



# Tumut Paper Mill Expansion Modification 5

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Additional Storage  
State Significant Development Modification Assessment  
(MP06\_0159-Mod-5)

February 2022



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# Glossary

<b>Abbreviation</b>	<b>Definition</b>
<b>Applicant</b>	Visy Pulp and Paper Pty Ltd
<b>Council</b>	Snowy Valleys Council
<b>Department</b>	Department of Planning and Environment (DPE)
<b>EPA</b>	Environment Protection Authority
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>EP&amp;A Regulation</b>	Environmental Planning and Assessment Regulation 2000
<b>EPBC Act</b>	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
<b>EPL</b>	Environment Protection Licence
<b>LEP</b>	Local Environmental Plan
<b>Minister</b>	Minister for Planning
<b>Planning Secretary</b>	Secretary of the Department
<b>RTS</b>	Response to Submissions
<b>SEPP</b>	State Environmental Planning Policy

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# 1 Introduction

This report provides the NSW Department of Planning and Environment's (Department's) assessment of an application to modify the State significant development (SSD) consent for the Tumut Paper Mill Expansion (06\_0159) (development).

The modification application was lodged on 8 November 2021 by Visy Pulp and Paper Pty Ltd (the Applicant) pursuant to section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The application sought to amend the development consent to permit the:

- construction and operation of a powered mobile equipment (PME) workshop, amenities building, paper reel storage shed, bleached kraft pulp storage shed, additional general use storage shed and a new training building
- construction of a new emergency water storage pond (2.76 megalitres (ML)) for processing water.

As part of the application, the Applicant is also seeking retrospective consent for the use of an existing storage shed which was approved under MP06\_159-Mod-2.

On 7 February 2022, the Applicant formally requested to amend the modification application (amended modification) pursuant to clause 121B(2) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) to remove the proposed paper reel storage shed and including a new fabrication workshop. All other components of the amended modification remain the same as originally lodged.

## 1.1 Background

The Applicant operates a paper mill at 1302 Snowy Mountains Highway, Tumut in the Snowy Valleys local government area (see **Figure 1**). The development operates under two separate ministerial approvals and allows the Applicant to produce up to 800,000 tonnes per annum (tpa) of finished industrial-grade paper products, being Kraft paper and white top liners used in the packaging and building industries.

Construction commenced in 2000, with the site becoming operational in 2002.

The development occupies an area of 53 hectares (ha), which forms part of a larger landholding of approximately 2,124 ha which is owned by Visy and is located approximately 5.5 kilometres (km) to the west of Tumut and 89 km west of Canberra. The area surrounding the Site consists of cleared farmland, with dispersed rural settlement.

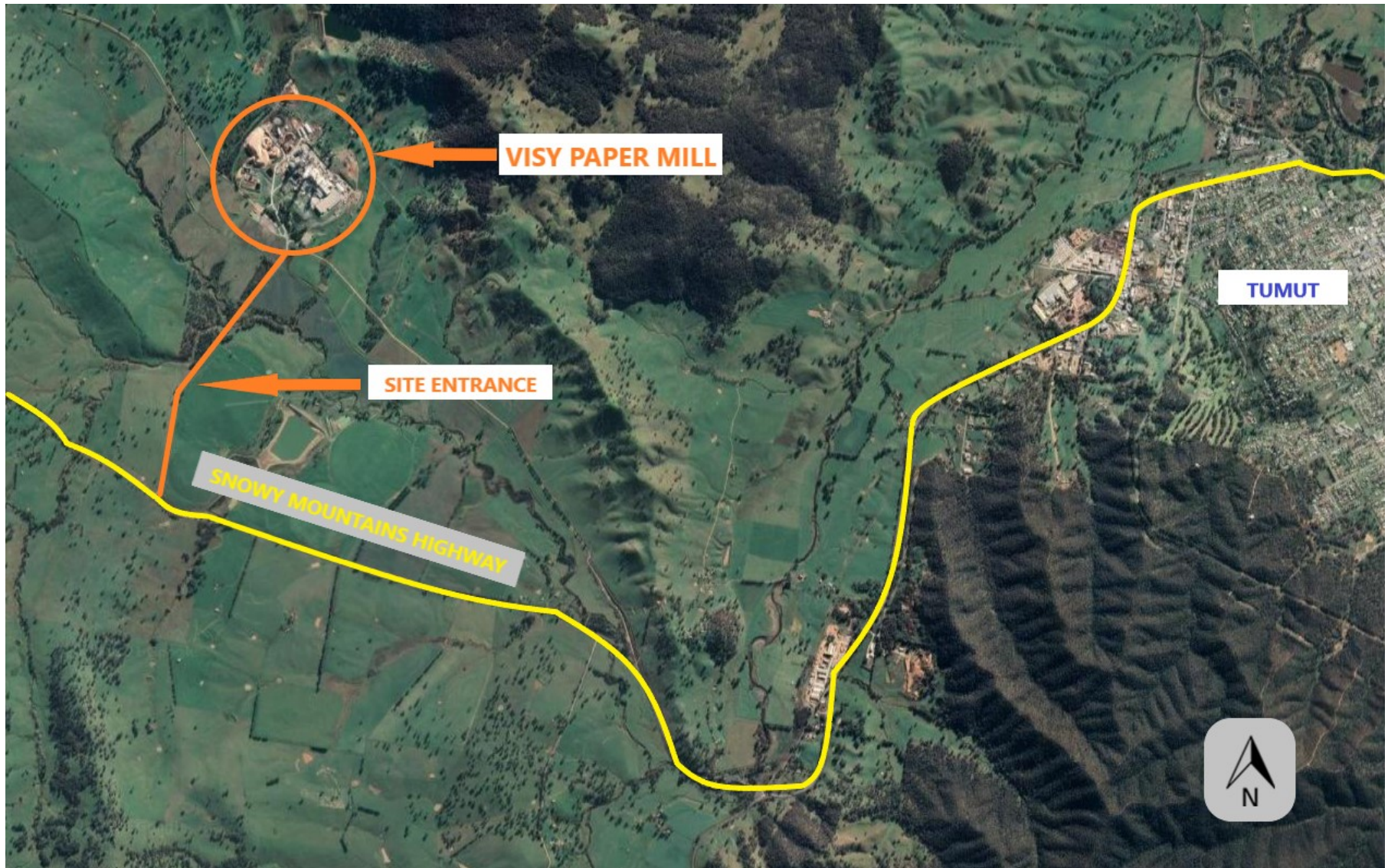


Figure 1 | Regional Context Map

## 1.2 Approval History

The Tumut Paper Mill operates under two separate ministerial approvals, DA 6/98 and MP06\_0159, both of which have been modified on a number of occasions. The development history of the site is provided in **Table 1**.

