

Development Consent, Project and Concept Approval Compliance Status - November 2020

Reference	Approval or licence requirement	Auditing Notes from 2017	Evidence collected Nov 2018	Evidence collected Nov 2019	Evidence collected 2020	Audit Finding	Compliance status	Action Reference	Visy Comment
Development Consent (DA/S96/00598)									
Annual Reporting									
9	Is an annual report detailing the using of Non-Standard Fuels & with the required details to the DG?	Non-standard fuels not used since 2006	Annual Report Figures 2018, Fuel Feed tracking Columns, Indicates that pine bark, fines and chip are the current fuel feed. Similar products purchased from off site ie. saw mills. Cited EPA review of fuel feeds listed in the current EPL.	Annual Report 2019 Table 14 p28, Provides fuel feed tracking Columns, Indicates that pine bark, fines and chip are the current fuel feed. Similar products purchased from off site ie. saw mills. Cited EPA fuel feeds listed in the current EPL 2019.	Annual Report 2020 Table 14 p28, Provides fuel feed tracking. Table 14 Indicates that pine bark, fines and chip (87051 t) are the current power boiler fuel feeds. Similar products from off site ie. saw mills. Cited EPA fuel feeds listed in the current EPL 2020.	Non-Standard Fuels not used on site. The definition of fuels is now subject to new guidelines from NSW EPA "Eligible waste fuel guidelines" Dec 2016. This will require updates to both the EPL and the Consent. Negotiations are currently underway with NSW EPA (Pers Com Matt O). The EPL will need to be modified prior to the modification of the consent.	Compliant	N/A	
OEMP									
11	OEMP shall address: a) Identification of the statutory obligations b) role, responsibility, authority, accountability & reporting c) management measures/mitigation measures d) environmental management procedures e) monitoring, inspection & test plans f) audit requirements g) delegation of responsibility for breaches & receipt of PINs issues by EPA h) community consultation & nonfiction strategy	Sited version c November 2016, expect revision in 2017 for plant increase to 800,000t. Document address CoA for OEMP. Supported by subplans and procedures. Some not reviewed OoC2016/001	Cited OEMP Revision C dated 22 Nov 2017. Cited statutory obligations p11,12,13. Roles and responsibilities documented p16 and 17. Visy Portal lists organisational chart with current staff names. Management measures under the OEMP occur in various section. Some mitigation measures are in the OEMP but most are include in the subplans. Monitoring and inspection is dealt with generically in section 16 p27 and specific details are provided in the relevant subplans. Auditing addressed in sect 20 p31 and 32. Community consultation is dealt with in section 8.	Cited OEMP Revision C dated 29 Mar 2019. Cited statutory obligations p11,12,13. Roles and responsibilities documented p16 and 17. Visy Portal lists organisational chart with current staff names. Management measures under the OEMP occur in various section. Some mitigation measures are in the OEMP but most are include in the subplans. Monitoring and inspection is dealt with generically in section 16 p27 and specific details are provided in the relevant subplans. Auditing addressed in sect 20 p31 and 32. Community consultation is dealt with in section 8. Map added to section 1 indicating overall site area.	Cited OEMP Revision C dated 29 Mar 2019. Cited statutory obligations p11,12,13. Roles and responsibilities documented p16 and 17. Visy Portal lists organisational chart with current staff names. Management measures under the OEMP occur in various section. Some mitigation measures are in the OEMP but most are include in the subplans. Monitoring and inspection is dealt with generically in section 16 p27 and specific details are provided in the relevant subplans. Auditing addressed in sect 20 p31 and 32. Community consultation is dealt with in section 8. Map at section 1 indicating overall site area.	OEMP is current and up to date. The NSW DP&E Independent Audit Guidelines could be referenced section 20.	Compliant	N/A	
12	OEMP required to be reviewed annually by the preparation of an environmental report which analyses the results of monitoring required. The report shall review the performance of the plant against the relevant EMP's, the Conditions of Consent & other licences and approvals relating to operation of plant.	ECMR 2016 prepared as required by the OEMP. The ECMR should include a summary of outcomes comprising key risks and new targets for the next financial year. Identified targets should then be included in the revised OEMP. Ofi2016/001	Review of OEMP Revision C dated 22 Nov 2017 and Subplans. Annual report for 2017-18 examined for Odour Management, Noise Management, Traffic Management and Waste water Management. Some exceedances were identified and investigated for Odour.	Review of OEMP Revision C dated 29 Mar 2019 and Subplans. Subplans updated with legislative changes. Annual report for 2018-17 examined the same issues as the year before including Odour Management, Noise Management, Traffic Management and Waste water Management. Some exceedances were identified and investigated for Odour.	Review of OEMP Revision C dated 29 Mar 2019 and Subplans. Subplans updated with legislative changes. Annual report for 2019-20 examined the same issues as the year before including Odour Management, Noise Management, Traffic Management and Waste water Management. Some exceedances were identified and investigated for Odour.	OEMP was reviewed in March 2019 and reflects on the findings of previous ISO accreditation audit. The Annual Environmental Compliance and Monitoring Report 2020 addresses the requirements of the Consent management plans and the EPL.	Compliant	N/A	
12	Annual report shall include: a) review of effectiveness of environmental management of plant b) results of monitoring including interpretation by suitably qualified person c) discussion of actual performance d) listing of any variations obtained to approvals e) record of heavy vehicle movements f) set out environmental management targets for the next year	ECMR 2014, included relevant details. ECMR 2015, included relevant details. Targets to be more site specific and identify programmed initiatives.	The Visy Pulp and Paper Tumut Mill annual Environmental Compliance and Monitoring Report 2018 (ECMR 2018) cited . Results of the monitoring programs cited. The assessment of Environmental Management Targets (appendix 10) cited. Monitoring results are summarised in various section eg. section 3.9 Wastewater Management and appendices 7 & 8. Performance discussed in each relevant section, eg 3.3 Odour Management and Appendix 3. Variations to approvals is summarised in Table 1. Heavy Vehicle movement is discussed in section 3.5 and Appendix 6. Environmental management targets are discussed in section 1.8 and Appendix 10. EMM Consulting Attended Noise Monitoring Report Dated May 2018. Mc Mahon Earth Science, Farm and Environmental Monitoring Report Dated 2017/2018.	The Visy Pulp and Paper Tumut Mill annual Environmental Compliance and Monitoring Report 2019 (ECMR 2019) cited . Results of the monitoring programs cited. The assessment of Environmental Management Targets (appendix 10) cited. Monitoring results are summarised in various section eg. section 3.9 Wastewater Management and appendices 7 & 8. Performance discussed in each relevant section, eg 3.3 Odour Management and Appendix 3. Variations to approvals is summarised in Table 1. Heavy Vehicle movement is discussed in section 3.5 and Appendix 6. Environmental management targets are discussed in section 1.8 and Appendix 10. EMM Consulting Attended Noise Monitoring Report Dated May 2019. Mc Mahon Earth Science, Farm and Environmental Monitoring Report Dated 2019/2019.	The Visy Pulp and Paper Tumut Mill annual Environmental Compliance and Monitoring Report 2020 (ECMR 2020) cited. Results of the monitoring programs cited. The assessment of Environmental Management Targets (appendix 10) cited. Monitoring results are summarised in various section eg. section 3.9 Wastewater Management and appendices 7 & 8. Performance discussed in each relevant section, eg 3.3 Odour Management and Appendix 3. Variations to approvals is summarised in Table 1. Heavy Vehicle movement is discussed in section 3.5 and Appendix 6. Environmental management targets are discussed in section 1.8 and Appendix 10. EMM Consulting Attended Noise Monitoring Results January 2020. Mc Mahon Earth Science, Farm and Environmental Monitoring Report Dated 2019/2020.	The ECMR 2020 investigates the performance of the Mill against the targets, Consent and EPL as required. Sufficient detail is provided to support the discussion. Non conformances particularly in response to odour are investigated, described and discussed. Specialist reports or summaries there of are presented in the Appendices, eg. Farm Environmental Monitoring.	Compliant	N/A	
Hazard Management									
15	Has a report for incidents associated with operation &/or transport of the proposed development and with an actual or potential significant off-site impacts on people or environment been prepared and submitted to the Department within 24hrs?	Minor incidents and complaints only for past reporting period. No notifiable/reportable incidents for past twelve months, VAULT system. Complaints recorded through vault as complaints	VAULT system interrogated for serious incidents. Returned nil results. The ECMR provided a summary of complaints received in the reporting period.	VAULT system interrogated for serious incidents over the 2019 reporting period. Returned nil results. The VAULT system and subsequently the ECMR provided a summary of complaints received in the 2018/19reporting period.	No Major incidents recorded in reporting period as evidenced in Vault system. Nill reports to EPA or other agencies.	No incidents with a significant impact off site have occurred during the reporting period. Odour complaints numbered 48 for the year due to several technical issues. 1 Noise complaint was also received in August 2017.	Not triggered	N/A	

