

# Visy Pulp & Paper

## Proposed Mill Expansion, Tumut NSW



# Submissions Report

March 2007



## Table of Contents

1	Introduction .....	3
1.1	Overview .....	3
1.2	Contents of this Report .....	3
2	Consultation Activities .....	4
2.1	Consultation During the Environmental Assessment Process .....	4
2.2	Consultation During Exhibition .....	5
2.3	Advertisement .....	5
2.4	Newsletters.....	5
2.5	Website .....	5
2.6	Public Exhibition of the Environmental Assessment .....	5
3	Consideration of Submissions .....	6
3.1	Submissions Summary .....	6
3.2	Response to Submissions .....	7
3.2.1	Department of Housing.....	7
3.2.2	Department of Environment and Conservation.....	11
3.2.3	Roads and Traffic Authority .....	14
3.2.4	NSW Health .....	15
3.2.5	Tumut Shire Council.....	16
3.2.6	Individual Submission 1: Adelong Progress Association.....	17
3.2.7	Individual Submission 2.....	18
3.2.8	Individual Submission 3.....	19
3.2.9	Individual Submission 4.....	23
4	Conclusion.....	25
4.1	Revised Statement of Commitments .....	25

## Figures

Figure 1: Snapshot of Estimated Onsite Manning Levels for Mill Expansion Project Construction Phase for 10 month period (Oct to June) .....	8
Figure 2: Hotels and Motels – Vacant Rooms for Tumut and Wagga.....	9
Figure 3: Caravan Parks – Vacant Sites in Tumut and Wagga .....	9

## List of Tables

Table 1: Consultation Activities During the Environmental Assessment Process.....	4
Table 2: Submission Summary.....	6

## Appendices

Appendix A	Copies of Submissions from Government Departments
Appendix B	Revised Statement of Commitments

# **1 Introduction**

## **1.1 Overview**

Visy Pulp and Paper Pty Ltd (Visy) seeks to expand the existing pulp and paper mill at Tumut NSW to increase paper production at the existing facility from the currently approved 300,000 tpy to 700,000 tpy as a result of the mill expansion. The mill expansion will be phased, as determined by production requirements and will include the installation of an additional paper machine and pulping capacity.

The project is being assessed under Part 3A of the Environmental Planning and Assessment Act 1979 (the Act). In accordance with the requirements of the Act, an Environmental Assessment (EA) was prepared to assess the potential environmental effects of the project on the surrounding environment and to satisfy the concurrent granting of Concept Approval and of an Approval for the project described in the EA. The approval granted for the project will apply to all aspects of the project except the use of non standard fuels in the multi fuel boiler. Visy is seeking concept approval only for this aspect of the project and will seek full approval at a later date.

The EA was submitted to Department of Planning (DoP) on 29 January 2007 and publicly exhibited from the 2<sup>nd</sup> February 2007 until 7<sup>th</sup> March 2007 inclusive. Following exhibition, the DoP provided Visy with a copy of submissions received in relation to the EA.

This report provides Visy's response to the issues raised in the submissions. No modifications to the proposal described in the EA are proposed by this report. However, where appropriate the Statement of Commitments (SOC) detailed in the EA has been adjusted to accommodate the responses to issues raised in the submissions.

## **1.2 Contents of this Report**

This report provides a summary of the submissions and presents Visy's responses to these submissions. The report also presents amendments to the SOC presented in the EA to accommodate responses to some of the submissions made.

## 2 Consultation Activities

### 2.1 Consultation During the Environmental Assessment Process

The consultation activities undertaken during the preparation of the EA were described in Chapter 4 of the EA. Since the submission of the EA, Visy has also undertaken further community consultation.

The consultation activities undertaken during the EA process are summarised in **Table 1** below. The objective of the activities has been to raise awareness of the project and provide opportunities for input from statutory authorities and the community.

**Table 1:** Consultation Activities During the Environmental Assessment Process

Activity	Date
Project briefing discussion with NSW Government Agencies (coordinated by NSW Premier's Department)	July 2005
Project briefing meetings with DEC	November 2005, June 2006, September 2006
Project briefing meetings with Tumut Shire Council	April 2005, June 2006
Project feasibility study updates for Visy Community Consultative Committee (VCCC) including presentation on the draft EA	Monthly during VCCC meetings in 2005 and 2006
Newsletter 1 local community	June 2006
Meetings with nearby neighbours to the mill	August 2006 to February 2007, ongoing
Meetings with Environmental Groups	Ongoing
Media releases	Numerous throughout 2005, 2006 and 2007 in local newspaper
Advertisement of public exhibition of EA	2 <sup>nd</sup> February 2007
Company Website	Visy website was updated in February 2007 and the EA was made available for public viewing during the exhibition period
Public exhibition of EA	2 <sup>nd</sup> February to 7 <sup>th</sup> March 2007
Newsletter 2 to local community	February 2007

## **2.2 Consultation During Exhibition**

The exhibition of the EA, including receipt of submissions, was coordinated and managed by DoP. To supplement this, Visy carried out the following consultation activities:

- Provided updated information on the company website: [www.visy.com.au](http://www.visy.com.au), including an electronic copy of the EA; and
- Distributed a newsletter to local community members and the VCCC announcing the public exhibition (newsletter 2).

## **2.3 Advertisement**

DoP placed an advertisement in Tumut Adelong Times on 2<sup>nd</sup> February 2006. The advertisement announced the public exhibition of the EA and provided details on how to view a copy of the EA and make a submission. It also provided contact details for members of the community who required more information on the project or the exhibition and approvals process.

## **2.4 Newsletters**

Visy prepared and distributed a second newsletter in February 2006 to all local residents around the mill and to the VCCC, the members of which represent a number of community interest groups in the local area.

The newsletter announced the public exhibition of the EA and provided details on how members of the community could view a copy of the EA, make a submission or obtain more information.

## **2.5 Website**

The Company website ([www.visy.com.au](http://www.visy.com.au)) was updated at the beginning of the exhibition period to include information on the proposed expansion and the EA. An electronic copy of the EA was uploaded onto the website to enable internet users to view a copy of the report. The website also provided details on how to make a submission and obtain more information.

## **2.6 Public Exhibition of the Environmental Assessment**

The EA was exhibited from 2<sup>nd</sup> February to 7<sup>th</sup> March 2007 at the following locations:

1. Tumut Shire Council Offices, Tumut
2. Tumut Library, Tumut
3. Adelong Library, Adelong
4. Department of Planning, Sydney
5. Department of Planning website: [www.planning.nsw.gov.au](http://www.planning.nsw.gov.au)
6. Visy website: [www.visy.com.au](http://www.visy.com.au)
7. Nature Conservation Council of NSW, Sydney

### 3 Consideration of Submissions

#### 3.1 Submissions Summary

A total of 9 submissions were received from the public exhibition of the EA, as summarised in **Table 2** . Copies of submissions (excluding submissions made by individuals) are included in the **Appendix A**.

**Table 2:** Submission Summary

<b>Submission Type</b>	<b>Number of Submissions</b>
<b>Government Agencies</b> Department of Housing (DOH) Department of Environment and Conservation (DEC) Roads and Traffic Authority (RTA) NSW Health Tumut Shire Council	<b>5</b>
<b>Associations</b> Adelong Progress Association	<b>1</b>
<b>Individuals</b>	<b>3</b>

The following sections provide a summary of each submission received followed by Visy's response to each of the issues raised in the submissions.