**Table 1** | Development Application / Modification Application History

Application No.	Summary of Applications	Approval Date
<b>DA 6/98</b>	Part 4 development consent for the construction and operation of an integrated Kraft pulp and paper mill, including: <ul style="list-style-type: none"> <li>• Stage 1 – construction and operation of the mill, woodyard, associated wastewater irrigation scheme and associated infrastructure</li> <li>• Stage 2 – an increase in production from 300,000 tpa to 450,000 tpa of finished product.</li> </ul>	29 November 1998
<b>DA 6/98 MOD 1</b>	Section 96(2) to: <ul style="list-style-type: none"> <li>• adopt a revised water management strategy, resulting in changes to the water supply, freshwater storage, wastewater re-use and winter storage elements</li> <li>• utilise natural gas in preference to liquid propane gas.</li> </ul>	15 June 2000
<b>DA 6/98 MOD 2</b>	Section 96(1A) to allow the utilisation of urban wood residues and compost manufacturing residues as non-standard wood fuel in the power boiler.	3 March 2005
<b>MP06_0159 Concept Plan &amp; Project Approval</b>	Part 3A approval for the expansion of the Tumut Paper Mill by installing a second paper machine to increase the manufacturing capacity to 700,000 tpa, including: <ul style="list-style-type: none"> <li>• Stage 1 – new paper machine and production line, expansion of the wood yard, installation of recovery boiler and expansion of the effluent irrigation area</li> <li>• Stage 2 – installation of multi-fuel boiler, digester, wastepaper de-inking plant and natural gas turbine.</li> </ul> <p>The Project Approval did not include the use of nonstandard fuel in the multi-boiler, which is required to be the subject of a further planning application, as set out in the concept plan approval.</p>	1 May 2007
<b>MP06_0159 MOD 1 Project Approval</b>	Section 75W to allow a change in the total reduced sulfide emission limit for main stack 2 to reflect installation phasing changes.	6 August 2007
<b>DA 6/98 MOD 3</b>	Section 75W for the construction and operation of a diesel refuelling facility.	5 October 2012

<b>Application No.</b>	<b>Summary of Applications</b>	<b>Approval Date</b>
<b>MP06_0159 MOD 2 Project Approval</b>	Section 75W for the construction of a white pulp storage facility, a coating kitchen facility and storage sheds.	25 September 2015
<b>MP06_0159 MOD 3 Concept Plan &amp; Project Approval</b>	Section 75W to: <ul style="list-style-type: none"> <li>• Increase in production capacity from 700,000 tpa to 800,000 tpa of finished product</li> <li>• Increase the use of recycled wastepaper in the mill feedstock from 220,000 tpa to 320,000 tpa</li> <li>• Increase the use of purchased pulp (bleached Kraft pulp) from 30,000 tpa to 60,000 tpa.</li> </ul>	7 July 2017
<b>MP06_0159 MOD 4 Project Approval</b>	Section 4.55(1A) to seek an exemption to the operational noise limits approved under Condition 2.15, where a written agreement has been entered into between the Applicant and the landholder.	21 August 2020

## 2 Proposed Modification

### 2.1 Proposed Modification

On 8 November 2021, the Applicant lodged a modification application under section 4.55(1A) of the EP&A Act to modify MP06\_0159. On 7 February 2022, the Applicant formally requested an amended modification application pursuant to clause 121B(2) of the EP&A Regulation. The amended modification is described in full in the amended Modification Report (Revision 4) and applies only to the project approval (now development consent). The concept plan is not proposed to be modified. Only the amended modification is considered from this point of the report.

The Applicant is seeking to modify the consent to permit the construction and operation of additional buildings at the site to support an increase in storage capacity and provide improved facilities and safety conditions onsite, as well as to provide additional process water storage capacity to facilitate the ongoing implementation of these process changes.

The amended modification proposes the construction and operation of the following components which are shown in **Figure 2**, **Figure 3** and **Appendix D**:

- Powered Machinery Equipment Workshop (**ID 1#**) – will be used to service onsite operational equipment such as forklifts, loaders, boom and scissor lifts. The workshop will have a floor area of 480 m<sup>2</sup> and have dimensions of 30 m long, 16 m wide and 9.5 m high and of steel frame and Colorbond (or similar) external cladding.
- Fabrication Workshop (**ID 2#**) – will be adjacent to the Powered Machinery Equipment Workshop and used by maintenance staff for onsite fabrication and equipment repairs. It will replace a current temporary workshop which consists of two shipping containers. The workshop will have a floor area of 480 m<sup>2</sup> and have dimensions of 30 m long, 16 m wide and 9.5 m high and of steel frame and Colorbond (or similar) external cladding.
- Amenities Building / Multi-Purpose Building (**ID 3#**) – will be used as an office, meeting room and staff amenities. The building will have a floor area of 292.5 m<sup>2</sup> and have dimensions of 19.5 m long, 15 m wide and 4.5 m high and of steel frame and Colorbond (or similar) external cladding. The amenities building will replace transportable buildings which are located in the same location and currently provide the same purpose.
- Bleached Kraft Pulp Storage Shed (**ID 4#**) – will be used to supplement the existing bleached kraft pulp storage shed. The shed will adjoin the existing bleached kraft pulp storage shed and have a floor area of 1,697.22 m<sup>2</sup> and have dimensions of 67.35 m long, 25.2 m wide and 9.35 m high and of steel frame and Colorbond (or similar) external cladding.
- General Use Storage Shed (**ID 5#**) – will be used to store large spare parts for the onsite maintenance team, including pumps and motors. The shed will adjoin the existing storage shed that was constructed in contravention to its approval and have a floor area of 1,598.2 m<sup>2</sup> and have dimensions of 65.5 m long, 24.4 m wide and 8.9 m high and of steel frame and Colorbond (or similar) external cladding.
- Training Building (**ID 6#**) – will be used to perform onsite competency and safety training as well as site inductions. The building will have a floor area of 900 m<sup>2</sup> and have dimensions of 30

m long, 30 m wide and 5.05 m high and of steel frame and Colorbond (or similar) external cladding.

- Emergency Storage Dam for Process Water (**ID 7#**) – the dam will be used to hold excess production process water during emergencies or shutdown periods before being returned to the production process cycle. The dam will have a surface area of 2,554 m<sup>2</sup> and a total capacity of 2.76 megalitres (ML)

Retrospective approval is also sought for the use of an existing storage shed (**ID 8#**) The shed is used to store large spare parts for the onsite maintenance team, including pumps and motors.

This storage shed was approved with dimensions of 72 metres (m) long, 12 m wide and a roof height of 6.0 m. The total floor area of the existing storage shed should have been 864 square metres (m<sup>2</sup>) but was in fact constructed to a size of 65.5 m long, 24.4 m wide and a roof height of 8.9 m, with a total floor area of 1,598 m<sup>2</sup>.

The Department has been informed by the Applicant that this shed has an existing construction certificate, passed all relevant mandatory stage inspections and should be receiving an occupation certificate shortly.