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25	Does the ONMP include: a) information on mitigation measures b) complaints handling, noise monitoring, reporting of complaints & response actions c) measures for dealing with low freq noise & extreme noise incidences?	As per previous 2016 audit. The noise management plan has been updated in 2017. In the next iteration cite the new NSW EPA Noise Policy for Industry 2017.	Noise Management Plan, 2017 Cited. Noise Mitigation Action Plan 2018 Cited	Noise Management Plan, July 2019 Cited. Minor editorial changes and legislative updates. Noise Mitigation Action Plan Oct 2019 Cited.	Noise Management Plan, July 2019 Cited. Progress on at house treatments achieved. Noise Mitigation Action Plan Nov 2020 Cited.	The Noise Management Plan 2019 addressed: a) In Section 6 b) In Section 8 c) In Section 6 - incidence recorded & the cause determined. Mitigation put in place and response given to complainant.	Compliant	In the next iteration cite the new NSW EPA Noise Policy for Industry 2017	
Air Quality									
26	Is the 'Best Available Technology' (BAT) for this type of pulp and paper mill being applied to achieve, at a minimum, compliance with the provision of the USEPA's NESHP limits?	BAT appear to be implemented. Sulphur levels reviewed and modified in liquor to minimise odours, recycled paper/fibre waste areas sealed and segregated to manage waste in 2017.	Air Quality Management Plan 2017 cited. Continuous Event Monitoring Systems (CEMS) exceedance summary 2018 Cited. Stack Sensor calibration records 2017 Cited Visy Pulp and Paper Emission Testing Report Ektimo 2018 Cited.	Air Quality Management Plan May 2019 cited. Continuous Event Monitoring Systems (CEMS) exceedance summary 2019 Cited. Stack Sensor calibration records 2019 Cited. Visy Pulp and Paper Emission Testing Report Ektimo Aug, Nov 2018 and Feb, May 2019 Cited.	Air Quality Management Plan May 2019 cited. Continuous Event Monitoring Systems (CEMS) exceedance summary 2020 Cited. Stack Sensor calibration records 2019 Cited. Visy Pulp and Paper Emission Testing Report Ektimo Aug, Dec 2019 and Feb, May 2020 Cited.	Visy employs CEMS for stack emissions at multiple locations on the plant. CEMS sensors are calibrated twice per year. Additional emissions monitoring also occurs twice per year. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmissions.	Compliant	N/A	
27	AQMP shall include - safeguards and procedures for dealing with all emission discharges, dust control and monitoring of odour	The 2016 audit found safeguards & procedures included in Section 6. Monitoring included in Section 7. All roads around site are sealed, visible dust is not leaving the site. Plan needed updating to reflect current concerns.	Air Quality Management Plan 2017 cited. ECMR 2018 Section 3.2 Cited	Air Quality Management Plan May 2019 cited. ECMR 2018-2019 Section 3.2 Cited. Feed liquor tank roof corrosion discovered Dec 17. Temp repairs effected. Roof replacement completed in March 2019. (\$500K). EPA correspondence to Craig Bretherton Jan 2018 cited re repairs above. Noticeable improvement in odour on site.	Air Quality Management Plan May 2019 cited. ECMR 2019-2020 Section 3.2 Cited.	Plan updated in May 2019 including minor updates and edits. The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emmissions.	Compliant	N/A	
29	Are all access roads and tracks constructed, designed and maintained in consultation with DLWC, and in accordance with the "Guidelines for the planning, construction and maintenance of tracks", Soil Con (1994)?	No tracks constructed, existing roads sealed and or compliant with CoA.	Observations from the site inspection conducted as part of the audit.	Observations from the site inspection conducted as part of the audit.	Road between weigh bridge and chipper replaced and widened with new concrete surface, site observation. No dust or scouring of road surfaces or drains observed.	No new access roads or tracks have been created in this reporting period. The main access roads are sealed. Additional concrete containment walls have been erected in the waste management area for Paper Machine Rejects (PMR).	Compliant	N/A	
30	Are forestry operations being carried out in accordance with the 'Forest code of practice for plantations on private lands in the SW slopes of NSW'?	The development of forestry on the site was not progressed.	Site observations and reference to aerial images.	Site observations and reference to aerial images.	Site observations and reference to aerial images.	No forestry has taken place on the subject land since the last audit.	Not triggered	N/A	
32	Have any earthwork structures for the storage of wastewater been undertaken? If so is it to the satisfaction of the DWLC?	A 3ML waste water pond was constructed at the plant due to wet weather. The pond held process water for 2 weeks during annual plant shutdown 2016. Survey and engineered plans were not produced for the structure. Liner requires upgrade, geotech and engineering signoff required.	Observations from the site inspection conducted as part of the audit.	Observations from the site inspection conducted as part of the audit.	Observations from the site inspection conducted as part of the audit.	A 3ML waste water pond constructed in 2016 to hold process water during annual plant shutdown. Survey and engineered plans not produced for the structure. Engineering signoff required. Planning has commenced to complete certification of dam and other waste water pond upgrades in next financial year (Pers Com Matt O).	Not-compliant	Have design reviewed by engineer, geotech completed and liner upgraded.	
Wastewater Management									
33	Are discharges of treated wastewater from the mill into Sandy Creek or any of its tributaries: a) have a average frequency of 1 in 10 or less b) permitted as per the EPL c) recorded - amount, duration & flow conditions	PA Approved discharges to Sandy Creek occurred in Oct and Nov 2016 due to wet conditions. Volumes and quality were monitored and were less than the discharged limits permitted in the EPL. Discharge occurred for 20 days in total.	Winter Storage Dam records 2016-2018 cited.	Winter Storage Dam records 2016-2019 cited.	Winter Storage Dam records 2016-2020 cited.	Winter storage dam was not more than 60% 2017, 40% 2018, 40% 2019 and 80% 2020. As such no need to discharge. Storage dam typically discharged when capacity nears 110%.	Not triggered	N/A	

34	WWMP shall include: a) crop management b) irrigation scheduling c) nutrient budgets d) salinity management measures e) site drainage control measures f) comprehensive soil details of areas proposed for irrigation g) measures to ensure maximisation of water recycling/reuse	While the WWMP has been updated it has not included the new 3ML waste water structure.	Water Management Plan VP9-10-10.3-PN-003 June 2017: Revision: Cited during the Audit.	Updated Water Management Plan MPL-TUM-ENV-007-2 June 2019: Revision, Cited during the Audit.	Updated Water Management Plan MPL-TUM-ENV-007-2 June 2019: Revision, Cited during the Audit.	WWM requirements are addressed in the WMP: a) sections 4.4, 6.3, 7.4 b) sections 4.4.4, 4.4.5, 4.4.5.8, 4.4.5.9, 6.3 c) sections 4.3.1, 4.3.2, 4.3.4, 4.4.1, 4.4.4, 4.4.5.2, 4.4.5.8, 6.3.2, Appendix 2 d) sections 4.4.1, 4.4.5.3, 4.4.5.9, 4.5.3 e) sections 4.1, 4.4.5 f) section 4.1.4, 4.2.4, 4.4.1, 4.3.4, 7.3.1.2 g) sections 4.2.1 WMP updated in 2019 now includes new 3ML waste water structure in Section 4.3.2.	Compliant		
35	Has monitoring indicated a water table rise in either the shallow or deep piezometer that exceeds an average 10cm per year over a 5 year period, &/or that the water table under the effluent irrigation area has risen within 2m of the land surface?	The dry winter in 2016 followed by a very wet spring produced a spike in GW levels that returned to normal over summer and autumn 2017.	ECMR 2018 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2017/2018 cited during the audit.	ECMR 2019 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2018/2019 cited during the audit.	ECMR 2020 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2019/2020 cited during the audit.	Ground water levels are stable or dropping in most piezometers. This is likely the result of below average rainfall over the last three reporting periods. May increase on the back of a wetter second half of 2020	Compliant	N/A	
36	Has a program to monitor groundwater salinity levels been prepared? Has there been any significant increases in salinity levels found attributable to the irrigation scheme? If so what methods have been implemented to avoid adverse impacts?	Monitoring & Measurement Table within Gadara Park Report 2016 No issues with salinity	ECMR 2018 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2017/2018 cited during the audit.	ECMR 2019 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2018/2019 cited during the audit.	ECMR 2020 cited during the audit. VISY TUMUT Farm and Environmental Monitoring Report 2019/2020 cited during the audit.	The reporting does not indicate an increase in soil salinity in the irrigation area or groundwater salinity as measures at the piezometers across the site as a consequence of irrigation.	Compliant	N/A	
37	Are those lands identified in the EIS for irrigation of effluent available for irrigation?	Site maps and observations indicate the site is suitable.	Site observations and aerial photography were cited during the audit.	Site observations and aerial photography were cited during the audit.	Site observations and aerial photography were cited during the audit.	Land identified in the EIS for irrigation is being used for irrigation with the exception of 20ha to the east of the centre pivots. This land is available but there is insufficient effluent to warrant its use	Compliant	N/A	
Surface Water & Storage									
38	SWMP shall include: a) areas potentially subject to contaminated stormwater runoff b) measures to prevent pollution of waterways c) proposed bunding for storage areas d) total run-off detention for flood mitigation e) provision for treatment of fire water on site, to prevent direct discharge offsite	The audit indicated the SWMP addressed: a) Section 4.5 b) Section 4.1 d) Section 4.2 e) Section 4.2 Stormwater system operating as planned and at capacity during the site audit	Water Management Plan VP9-10-10.3-PN-003 June 2017: Revision: Cited during the Audit.	Water Management Plan MPL-TUM-ENV-007-2 June 2019: Revision: Cited during the Audit.	Water Management Plan MPL-TUM-ENV-007-2 June 2019: Revision: Cited during the Audit. Un changed from previous year.	The audit indicated the SWMP addressed: a) Section 4.5 b) Section 4.1 d) Section 4.2 e) Section 4.2 The stormwater system was operating as planned during the site audit due to rainfall.	Compliant	N/A	
40	Has all uncontaminated surface runoff that has left site to the satisfaction of the DLWC?	Un-contaminated surface runoff that has left site has not caused scouring or damage to receiving waters, creek beds or banks.	Site observations and aerial photography were cited during the audit.	Site observations and aerial photography were cited during the audit.	Site observations and aerial photography were cited during the audit.	No scouring of waterways was observed at the time of the audit. Waterways accepting overland flow were generally grassed and or tree lined. Sandy Creek does have some historic cut bank erosion.	Compliant	N/A	
Solid Waste Management									
41	WMP shall include: a) details of solid wastes returning to the pulping process b) details of ongoing analysis & monitoring for solids being disposed by landfill c) details of investigations into beneficial reuse of purge fly ash & purge lime mud d) other measures to reduce amount of waste going to landfill	Plan updated in October 2017, and satisfactory. Reuse of fly ash is available through a waste exemption. Lime mud is recycled through the plant. Lime mud used for mine reclamation exemption in the Boorowa LGA at derelict Mine 1150t (Table 6 of WMP). Compliant		Plan updated in October 2017, and satisfactory. Reuse of fly ash is available through a waste exemption. Lime mud is recycled through the plant. Lime mud used for mine reclamation exemption in the Boorowa LGA at derelict Mine 1150t (Table 6 of WMP). Compliant	Plan updated in October 2017, and satisfactory. Reuse of fly ash is available through a waste exemption. Lime mud is recycled through the plant. Lime mud used for mine reclamation exemption in the Boorowa LGA at derelict Mine 1150t (Table 6 of WMP). Compliant	a) Section 4.2 of the WMP details the reuse of suitable solid waste in the pulping process as fuel and fibre sources. B) Section 3 of the WMP details the analysis and monitoring waste and identifies the waste disposed of to landfill. C) Section 4.2 of the WMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption. d) Section 5 of the WMP details the landfill diversion strategy that Visy are pursuing. Exemption and order now available for Dregs and Grits and boiler (bottom) sand.	Compliant	N/A	
Access & Traffic Management									
45A	Has the construction of the refuelling area and associated access road commenced? If so, have the plans: a) been prepared on consultation with council b) include details of onsite traffic management signage c) prepared to accommodate 36m articulated vehicles?	No work had commenced and the project and still not likely to proceed.	Site observations during the audit.	Site observations during the audit.	Site observations during the audit.	AS per 2019; No work has commenced the construction of the refuelling area and associated access road is not likely to proceed.	Compliant	N/A	
46	Is all access to site via the new intersection & access road?	Yes as at the time of the 2014, 2015 and 2016 audits.	Site observations at the time of the Audit.	Site observations at the time of the Audit.	Site observations at the time of the Audit.	Yes the upgraded intersection and access road form the Snowy Mountains Highway is the site access.	Compliant	N/A	
47	Has there been any night time (2200-0700) semi-trailer or B-double truck movements to and from the plant via Snow Mountains Highway through Adelong?	No out of curfew movements for the 2016/17 reporting period.	Monthly heavy vehicle movement data for 17/18 cited during the audit. ECMR cited during the audit.	Monthly heavy vehicle movement data for 18/19 cited during the audit. ECMR cited during the audit.	Monthly heavy vehicle movement data for 19/20 cited during the audit. ECMR cited during the audit.	Based on the records examined semi-trailer or B-double truck movements to and from the plant through Adelong between 2200 and 0700 have not occurred.	Compliant	N/A	