### **3.2 Response to Submissions**

#### **3.2.1 Department of Housing**

The submission from the Department of Housing raised the following issues which are followed by Visy's response.

##### **Issue: Increase in housing demand**

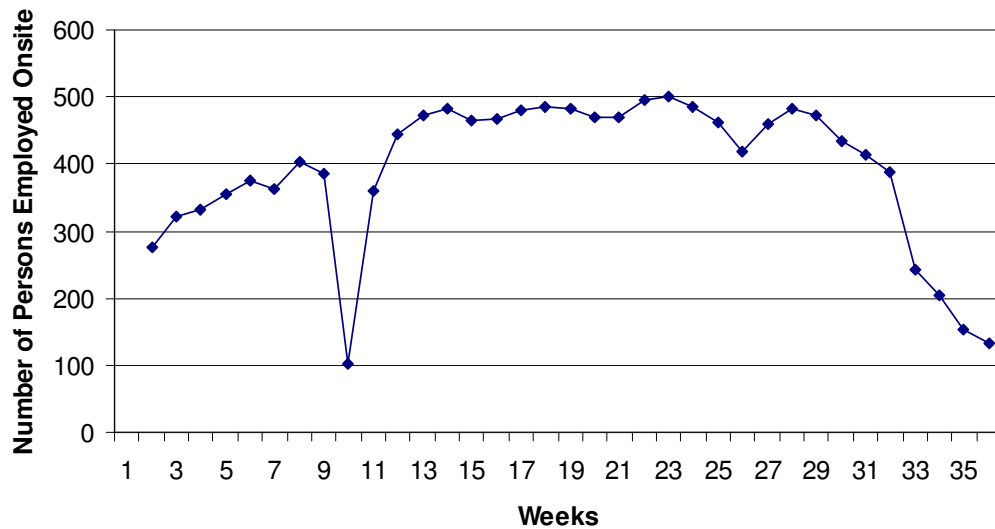
The DOH states that the EA does not address the feasibility of housing the construction workforce in and around Tumut nor does it examine what the impact of that will be on the community. The DOH requested Visy to provide more detailed information on adequacy and availability of temporary accommodation for the construction workforce and an indication on how far it is reasonable for construction workers to commute to work where demand for this kind of accommodation is likely to be most acute.

The DOH requested Visy to address how the permanent workforce might impact on demand for housing, including type, size or tenure of housing likely to be required by employees and their families. The DOH suggests that Visy work with Council and DOH to minimise housing impacts on lower income earners and monitor the impacts of the development on local housing market.

##### **Visy's Response**

In the EA Visy states that at its peak, there would be up to 500 personnel employed onsite during the construction phase. The duration of construction is expected to be approximately 18 months. A snapshot of the expected manning levels and distribution of the number of personnel likely to be employed for the 10 month period when construction is expected to be most active is illustrated below and is based on the distribution of manning levels documented during the construction phase of the existing mill. **Figure 1** below demonstrates that a peak of 500 workers may only occur for approximately 20 weeks.

**Figure 1:** Snapshot of Estimated Onsite Manning Levels for Mill Expansion Project Construction Phase for 10 month period (Oct to June)



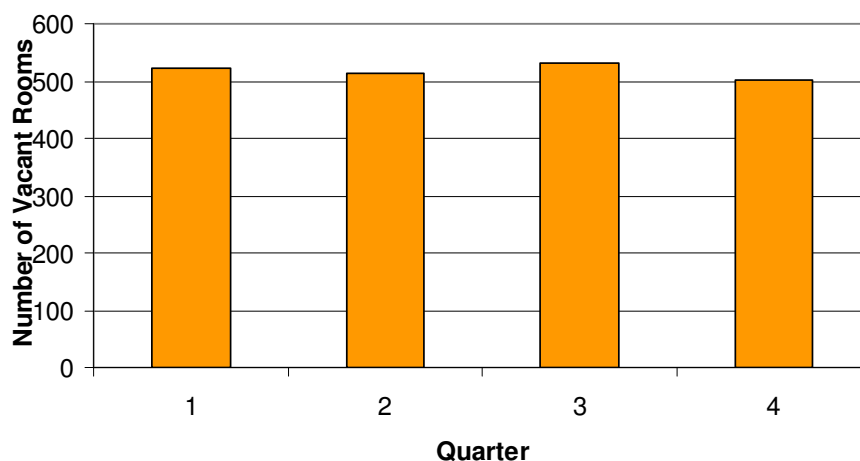
In the EA Visy proposes to house construction workers in temporary accommodation such as hotels, motels and caravan parks in the Tumut Shire and surrounding areas as well as Wagga. Should additional housing be required, Visy would seek rental accommodation in these areas also.

Data obtained from the Australian Bureau of Statistics on occupancy rates of hotels and motels in Tumut and Wagga for the period of July 2005 to June 2006 were utilised to calculate the number of available rooms and is illustrated in **Figure 2** below. Data for Gundagai, Batlow, Talbingo and Adelong were not readily available, though it should be noted that hotels and motels in these areas would also be considered for accommodation purposes.

**Figure 2** below illustrates that for the majority of the year; more than 500 rooms are available between these two areas. It should also be noted that rooms are likely to be shared by some workers. Not included in the statistics are other types of accommodation including bed and breakfasts and holiday cabins which would also be utilised.

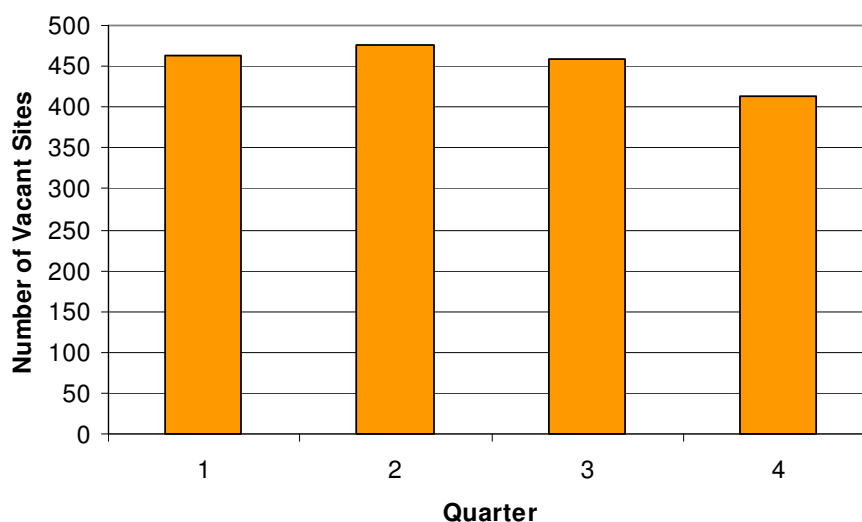


**Figure 2: Hotels and Motels – Vacant Rooms for Tumut and Wagga**  
July 2005 – June 2006



Data obtained from the Australian Bureau of Statistics on occupancy rates of caravan parks in Tumut and Wagga for the period of July 2005 to June 2006 were utilised to calculate the number of available sites, including vans, powered sites, cabins and villas and is illustrated in **Figure 3** below. Data for Gundagai, Batlow, Talbingo and Adelong were not readily available, though it should be noted that caravan parks in these areas would also be considered for accommodation purposes.

**Figure 3: Caravan Parks – Vacant Sites in Tumut and Wagga**  
July 2005 to June 2006



**Figure 3** illustrates that there are a number of vacant sites available between Tumut and Wagga alone which together with available hotel and motel rooms provide more than adequate available accommodation for construction workers for the project. It should also be noted that multiple workers are likely to share caravan and cabin accommodation.