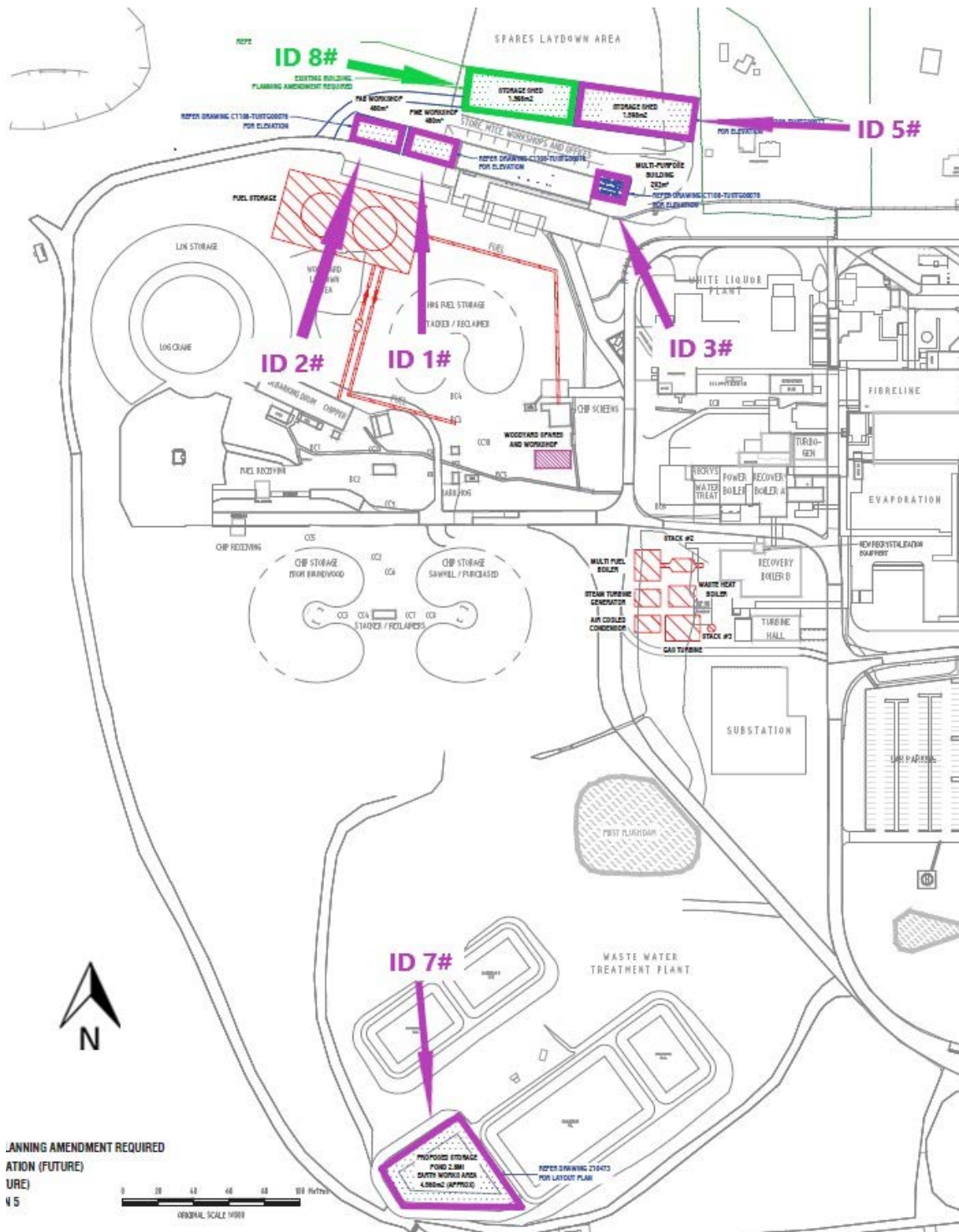
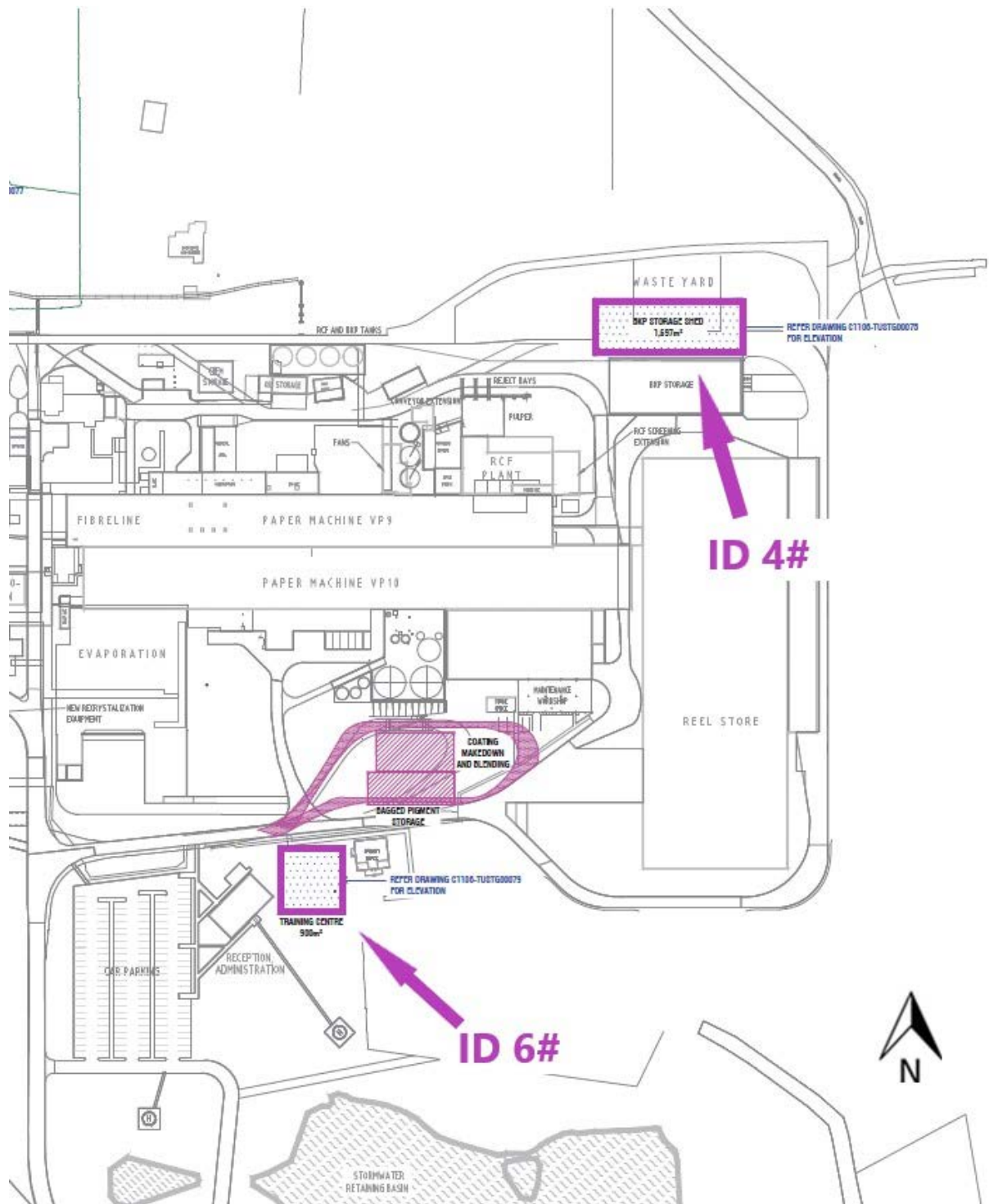


Figure 2 | MP06\_0159-Mod-5 – Extent of Proposed Works (WEST)



**Figure 3 | MP06\_0159-Mod-5 – Extent of Proposed Works (EAST)**

## 3 Statutory Context

### 3.1 Scope of Amended Modification

The Department has reviewed the scope of the amended modification and considers the amended modification can be characterised as a modification involving minimal environmental impacts as:

- the primary function and purpose of the approved development would not change as a result of the amended modification
- any potential environmental impacts would be minimal and appropriately managed through the existing and modified conditions of consent
- the amended modification is of a scale that warrants the use of section 4.55(1A) of the EP&A Act
- is substantially the same development as last modified under the former section 75W of the EP&A Act
- would not involve any further disturbance outside the already approved disturbance areas for the development.

Therefore, the Department is satisfied the amended modification is within the scope of section 4.55(1A) of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the amended modification should be assessed and determined under section 4.55(1A) of the EP&A Act rather than requiring a new development application to be lodged.

### 3.2 Consent Authority

The Minister for Planning (Minister) is the consent authority for the application under section 4.5(a) of the EP&A Act. Under the Minister's delegation of 26 April 2021, the Team Leader, Industry Assessments, may determine the amended modification under delegation as:

- the amended modification has not been made by a person who has disclosed a reportable political donation under section 10.4 of the EP&A Act
- there are no public submissions (other than a council) in the nature of objections, and
- Council has not made a submission by way of objection under the mandatory requirements for community participation listed under Schedule 1 of the EP&A Act.

### 3.3 Part 3A Transition to State Significant Development

This project was originally approved under the former section 75J of the EP&A Act and was a transitional Part 3A project under Schedule 2 of the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 (EP&A (ST&OP) Regulation).

Following amendments to the EP&A Act and the commencement of the associated EP&A (ST&OP) Regulation on 1 March 2018, the power to modify Part 3A project approvals under former section 75W is no longer available for modifications submitted after 1 March 2018. In order to modify a transitional Part 3A project approval, the Minister for Planning and Public Spaces can declare the development to be SSD by order under clause 6 of Schedule 2 of the EP&A (ST&OP) Regulation. If a declaration is made the project approval becomes a development consent which can be modified under Part 4 of the EP&A Act if it meets the relevant criteria.