48	Has MR280 north of Adelong been upgraded to give B-double access? Has this route been used by semi-trailers or B-doubles to and from the plant?	No recorded truck movements No upgrade has occurred	Monthly heavy vehicle movement data for 17/18 cited during the audit. ECMR cited during the audit.	Monthly heavy vehicle movement data for 18/19 cited during the audit. ECMR cited during the audit.	Monthly heavy vehicle movement data for 19/20 cited during the audit. ECMR cited during the audit.	No truck movements on MR280 north of Adelong are recorded. No upgrade of MR280 north of Adelong has occurred.	Compliant	N/A	
49	Is transport of waste restricted to SH4, Boonderoo Rd and MR280?	Waste travels on Gocup Road and the Snowy Mountains Highway to facilities north of Tumut.	Waste removal records cited at the time of the audit.	Waste removal records cited at the time of the audit, Nov 18, Feb 19, May 19.	Waste removal records cited at the time of the audit, Sept 19, Oct 19, Feb 20, Mar 20, May 2020.	Waste travels on Gocup Road and the Snowy Mountains Highway to facilities north of Tumut.	Compliant	Recommend removing condition	
50	Prior to construction of refuelling area, has a revised TMP been prepared that includes: a) records of all heavy vehicles (>3tonne) entering or leaving site - times and access routes b) measures to reduce sleep disturbances in built up areas c) measures to reduce other impacts in built up areas - movement through town, parking, etc d) measures to ensure plan is implemented e) measures to ensure drivers are aware of any provisions & restrictions associated with the utilisation of the refuelling facility f) proposed onsite traffic signage	No construction has occurred	Site observations during the audit.	Site observations during the audit.	Site observations during the audit.	No work has commenced the construction of the refuelling area and associated access road is not likely to proceed.	Compliant	N/A	
52	Does Visy participate in any relevant committees established to investigate transport infrastructure initiatives?	As at 2014 - 2016 Visy is a member of South West Slopes Softwoods Working Group (SWSWG) & Forestry Industry Council (FIC) - both include RMS memberships to improve the maintenance, standards & safety along the main haulage road	SWSWG web site cited (http://www.swg.org.au/index.php/members-supporters.html). FIC web site cited (http://forestindustrycouncil.com.au/members/)	SWSWG web site could not be cited (http://www.swg.org.au/index.php/members-supporters.html) link not supported. FIC web site cited (http://forestindustrycouncil.com.au/members/)	SWSWG web site could not be cited (http://www.swg.org.au/index.php/members-supporters.html) link not supported. FIC web site cited (http://forestindustrycouncil.com.au/members/)	Visy is listed as a member of South West Slopes Softwoods Working Group (SWSWG) & Forestry Industry Council (FIC) - focussed on improve the maintenance, standards & safety along the main haulage road.	Compliant	N/A	
Landscape & Vegetation Management									
54	LMP shall be integrated with the NVMP and include: a) existing landforms & final landforms b) proposals for the irrigation areas & softwood plantations c) planting species, purpose, maintenance requirements, irrigation req & illustration of typical visual character d) location of all hard & soft landscaping features e) program for staged work & maintenance of all landscaping & rehab works	The Native Vegetation Management Plan (NVMP) was reviewed and updated in November 2015. Appendix H was added and includes a monitoring and maintenance checklist. This new addition to the NVMP was send to TSC and OEH for their review. Both TSC and OEH endorsed the changes.	The LMP and NVMP, VP9-10-10.3-PN-005, Oct 2017 cited	The LMP and NVMP, MPL-TUM-ENV-003-2, Landscape and Native Vegetation Management Plan, June 2019 cited.	The LMP and NVMP, MPL-TUM-ENV-003-2, Landscape and Native Vegetation Management Plan, June 2019 cited. No changes made in 2019/20 to the plans.	The LMP and NVMP are integrated and were reviewed and updated in Oct 17. Pre-existing and final landforms landforms are described. Irrigations of softwood plantations has not occurred on site. Irrigation areas fully described in the Water Management Plan. Planting species and purpose are described in section 2 and app B, maintenance in section 3 and App G+H, illustrations are shown in App D,E+F. Existing and planted vegetations is described in Appendix A, C + F. Revegetation is described in app A + F.	Compliant	N/A	
55	NVMP shall include: a) retained native veg is appropriately fenced & signposted to exclude stock b) large HBT's shall be retained where possible c) native veg buffers are retained 50m to each side of Sandy Creek & 20m to each side of major drainage depressions d) indigenous plant species used for site reveg	New plantings were undertaken at the South Highway Block in 2016 with approximately 1500 new trees planted in the southern section of the rehabilitation area. This planting represents part of the 11ha that are planned to be rehabilitated along an existing drainage line. Fencing is in the progress of being established.	Site inspection at the time of the audit and aerial photography.	Site inspection at the time of the audit and aerial photography.	Site inspection at the time of the audit and aerial photography.	Vegetation established continues to grow taking advantage of a wetter winterin 2020. No plantings in 2017-2020. Retained vegetation is fenced with appropriate signage. Large HBT have been retained and interspersed with plantings to promote connectivity. The creeks have been fenced on both sides and the buffer generally exceeds 50m, smaller drainage depressions have been fenced and revegetated with native trees and shrubs. No fire impact durring 19/20 summer. No significant losses. Yes, the plan is incorporated in the OEMP.	Compliant	N/A	
	Is the plan incorporated in OEMP?	Yes	OEMP cited at time of the audit	OEMP cited at time of the audit	OEMP cited at time of the audit	Yes, the plan is incorporated in the OEMP.	Compliant	N/A	
Monitoring									
57	A detailed monitoring program shall include: a) provisions for monitoring the implementation & effectiveness of MP's required by the consent b) sampling locations, frequencies & parameters to be tested c) characteristics of existing env - i.e. ambient air levels d) timing of monitoring reports	Monitoring is described in the OEMP, subplans and EPL. ECMR and annual return details the results of the monitoring.		Monitoring is described in the OEMP, subplans and EPL. ECMR and annual return details the results of the monitoring.	Monitoring is described in the OEMP, subplans and EPL. ECMR and annual return details the results of the monitoring.	The OEMP details the need for monitoring and references the Monitoring and Measurement Schedule (VP9-10-10.5-OP-001-A01). The schedule details monitoring and also references a number of other subplans. The schedule and subplans detail the location and methods for monitoring, evaluation criteria and reporting requirements.	Compliant	N/A	
	Is a NATA accredited lab being used for monitoring analysis?	All labs NATA accredited, CSU NATA 9597, Ektimo Air NATA 14601, EMM Noise use NATA accredited labs to calibrate metres.	ECMR 2019 and monitoring reports was cited at the time of the audit. NATA web site accessed for Lab certifications.	Ektimo - NATA Cert No. 14601 CSU Lab - NATA Cert No. 9597	Ektimo - NATA Cert No. 14601 CSU Lab - NATA Cert No. 9597	NATA certificates were cited for calibration of the noise meter. EKTIMO NATA certification cited at https://www.nata.com.au/entity_scope/?q1=bb7&str=&&BEName=EKTIMO . McMahon NATA Certification Cited at https://www.nata.com.au/entity_scope/?q1=2ku&str=&&BEName=DM%20McMahon . CSU EAL NATA Certification Cited at https://www.nata.com.au/entity_scope/?q1=7ee	Compliant	N/A	