Given the above information, Visy believes that it is feasible to house construction workers in this type of accommodation and that given the occupancy rates provided, there is sufficient accommodation still available for tourists and other temporary residents such as low income earners for which the DOH provides rent assistance. Additional accommodation would also be sought through private rental accommodation in Tumut, Talbingo, Adelong, Batlow, Gundagai and Wagga.

Many workers currently employed at the mill have chosen to live in areas beyond Tumut including Gundagai, Batlow and Wagga and commute daily to the site. Visy therefore considers housing workers during construction in these areas as a feasible option in terms of commuting distances.

As requested, Visy will participate in community housing discussions with Council and DOH to further discuss housing requirements for the area and undertake to provide data on the expected permanent workforce including marital status, number of family members and age brackets as well as expected housing requirements if required.

***Issue: Increase in cost of rental housing***

The DOH is concerned that increased demand for housing is likely to spill over into private rental market as construction workers may seek short term accommodation in the private rental market. Should this occur then increased rental demand is likely to lead to increases in the cost of rental housing.

**Visy's Response**

Discussions with real estate agents in the area indicate that rental properties that would be sought by construction workers would be in a higher rental bracket than those sought by low income earners on rental assistance, particularly if these are individuals. This is mainly because a number of workers are likely to share accommodation and car pool to work and therefore are likely to seek rental properties that are bigger with higher rental yield. More land has been released in the Tumut Shire for housing developments since the construction phase of the existing mill. This also includes development of flats and units.

While market forces may be influenced by the construction phase, it is likely to be a short term impact. The information presented above demonstrates that there is sufficient temporary accommodation available in the local and broader region to accommodate the additional personnel required for the construction and operational phases of the mill expansion.

### **3.2.2 Department of Environment and Conservation**

The submission from the Department of Environment and Conservation raised the following issues which are followed by Visy's response.

#### **Issue: *Revised Statement of Commitments***

The DEC submission included a number of revisions to the Statement of Commitments presented in the EA. These revisions related to air quality, use of non standard fuels, odour management and noise.

#### **Visy's Response**

Visy agrees to the revised Statement of Commitments other than those issues listed below.

#### ***Non Standard Fuels***

- Other than air emissions directed to Stack 2 and steam and power supplied to the process the multi-fuel boiler proposed for Phase 2 of the project does not have any other interaction with the Phase 1 mill installation. This includes ash streams produced from combustion which will be sent to landfill without any further on-site processing. Phase 2 of the expansion involves the replacement of the gas fired boiler installed in Phase 1 with the multi fuel boiler only. It does not involve any variation to the paper production process. Visy does not consider it reasonable or practical for it to provide a review of the multi-fuel boiler prior to construction of Phase 1 because there is essentially no interaction of the boiler with the rest of the process. Visy intends to provide to DoP a detailed report on the means of installing and commissioning the multi-fuel boiler as part of the process of obtaining project approval for this aspect of the development, under the Concept Plan approach.
- Visy will undertake to meet all EU limits specified except for where there is a statutory limit specified in the proposed NSW DEC licence. Where a discrepancy exists between the NSW DEC licence and EU limits Visy suggests that the statutory licence terms shall prevail.

### *Noise and Vibration*

- Visy agrees with the noise limits provided by DEC in the amended SOC. However Visy requests that clarification is provided in the SOC to specify under which meteorological conditions these limits apply i.e. reference to the information contained in L6.4 of the proposed licence in attachment 3 which specifies that these limits apply for D and F class stability.
- Further clarification should be provided in the SOC in relation to the Noise Management Plan including mitigation of noise impacts under extreme noise enhancing conditions. Reference should be made to the information contained in attachment 3 of the DEC submission (proposed licence condition L8.8d) regarding extreme noise enhancing conditions. Visy requests that the requirement to design and operate the plant in such a way that noise limits are not exceeded by more than 3dBA under extreme noise enhancing conditions (i.e. G class inversion conditions) is added to the SOC.

### **Issue: *Proposed Licence Conditions***

The DEC submission included the proposed licence conditions for the expanded mill including concentration limits for air emissions, monitoring requirements for air emissions, conditions relating to odour management, proposed noise limits and construction noise management requirements.

### **Visy's Response**

Visy agrees to the proposed licence conditions other than those outlined below:

- **Condition P1** Emission Concentration Limits – Visy requests that the emission limits provided for HCl and SO<sub>2</sub> are reviewed for Point 1 (Main Stack 2) for Phase 2 of the development following finalisation of design of the multi-fuel boiler.
- **Condition O7** Odour Control - Visy requests the following revision– “All operations and activities, occurring at the premises must be carried out in a manner that will eliminate offensive odour at and beyond the boundary of the premises during steady state operations. Visy shall continue to adopt Industry Best Practice to minimise and mitigate offensive odour generation during start up, shut down and process upsets”
- **Condition M2 Point 3a and 3b** - Visy requests that “special frequency 4” be defined in the licence.
- **Conditions L6.1 – L6.8** – Visy agrees with all these proposed licence conditions.

**Issue: *Broader Environmental Issues***

The DEC submission outlined broader environmental issues that Department of Planning may wish to consider in assessment of the project including waste management and traffic noise.

**Visy's Response:**

Visy's response to the issues raised in relation to waste management and traffic noise are outlined below.

***Waste Management***

Visy suggests the following is added to the SOC in relation to waste management:

- As part of the mill operations and further environmental planning at the site, Visy will use its best endeavours to implement the principles of a hierarchy for managing waste, according to the following priorities:
  - Priority 1: avoid unnecessary resource consumption
  - Priority 2: recover resources (including reuse, reprocessing, recycling and energy recovery), and
  - Lastly: dispose in a responsible manner

In relation to the potential expansion of the Bellete's Landfill in Gilmore, from Visy's discussions with landfill owners it is apparent that a DA has not been lodged. Making commitments to a future planning approval and EP licences for a third party site such as this landfill is beyond Visy's power and beyond the scope of the development. Visy has demonstrated in the EA that there is sufficient capacity within Visy's economic transportation zone to dispose of the residues to landfill. However, if required, Visy is willing to support or supply assistance to the landfill owner in its process towards preparation and lodgement of a DA for the landfill expansion

***Traffic Noise Assessment***

Visy agrees to develop a traffic noise strategy as outlined in the EA and agrees to the types of mitigation measures listed in the DEC submission except for the suggestion of scheduling truck movements where practicable to reduce impacts during sensitive times of the day. Since the Visy mill is a 24 hour operation, it is difficult to schedule movements in this manner. Visy will strive to ensure that this can be conducted where economically practicable.

### **3.2.3 Roads and Traffic Authority**

The submission from the Roads and Traffic Authority raised the following issues which are followed by Visy's response.

#### **Issue: *Intersection of Bachelor Valley Way and Snowy Mountains Highway***

RTA supports the intersection analysis presented in the EA however expressed concern regarding peak activity during construction phase at this intersection and impacts on road safety and capacity of intersection. Visy to consider staggering finishing times of construction teams to reduce impact on intersection.

#### **Visy's Response**

Visy agrees to staggering finishing times of construction teams in order to reduce impact on the intersection of Bachelors Valley Way and the Snowy Mountains Highway.

#### **Issue: *Super B-doubles***

The swept path of the largest vehicles entering and exiting the subject site and maneuverability through the site is to be in accordance with AS 2890.2-2002 and Councils satisfaction.