On 21 January 2020, the Director - Industry Assessments, (as delegate of the then Minister for Planning and Public Spaces), made an order under clause 6 of Schedule 2 to the EP&A (ST&OP) Regulation declaring the development the subject of project approval to be SSD. The order was published in the NSW Government Gazette on 24 January 2020 and took effect from that date.

The effect of this order is that the project approval is taken to be a development consent under Part 4 of the EP&A Act for the carrying out of the development. The Department notes that the concurrent concept plan was not transitioned. Any modifications to that approval would continue under the former section 75W of the EP&A Act.

### **3.4 Biodiversity Conservation Act 2016**

Clause 30A(2)(c) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 specifies that if the determining authority is satisfied a modification will not increase the impact on biodiversity values, a biodiversity development assessment report (BDAR) is not required.. The Department is satisfied that due to the proposed works being located within the existing disturbance footprint of the site there will be no additional clearing of native vegetation or habitat loss beyond that previously assessed and considered for the development. For the reasons discussed above, the Department's assessment concludes a BDAR is not necessary for the amended modification.

## 4 Engagement

### 4.1 Department's Engagement

Clause 117(4) of the EP&A Regulation requires a section 4.55(1A) modification application to be notified or advertised if specified by a community participation plan. The Department's Community Participation Plan notes the exhibition requirements for such modifications are discretionary, and based on the urgency, scale and nature of the proposal.

Given the proposed changes would result in minimal environmental impacts (see **Section 5**), the modification and amended modification were not notified or advertised. However, the modification was made publicly available on the Department's website on 9 November 2021 and the amended modification was made publicly available on 7 February 2022. The modification was referred to the Environment Protection Authority, the Department's Water Group and Snowy Valleys Council (Council) for comment. The Department was satisfied the amended modification did not require notification to agencies due to the minor changes of the amendment and the nature of the comments received in relation to the modification (see **Section 4.2**).

### 4.2 Government Advice

A summary of the advice received is provided below:

**Environment Protection Authority** did not raise concerns with the modification and noted that it did not change the existing activities of the site and would not require any variation to conditions on the existing Environment Protection Licence (EPL No 10232).

**Water Group** of the Department did not raise concerns with the modification and recommended conditions to ensure the additional stormwater generated is integrated into the existing stormwater management system. A condition was also recommended pertaining to the construction of the paper reel storage shed, however this component was removed under the amended modification for operational reasons.

**Snowy Valleys Council** did not respond to the Department's request for comment.

The Department sought further information from the Applicant on the nature of the modification, including the retrospective approval being sought for the storage shed (ID 8#) and clarifications around proposed building sizes.

### 4.3 Amended Modification

On 7 February 2022, the Applicant responded to the issues raised by the Department within its amended Modification Report. The amended Modification Report:

- removed the paper reel storage shed and included a new fabrication workshop
- provided additional information pertaining to amended modification in general and the already constructed storage shed, including in relation to the construction certificate and mandatory inspections (ID 8#)
- provided revised architectural drawings for the proposed buildings and clarified proposed building dimensions.

## 5 Assessment

The Department has assessed the merits of the amended modification. During this assessment, the Department has considered the:

- amended Modification Report provided to support the amended modification (see **Appendix A**)
- documentation and Department’s assessment report for the original application and subsequent modification application(s) (see **Appendix A**)
- advice from State government authorities (**Appendix A**)
- relevant environmental planning instruments, policies and guidelines
- requirements of the EP&A Act, including the objects of the EP&A Act.

The Department’s assessment of the key assessment issues is provided in **Table 2**.

**Table 2 | Assessment of Other Issues**

Findings	Recommendations
<b>Construction Impacts</b>	
<ul style="list-style-type: none"> <li>• The amended modification has the potential to generate impacts within the locality during the construction phase. These impacts are expected to be limited to increased vehicle movements and potential noise, dust and waste generation during the construction period. The Applicant has advised the Department that construction would occur on an ad hoc basis over a two-year period.</li> <li>• Traffic: The Applicant is predicting a maximum of 36 heavy vehicles movements (return trips) during the entire construction stage for materials and concrete deliveries. As the consent restricts construction activities to standard construction hours it is expected that construction related deliveries will also occur within these hours. The Department notes that the development currently operates 24 hours, 7 days per week including heavy vehicle operations.</li> <li>• Noise: The Applicant is currently required under the existing consent to limit construction activities to standard construction hours. There are no changes proposed to this existing requirement.</li> <li>• Dust: The Applicant is currently required under the existing consent to minimise dust emissions from the site and to implement dust mitigation measures when visible dust emissions occur. There are no changes proposed to this existing requirement.</li> <li>• Waste: The Applicant is currently required under the existing consent to ensure any waste generated must be reused / recycled were</li> </ul>	<p>New condition of consent to require the Applicant to review and update (as required) pre-construction management plans to the satisfaction of the Planning Secretary.</p>

## Findings

## Recommendations

possible or disposed of to a lawful facility. There are no changes proposed to this existing requirement.

- The existing consent currently requires the Applicant to have prepared, for the approval of the Planning Secretary a range of post approval management plans which are required prior to the commencement of construction which are intended to minimise and mitigate construction related impacts. These include: Construction Environmental Management Plan, Traffic Management Protocol, Construction Noise Management Plan and Acid Sulfate Soil Management Plan.
- The existing consent is unclear as to the requirement to update these management plans after the approval of a modification (as is the case with contemporary consents) and the Department has therefore recommended a new condition to require management plans to be reviewed and updated (as required) to the satisfaction of the Planning Secretary (in this case prior to the commencement of construction approved under amended modification).
- The Department notes there is significant separation between the site and sensitive receivers, and that the existing development consent contains a number of conditions to manage and mitigate potential construction related impacts. The Applicant has not proposed any amendments to these existing conditions, however the Department has recommended a new condition, as described above to mitigate potential construction impacts. The Department further notes that construction related impacts are temporary in nature and should be considered in the context of the existing 24hr, 7-day operational environment of the site.
- Given the extensive nature of existing operations within the site, existing and proposed conditions of consent and the significant separation distance between the site and sensitive receivers the Department's assessment concludes the amended modification is unlikely to generate any notable impacts external to the site during construction activities.

## Operational Impacts

- The Department notes that the amended modification does not seek to increase the production capacities of the development and is instead focussed on improving the overall operational efficiency of the development. New condition to require additional stormwater generated is integrated into the existing

## Findings

## Recommendations

development, particularly in relation to product storage, engineering maintenance and staff training.

stormwater management system.

- In relation to the new emergency water storage dam, the Applicant has explained that during the development's annual major maintenance shut down all process water is transferred to the existing six ML storage dam. This results in the dam being at maximum capacity with no additional capacity available to account for heavy or extended rainfall or delays in mill start up (which recovers process water back from the dam). The additional storage dam provides emergency buffer storage of 2.74 ML to alleviate potential overflows from the existing dam.
- The Department notes that the new dam design involves a compacted base layer and bunded wall/bank system which does not require any significant surface excavation to take place and is therefore unlikely to intercept groundwater. The Department further notes that neither the EPA nor Water Group raised concerns regarding the new dam.
- The Department further notes that there is an existing requirement in the consent which requires an operational Water Management Plan (WMP) to be in effect for the development and that the new dam will be operated in a manner consistent with the WMP.
- The amended modification does have the potential to generate noise within the site. However, as there is no intensification to production capacity and the nature of activities proposed under the amended modification being consistent with those already occurring it is considered unlikely that there would be any perceptible increases in noise emissions generated within the site. The Department notes the existing consent contains several conditions to manage and mitigate operational noise impacts and the Applicant has not proposed any amendments to the existing conditions of consent, including the consented noise limits. The Department is confident that the development can still achieve its consented noise limits.
- Due to the increase in overall roof catchment area the modification will change the surface water environment of the site. The Department notes that Water Group recommended a condition to ensure the additional stormwater generated is integrated into the existing stormwater management system. The Department supports this and is satisfied it is achievable as all proposed structures are located within the existing built footprint of the development and has recommended a condition in response to this advice.

