon request. The Safety Management System shall be developed in accordance with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 9, ‘Safety Management’.	
Pre-startup		
24C	<u>PRE-STARTUP COMPLIANCE REPORT</u> One month prior to the commencement of operation of the upgraded WTP, the Proponent shall submit to the Secretary, a report detailing compliance with conditions 24A and 24B, including: a) dates of study/plan/system submission, approval, commencement of construction and commissioning; b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and c) responses to each requirement imposed by the Secretary under condition 24F.	Report detailing compliance with conditions 24A and 24B issued to DPE prior to commencement of the WTP.
Post-startup		
24D	<u>POST-STARTUP COMPLIANCE REPORT</u> Three months after the commencement of operation of the upgraded WTP, the Applicant shall submit to the Secretary, a report verifying that:	Report detailing compliance with conditions 24A and 24B issued to DPE demonstrating ongoing compliance with conditions 24B a) and 24B b).
a)	the updated Emergency Plan required under condition 24B a) is effectively in place and that at least one emergency exercise has been conducted; and	

Number	Condition	Action
b)	the updated Safety Management System required under condition 24B b) has been fully implemented and that records required by the system are being kept.	
Ongoing		
24E	<u>HAZARD AUDIT</u> Twelve months after the commencement of operations of the upgraded WTP and every three years thereafter, or at such intervals as the Secretary may agree, the Proponent shall carry out a comprehensive Hazard Audit of the facility as modified and within one month of each audit, submit a report to the Secretary. The audit shall be carried out at the Proponent's expense by a qualified person or team, independent of the project, approved by the Secretary prior to commencement of the audit. The Hazard Audit shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented.	The WTP has not yet been commissioned.
24F	<u>FURTHER REQUIREMENTS</u> The Proponent shall comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 24A to 24E inclusive, within such time as the Secretary may agree.	Noted.
WASTE		
25.	The Proponent shall ensure that all waste generated on the site during demolition, construction and operation of the project is classified in accordance with the DECC's Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes and disposed of to a facility that may lawfully accept the waste.	All waste generated during demolition, construction and operation has been appropriately classified and disposed of. It should be noted that the Waste Classification Guidelines (EPA 2014) are now the appropriate guidelines. An updated Waste Management Plan will be provided pre-demolition of the B7 Reel Store Building.

Number	Condition	Action
26.	The Proponent shall prepare and submit to the Secretary prior to commencement of demolition and construction, a Waste Management Plan including:	A staged Waste Management Plan was prepared, approved by DPE and implemented during construction. An Operational Waste Management Plan has also been approved by DPE.
a)	Details of the type and quantity of waste to be generated by demolition, construction, transition and operational phases of the project;	
b)	Detail materials to be reused or recycled, either on or off site; and	
c)	Procedures for handling, storage, collection of recycling and disposal of waste.	
26A	The Proponent shall update the existing Waste Management Plan for the site required by Condition 26 to include the works associated with 05_0120 MOD 5. The Plan shall:	
a)	be submitted to the Secretary prior to the commencement of demolition of the B7 Building; and	An updated Waste Management Plan was provided in relation to the approved demolition of the B7 building. In a similar fashion to the above, an updated Waste management Plan will be provided pre-demolition of the B7 Reel Store Building.
b)	include procedures to ensure the removal, handling and disposal of asbestos would be undertaken in accordance with the relevant guidelines, standards and legislation.	
26B	The Proponent shall update the existing Waste Management Plan for the site required by Condition 26 to include the works associated with 05_0120 Mod 6. The Plan shall:	
a)	be submitted to the Secretary prior to the commencement of operation of the upgraded wastewater treatment plant; and	An updated Waste Management plan was provided in relation to the approved upgraded WTP prior to commencement of it's operation.
b)	include procedures to ensure the removal, handling and disposal of aerobic and anaerobic sludge would be undertaken in accordance with the relevant guidelines, standards and legislation.	
26C	Prior to commissioning the upgraded WTP, the Proponent shall submit a Wastewater Treatment Plant Waste Management report to the EPA containing:	
a)	details of the quantity and type of any additional liquid waste and non-liquid waste generated, handled, processed or disposed of at the site as a result of 05_0120 MOD 6;	A Wastewater Treatment Plant Waste Management report has been issued to the EPA prior to it's operation.
b)	details of liquid waste and non-liquid waste management at the site as a result of and/or generated by 05_0120 MOD 6, including: i. the transportation and handling of additional waste generated;	

Number	Condition	Action
	ii. any stockpiling of wastes or recovered materials at the site; iii. any waste processing, including reuse, recycling, reprocessing (including composting) or treatment both on and off-site; iv. the method of disposing of all wastes or recovered materials generated (including any sludge wastes not eligible for any proposed exemptions);	
c)	the emissions arising from the handling, storage, processing and reprocessing of waste at the site;	
d)	details of vehicles, container or trailers used to transport waste off the site and how odours, spills or any escape of waste will be minimised during transport; and	
e)	whether clarification of these processes has any impact on the AQIA (particularly in relation to odour) or Operational or Construction NIA, submitted as part of 05_0120 MOD 6. <i>(Note: The Proponent shall consider the EPA’s comments and recommendations, including any licence variations required for the Water Treatment Plant Waste Management prior to commissioning the upgraded WTP.)</i>	
27	For the life of the project, the Proponent shall:	
a)	Monitor the amount of waste generated by the project	The type and quantities of waste generated by the project is monitored - and wherever possible opportunities to minimise waste are implemented.
b)	Investigate ways to minimise waste generated by the project; and	
c)	Implement reasonable and feasible measures to minimise waste generated by the project. To the satisfaction of the Secretary.	
GREENHOUSE GAS		
Energy Savings Action Plan		
28.	The Proponent shall prepare and implement an Energy Savings Action Plan for the project to the satisfaction of the Secretary. This plan must be prepared in accordance with the requirements of the DWE and the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Secretary for approval.	An Energy Savings Action Plan was prepared, approved by DPE and has been implemented.
Subdivision and Easements		
28A.	The Proponent shall carry out the subdivision in accordance with the Plans of Subdivision included in Appendix A.	Subdivision of the site has been undertaken which is generally in accordance with the approved plans for