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69	Are all monitoring results arising from the DA conditions being submitted annually to EPA, DLWC, the Council & the community consultative committee?	Results sent to NSW EPA, Office of water, Snowy Valleys Council, Coms committee, email cited 10 Nov 2016	Email submitting ECMR to EPA, DP&E and Council dated 13th September 2018 cited. EPL Annual Return submission Receipt cited Dated 29 Aug 2018.	Email submitting ECMR to EPA, DP&E and Council dated 19 Nov 2019 cited. EPL Annual Return submission Receipt cited Dated Aug 2019.	Email submitting ECMR to EPA, DP&E and Council dated Nov 2020 cited. EPL Annual Return submission Receipt cited 2020.	Results sent to NSW EPA, Office of water, Snowy Valleys Council, Coms committee, email cited Nov 2020	Compliant	N/A	
70	Are monitoring results made available to DG upon request?	Under POEO Act, Visy are required to publish monitoring results on website: visy.com.au/sustainability/environment-sustainability/monitoring-data	Email submitting ECMR to EPA, DP&E and Council dated 13th September 2018 cited.	Email submitting ECMR to EPA, DP&E and Council dated 19 Nov 2019 cited.	Email submitting ECMR to EPA, DP&E and Council dated 19 Nov 2019 cited.	Yes, results forwarded to DP&E, email cited Nov 2019.	Compliant	N/A	
Independent Environmental Audit									
71	Is an annual independent environmental audit being undertaken?	NGH Environmental conducted audit in 2014, 2015, 2016, 2017. Refer to PA 3.16	Past Environmental reports for 2016, 2017 cited.	Past Environmental reports for 2016, 2017, 2018 cited.	Past Environmental reports for 2016, 2017, 2018, 2019, 2020 cited.	NGH Environmental conducted audit in November 2017. Refer to PA 3.16	Compliant	N/A	
71A	Are 12 monthly independent audits being undertaken on the use of Non-Standard Fuels?	Non-standard fuels not utilised since EMCR (2006) reports cessation of use.	ECMR 2006 report Cited.	ECMR 2016-2018 report Cited.	ECMR 2016-2020 report Cited.	Non-standard fuels not in use.	Not triggered	N/A	
Community Consultation									
72	Is a community consultative committee established? If so, what are the details - frequency of meetings, how issues raised are dealt with, who are the representatives?	Yes, two monthly meetings, local reps, chamber of commerce and TSC. Minutes sited for 6 June 17. Plant operation and additional information, responses to enquiries and complaints.	Minutes sited for 6 Feb 2018. Minutes sited for 17 April 2018. Minutes sited for 7 June 2018.	Minutes sited for December 2018. Minutes sited for August 2019.	Minutes sited for October and December 2019. Minutes sited for Feb and June 2020.	Yes, two monthly meetings, local reps, chamber of commerce and TSC. Plant operation and additional information, responses to enquiries and complaints.	Compliant	N/A	
73	Is a telephone service being operated, maintained & promoted that allows members of the public to report unacceptable noise or air quality impacts?	Number maintained and advertised through web site, signage minutes of CCC.	Web site listed phone number cited at https://www.visy.com.au/env-appv-mgmt-plan/	Web site listed phone number cited at https://www.visy.com.au/env-appv-mgmt-plan/	Web site listed phone number cited at https://www.visy.com.au/env-appv-mgmt-plan/	Number maintained and advertised through web site, signage minutes of CCC.	Compliant	N/A	
74	Is a complaints register being maintained with adequate detail?	ECMR Appendix 9 Yes, and electronically managed in Vault.	ECMR 2018 appendix 9 cited.	Register maintained in Vault, Cited at the time of the audit. ECMR 2019 appendix 9 cited.	Register maintained in Vault, Cited at the time of the audit. ECMR 2019 appendix 9 cited.	A complaint resisted is being maintained and electronically managed in Vault. It has sufficient detail to record track and manage complaints.	Compliant	N/A	
75	Has the effectiveness and the degree of public satisfaction with the complaints service been audited?	Environmental manager direct feedback records sited. Compliant.	Email cited from member of the community 15 Dec 2017.	Response from SVC Mayor to response on odour compliant cited.	Emailed response to complaints cited.	No, however direct feedback from the public is sort with each complaint.	Compliant	Consolidate CoA	
76	Is Visy providing a copy of the complaints register every 3 months to Council & EPA & accompanied by an internal audit report of the system?	3 monthly audit undertaken & provide Council & EPA - this includes a copy of complaints register Internal Audit Report of the Complaints System (59)	Email to regulators cited 20 Mar 2018. Complaints Audit Report #73 dated Nov 17 to Jan 18 to regulators Cited	Email to regulators cited 26 Nov 2019. Complaints Audit Report #79 dated Nov 17 to Jan 18 to regulators Cited	Email to regulators cited 26 Nov 2019. Complaints Audit Report #79 dated Nov 19 to Jan 20 to regulators Cited	Complaints for the 1/4 forwarded with summation and analysis of the type and probable caused of complaint.	Compliant	N/A	
Archaeology & Heritage									
77	Has the recommendations from the Cultural Heritage Assessment been implemented to the satisfaction of the DG?	Homestead works on hold pending budget provisions. Site maintained and kept free of vegetation, vermin and other erosive elements.	Site observations at the time of the Audit.	Site observations at the time of the Audit.	Site observations at the time of the Audit.	No new works this reporting period due to lack of funding and availability of resources. Further works planned for next reporting period (Pers Com Matt O).	Compliant	N/A	
80	Has any Aboriginal artefacts been identified during operation of the mill? If so, were the correct procedures & reporting undertaken?	None noted in the 2014, 2015, 2016 and 2017 audit findings.	Pers Comm HSE Manager at the time of the audit.	Pers Comm HSE Manager at the time of the audit.	Pers Comm HSE Manager at the time of the audit.	No Aboriginal objects have been reported in the last twelve months.	Compliant	N/A	
Fire Fighting Control									
82	Is a 4WD Fire Tanker with 3600L water carrying capacity on site?	Yes, pink slip sited 16/11/16. Compliant	Fire tanker sited at the time of the audit. Pink slip dated 31/10/2017 cited at the time of the audit.	Pink slip dated 30/9/2019 cited at the time of the audit.	Water tanker cited at the time of the audit, pink slip obtained for fire tanker to	Isuzu Fire tanker available on site. Estimated volume 3600L. Pink slip obtained for fire tanker to ensure servcability.	Compliant	N/A	
83	Is the tanker available to the Gilmore Bush Fire Brigade?	Visy's EO reports the Fire tanker is available for use by Gilmore Bush Fire Brigade when required. Brigade captain services the unite as required.	Pers Comm HSE Manager at the time of the audit. The Unit is labelled with Gilmore Fire Brigade.	Pers Comm HSE Manager at the time of the audit. The Unit is labelled with Gilmore Fire Brigade.	Pers Comm HSE Manager at the time of the audit. The Unit is labelled with Gilmore Fire Brigade.	The tanker is available on request.	Compliant	N/A	
84	Is there a minimum of 10 staff that have received Rural Fire Service basic fire fighter standard training available? Is a minimum of 1 staff member with advanced fire fighter standard competency training available?	16 with Structural Fire Fighting Training which equivalent to advanced bush fire fighting training. Staff also members of RFS. Fire training log sited.	Training Logs dated 2013 -2014 cited at the time of the audit. Student register cited for IRT August 2018.	Training Logs dated 2013 -2014 cited at the time of the audit. Student register cited for IRT August 2018. June 2019 training record Cited.	Student register cited for IRT August 2019. June 2020 training record Cited. Exposure to 2019/2020 bushfire noted for several staff.	Internal training completed. In addition to existing members on the Visy staff trained six new members completed training in Aug 2018.	Compliant	N/A	
85	Is the maintenance of bush fire fighting equipment at all times in accordance with current bush fire control and safety practice & in consultation with TSC Fire Control Officer?	Trucks serviced every 12 months including fire fighting equipment ERT inspect truck & equipment every 3 weeks during training sessions Viewed training register	Training Records for September 2013-14 cited at the time of the Audit	Monthly training includes fire tanker inspections. Training records Cited.	Monthly training includes fire tanker inspections. Training records Cited.	As per the 2016 audit ERT training includes tanker maintenance review and checks. Tanker being taken from shed for training at time of audit.	Compliant	N/A	
Environmental Officer									

88	Is the Environmental Officer that is appointed qualifications acceptable to the DG?	Matthew O'Donovan was accepted by the DG prior to appointment and is still employed as EO at Visy.	M Donovan's submission to DP&E 11 December 2012 Cited.	Matt Donovan is still the primary. Pelin Beklenoglu will be nominated to the DG in the next reporting period.	Matt Donovan is still the primary. Pelin Beklenoglu leaving Visy to go to Qld, replacement to be sort.	Matthew O'Donovan is the HSE manager. Pelin Beklenoglu has completed the probationary period and will be nominated to the DG. Pelins qualifications include Ba Biological Science and Masters of Environmental Management - Sustainable Development.	Compliant	Pelin Beklenoglu will be nominated to the DG in the next reporting period.	
Cooling Tower									
90	Does the operation of the cooling tower comply with AS3666 - 1995 & with microbial control provisions of the Public Health Act, 1991 & Regulations?	Cooling towers maintained monthly. September 2016 report cited. Compliant.	Buckman Laboratories Cooling Tower Water Testing Reports February 2018, March 2018 and April 2018 cited.	Buckman Laboratories Cooling Tower Water Testing Reports April May June Aug 2019 cited.	Buckman Laboratories Cooling Tower Water Testing Reports Q4 2019 and Q3 2020 And testing reports Aug 19 and July 2019.	Cooling towers maintained and monitored continuously. Weekly testing of waters sampled is conducted by Buckman Laboratories and reported monthly. No exceedances noted for the reporting period.	Compliant	N/A	
Compliance with Dangerous Goods Act									
91	Compliance with Dangerous Goods Act 1975?	Three outstanding issues currently being addressed, down from 9 same time last year. Plan in place and being addressed. Compliant.	Advitech Hazardous Chemical Review Cited 2018.	Advitech Hazardous Chemical Review Cited Nov 2018.	Observations during audit, dangerous goods stored, banded, recorded (Chem Watch) and labelled as per previous audit.	Visy now has an annual Hazard review process in place to identify issues and propose solutions	Compliant	N/A	
Traffic Noise									
93	Have Mr & Mrs Beale & Mr F Dutton requested any window or acoustic barrier treatments? If so what has been done?	Dutton residence has been sold to Steunkal. Beal residence has been demolished & relocated.	Pers Com HSE Manager. Google images of Beal Residence 2006 and present.	Pers Com HSE Manager. Google images of Beal Residence 2006 and present.	Pers Com HSE Manager. Google images of Beal Residence 2006 and present.	Dutton residence sold to Steunkal has been resold to a third party. That Party is unknown. Beal residence was demolished.	Compliant	Ofi 2017/005, Consolidate or remove condition	
Public Notification of Wastewater Discharge									
94	Has Visy given public notice of any impending wastewater discharge from its wastewater storages including those persons downstream of the site?	Nil discharges in this reporting season.	EPL Annual Return 2018 Cited. Records for Winter storage dam cited.	EPL Annual Return 2018/19 Cited. Records for Winter storage dam cited.	EPL Annual Return 2019/20 Cited. Records for Winter storage dam cited.	Nil discharges in this reporting season.	Not triggered	N/A	
Truck Scheduling									
95	Has a truck scheduling been submitted to the DG & how often is it required to be reviewed? Show evidence of the review	Submitted as part of ECMR 2015 Table of predicted vs actual Reviewed annually as part of ECMR	ECMR 2018 ch 3.5 and Appendix 6 cited at the time of the audit.	ECMR 2019 ch 3.5 and Appendix 6 cited at the time of the audit.	ECMR 2020 ch 3.5 and Appendix 6 cited at the time of the audit.	Heavy vehicle movements submitted to DP&E on an annual basis in the ECMR. Figures are reviewed annually as part of the ECMR preparation. Truck movements minimised between WW and the Mill by backloading with white pulp. White pulp trained from Port (Sydney/Melbourne) to Wagga Wagga reducing HV numbers on the Hume Highway.	Compliant	N/A	
Process Water Reuse									
96	How often is the process water use report required to be reviewed? Show evidence of reviews	Process water reuse was reviewed by a site process engineer on 26th November 2015. This review was submitted to D&PE on 1st December 2015.	Email submitting review to D&PE on 1st December 2015 cited.	Process Water internal review completed in Dec 2018.	Process Water internal review completed in Dec 2018.	Process water reuse was reviewed by a site process engineer on December 2018. This review was submitted to D&PE on 11th Jan 2019.	Compliant	N/A	
Concept Approval CA06_0159									
Administrative Conditions									
1.1	Is the project being carried out generally in accordance with: a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, NSW, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) e) the Statement of Commitments f) Tumut mill expansion - Project component phasing changes (Jun 2007)	No new phases of the project have commenced Statement of Commitments revisited in last audit	Observations at the time of the audit and Perscom HSE manager.	Observations at the time of the audit and Perscom HSE manager.	Observations at the time of the audit and Perscom HSE manager.	No new phases of the project were observed to have commenced. Statement of Commitments revisited in last audit. Compliant.	Compliant	N/A	
1.3	Have there been any inconsistencies with this approval or any other approvals?	Several inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) and are still outstanding. A plan exists for modification of CoA where inconsistencies occur, however, other planning issues have precedence.	Previous audits and this audit.	Previous audits and this audit.	Previous audits and this audit.	Several inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) and are still outstanding. A plan exists for modification of CoA where inconsistencies occur, however, other planning issues have precedence.	Not-compliant	Inconsistent CoA's flagged with DP&E, action in 2018.	In progress DPE are willing to discuss. GHD have prepared initial advice.
Compliance Monitoring & Tracking									
3	Has a compliance tracking program been developed & implemented that includes: a) periodic review b) periodic reporting to relevant approval authorities c) a program for independent environmental auditing d) means of rectifying non-compliances identified e) provisions & framework that demonstrates the regulatory interactions between approval instruments & licences	ECMR and internal audit is the periodic review of CoA compliance. The ECMR is submitted to DP&I, TSC & EPA each year. Environmental audit currently occurring annually & submitted to DP&I via email.	ECMR 2018, EPL Annual Return 2018 and previous Independent Audit 2017 cited.	ECMR 2019, EPL Annual Return 2019 and previous Independent Audit 2018 cited.	ECMR 2020, EPL Annual Return 2020 and previous Independent Audit 2019 cited.	a) periodic review using ECMR, EPL Annual Return. b) Annual EPL report and provision of EMR to relevant authorities cited. c) Independent Auditing required and completed annually d) Non-compliances added to targets for subsequent years or immediate correction. e) EMR and management plans Compliant	Compliant	N/A	
Community Information Consultation & Involvement									