New condition of consent to require the Applicant to review and update (as required) pre-operational management plans to the satisfaction of the Planning Secretary.

## Findings

## Recommendations

- The addition of six new buildings within the site could potentially generate visual impacts on surrounding sensitive receptors. The Department notes the proposed buildings are incorporated either within or directly adjacent to the existing building / structure envelopes within the site and receivers are located a significant distance from the site. Furthermore, the natural undulating topography and vegetation pattern of the locality make it unlikely that any receiver that can currently see the development would perceive any material change.
- Given the extensive nature of existing operations within the site, existing and proposed conditions of consent and the significant separation distance between the site and sensitive receivers the Department concludes the amended modification is unlikely to generate any notable impacts external to the site during operations.

### Retrospective Approval for Use of Storage Shed

- The Department has considered the increased size of the storage shed above the original approval and is satisfied that it will not compromise the operations of the site or the surrounding environment. The Department also considered the suitability of the shed to be used for general storage, including storing pumps and motors in support of the development's maintenance team. The Department considers the use to be consistent with the existing approvals for the development and overall site operations.
  - The Department notes that the Applicant will need to obtain an occupation certificate for the storage shed before its use is authorised.
- New condition requiring the Applicant to obtain an occupation certificate within three months of the date Modification 5 is approved.

## 6 Evaluation

The Department has assessed the amended modification in accordance with the relevant requirements of the EP&A Act.

The Applicant is proposing to modify the development to construct and operate a powered mobile equipment (PME) workshop, fabrication workshop, amenities building, bleached kraft pulp storage shed, additional general use storage shed and a new training building. The Applicant is also proposing to construct a new emergency water storage pond for processing water and seeks retrospective approval for the occupation of the already constructed storage shed.

The Department considers the amended modification is appropriate on the basis it:

- is substantially the same development as that originally approved
- would not result in additional environmental impacts beyond those already assessed and approved, including impacts associated with noise, dust, traffic and stormwater
- supports more efficient operations within the development.

The Department is satisfied that the amended modification should be approved, subject to conditions.

## 7 Recommendation

It is recommended that the Team Leader, as delegate of the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report
- **determines** that MP06\_0159-Mod-5 (as amended) falls within the scope of section 4.55(1A) of the EP&A Act
- **forms the opinion** under clause 30A(2)(c) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 that a BDAR is not required to be submitted with this modification as the modification will not increase the impact on biodiversity values on the site
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to approve the amended modification
- **modify** the consent 06\_0159
- **signs** the attached approval of the amended modification (**Appendix B**).

**Recommended by:**



**David Koppers**  
Senior Environmental Assessment Officer  
Industry Assessments

## 8 Determination

The recommendation is **Adopted** by:

 18 February 2022

**Joanna Bakopanos**

Team Leader

Industry Assessments

as delegate of the Minister for Planning

# Appendices

## Appendix A – List of Documents

The Department has relied upon the following key documents during its assessment of the modification:

### Amended Modification Application

- 'Tumut Pulp and Paper Mill – Modification Report 06\_0159' prepared by GHD Pty Ltd, Revision 4, dated 7 February 2022 - <https://www.planningportal.nsw.gov.au/major-projects/project/43241>

### Government Agency Advice

- <https://www.planningportal.nsw.gov.au/major-projects/project/43241>

### Department's Assessment Report for MP06\_0159

- <https://www.planningportal.nsw.gov.au/major-projects/project/24551>

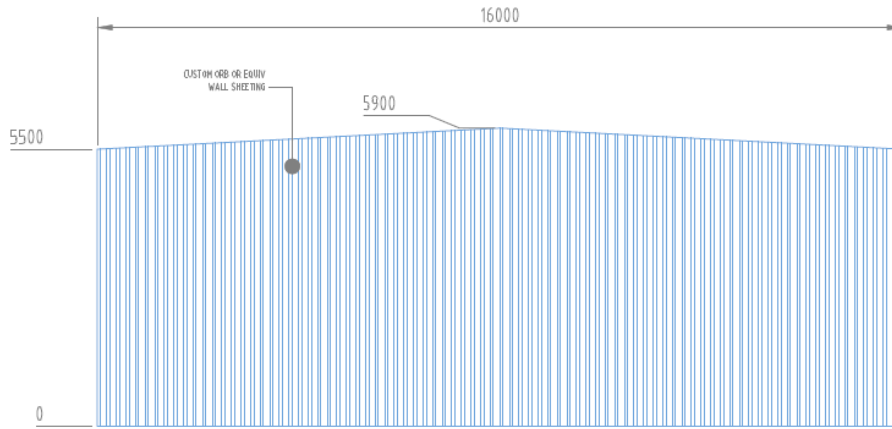
## Appendix B – Notice of Modification

## Appendix C – Consolidated Consent

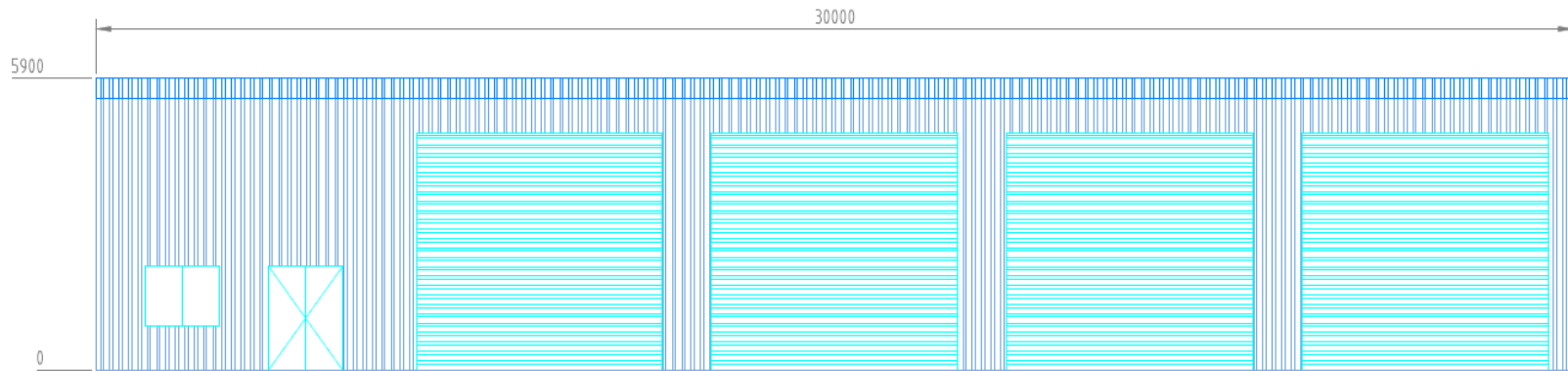
Appendix D – Proposed Development Plans

**Powered Machinery Equipment Workshop (ID 1#)**

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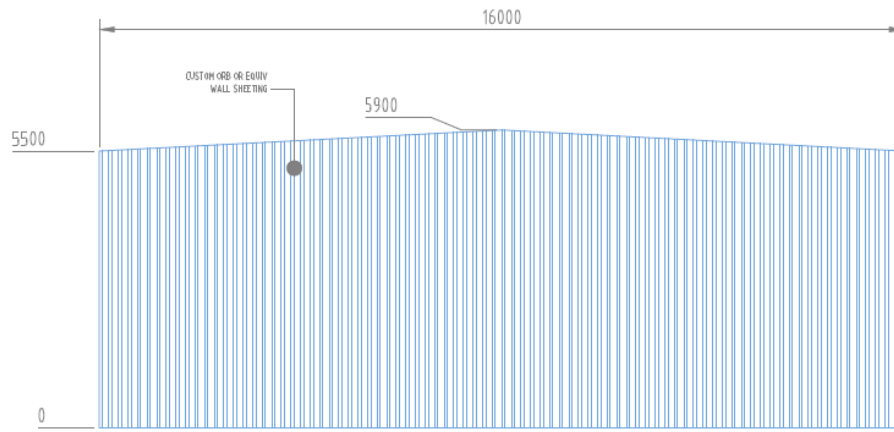
EAST ELEVATION