Number	Condition	Action
		Modification 5.
28B.	Prior to the issuing of the subdivision certificate, the Proponent shall ensure that each lot is connected to services, drainage and utilities and provide documentary evidence of the proposed easements to the accredited certifier or Council.	As part of the B9 construction works, required services to the new lots were provided. Drainage, services and easements were provided as part of the subdivision and sale of the McCauley Street precinct.
28C.	Easements for services, drainage, maintenance or any other encumbrances and indemnities required for joint or reciprocal use of part or all of the proposed lots as a consequence of the subdivision, must be created over those lots pursuant to the Conveyancing Act, 1919. Note: Any easements in the subdivision plan must nominate Randwick City Council as the authority to release, vary or modify the easement. The form of the easement must be in accordance with Council's standard recitals for terms of easements, or the standard form for easements accepted by the Department of Lands.	Information, services and easements (as per Conveyancing Act 1919) were provided as part of the subdivision and sale of the McCauley Street precinct.
28D.	All costs associated with the preparation and registration of any covenant or restriction on title, whether directly or indirectly, will be borne solely by the Proponent.	Any planning costs were borne by Orora.

SCHEDULE 4: ENVIRONMENTAL MANAGEMENT AND MONITORING

ENVIRONMENTAL MANAGEMENT STRATEGY

29.	The Proponent shall prepare and implement an Environmental Management Strategy for the project, to the satisfaction of the Secretary. This strategy shall be submitted to the Secretary prior to demolition commencing. The plan shall be updated as required throughout construction and must:	
a)	provide the strategic context for environmental management of the project;	A staged Environmental Management Strategy was prepared, approved by DP&E and implemented during construction.
b)	identify the statutory and other obligations that apply to the project;	
c)	describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project; and	
d)	describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the construction, operation and environmental performance of the project;	

Number	Condition	Action
	• receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • report on monitoring results; and • respond to emergencies.	
29A.	The Proponent shall prepare and implement a Construction and Demolition Environmental Management Plan that incorporates the requirements of Conditions 9A, 13A, 21A and 26A. This Plan shall be submitted to and approved by the Secretary, prior to the commencement of works associated with 05_0120 MOD 5.	An Environmental Management Plan that incorporates the requirements of Conditions 9A, 13A, 21A and 26A was submitted to and approved by the Secretary, prior to the commencement of works associated with Modification 5.
INDEPENDENT ENVIRONMENTAL AUDIT		
30.	Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission an Independent Environmental Audit of the project. This audit must: a) be carried out by a suitably qualified, experienced and independent audit team, that contains an odour specialist, noise expert and wastewater specialist, whose appointment has been endorsed by the Secretary; b) assess the environmental performance of the project; c) assess whether the project is complying with the conditions of both this approval and the EPL for the project; d) review the adequacy of any strategy/plan/programme required under this approval, and if necessary, recommend measures or actions to improve the environmental performance, and or any strategy/plan/programme required under this approval.	An Independent Environmental Audit was undertaken August 2016. The next will be due in 2019.
31.	Within two months of completing this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, with a response to any recommendations contained in the audit report.	Refer to above.
32.	Within three months of submitting the audit report to the Secretary, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval.	Refer to above.
INCIDENT REPORTING		

Number	Condition	Action
33.	Within seven days of detecting an exceedance of the limits/performance criteria in this approval, or an incident causing (or threatening to cause) material harm to the environment, the Proponent shall report the exceedance/incident to the Department, and any relevant agency. The report must: - describe the date, time, and nature of the exceedance/incident; - identify the cause (or likely cause) of the exceedance/incident; - describe what action has been taken to date; and - describe the proposed measures to address the exceedance/incident.	The only incident to date that has required reporting is the December 2013 fire in the B7 building. Information on this incident has been provided to DPE - with the action to demolish the building the outcome which has been undertaken.
ANNUAL REPORTING		
34.	34. Within 12 months of this approval, and annually thereafter, the Proponent shall submit an Annual Environmental Monitoring Report (AEMR) to the Secretary and relevant agencies. This report must: - identify the standards and performance measures that apply to the project; - describe the works carried out in the last 12 months; - describe the works that will be carried out in the next 12 months; - include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; - include a summary of the monitoring results for the project during the past year; - include an analysis of these monitoring results against the relevant: - impact assessment criteria/limits; - monitoring results from previous years; and - predictions in the EA; - identify any trends in the monitoring results over the life of the project; - identify any non-compliance during the previous year; and - describe what actions were, or are being, taken to ensure compliance	AEMRs have been submitted for most of the construction period.
ACCESS TO INFORMATION		
35.	Subject to confidentiality, the Proponent shall make all documents required under this approval available on a web site	Most of the original documents and most recent compliance reports available at: www.ororagroup.com/about/sustainability-

Number	Condition	Action
		reports
REVISION OF STRATEGIES, PLANS AND PROGRAMS		
36.	Within 3 months of: a) an annual independent environmental audit submitted under Condition 30; b) an incident report submitted under Condition 33; or c) the approval of a modification to the project approval, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. (Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.)	Noted.