4.1	Is Visy continuing to participate with the Community Consultation Committee?	Meetings held every 2 months & every 2nd meeting is open to public. Motions are noted & minuted, assigned to a person who follows up & provides feedback at next meeting. Reps - council, Landcare, Tumut Chamber of Commerce, Neighbour, etc Refer to PA 4.1	Minutes of the June 2018 meeting cited.	Minutes of the 2018/2019 meetings cited.	Minutes of the 2019/2020 meetings cited.	Visy are holding quarterly CCC meetings, minutes cited. Compliant.	Compliant	N/A	
4.2	Is a telephone number, postal address & email address available for community complaints & displayed on a sign near the entrance to site?	Yes, 2014 and 2015 audit found contact number advertised on sign, on minutes & on website.	Observations on Site. OEMP. Signage at the front gate.	Observations on Site. OEMP. Signage at the front gate.	Observations on Site. OEMP. Signage at the front gate.	Number maintained and advertised through web site, signage and in the minutes of CCC.	Compliant	N/A	
4.3	Is a complaints register being maintained with the following information: a) date, time b) means by which complaint was made (telephone, email, etc) c) personal details d) nature of complaint e) action taken f) if no action, why?	Complaint system (Vault) and last twelve months of complaints cited. Complaint numbers up on last year. Odour issues over January February and March 2017 due to excess sulphur emissions. Compliant.	Complaint system (Vault) and last twelve months of complaints cited.	Complaint system (Vault) and last twelve months of complaints cited.	Complaint system (Vault) and last twelve months of complaints cited.	Complaint number 28 for the year. Quartely complaint Audit Cited, included review of complaints and reference to the last four years of data. Odour issues dominate the complaints and each complaint is investigated and responded to. Compliant.	Compliant	N/A	
4.4	Is appropriate electronic info being made available on website, including: a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact	http://www.visy.com.au/env-appv-mgmt-plan/ As per 2016 audit a broad rang of assessment, approval, monitoring and reporting documents area available on the Home page of the Visy website.	OEMP updated 27 Nove17. Doc VP9-10-10.3-PN-000.	Web site interrogated for management plans and monitoring documents	Web site interrogated for management plans and monitoring documents	The Visy Tumut web site has Project assessment documents and consent, licenses for EPL and water extraction, Management Plans, Annual monitoring reports, EPL compliance report and audit outcomes. Contact details (24h) are also available on the website. Compliant.	Compliant	N/A	
Environmental Management									
5	Is an OEMP being maintained?	OEMP updated 27 Nov 17. Doc VP9-10-10.3-PN-000.	OEMP 27 Nov 17. VP9-10-10.3-PN-000 Cited	OEMP MPL-TUM-ENV-001-2 29 March 2019	OEMP MPL-TUM-ENV-001-2 29 March 2019	OEMP updated 29 March 2019. Doc MPL-TUM-ENV-001-2. Environmental targets updated on annual basis, 2018-2019 Targets cited. Compliant.	Compliant	N/A	
Environmental Reporting									
6.1	Has there been any events where there was actual or potential significant off-site impacts on people or the biophysical environment? If so was it reported to the DG within 12hrs of the event & full written details provided to DG within 7 days?	Nil reportable events in the 2016/17 reporting period. Compliant.		Nil reportable events in the 2018/19 reporting period. (Pers Com Matt O'D)	Nil reportable events in the 2019/20 reporting period. (Pers Com Pelin Beklenoglu)	Nil reportable events in the 2019/20 reporting period. Compliant.	Not triggered	N/A	
6.2	Were the requirements of the DG met to address cause or impact of incident?	N/A. No reportable events the 2014 and 2015 reporting periods	N/A	N/A	N/A	Nil reportable events in the 2019/20 reporting period. Compliant.	Not triggered	N/A	
6.3	Is a Annual Environmental Management Report (AEMR) being submitted to the DG reviewing performance against the OEMP and does it include: a) details of compliance with this approval b) copy of complaints register c) identification of any circumstances in which the environmental impacts & performance of the project during the year have not been generally consistent with environmental impacts & performance predicted d) results of environmental monitoring & interpretation e) list of performance goals not achieved & details	ECMR 2017 cited. Compliance report included as an appendix to the document.	ECMR 2018 cited.	ECMR 2019 cited.	ECMR 2020 cited.	ECMR 2020 cited. Compliance report included as app 1 to the document. Complaints dealt with in section 3.3 and listed in app 9. Complaints from odour exceedances noted and source identified as is corrective action. Monitoring results and interpretations documented in EMR and app 3, 4, 6, 7, 8, and 10.	Compliant	N/A	
4.4	Is appropriate electronic info being made available on website, including: a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact	Yes web site cited, Nov 2017. Compliant.	http://www.visy.com.au/env-appv-mgmt-plan/	http://www.visy.com.au/env-appv-mgmt-plan/	http://www.visy.com.au/env-appv-mgmt-plan/	Yes web site cited, Nov 2020. Compliant.	Compliant	N/A	
Project Approval 06_0159									
Administrative Conditions									
1.1	Is the project being carried out generally in accordance with: a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, NSW, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) d) concept approval 06_0159 e) the Statement of Commitments f) Tumut mill expansion - Project component phasing changes (Jun 2007) g) conditions of this approval	The project is being carried out generally in accordance with application and modifications. No new phases of the project have commenced Statement of Commitments revisited in last audit. Additionally Visy have been granted (7/7/17) approval to go from 700,000t/a to 800,000t/a	Site inspection. Production figures for reporting period. Waste figures for the period.	Site inspection. Production figures for reporting period. Waste figures for the period.	Site inspection. Production figures for reporting period. Waste figures for the period.	Visy have been granted (7/7/17) approval to go from 700,000t/a to 800,000t/a. Production for the period was 661,726 t. Some consent conditions have not been strictly complied with. Visy are in the process of seeking modifications to those conditions. Compliant.	Compliant	N/A	
1.2	Have there been any inconsistencies with this approval or any other approvals?	Minor inconsistency have arisen due to restructuring of government departments. Addressed through new departments. Compliant.	CEMP and sub plans, OEMP and ECMR	CEMP and sub plans, OEMP and ECMR	CEMP and sub plans, OEMP and ECMR	Minor inconsistency have arisen due to restructuring of government departments. Addressed through new departments. However the operation is generally consistent with the consent. Compliant.	Compliant	N/A	

[illegible]