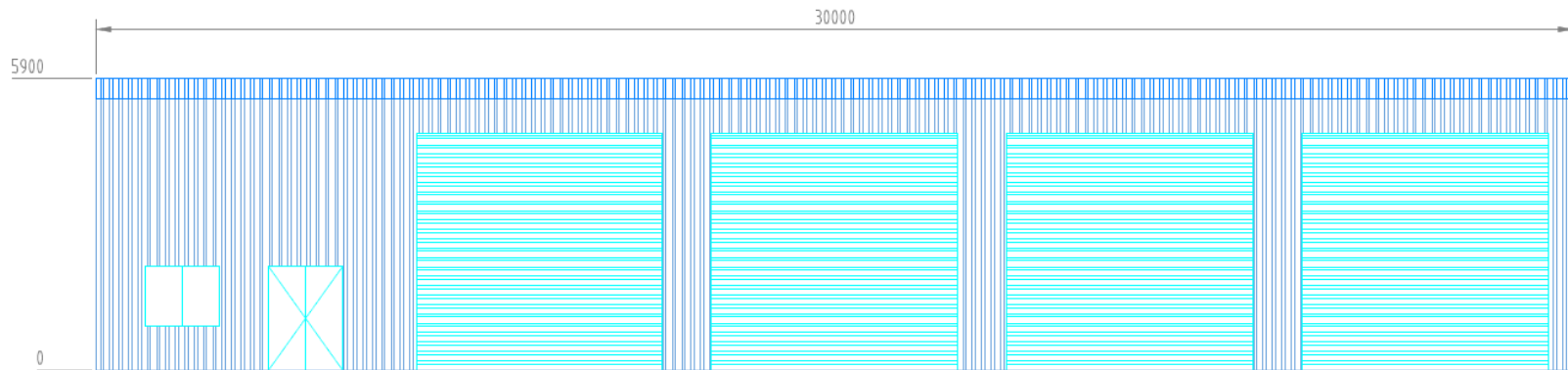
SOUTH ELEVATION

## Fabrication Workshop (ID 2#)

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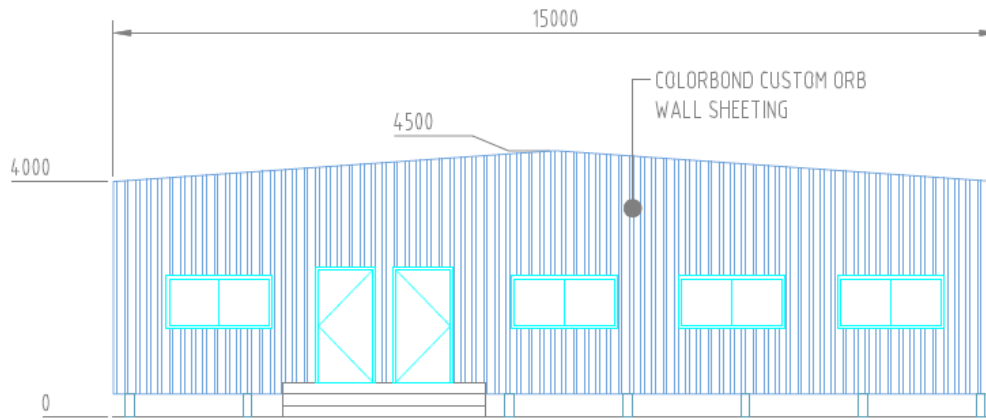


EAST ELEVATION

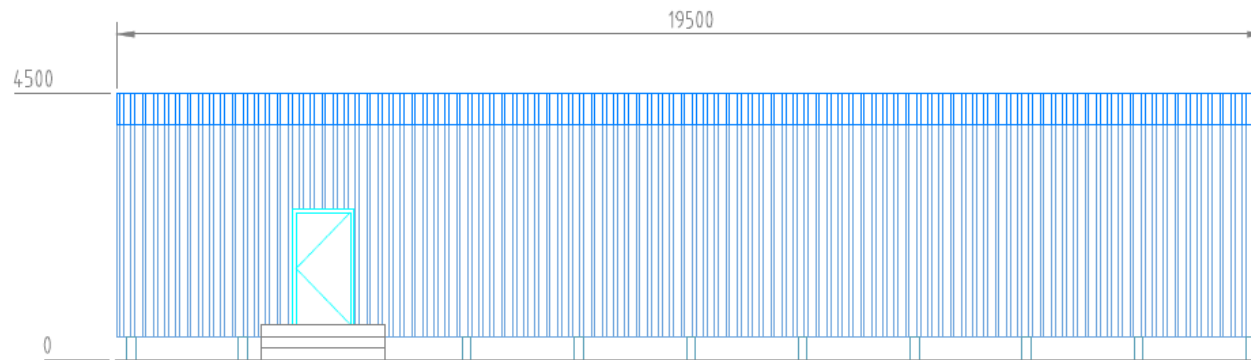


SOUTH ELEVATION

**Amenities Building / Multi-Purpose Building (ID 3#)**

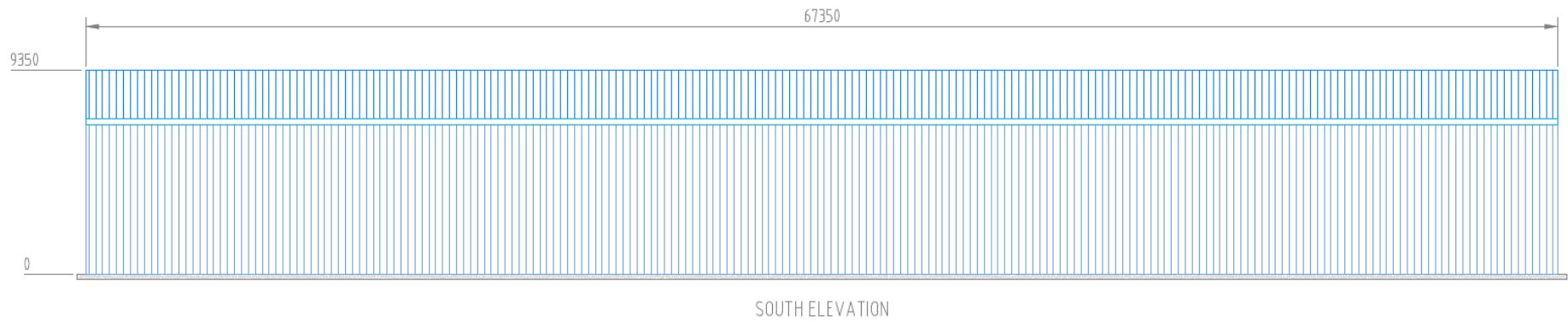
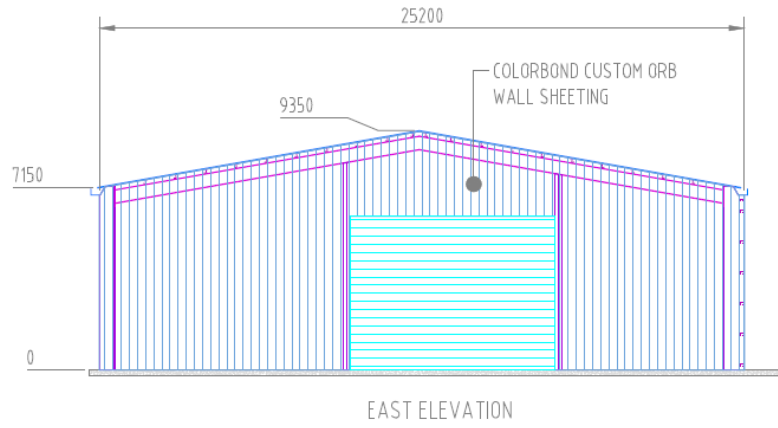