#### **Visy's Response**

Visy agrees to implement this requirement.

#### **Issue: *Site Car Park and Internal Roads***

The RTA requested the following in relation to site carparking and internal roads:

- Layout of carpark and internal roadway width, aisle widths and parking bay dimensions to be in accordance with AS 2890.1-2004.
- Number of car parking spaces must be to Council's satisfaction.
- Internal roads and car parking area to be strategically and appropriately sign posted and line marked.
- Consider implementing traffic calming measures on internal roads

#### **Visy's Response**

Visy agrees to implement these requirements.

#### **Issue: *Stormwater***

RTA requests Visy to implement measures to retard increased stormwater run off directly from the subject site onto Snowy Mountains Highway.

**Visy's Response**

Stormwater from site will not substantially increase as the mill expansion is planned within the existing mill footprint. Stormwater currently is collected on site at the stormwater pond and discharged through grassed channels and dams to Sandy Creek which intersects the site before the Snowy Mountains Highway. Therefore there should not be any impact of additional stormwater from the expanded site on the Snowy Mountains Highway.

**3.2.4 NSW Health**

The submission from NSW Health raised the following issues which are followed by Visy's response.

**Issue: *Health Risk Assessment***

- Best Available Technology for combustion sources and pollution control equipment should be conditioned into the approval as per proponents Draft SOC.
- Refinement of the Health Risk Assessment based on actual monitoring data as per SOC should be made a condition of approval.
- New World Health Organization Air Quality Guidelines for SO<sub>2</sub> may influence national air quality standard setting processes in the future.

**Visy's Response**

Visy agrees with the suggested conditions of consent. Visy notes the WHO SO<sub>2</sub> levels and will take these into account when conducting further stages of the health risk assessment.

**Issue: *Odour Assessment***

The odour management plan for mill operations should include proactive community liaison with local residents to pre-warn of potential odour issues during start up and shut down.

**Visy's Response**

NSW Health suggests Visy's current management of start up and shut down events includes pre-warning of local residents of potential odour. Visy agrees to include this as part of the updated Air and Odour Management Plan for the mill expansion.

**Issue: *Air Quality Management Plan***

NSW Health suggests Visy develop an appropriate strategy to review and respond to complaints made on complaints hotline.

### **Visy's Response**

Visy already has in place a complaint response procedure for all comments or complaints received through the free 24 hour hotline. The complaints are reviewed regularly by senior management and on a quarterly basis the complaints system is audited and the complaints register is sent to the Department of Planning and the Department of Environment and Conservation.

### **Issue: *Operational, Construction and Traffic Noise Assessment***

NSW Health suggests that Visy's 24 hour complaints hotline must include noise complaints and that an appropriate strategy is developed to review and respond to these complaints.

### **Visy's Response**

The complaints hotline is open to receive any complaints or comments regarding the mill operation including noise complaints. Occasionally a noise complaint has been made by nearby residents and the complaint is handled through the complaint response procedure.

### **3.2.5 Tumut Shire Council**

The submission from Tumut Shire Council raised the following issues which are followed by Visy's response.

### **Issue: *Traffic Impacts***

A major issue to Council is the increase in traffic, particularly on the feeder roads from the softwoods plantations, and on Gocup Road from Tumut to Gundagai. The Council expressed concern regarding the safety of the following intersections given the projected increase in traffic associated with the project and accidents and near misses that have occurred at these locations in the past:

- Intersection of the Snowy Mountains Highway and Main Road 85 (Batlow Road), which is a State Arterial Road.
- Intersection of the Snowy Mountains Highway and Gocup Road

The Council asks that the RTA upgrade the intersections, including a round about at the intersection of the Snowy Mountains Highway and Gocup Road.

### **Visy's Response**

Consistent with the views of Tumut Shire Council, Gundagai Shire Council, other industries and the community, Visy acknowledges that Gocup Road requires upgrading particularly if Super B doubles are to be used. This is mentioned in the EA. Visy is actively involved with Council and



other industry in the area to seek public funding to improve the condition of Gocup Road, as well as other roads in the area.

**Issue: *Civic Infrastructure***

The Council is concerned about the ability of Tumut's civic infrastructure, particularly the Tumut District Hospital, to cope with the influx of construction workers for the Visy project and the long term population growth expected once the project is operational. Council were of the understanding that the Tumut Hospital would be replaced with a more modern and efficient facility by 2010 however recent announcements regarding hospital upgrades over the next 4 years do not include Tumut. Council therefore seeks a commitment that this basic infrastructure will be upgraded by 2010.

**Visy's Response**

Upgrading of civic infrastructure such as the hospital is beyond Visy's scope for the development however, Visy supports the Council's request for government commitment to improve civic infrastructure for the benefit of both Visy's employees and the broader community.

**Issue: *Waste Management***

Council opposes land filling of waste and recommends that Visy investigate alternate uses for de-inking and de-ashing sludge.

**Visy's Response**

Visy's preference for the management of waste is reuse as a first priority (see Section 3.2.2 for Visy's suggested waste management hierarchy). As stated in the EA, de-inking sludge will be produced in Phase 2 of the project with the installation of the de-inking plant. The preferred management option for the de-inking sludge is boiler fuel for the multi-fuel boiler. De-ashing sludge is not proposed as a waste product from the process. Visy intends to investigate alternative uses for the waste products from the process as outlined in the EA. Land filling is proposed either as an interim measure or in the event that no other possible re-use option is available.

**3.2.6 Individual Submission 1: Adelong Progress Association**

The Adelong Progress Association as a representative of business owners and local residents strongly support the mill expansion project. The Association acknowledges Visy as one of the largest employers of local people in Tumut Shire and that the additional employment that will result from the project will have a positive impact on the community given the impact the drought has had in recent years.

The submission acknowledges Visy as a good corporate citizen that has been actively involved in the local community with senior management attending the community meetings to offer input in a positive and constructive non-intrusive manner. The submission also acknowledges Visy as generous in providing support of local events.

#### **Visy's Response**

Noted.

#### **3.2.7 Individual Submission 2**

The following issues were raised in an individual submission to the project.

##### **Issue: *Unacceptable High Vehicle Noise***

- Speed limit outside respondents house is 100kph and there is no ban on use of exhaust brakes
- Trucks coming from Batlow currently use exhaust brakes when approaching intersection and rapidly accelerate out of intersection past respondent's house.
- Expansion of mill proposes to more than double existing truck movements therefore creating more noise, dust and diesel fumes to settle on roof and washed into drinking water.
- Sleep will be difficult and quality of life during the day will be greatly reduced

#### **Visy's Response**

- The speed limit posted on approach to the respondent's house along the Snowy Mountains Highway is currently 75km/h. Visy recommends that the RTA be requested/required to reduce this speed to 60km/hr.
- Visy acknowledges that the majority of trucks travelling along the Snowy Mountains Highway past this location are going to or are coming from the mill and Visy will emphasise with truck drivers through induction and driver education programs the requirement to ensure that statutory speed limits are adhered to.
- However, trucks utilising the Batlow road are likely to be going to or coming from both Visy and other timber processors in the area. Visy recommends that the RTA be requested to erect a sign on approach to this section of the Snowy Mountains Highway, and on the Batlow Road on approach to the intersection with Snowy Mountains Highway, to reduce speed to 60km/hr and to minimise the use of exhaust brakes.
- In relation to impacts of dust and diesel fumes impacting the respondent's drinking water, Visy commits to provide water filtration for the respondent.