2.10	Has any of the below concentration limits been exceeded at any of the discharge points?	Exceedances documented in report and similar to previous years. Exceedances and CO spikes on the Lime Kilns result in the Electrostatic Precipitators tripping and high dust concentrations. Routine maintenance has occurred in 2017 to reduce dust levels. A major project is being scoped to modify the Lime Kiln Electrostatic Precipitator inlet screens to reduce dust levels in the longer term.	ECMR 2018 EPL Annual Return 2017/2018	ECMR 2019 EPL Annual Return 2018/2019	ECMR 2020 EPL Annual Return 2019/2020	Exceedances documented in ECMR and the EPL annual Return.	Not-compliant	On going routine maintenance to the plant.																																																																	
	<table><caption>Table 2 - Maximum Allowable Discharge Concentration Limits (Main Stack 2)</caption><thead><tr><th>Pollutant</th><th>100 Percentile limit (mgm⁻³)</th></tr></thead><tbody><tr><td>Cadmium</td><td>0.5</td></tr><tr><td>Chlorine</td><td>100</td></tr><tr><td>Mercury</td><td>0.5</td></tr><tr><td>Nitrogen Oxides</td><td>400</td></tr><tr><td>Hydrogen Chloride**</td><td>50</td></tr><tr><td>Sulfur Dioxide**</td><td>250</td></tr><tr><td>Total Solid Particulates</td><td>50</td></tr><tr><td>Sulfuric acid mist and sulfur trioxide (as SO₂)</td><td>20</td></tr><tr><td>Opacity*</td><td>20</td></tr><tr><td>TCDD (equivalent)*</td><td>0.1</td></tr><tr><td>Hydrogen Fluoride</td><td>20</td></tr><tr><td>Type 1 and Type 2 Substances (in aggregate)</td><td>1</td></tr><tr><td>TRS (as H₂S)</td><td>2</td></tr></tbody></table> * Note: The unit of measure for Opacity is %Opacity and for TCDD (equivalent) it is ngm³. ** Note: is the maximum allowable discharge concentration limit for the multi-fuel boiler operating on standard fuels only. <table><caption>Table 3 - Maximum Allowable Discharge Concentration Limits (Natural Gas Boiler)</caption><thead><tr><th>Pollutant</th><th>100 Percentile limit (mgm⁻³)</th></tr></thead><tbody><tr><td>Nitrogen Oxides</td><td>100</td></tr><tr><td>Solid Particulates</td><td>30</td></tr><tr><td>Carbon Monoxide</td><td>120</td></tr><tr><td>Type 1 and Type 2 Substances (in aggregate)</td><td>0.5</td></tr></tbody></table> Table 4 - Maximum Allowable Discharge Concentration Limits (Multi-fuel Boiler) <table><thead><tr><th>Pollutant</th><th>100 Percentile limit (mgm⁻³)</th></tr></thead><tbody><tr><td>Cadmium</td><td>0.06</td></tr><tr><td>Mercury</td><td>0.06</td></tr><tr><td>Hydrogen Chloride</td><td>90</td></tr><tr><td>Dioxins & Furans*</td><td>0.1</td></tr><tr><td>Nitrogen Oxides</td><td>300</td></tr></tbody></table> <table><tbody><tr><td>Solid Particulates</td><td>26</td></tr><tr><td>Carbon Monoxide</td><td>120</td></tr><tr><td>Type 1 and Type 2 Substances (in aggregate)</td><td>1</td></tr></tbody></table> * Note: The unit of measure for Dioxins & Furans is ngm³. <table><caption>Table 5 - Maximum Allowable Discharge Concentration Limits (Gas Turbine)</caption><thead><tr><th>Pollutant</th><th>100 Percentile limit (mgm⁻³)</th></tr></thead><tbody><tr><td>Nitrogen Oxides</td><td>70</td></tr><tr><td>Solid Particulates</td><td>10</td></tr><tr><td>Carbon Monoxide</td><td>20</td></tr></tbody></table>	Pollutant	100 Percentile limit (mgm ⁻³)	Cadmium	0.5	Chlorine				100	Mercury	0.5	Nitrogen Oxides	400	Hydrogen Chloride**	50	Sulfur Dioxide**	250	Total Solid Particulates	50	Sulfuric acid mist and sulfur trioxide (as SO ₂)	20	Opacity*	20	TCDD (equivalent)*	0.1	Hydrogen Fluoride	20	Type 1 and Type 2 Substances (in aggregate)	1	TRS (as H ₂ S)	2	Pollutant	100 Percentile limit (mgm ⁻³)	Nitrogen Oxides	100	Solid Particulates	30	Carbon Monoxide	120	Type 1 and Type 2 Substances (in aggregate)	0.5	Pollutant	100 Percentile limit (mgm ⁻³)	Cadmium	0.06	Mercury	0.06	Hydrogen Chloride	90	Dioxins & Furans*	0.1	Nitrogen Oxides	300	Solid Particulates	26	Carbon Monoxide	120	Type 1 and Type 2 Substances (in aggregate)	1	Pollutant	100 Percentile limit (mgm ⁻³)	Nitrogen Oxides	70	Solid Particulates	10	Carbon Monoxide	20					
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2.11	Is compliance being met with averaging periods for pollutants emitted from the discharge points?	All compliant Averaging period reported in the Exceedance reporting ECMR 2017	Refer to Exceedance report in ECMR 2018	Refer to Exceedance report in ECMR 2019	Refer to Exceedance report in ECMR 2020	Averaging period reported in the Exceedance reporting ECMR 2020. Averaging periods appropriate.	Compliant	N/A																																																																	
	<table><caption>Table 6 – Averaging Periods</caption><thead><tr><th>Pollutant</th><th>Averaging Period</th></tr></thead><tbody><tr><td>TRS (as H₂S)</td><td>1 hour</td></tr><tr><td>SO₂</td><td>1 hour</td></tr><tr><td>HCl</td><td>1 hour</td></tr><tr><td>Nitrogen Oxides (as NO₂)</td><td>1 hour</td></tr><tr><td>Opacity</td><td>6 minutes</td></tr><tr><td>All other pollutants</td><td>As per test methods specified in condition 3.1</td></tr></tbody></table>	Pollutant	Averaging Period	TRS (as H ₂ S)	1 hour	SO ₂	1 hour	HCl	1 hour	Nitrogen Oxides (as NO ₂)	1 hour	Opacity	6 minutes	All other pollutants	As per test methods specified in condition 3.1																																																										
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2.12	Has vibration resulting from operation exceeded the evaluation criteria presented in British Standard BS6472 for low probability of adverse comment, at any affected locations?	No vibration monitoring completed and no limits included in EPL. No complaints regarding vibration have ever been received.	Google Earth	Google Earth No heavy vibrating works on site.	Google Earth No heavy vibrating works on site.	No vibration monitoring completed. No vibration works (blasting, rock breaking, piling, compaction etc) in the reporting period. No residences within close proximity to the site.	Compliant	N/A																																																																	
	Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings <table><thead><tr><th>Place and time</th><th>Low probability of adverse comment m·s^{-1.75} 1)</th><th>Adverse comment possible m·s^{-1.75}</th><th>Adverse comment probable m·s^{-1.75} 2)</th></tr></thead><tbody><tr><td>Residential buildings 16 h day</td><td>0.2 to 0.4</td><td>0.4 to 0.8</td><td>0.8 to 1.6</td></tr><tr><td>Residential buildings 8 h night</td><td>0.1 to 0.2</td><td>0.2 to 0.4</td><td>0.4 to 0.8</td></tr></tbody></table>	Place and time	Low probability of adverse comment m·s ^{-1.75} 1)	Adverse comment possible m·s ^{-1.75}	Adverse comment probable m·s ^{-1.75} 2)	Residential buildings 16 h day	0.2 to 0.4	0.4 to 0.8	0.8 to 1.6	Residential buildings 8 h night	0.1 to 0.2	0.2 to 0.4	0.4 to 0.8																																																												
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2.15	Has the noise contribution from the project to the background acoustic environment exceeded the maximum allowable noise contribution:	The attended noise monitoring data indicated that noise from the site was audible at most locations. Site noise was inaudible at the Gentle property during this monitoring period. Where site noise was audible and limits applied, the LAeq(15-min) noise contributions complied with the relevant limits at most locations, or otherwise compliant within INP definitions for non-compliance.	EMM, Visy Tumut Pulp and Paper Mill Annual attended noise monitoring, May 2018	EMM, Visy Tumut Pulp and Paper Mill Annual attended noise monitoring, May 2019.	EMM, Visy Tumut Pulp and Paper Mill Annual attended noise monitoring, Feb 2020 and Aug 2020. Mod -4 Aug 2020	The attended noise monitoring data indicated that noise from the site was audible at most locations. Site noise was inaudible at a number of adjacent properties during this monitoring period. Where site noise was audible and limits applied, the LAeq(15-min) noise contributions complied with the relevant limits during the day. Most of the evening and night time readings were affected by weather conditions and the results could not be used. In general based on the reports findings the site is compliant within INP requirements. Due to the timing of the monitoring a large proportion of the monitoring can not be used because of climatic impacts. Mod -4 Aug 2020 allows for noise above previous limits where agreements are in place.	Not-compliant	Despite change in monitoring date to Feb 2020, inversions continue to influence night and evening noise results.																																																																	
	<table><caption>Table 7 - Maximum Allowable Noise Contribution</caption><thead><tr><th rowspan="2">Location</th><th>Day 7:00am to 6:00pm Mondays to Saturdays 8:00am to 6:00pm Sundays and public holidays</th><th>Evening 6:00pm to 10:00pm on any day</th><th colspan="2">Night 10:00pm to 7:00am Mondays to Saturdays 10:00pm to 8:00am Sundays and public holidays</th></tr><tr><th>L_{Aeq}(15 minute)</th><th>L_{Aeq}(15 minute)</th><th>L_{Aeq}(15 minute)</th><th>L_{Amax}</th></tr></thead><tbody><tr><td>Pleasant View*</td><td>40</td><td>40</td><td>40</td><td>45</td></tr><tr><td>Deep Creek*</td><td>39</td><td>39</td><td>39</td><td>45</td></tr><tr><td>Roka* & Glengarry*</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></tbody></table> * Note: Residence names are those described in Appendix N of the EA.	Location	Day 7:00am to 6:00pm Mondays to Saturdays 8:00am to 6:00pm Sundays and public holidays	Evening 6:00pm to 10:00pm on any day	Night 10:00pm to 7:00am Mondays to Saturdays 10:00pm to 8:00am Sundays and public holidays		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Amax}	Pleasant View*	40	40	40	45	Deep Creek*	39	39	39	45	Roka* & Glengarry*	36	36	36	45	Any other residence	35	35	35	45																																											
Location	Day 7:00am to 6:00pm Mondays to Saturdays 8:00am to 6:00pm Sundays and public holidays		Evening 6:00pm to 10:00pm on any day	Night 10:00pm to 7:00am Mondays to Saturdays 10:00pm to 8:00am Sundays and public holidays																																																																					
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Any other residence	35	35	35	45																																																																					