EAST ELEVATION

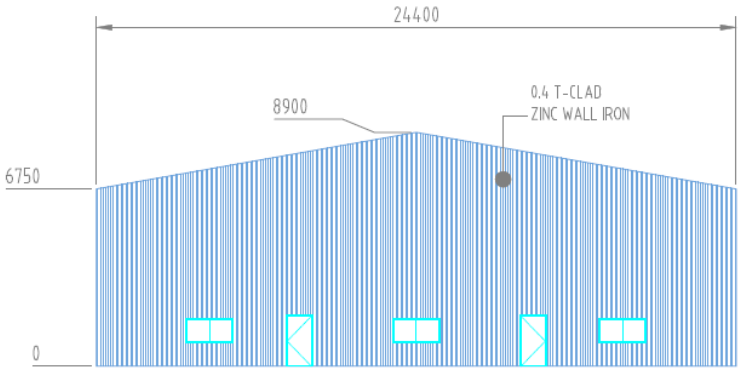


SOUTH ELEVATION

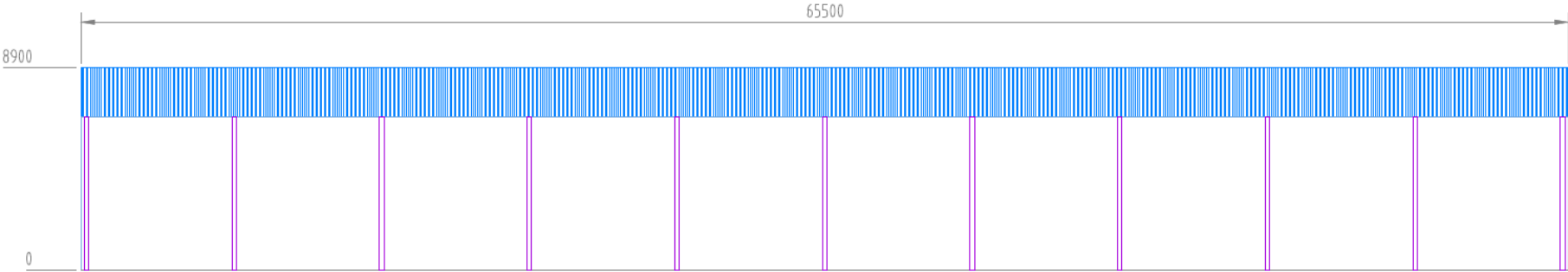
### **Bleached Kraft Pulp Storage Shed (ID 4#)**