- In relation to the respondents concern for sleep disturbance, Visy will liaise with the respondent to investigate the feasibility of noise amelioration of the house fabric.
- It should be noted that the respondent purchased the property after commencement of the operation of the existing mill, and was therefore apprised of the existence of timber industry transport and other users of the road. The original EIS for the existing mill highlighted the potential for up to 410 truck movements per day to and from the mill. The projected traffic movements per day for the mill expansion is a slight increase on this original projection at 531 movements per day which is less than double despite a doubling of production.

**Issue: *Difficulty and danger in exiting property***

The submission highlights the potential for serious accident exiting the respondent's driveway with increased traffic volumes.

**Visy's Response:**

Due to the location of the house and driveway on a blind bend in the highway, Visy recommends that the RTA be requested to install traffic vision mirrors to aid the respondent's vision in exiting the driveway safely.

Visy recommends that the sign requested above on approach to this section of the Snowy Mountains Highway also include a warning regarding concealed driveways. This applies not only to the respondent but to at least two other residences further along the highway.

### **3.2.8 Individual Submission 3**

The following issues were raised in an individual submission to the project.

**Issue: Odour**

The respondent acknowledges that odours from the mill have improved but still occur, however has stopped phoning Visy to report odour complaints and states that the statistics on odour complaints in the EA are therefore not accurate.

The respondent is concerned that odours will be constant during commissioning phase and that they may be worse than they are now once the expansion is up and running. The respondent is concerned that odour will be worse than stated in the EA (that mill expansion will not produce any additional odours) considering that no odours were expected from the existing mill.

The odour and air assessments in the EA assume two residents per household to set the odour assessment criteria however most residences in the area assessed have more than two residents.

### **Visy's Response**

The EA documents the range of measures that Visy has taken to reduce the incidence of odorous emissions. Visy agrees with the respondent that odorous emissions have improved but still occur particularly during shut downs and process upsets.

In relation to the respondent not reporting odour complaints, Visy and the Community Consultative Committee encourage all residents to call the free complaints line to register complaints as it assists the mill in identifying and rectifying process issues. This service will continue to be operational during the mill expansion and Visy encourages the respondent to utilise the service. It should be noted that the number of complaints is just one measure of odour improvement used in the EA. Odour monitoring and audits are also undertaken by Visy to monitor odour performance. A comprehensive odour assessment was undertaken as part of the EA which involved utilising odour monitoring data and dispersion modelling which has also indicated improvements in odour impacts.

The EA outlines proposed odour management measures for the mill expansion. This includes odour management measures during start up and shut downs as well as additional proposed technology i.e. Vapour compression evaporation to further improve fugitive emissions that can occur during steady state operations. The management measures that Visy currently and will continue to utilise for start up shut down and process upsets was analysed by independent industry experts confirming that Best Practice Technology is being implemented.

Visy does not anticipate that the frequency and duration of odorous emissions during start up, shut down and commissioning of the expanded mill to be as initially experienced with the existing mill. This is due to added redundancy in the mill system by the installation of new mill components such as new recovery boiler, paper machine etc as well as a commitment to continuous improvement of the mill operations and awareness of issues that can cause odourous emissions since commissioning and operation of the existing mill.

In the current situation, during the Paper Machine shut to change felts and wires, odorous emissions generally occur as a result of the reduced production rate through the pulping line and recovery island while the Paper Machine is shut. The reduced production rate means that Non Condensable Gases (NCG's) can no longer be burned in the Recovery Boiler, increasing the

potential for odorous emissions. Following the mill expansion, the added redundancy within the mill system of an additional Paper Machine and Recovery Boiler, will allow at least one Recovery Boiler to continue to operate at a higher production rate during these partial shutdown periods. This will allow greater control of NCG's thus reducing potential odour impacts.

Visy acknowledges that the level of odorous emissions initially experienced during commissioning and after the commencement of operation of the existing mill in 2001 was not anticipated. However since this time, significant work has been conducted to reduce and manage the odorous emissions from the mill as outlined in the EA. Visy will ensure that the mill expansion is built to incorporate the changes that have been made to the existing plant as well as incorporate the proposed new technology to further improve odour emissions. Utilising all these management measures, the assessment and modelling conducted in the EA demonstrates that odorous emissions during steady state operations from the mill following the expansion will either remain at existing levels or will improve at some residential locations.

The respondent advised that there is likely to be more than two residents per household within the area of the odour assessment. The odour and air assessment criteria is based on bands of population, therefore if there are more than two residents per household this would not change the odour criteria as the population band that is considered in the EA is between 30 and 125 people for which 5OU is the assumed threshold.

#### **Issue: Health Impacts**

The respondent expressed concern regarding the health impact of air and odour emissions stating there is "anecdotal evidence" relating to health of some of the neighbours of Visy as well as Visy on site employees and contractors.

It is requested that the health impacts on all exposed to the mill emissions i.e. employees, contractors, neighbours and beyond should be monitored by an independent body to enable the identification of both long and short term trends that may or may not be evident.

#### **Visy's Response**

The respondent stated that there is "anecdotal evidence" of health effects on neighbours, employees and contractors from the mill process emissions. While Visy acknowledges that some neighbours have stated they have experienced health impacts from the air and odorous emissions from the mill, no reports have been made to Visy management by employees or contractors relating to health affects as a result of such emissions from the process. Visy is aware of only one incident, an allergic reaction that was reported by an employee for which no apparent

cause linked to the mill was found. The same employee experienced a similar reaction some months later when offsite and interstate from the mill which concludes that the reaction was not related to the mill process. This is one reported incident in 6 years of operation (200 employees over 6 years which is 1200 man years of operation) which was proven inconclusive.

The respondent suggests that an independent health assessment is conducted on neighbours, employees and contractors. Visy has commissioned a multi stage Health Risk Assessment to examine the health impact of air emissions from the mill. The first stage of the assessment was completed as part of the EA utilising actual operating data from the existing mill operations and extrapolating the data for the mill expansion. Future stages of the assessment will be undertaken after commencement of operation of the mill expansion utilising actual operating data from the process following one year of operation after the commissioning phase as outlined in the SOC in the EA. The multi staged health risk assessment was a requirement of the Department of Health who approved the proposed scope of work for the assessment.

***Issue: Noise***

The respondent states that truck noise is currently audible at the residence and is concerned for noise impacts on other neighbours.

**Visy's Response**

Although noise modelling in the EA does not show potential for exceedence of noise limits at this residential location, Visy will conduct noise monitoring at this residence to confirm the modelling predications made in the EA.

As the resident is located to the north west of the mill site, it is possible that the truck noise that is audible are from trucks entering/exiting the township of Adelong. Visy has committed to continue adhering to the Adelong night time curfew which minimises the impact of night time noise for residents in the township of Adelong and those to the west of the site.

***Issue: Air Emissions and Use of Non Standard Fuels***

The respondent is concerned for impact on surrounding community and neighbours from air emissions from use of non standard fuels in multi-fuel boiler.

**Visy's Response**

Visy is seeking only concept approval for the multi-fuel boiler at this stage and will submit a full assessment on the use of non standard fuels when full approval will be sought. In any case the Health Risk Assessment included in the EA assessed the impact of the estimated emissions from

the multi-fuel boiler proposed for Phase 2 of the expansion. The air dispersion modelling and Health Risk Assessment undertaken for the EA, have demonstrated that the emissions to air comply with the relevant criteria and that acute or chronic human health impacts as a result of the expanded mill (including Phase 2 and the multi-fuel boiler) are not expected.