2.16	Noise monitoring shall be: a) at any point within the residential boundary, or at any point within 30m of dwelling b) 30m from boundary c) subject to the modification factors	Noise monitoring conducted at the appropriate locations as per the EMM <i>Noise Compliance Report – May 2017</i> .	EMM, Visy Tumut Pulp and Paper Mill Annual attended noise monitoring, May 2018	EMM, Visy Tumut Pulp and Paper Mill Annual attended noise monitoring, May 2019	EMM, Visy Tumut Pulp and Paper Mill, Annual attended noise monitoring, May 2019	Noise monitoring conducted at the appropriate locations as per the EMM <i>Noise Report</i> .	Compliant	N/A	
Soil & Water Quality Impacts									
2.17	Has any pollution of waters under the POEO Act s120 been caused by the project?	As per 2016 audit. All discharges as per the EPL, discharges to water occurred in the last reporting period. Water quality in the receiving waters generally better or the same as the upstream waters. Compliant.	Water Storage levels	Water Storage levels 2018/19	Water Storage levels 2019/20. Met station data 2020.	No Discharges to the surface water system have occurred in the reporting period. Average rainfall conditions for the past 12 months have raised the level of effluent storage and reduced the need to irrigate. Sufficient storage room available at present.	Compliant	N/A	
2.18	Has surface water runoff been maintained at similar levels post-construction?	As per 2016 audit. All clean stormwater runoff is directed to controlled water quality treatment ponds prior to staged release off site. Compliant.	Water Storage levels Stormwater system plans and site observations.	Water Storage levels Stormwater system plans and site observations.	Water Storage levels Stormwater system plans and site observations.	All clean stormwater runoff is directed to controlled water quality treatment ponds prior to release off site. Compliant.	Compliant	N/A	
Waste Generation Management									
2.21	Is all waste materials removed from site being directed to a licenced landfill permitted to accept that waste?	As per 2015 audit. All waste is directed to Gundagai, Bald Hill, Bellette's, Hi Quality Goulburn and Woodlawn Goulburn. Compliant.	Waste removal Records for Nov 2018 Woodlawn Cited. EPL 20476 cited. EPL 10398 cited.	Waste removal Records for Nov 2018 Woodlawn, High Quality, Bald Hill Cited. EPL 20476 cited. EPL 10398 cited.	Waste removal Records for Nov 2018 Woodlawn, High Quality, Bald Hill Cited. EPL 20476 cited. EPL 10398 cited. EPL 2552 cited.	Waste is directed to waste facilities at Bald Hill EPL 2552, Hi Quality EPL 10398 Goulburn and Woodlawn EPL 20476 Goulburn.	Compliant	N/A	
2.22	Is the treatment, reuse & recycling on site of any waste oils, excavated soils, slurries, dusts & sludges being maximised?	Waste oils sent off site for recycling - Transpacific Excavated soil stockpiled for later reuse	Waste oil removal by contractor cited at the time of the audit.	Waste oil removal by contractor cited at the time of the audit.	Waste oil removal by contractor cited at the time of the audit. AEMR p 28	Oils taken by contractor Cleanaway contractors. Excavated soils are stored at the rear of the plant and used on site for earthworks. Organic dusts are fed to the boiler. Slurries and sludges are processed in the waste water treatment system and irrigated on site. Resource recovery exemption now in place for the reuse of Dregs and grits, fly ash and boiler sand at remote location.	Compliant	N/A	
2.23	Has any offsite generated waste been accepted or received onsite unless as permitted by the EPL?	As per 2016 audit. Waste paper is accepted on site - cardboard boxes, paper clippings & commons. Compliant.	ECMR 2018	ECMR 2019	ECMR 2020	Visy accepted 224,374t of waste paper and 506,576t of sawmill chip as a raw fibre source in the last reporting period. Visy also powered the boilers on site with waste generated on site and received from off site in the form of timber residues.	Compliant	N/A	
2.24	Are waste being classified as per Environmental Guidelines: Assessment, Classification & M/ment of Liquid & Non-Liquid Wastes (DECC 2004)?	Waste is being classified using the NSW Waste Classification Guidelines. Compliant.	Waste Classification Report by McMahon Date Sept 2016 Cited.	As per previous Audit	As per previous Audit	As per 2016-2019 audits. Waste is being classified using the NSW Waste Classification Guidelines. Compliant.	Compliant	N/A	
Wastewater Management									
2.25	Is effluent irrigation on existing & expanded area identified in the EA being undertaken in a sustainable manner including: a) use of crops that will reduce soil salinity levels b) measuring to maintain crop biodiversity - e.g. Lucerne crop rotation c) the provision of subsurface drainage under low-lying areas d) use of best practice ameliorative measures where soil improvement is determined to be necessary	Water management Plan sited. Waste water testing, crop export testing and soil testing completed for the monitoring period on the Gadara Park Farm. Compliant	Water management Plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2020	Waste water testing is routinely carried out. Soil and plant analysis of crops/pastures is completed for the monitoring period on the Gadara Park Farm. Nutrient balances calculated to ensure net accumulation of nutrients is managed. Soils are limed to manage soil pH. Crops are rotated between millet, winter cereals and Lucerne.	Compliant	N/A	
2.26	Are all those lands identified in the EA for the purpose of irrigation of effluent available for effluent irrigation?	Lands identified in the EA are available, through reduced water use & better recycling, Visy have reduced the amount of effluent generated and irrigation required.	Google earth Images Waste water Management plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Google earth Images Waste water Management plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Google earth Images Waste water Management plan Farm and Environment Report 2019/2020 McMahon ECMR 2020	All farm land identified in the EA is available for irrigation. However, Visy have minimised effluent production and as such need less land. As a consequence 16 ha of irrigation land to the east of the centre pivots is currently not irrigated.	Compliant	N/A	
2.27	Has the winter storage dam been extended?	No extension of the winter storage dam has occurred between 2014 to 2017 and is not required.	Observations on site.	Observations on site.	Observations on site. Aerial observations Nov 2020.	No extension of the winter storage dam occurred in the reporting period. Compliant.	Compliant	N/A	

2.28	Have all treated wastewater discharges occurred as permitted by the DECC & in accordance with DECC's Environmental Guidelines: Use of Effluent by Irrigation (2004), including relevant discharge information?	Discharges to the effluent irrigation area are in accordance with DECC Guideline.	Water management Plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Water management Plan Farm and Environment Report 2019/2020 McMahon ECMR 2020	Discharges to the irrigation area are planned, implemented, monitored and reviewed in accordance with the Water Management Plan 2019 and the DECC guidelines. Groundwater and soil monitoring results indicate that accumulations in the soil and impacts to groundwater are being effectively managed.	Compliant	N/A	
Hazards & Risks									
2.29	Has any structures been demolished? If so was it in accordance with AS2601:1991?	No demolition of structures has occurred in this reporting period	Observations on site.	Observations on site.	Observations on site.	No demolition has occurred since the last audit.	Compliant	N/A	
2.31	Is the storage & handling of dangerous goods as per AS?	Rezoning identified in 2016 will be updated as part of the finalisation of the Hazard Area Classification Report (Benbow, 2015). Compliant	Observations On site Hazard Area Classification Report (Benbow, 2015)	Observations On site Pinnacle Hazard Audit Jan 2019	Observations On site Pinnacle Hazard Audit Jan 2019	Thirteen findings documented in the report. Action Plan prepared.	Compliant	N/A	
Traffic Impacts									
2.34 & 2.35	Has any traffic access arrangements changed?	As per 2016 audit. No changes to traffic access arrangements. Compliant	Traffic Management Plan Aug 2017 VP9-10-10.3-PN-008 Observations on site. Monthly Day/Night Movements By Route 17/18	Traffic Management Plan Aug 2019, MPL-TUM-ENV-006-2 Observations on site. Monthly Day/Night Movements By Route 18/19	Traffic Management Plan Aug 2019, MPL-TUM-ENV-006-2 Observations on site. Monthly Day/Night Movements By Route 18/19	There have been no changes to the traffic access arrangements in the reporting period. Go Cup road has been upgraded and as such off site conditions are safer for drivers.	Compliant	N/A	
2.36	Is the use of B-doubles & backloading being maximised? Is the use of super B-doubles being used so as to reduce the number of heavy vehicle movements?	Trucks that bring waste paper in, backload with paper reals Super B-doubles were never approved	Traffic Management Plan Aug 2017 VP9-10-10.3-PN-008 ECMR 2018	Traffic Management Plan Aug 2019, MPL-TUM-ENV-006-2	Traffic Management Plan Aug 2019, MPL-TUM-ENV-006-2. AEMP p24 Ch 3.5	Logs ave. 62% B doubles and 39% semi-trailers, ave. log truck load B double = 39t, semi-trailer = 26t. Sawmill chip 53% B doubles and 47% semi-trailers, ave. load 38t B double and 25t semi-trailer. Paper export 70% B doubles and 30% semi-trailers, ave. load 36t B double and 24t semi-trailer.	Compliant	N/A	
2.37	Has there been any night time (2200-0700) semi-trailer, super B-Double or B-double movements to & from plant via Snowy Mountain Highway through Adelong or to & from the plan via MR280 north of Adelong?	No outside of curfew movements have been recorded.	Monthly Day/Night Movements By Route 17/18	Monthly Day/Night Movements By Route 18/19	Monthly Day/Night Movements by Route 19/20.	No outside of curfew movements have been recorded.	Compliant	N/A	
2.38	Do all trucks associated with the project: a) utilise air bag suspension b) minimise use of exhaust brakes at night in residential areas c) operate in a manner that reduces adverse noise impacts?	All drivers are inducted into Visy site Visy maintain records of driver training & driver run sheet	Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) Complaints register 2017/2018	Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) Complaints register 2018/2019	Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) Complaints register 2019/2020	Drivers and employees at Visy site are inducted and trained. A toolbox talk developed February 2015 and has been used to train new and existing staff. No complaints have been received from the public regarding airbrake noise for the reporting period. Heavy vehicles observed accessing the site at the time of the audit had airbag suspension.	Compliant	N/A	
Visual Amenity Impacts									
2.42	Is all external lighting associated with the project mounted, screen & directed in such a manner so as not to create nuisance?	No lighting complaints Occupancy cert issued	Site observations	Site observations	Site observations	Plant lighting at the time of the audit was observed to be fixed and directed toward the plant.	Compliant	N/A	
Air Quality Monitoring									

3.1

Are the detailed pollutant concentrations & emission parameters in the tables below being monitored?