**General Use Storage Shed (ID 5#)**

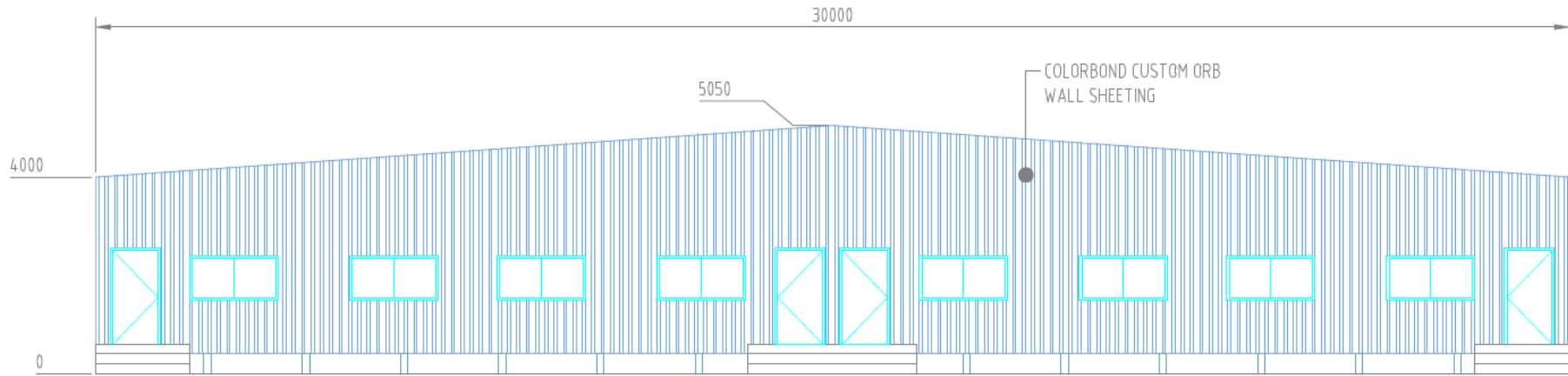


EAST ELEVATION

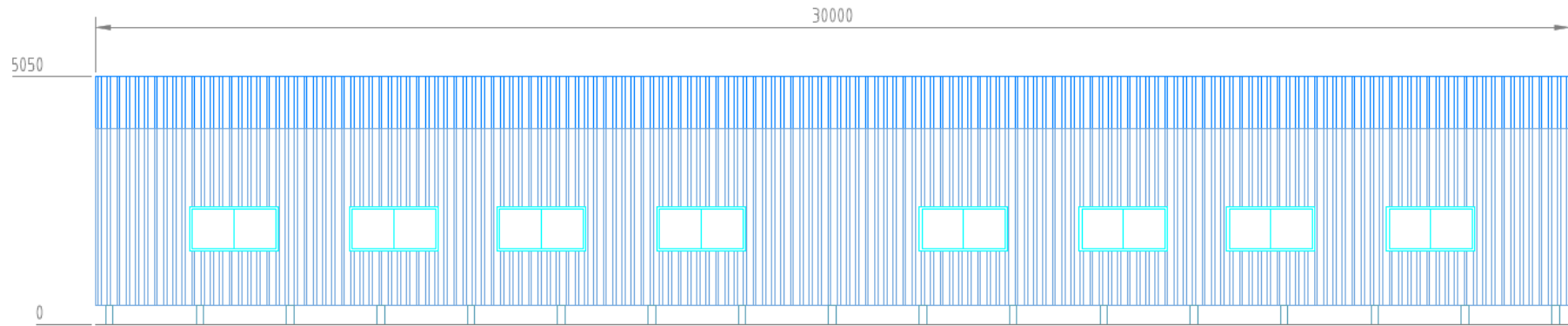


SOUTH ELEVATION

**Training Building (ID 6#)**

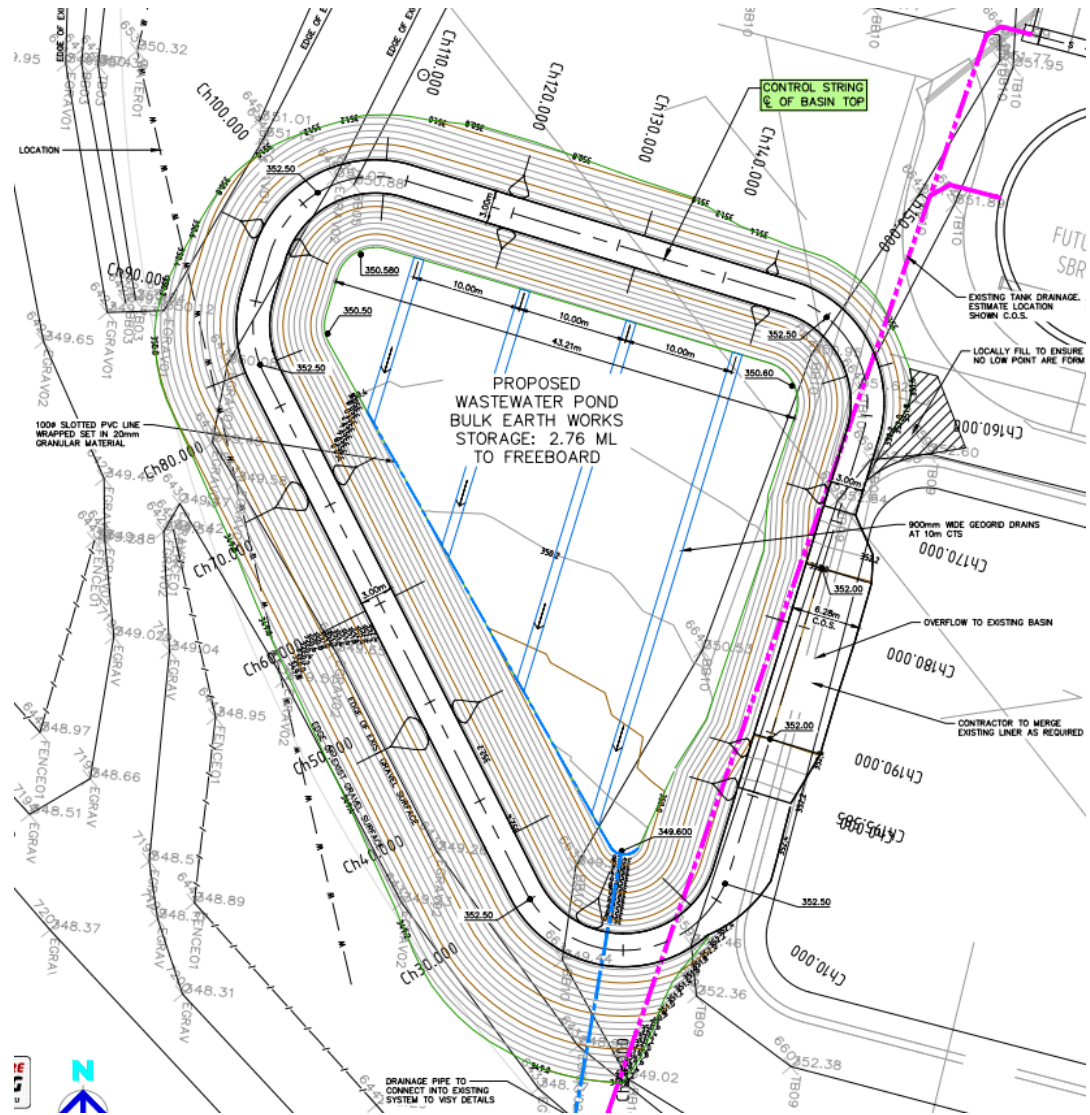


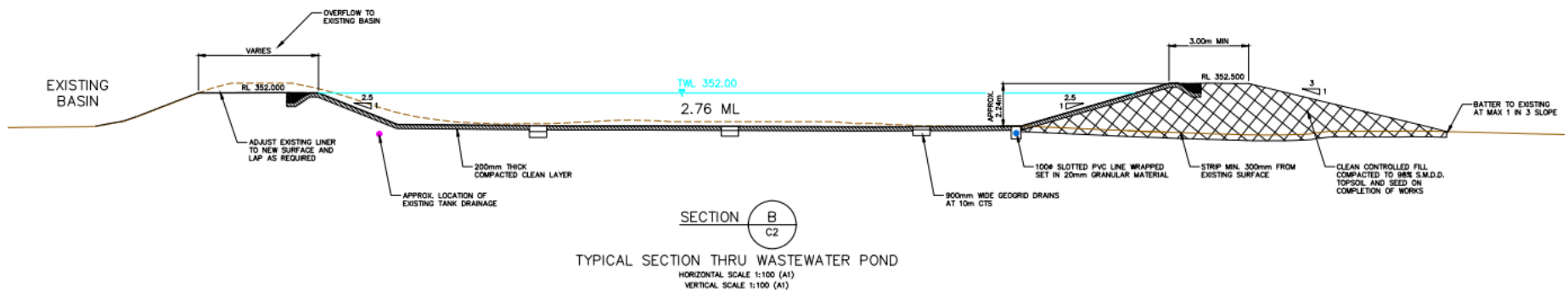
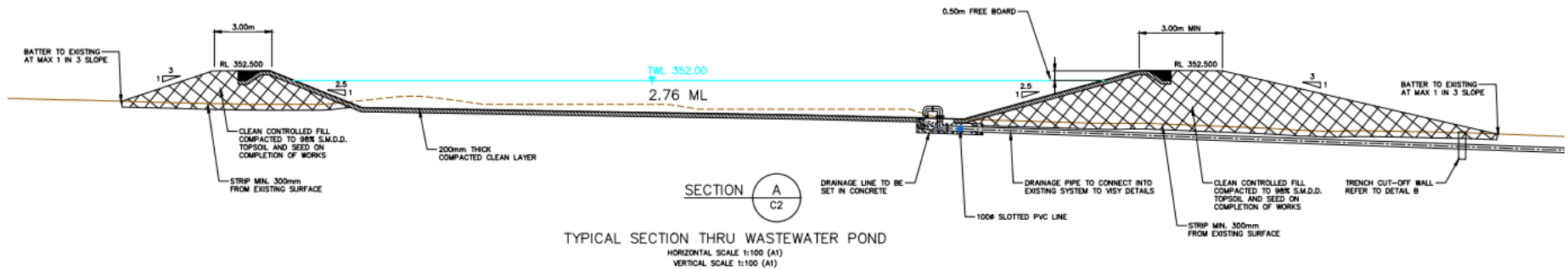
EAST ELEVATION



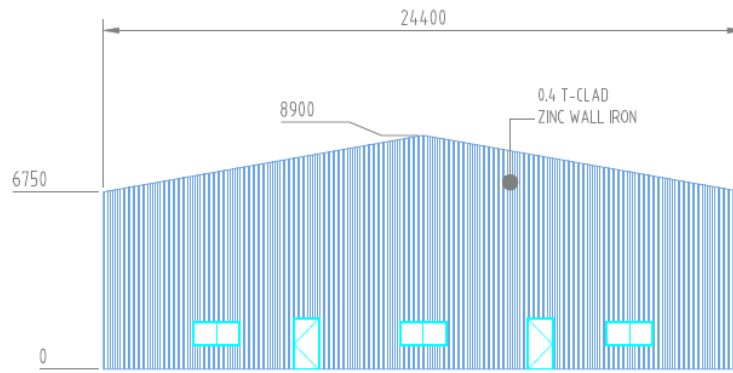
SOUTH ELEVATION

## Emergency Storage Dam for Process Water (ID 7#)

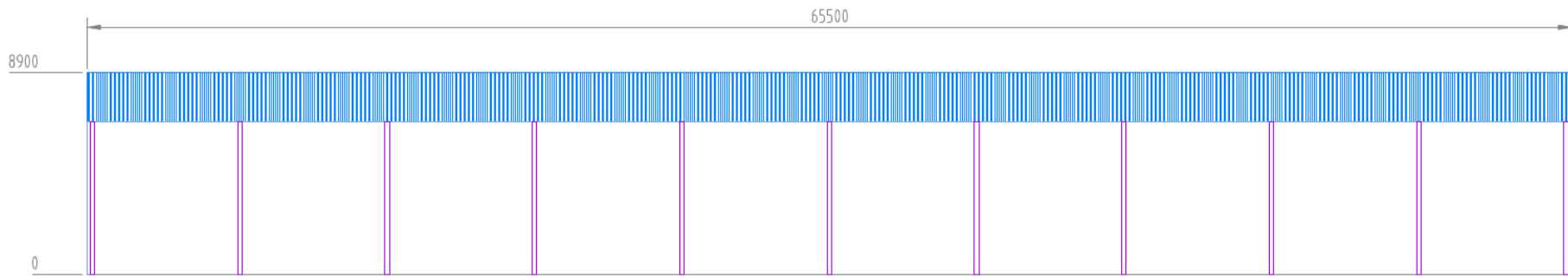




**Retrospective Existing Storage Shed (ID 8#)**



EAST ELEVATION



SOUTH ELEVATION