**Issue: *Traffic***

The respondent is concerned for impact on local roads and safety due to increase in trucks and potential accidents with log trucks

**Visy's Response**

The EA assessed the local road network in terms of safety, design and capacity to handle additional traffic projected for the mill expansion. This was done by utilising the RTA's Level of Service (LOS) measure which concluded that the Level of Service would not change for each of the main haulage routes following the additional traffic generated by the mill expansion. This assessment was based on the number of trucks each road currently handles and the projected increase expected. All roads currently had an LOS of A to C which indicates that they have sufficient capacity for the traffic they accommodate. The LOS did not change when the additional traffic from the mill expansion was added.

However Visy acknowledges that the road surfaces and general conditions could be improved for safety reasons and actively supports local and regional road upgrade discussions and plans.

**3.2.9 Individual Submission 4**

The following issues were raised in an individual submission to the project.

**Issue: *Truck Movements***

The traffic Assessment presented in the EA was conducted prior to the Buccleuch State Forest fires. The EA states that after the mill expansion 25.8% of heavy vehicles to the mill would be coming from this direction. Lost product from these areas will mean wood will need to be sourced from elsewhere and numbers should be recalculated. Material sourced from Oberon/Bathurst and ACT/Bombala will put increased pressure on Gocup Road.

Gocup Road is not up to standard to accept Super B doubles and the night time curfew through Adelong will mean there will be additional traffic along Gocup Road.

### **Visy's Response**

The respondent's interpretation of the EA is incorrect. According to the EA Visy will actually be marginally reducing the number of movements along this route compared to current operations. The 25.8% refers to the total number of heavy vehicles on this road after the Visy mill expansion and includes non Visy vehicles. Visy acknowledges that the Traffic Assessment was conducted prior to the forest fires and the shortfall in timber will be supplied by other areas. However this effect will be short-lived and Forests NSW has developed a revised plan for scheduling and delivering wood fibre from this area. Approximately 50,000 tonnes of material per year from this source for the next 8 to 10 years will now be sourced from forests to the south of Tumut. The trucks providing this timber will utilise Wondalga Road. This will remove approximately 8 truck movements per day along the Bombowlee Creek Road which will be added to the Wondalga Road.

Consistent with the views of Tumut Shire Council, Gundagai Shire Council, other industries and the community, Visy acknowledges that Gocup Road requires upgrading particularly if Super B doubles are to be used. This is mentioned in the EA. Visy is actively involved with Council and other industry in the area to seek public funding to improve the condition of Gocup Road, as well as other roads in the area.

### **Issue: *Level of Service and Traffic Safety***

The Level of Service definition in the Traffic Assessment appears to be more about traffic flow and delays. Safety considerations need clarification.

### **Visy's Response**

The Traffic Assessment in the EA states the following regarding Level of Service; "AUSTROADS is the national association of road transport and traffic authorities in Australasia and works towards uniformity of practice in respect to design, construction and user aspects of roads and bridges. AUSTROADS defines level of service as a qualitative measure describing operational conditions within a traffic stream, and their perception by motorists and/or passengers. The volume and composition (type of vehicles) of traffic on a given road determines the level of interaction between vehicles and therefore the level of service. LOS A is defined as being a free flowing condition and LOS F is defined as being very congested"

The level of service of a road is largely related to traffic flow which in turn has safety implications. The more congested a road, the lower the level of service, and therefore the more unsafe the road is in terms of overtaking etc. Visy acknowledges in the EA that certain roads require upgrading including Gocup Road and Wondalga Road. The safety aspects including pavement



condition etc relating to these roads and other roads in the Shire have been extensively assessed in the past and the recommendations documented in the Regional Transport Plan for the Timber Industry in the South West Slopes of NSW, which was commissioned by the Softwoods Working Group of which Visy is an active member together with other local industry and Tumut Shire Council. The report has been submitted to State Government to highlight which roads require upgrading in order to cope with the growing timber industry in the area.

#### **Issue: Road Improvements**

The respondent suggests a roundabout at Gocup Road/Snowy Mountains Highway intersection, overtaking lanes on hills at both sides of Adelong for westbound traffic, RTA to take over Gocup Road and bring it up to standard and for Batlow road to be brought up to standard.

The respondent suggests rail is ideal or conversion of the rail line to road from the mill to Hume highway.

#### **Visy's Response**

Although the suggested improvements are not within Visy's scope to implement, Visy supports all suggestions for road improvements. In relation to rail, Visy has publicly stated a number of times that if rail was made available then Visy would utilise this mode of transport subject to commercial considerations.

## **4 Conclusion**

### **4.1 Revised Statement of Commitments**

The SOC prepared as part of the EA has been updated to include additional commitments and amendments to commitments arising from the submissions received during public exhibition.

A full and final SOC is provided in **Appendix B**. All issues raised have been adequately addressed. Based upon the detail provided in this submission report, including the revised SOC, Visy seeks approval of the proposed mill expansion under Part 3A of the Environmental Planning and Assessment Act 1979.

## **APPENDIX A**

### **Copies of Submissions from Government Departments**

**APPENDIX B**  
**Revised Statement of Commitments**

## Visy's Proposed Amendments to the draft Statement of Commitments as modified by DEC

NOTE: Original text in blue, DEC recommended changes in black text, further changes suggested by Visy as a result of submissions received are in red text

Environmental Issue	Safeguard/Commitment	Timing
<b>Air Quality</b>		
Mitigation	<ul style="list-style-type: none"> <li>Operate mill processes to minimise emissions to atmosphere and ensure compliance with POEO licence requirements <del>Group 6 Limits in the POEO (Clean Air) Regulations</del> and impact assessment criteria outlined in <i>Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales</i> (DEC 2005c).</li> <li>Incorporate BAT for combustion sources and pollution control equipment.</li> </ul>	Operational Phase
Monitoring	<ul style="list-style-type: none"> <li>Conduct emissions monitoring in accordance with POEO Licence requirements.</li> <li>Conduct ambient air monitoring as per POEO Licence requirements.</li> </ul>	Operational Phase
Management	<ul style="list-style-type: none"> <li>Update the site's Air Quality Management Plan to incorporate expanded mill operations.</li> <li>Refine Human Health Risk Assessment based on one year of actual emissions monitoring data following commissioning phase.</li> </ul>	Operational Phase
<b>Use of Non-Standard Fuels (Concept Approval only sought)</b>		
Mitigation	<ul style="list-style-type: none"> <li>Visy suggests removing this requirement as the multi-fuel boiler is a stand alone unit providing only power and steam for the process with no other interaction with the process or phases. <del>Engage an independent expert to review the final design of the Stage 2 multi-fuel boiler and control equipment prior to construction of Stage 1 of the project, to ensure that the overall design and all Stage 1 equipment which will remain at Stage 2 is optimised to best work at Stage 2 to reduce emissions to the maximum extent (Note 6).</del> Visy shall provide DoP with a</li> </ul>	Design Phase

Environmental Issue	Safeguard/Commitment	Timing
	<p>detailed report on the means of installing and commissioning the multi-fuel as part of the process of obtaining project approval for this aspect of the development under the Concept Plan approach.</p> <ul style="list-style-type: none"> <li>The assessment of non-standard fuels to be in accordance with Guidance Note: Assessment of Non-Standard Fuels 2005. (Note 5)</li> <li>Conduct chemical characterization of all proposed non-standard fuels prior to the operation of the multi fuel boiler in accordance with requirements outlined in correspondence from DEC dated 22 December 2006</li> <li>Prior to commencement of operation of the multi fuel boiler, prepare and submit for approval a fuel specification including a proposed testing regime and test methods for ongoing monitoring.</li> <li>Develop contaminant thresholds for fuel specification in consultation with selected equipment supplier.</li> <li>Incorporate BAT for multi fuel boiler and associated pollution control equipment to meet limits specified in the EU Waste Incineration Directive except for where there is a statutory limit specified in the POEO Licence. <del>at a minimum the emission limits in line with the Waste Incineration Directive (Note 4).</del> Where a discrepancy exists between the Licence and the EU limits, the POEO Licence shall prevail.</li> <li>Develop and implement QA/QC procedures for non-standard fuels on site and at supplier sites.</li> </ul>	
Monitoring	<ul style="list-style-type: none"> <li>Conduct emissions monitoring in accordance with POEO Licence requirements.</li> <li>Undertake enhanced monitoring program of boiler fuel, emissions and ash during first 12</li> </ul>	Commissioning/Operational Phase

Environmental Issue	Safeguard/Commitment	Timing
	<p>months of operation for non-standard fuel use in the multi fuel boiler.</p> <ul style="list-style-type: none"> <li>Undertake review of fuel specification and contaminant thresholds after first 12 months of operations based on monitoring data.</li> <li>Refine fuel specification and QA/QC procedures after review of contaminant thresholds.</li> </ul>	
Management	<ul style="list-style-type: none"> <li>Update the site's Air Quality Management Plan to incorporate non-standard fuel use.</li> </ul>	Operational Phase
<b>Odour Management</b>		
Mitigation	<ul style="list-style-type: none"> <li>The proponent must prepare, to the satisfaction of the Director General, a detailed report on appropriate mitigation measures, beyond those detailed in the mill expansion EA, to reduce odour at receptors that arises from startup and shutdown activities. This is to include, but not limited to investigating the timing (eg avoiding odourous activities at night) and sequencing of activities and the effect of prevailing weather conditions on the activities in regard to odour at receptors. (Note 3)</li> <li>The proponent must prepare, to the satisfaction of the Director General, a detailed report on the proposed Vapour Compression Evaporation that sets out how the system will halve odour emissions from all sources where clean condensate is used, both in the existing mill and for the proposed mill expansion.(Note 1)</li> <li>Install odour collection and reduction systems for new mill components.</li> <li>Install Vapour Compression Evaporation that will halve odour emissions from all sources where clean condensate is used, both in the existing plant and proposed mill expansion or install other systems of control that will achieve the same objective. (Note 2)</li> <li>Operate expanded mill to minimise odorous emissions during normal operations and start up and shut downs.</li> </ul>	<p>Design/Construction Phase</p> <p>Design Phase</p> <p>Operational Phase</p>

Environmental Issue	Safeguard/Commitment	Timing																													
Monitoring	<ul style="list-style-type: none"><li>Conduct odour monitoring every six months for the first year of operation and then annually for the first five years and then every two years thereafter.</li></ul>	Operational Phase																													
Management	<ul style="list-style-type: none"><li>Update the Air Quality Management Plan for the site to incorporate odour management for the mill expansion.</li><li>Maintain 24 hour complaints hotline.</li><li>Seek to continually improve mill operations to minimise odour emissions.</li><li>Implement best practice odour management procedures during start up, shut down and process upset conditions in order to comply with Section 129(1) of the POEO Act (“must not cause or permit the emission of any offensive odour from the premises”)</li><li>Continue to communicate with local community regarding start up and shut down activities</li></ul>	Operational Phase																													
Noise and Vibration																															
Mitigation	<ul style="list-style-type: none"><li>Implement noise control measures for expanded mill operations to ensure mill operations meet proposed noise limits as detailed in below (Note 8, note 10 and note 12):</li></ul> <table><tr><th rowspan="2">Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr><tr><th>L<sub>Aeq</sub>(15 minute)</th><th>L<sub>Aeq</sub>(15 minute)</th><th>L<sub>Aeq</sub>(15 minute)</th><th>L<sub>Amax</sub></th></tr><tr><td>Pleasant View<sup>(1)</sup></td><td>40</td><td>40</td><td>40</td><td>45</td></tr><tr><td>Deep Creek<sup>(1)</sup></td><td>39</td><td>39</td><td>39</td><td>45</td></tr><tr><td>Reka &amp; Glengarry<sup>(1)</sup></td><td>36</td><td>36</td><td>36</td><td>45</td></tr><tr><td>Any other residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table>	Location	Day	Evening	Night		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Amax</sub>	Pleasant View <sup>(1)</sup>	40	40	40	45	Deep Creek <sup>(1)</sup>	39	39	39	45	Reka & Glengarry <sup>(1)</sup>	36	36	36	45	Any other residence	35	35	35	45	Design/ Construction Phase
Location	Day		Evening	Night																											
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Amax</sub>																											
Pleasant View <sup>(1)</sup>	40	40	40	45																											
Deep Creek <sup>(1)</sup>	39	39	39	45																											
Reka & Glengarry <sup>(1)</sup>	36	36	36	45																											
Any other residence	35	35	35	45																											

Environmental Issue	Safeguard/Commitment	Timing
	<ul style="list-style-type: none"> <li>➤ <del>Night time limit of 40 dB(A);</del></li> <li>➤ <del>Evening and daytime limit of 40 dB(A); and</del></li> <li>➤ <del>An evening, daytime and night time limit of 43 dB(A) for extreme noise enhancing conditions.</del></li> </ul> <p>The above noise limits shall apply under meteorological conditions of wind speed up to 3 metres per second at 10 metres above ground level (D class stability) and under temperature inversion conditions (3°C/100m) and wind speeds up to 2m/s (F class stability).</p> <ul style="list-style-type: none"> <li>• Negotiate an agreement for noise mitigation at Woomera residence (Note 7)</li> </ul>	
Monitoring	<ul style="list-style-type: none"> <li>• Conduct noise monitoring quarterly during the first 12 months of operation with a view to reducing frequency of noise survey to every two years thereafter once satisfactory performance is demonstrated.</li> </ul>	Operational Phase
Management	<ul style="list-style-type: none"> <li>• Update the Noise Management Plan for the site to incorporate expanded mill operations, including management action for residents above the Project Specific Noise Levels (Note 9) and for the mitigation of noise impacts under extreme noise enhancing conditions (Note 11).</li> <li>• The expanded mill shall be designed and operated in such a way that noise limits are not exceeded by more than 3dBA under extreme noise enhancing conditions (G class inversion conditions).</li> </ul>	Operational Phase
<b>Traffic and Transport</b>		
Mitigation	<ul style="list-style-type: none"> <li>• Maximise the use of B-doubles and back loading to minimise heavy vehicle traffic movements to and from the site</li> <li>• Implement mitigation measures in Traffic Management plan to minimise sleep disturbance.</li> </ul>	Operational Phase



Environmental Issue	Safeguard/Commitment	Timing
Monitoring	<ul style="list-style-type: none"> <li>Conduct traffic noise monitoring quarterly during the first 12 months to confirm predicted traffic noise impacts.</li> <li>Conduct random auditing to ensure heavy vehicles are not breaking the Adelong curfew.</li> </ul>	Operational Phase
Management	<ul style="list-style-type: none"> <li>Continue participation in rail discussions.</li> <li>Continue participation in road upgrade discussions.</li> <li>Update Traffic Management Plan to incorporate monitoring and mitigation measures to reduce sleep disturbance from heavy vehicles.</li> <li>Conduct driver education training on the requirements of the traffic management plan.</li> </ul>	Operational Phase
<b>Safety and Hazard</b>		
Mitigation	<ul style="list-style-type: none"> <li>Operate mill in accordance with standard operational procedures.</li> </ul>	Operational Phase
Monitoring	<ul style="list-style-type: none"> <li>Conduct auditing of on-site operations during construction.</li> <li>Conduct hazard audit once every three years for onsite operations.</li> </ul>	Construction Phase Operational Phase
Management	<ul style="list-style-type: none"> <li>Update and maintain all documentation such as emergency plans, safety records and changes to operation practices and communicate changes to staff and contractors.</li> <li>Undertake risk assessment on proposed changes to plant.</li> </ul> <p>Conduct training and induction of all site personnel outlining safety hazard issues associated with construction and operation of the expanded mill.</p>	Construction and Operational Phases
<b>Chemical Hazards</b>		
Mitigation	<ul style="list-style-type: none"> <li>Incorporate appropriate control measures into design of the mill expansion, including bunding of chemical storage and process areas and design of chemical storage areas to include regulatory separation distances.</li> </ul>	Design/Construction Phase

<b>Environmental Issue</b>	<b>Safeguard/Commitment</b>	<b>Timing</b>
Monitoring	<ul style="list-style-type: none"> <li>Conduct auditing of chemical storage requirements on a random basis during both construction and operations.</li> </ul>	Construction and Operational Phase
Management	<ul style="list-style-type: none"> <li>Comply with the relevant statutory requirements for the transportation, storage and handling of chemicals.</li> <li>Maintain in house procedures in relation to storage and handling of chemicals and emergency procedures.</li> <li>Conduct training of new staff that handle chemicals and in emergency procedures.</li> <li>Continue to adhere to procedures that have been developed for the collection and treatment of any spilled chemicals.</li> <li>Conduct risk assessments for all new hazardous or dangerous goods storage locations</li> </ul>	Construction and Operational Phases
<b>Fire Safety</b>		
Mitigation	<ul style="list-style-type: none"> <li>Maintain fire breaks and remove flammable sources i.e. long grass.</li> <li>Conduct burning off in accordance with provisions of the Bush Fire act 1949.</li> </ul>	Construction/Operation
Monitoring	<ul style="list-style-type: none"> <li>Visually monitor fire breaks and areas requiring burning off.</li> </ul>	Construction and Operational Phase
Management	<ul style="list-style-type: none"> <li>Install fire alarm and suppression systems for new process areas.</li> <li>Train additional personnel in fire fighting skills.</li> <li>Maintain no smoking policy on site.</li> <li>Continue to utilise hot work permit system.</li> </ul>	Construction and Operational Phases
<b>Irrigation Management – Soil and Water Impacts</b>		
Mitigation	<ul style="list-style-type: none"> <li>Operate the expanded irrigation system in a sustainable manner incorporating appropriate irrigation management, scheduling, cropping and drainage management recommendations in</li> </ul>	Design and Operational Phases

Environmental Issue	Safeguard/Commitment	Timing
	the EA.	
Monitoring	<ul style="list-style-type: none"> <li>Undertake monitoring of a number parameters for irrigation system including: <ul style="list-style-type: none"> <li>➤ Continue monitoring treated wastewater quality;</li> <li>➤ Continue monitoring the quantity of treated wastewater irrigated to the existing and expanded reuse area;</li> <li>➤ Continue surface water sampling in Sandy Creek during the irrigation season and as per the POEO Licence in the event of discharge of treated wastewater from the Winter Storage dam to Sandy Creek;</li> <li>➤ Monitor all new and original groundwater bores for groundwater levels and groundwater quality;</li> <li>➤ Install soil moisture probes for daily soil moisture monitoring in the new irrigation areas.</li> <li>➤ Determine appropriate soil sampling locations under the new irrigation areas ensuring spatial coverage of hydrogeological conditions;</li> <li>➤ Conduct soil quality sampling of the topsoil and subsoil before and after the irrigation season for the parameters outlined in the POEO Licence;</li> <li>➤ Continue monitoring daily dam surface water level; and</li> <li>➤ Install pan evaporation and rainfall instruments at Point 8 to assist in irrigation scheduling.</li> </ul> </li> </ul>	Operational Phase
Management	<ul style="list-style-type: none"> <li>Update the Wastewater Management Plan to include the expanded irrigation area.</li> </ul>	Operation
<b>Waste Management</b>		
Mitigation and Management	<ul style="list-style-type: none"> <li>As part of the mill operations and further environmental planning at the site, Visy will use its best endeavours to implement the principles of a hierarchy for managing waste, according to the following priorities:</li> </ul>	Construction and Operational Phases

Environmental Issue	Safeguard/Commitment	Timing
	<ul style="list-style-type: none"> <li>○ Priority 1: avoid unnecessary resource consumption</li> <li>○ Priority 2: recover resources (including reuse, reprocessing, recycling and energy recovery), and</li> <li>○ Lastly: dispose in a responsible manner</li> </ul>	
<b>Construction</b>		
Mitigation	<ul style="list-style-type: none"> <li>• Install appropriate sediment and erosion control measures to minimise potential impacts on stormwater leaving the site.</li> <li>• Ensure that noise generated during construction does not exceed current licence limits i.e.: <ul style="list-style-type: none"> <li>➢ L<sub>A10</sub> 40 dB(A) – 7:00am to 10:00pm; and</li> <li>➢ L<sub>A10</sub> 38 dB(A) – 10:00pm to 7:00am.</li> </ul> </li> <li>• Schedule construction activities to minimise night time noise impacts to neighbouring properties i.e. conduct construction activities within buildings at night.</li> </ul>	Construction
Monitoring	<ul style="list-style-type: none"> <li>• Conduct site audits during construction in accordance with the Construction Environmental Management Plan.</li> </ul>	Construction
Management	<ul style="list-style-type: none"> <li>• Prepare a Construction Environmental Management Plan.</li> <li>• Prepare a Construction Safety Study.</li> <li>• Ensure physical segregation of operational and construction areas.</li> <li>• Use existing task based risk assessment procedure for the construction and commissioning phases.</li> <li>• Allocate dedicated personnel for liaison between construction activities and plant operation.</li> <li>• Develop and maintain a comprehensive planning schedule.</li> </ul> <p>Contractors to undergo instruction on site procedures and company expectations</p>	Construction

Environmental Issue	Safeguard/Commitment	Timing
<b>Other Commitments</b>		
Management	<ul style="list-style-type: none"> <li>Continue consultation with neighbours and the VCCC during construction and operation of the expanded mill.</li> </ul>	Construction/Operation
	<ul style="list-style-type: none"> <li>Continue consultation with DEC during construction and operation of the expanded mill.</li> </ul>	
	<ul style="list-style-type: none"> <li>Continue consultation with DoP during construction and operation of the expanded mill.</li> </ul>	Construction Phase
	<ul style="list-style-type: none"> <li>Prior to construction phase, consult with the NSW Department of Education and Training to determine specific training needs for the construction workforce.</li> </ul>	Operational Phase
	<ul style="list-style-type: none"> <li>Continue to work with TAFE to develop vocational training courses for mill operations.</li> </ul>	