Table 8 – Periodic Pollutant and Parameter Monitoring (Main Stack 2)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Cadmium	mgm ⁻³	TM-12, TM-13, TM-14	Annually
Chlorine	mgm ⁻³	TM-7, TM-8	Annually
Chromium	mgm ⁻³	OM-4	Annually
Flow	Nm ³ /s	CEM-6	Continuous
Hazardous substances	mgm ⁻³	TM-12, TM-13, TM-14	Annually
Hydrogen chloride	mgm ⁻³	TM-8	Continuous
Hydrogen fluoride	mgm ⁻³	TM-9	Annually
Mercury	mgm ⁻³	TM-12, TM-13, TM-14	Annually
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm ⁻³	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O2)	%	CEM-3	Continuous
Sulfuric acid mist and sulfuric trioxide (as SO3)	mgm ⁻³	TM-3	Annually
Sulphur dioxide	mgm ⁻³	CEM-2	Continuous
TCDD (equivalent)	ngm ⁻³	TM-18	Annually
TRS (as H2S)	mgm ⁻³	CEM-5	Continuous
Temperature	°C	TM-2	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly

Table 9 – Periodic Pollutant and Parameter Monitoring (Recovery Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm ⁻³	CEM-4	Continuous
Flow	Nm ³ /s	CEM-6	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm ⁻³	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O2)	%	CEM-3	Continuous
Temperature	°C	TM-2	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly
Volatile Organic Compounds	mgm ⁻³	CEM-8	Continuous

Table 10 – Periodic Pollutant and Parameter Monitoring (Natural Gas Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm ⁻³	CEM-4	Continuous

Flow	Nm ³ /s	CEM-6	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm ⁻³	CEM-2	Continuous
Oxygen (O ₂)	%	CEM-3	Continuous
Temperature	°C	Other approved method 1	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly

Table 11 – Periodic Pollutant and Parameter Monitoring (Multi-Fuel Boiler)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Cadmium	mgm ⁻³	TM-12, TM-13, TM-14	Quarterly
Carbon Monoxide	mgm ⁻³	CEM-4	Continuous
Chromium	mgm ⁻³	OM-4	Quarterly
Flow	Nm ³ /s	CEM-6	Continuous
Hazardous substances	mgm ⁻³	TM-12, TM-13, TM-14	Quarterly
Mercury	mgm ⁻³	TM-12, TM-13, TM-14	Quarterly
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm ⁻³	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O ₂)	%	CEM-3	Continuous
TCDD (equivalent)	mgm ⁻³	TM-18	Quarterly
Temperature	°C	Other approved method 1	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly

Table 12 – Periodic Pollutant and Parameter Monitoring (Lime Kiln 2)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm ⁻³	CEM-4	Continuous
Moisture	%	TM-22	Continuous
Nitrogen oxides	mgm ⁻³	CEM-2	Continuous
Opacity	% Opacity	CEM-1	Continuous
Oxygen (O ₂)	%	CEM-3	Continuous
Temperature	°C	TM-2	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly

Table 13 – Periodic Pollutant and Parameter Monitoring (Gas Turbine)

Pollutant/ Parameter	Units of Measure	Method	Frequency
Carbon Monoxide	mgm ⁻³	TM-32	Quarterly
Moisture	%	TM-22	Quarterly
Nitrogen oxides	mgm ⁻³	TM-11	Quarterly
Oxygen (O ₂)	%	TM-25	Quarterly
Temperature	°C	TM-2	Continuous
Total Solid Particles	mgm ⁻³	TM-15	Quarterly

3.2

Has any new project phases commenced since the last audit?
If so, has a program to confirm air emission performance been undertaken including:
a) point source emission sampling & analysis
b) a comprehensive air quality impact assessment
c) a comparison of results from those collected & predicted
d) a comparison of results from those collected to the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW
e) details of any complaints relating to air quality impacts
Has a report been provided to the DG & DECC with 28 days of completion of testing?

Discussions have occurred with DPE regarding inconsistent consent conditions. DPE have indicated that they are willing to discuss this issue.

Annual Return

Site Observations.
Previous Audit Reports.
ECMR 2018

Site Observations.
Previous Audit Reports.
ECMR 2019

Site Observations.
Previous Audit Reports.
ECMR 2020

No new phases have occurred in the last reporting period. Compliant.

Not triggered

N/A

See Above

3.3	Did the program indicate any of the following: a) greater point source emissions or ground-level concentrations of air pollutants than predicted in the documents listed under condition 1.1 of this approval b) greater point source emission or ground-level concentrations of air pollutants than the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
3.4	Has any new project phases commenced since the last audit? If so, has an independent, qualified person or team been commissioned to undertake odour performance monitoring 90 days prior to commencement of this phase, including: a) point & area source emission sampling & analysis b) a comprehensive odour assessment c) a comparison of results from those collected & predicted d) a comparison of results from those collected to the impact assessment criteria detailed in Technical Framework - Assessment & Management of Odour from Stationery Sources in NSW & Technical Notes: Assessment & Management of Odour from Stationary Sources in NSW e) details of any complaints relating to odour impacts	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
3.5	Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater odour impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
3.6	Has any new project phases commenced since the last audit? If so, has a revised Human Health Impact Assessment been undertaken within 12 months of commencement of that phase using actual air emission data collected? Was it submitted to the DG & NSW Health within 3 months of commencement of emission data collection?	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
Noise Monitoring									
3.7	Has any new project phases commenced since the last audit? If so, has a program to confirm noise emission performance been undertaken including: a) noise monitoring b) methodologies, locations & frequencies for noise monitoring c) identification of monitoring sites at which pre & post-project noise levels can be ascertained d) details of any complaints relating to noise impacts	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
3.8	Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater noise impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
Soil Monitoring									
3.10	Is the Soil Monitoring Program being conducted every 12 months including: a) installation of soil moisture probes for daily moisture monitoring b) calibration of probes c) locations of soil sampling d) soil sampling undertake biannually, before & after irrigation season	Yes, as ECMR & Monitoring Gadara Park Report 2017, to 2017.	Water management Plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2020 Oct 2019 soil sampling results for farm April 2020 soil sampling results for farm	a) soil moisture probes are installed under the irrigation areas and are used to monitor and schedule irrigation. b) The probes are calibrated c) Soil sample locations recorded d) Soil sampling is biannually, before & after irrigation season as specified in the CoA.	Compliant	N/A	
3.11	Has the program indicated that effluent irrigation is having an adverse impact on the sustainable use of soils within the irrigation area? If so, what soil amelioration measures have been put in place in consultation with DPI?	As per 2016 audit there is no indication of changing soil parameters that indicate an adverse influence. Compliant	Water management Plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Water management Plan Farm and Environment Report 2019/2020 McMahon ECMR 2020	The soil and ground water monitoring do not indicate changing soil parameters of an adverse influence. Compliant	Compliant	N/A	
Water Monitoring									
3.12	Is a surface & groundwater monitoring program being implemented?	As per the WMP and 2017 ECMR reviewed. Compliant	Water management Plan Farm and Environment Report 2017/2018 McMahon ECMR 2018	Water management Plan Farm and Environment Report 2018/2019 McMahon ECMR 2019	Water management Plan Farm and Environment Report 2019/2020 McMahon ECMR 2020	A surface water and groundwater monitoring program is being implemented.	Compliant	N/A	
Hazard Compliance									
3.13	Has a report detailing compliance with conditions 2.32 (Fire Safety Study and Construction Safety Study) & 2.33 (Emergency Plan and Safety Management System) been submitted within 90 days of the commencement of each phase including the following detail: a) dates of study, plan or system completion b) actions taken or proposed to implement recommendations made in studies, plans or systems c) responses to each requirement that may be requested by the DG?	No new phases of the project have commenced in 2014-2017.	Site Observations. Previous Audit Reports. ECMR 2018	Site Observations. Previous Audit Reports. ECMR 2019	Site Observations. Previous Audit Reports. ECMR 2020	No new phases have occurred in the last reporting period. Compliant.	Not triggered	N/A	
Auditing									
3.14	Refer to DA Condition 16	Refer to DA Condition 16				As per 2016 audit. Compliant	Compliant	N/A	

3.15	Is an annual odour audit being undertaken including a leak detection & repair program? Have reports been submitted to DECC no later than 1 month after completion of the audit?	Visy have confirmed with NSW EPA that they will receive the Annual Audit Report as part of the ECMR	Appendix 3 of ECMR 2018. Ektimo Emission Testing Report, Visy Tumut September 2017. Ektimo Emission Testing Report, Visy Tumut March 2018.	Appendix 3 of ECMR 2019. Ektimo Emission Testing Report, Visy Tumut 2019. Ektimo Emission Testing Report, Visy Tumut 2018.	Appendix 3 of ECMR 2019. Ektimo Emission Testing Report, Visy Tumut 2019. Ektimo Emission Testing Report, Visy Tumut 2020.	Biannual odour emissions monitoring reports cited. Performed in 2018 and 2019. Submitted with ECMR 2019.	Compliant	N/A	
3.16	Refer to DA Condition 71 - annual audit required	Refer to DA Condition 71			Refer to DA Condition 71	Compliant	Compliant	N/A	
4.1	Refer to CA Condition 4.1	Refer to CA Condition 4.1			Refer to CA Condition 4.1	Compliant	Compliant	N/A	
4.2	Refer to CA Condition 4.2	Refer to CA Condition 4.2			Refer to CA Condition 4.2	Compliant	Compliant	N/A	
4.3	Refer to CA Condition 4.3	Refer to CA Condition 4.3			Refer to CA Condition 4.3	Compliant	Compliant	N/A	
OEMP									
5.3	Has OEMP been updated to detail an environmental framework, practices & procedures to follow during operation? Does the OEMP include: a) identification of all statutory & other obligations including approvals/licences b) description of roles & responsibilities c) environmental policies/principles d) environmental performance review & improvement e) management policies to ensure environmental goals are met f) additional studies listed under condition 5.4 g) monitoring requirements	The OEMP has been reviewed in 2017 prior to the commencement of works under Modifications MP 06_0159. Compliant	OEMP	OEMP 2019	OEMP 2019 Cited.	The OEMP has been modified to include update targets for environmental programs. a) Section 4 of the OEMP describes and lists relevant approvals and legislation. b) Section 6 of the OEMP describes roles & responsibilities c) Sections 1 and 2 of the OEMP describes the role of the environmental policy and procedures employed by Visy. d) Sections 16-21 describe monitoring, management review and improvement. e) Section 5 of the OEMP describes the objectives targets and management of the OEMP. f) Section 1 and 9 describe the additional air quality action required. The Air Quality Management Plan supports the OEMP in this respect. g) Section 16 of the OEMP and the Management Subplans describes monitoring for the Visy operation.	Compliant	N/A	
5.4a	Has the AQMP been updated and does it include: i) identification of major sources of particulate & gaseous air pollutants that may be emitted, both point-source & diffuse emissions, including identification of major components & quantities ii) monitoring iii) procedures for minimisation of gaseous & particulate emissions iv) pro-active & reactive management & response mechanism for particulates, odour & gaseous emissions v) specific procedures for m/ment of generating efficiency & minimisation of GGH per unit of electricity generated vi) procedures aimed at maximising the efficiency of start-up & shut-down vii) provision for regular review of air quality monitoring data & comparison of assumed & predicted viii) plans for regular maintenance to minimise leaks & fugitive emissions	AQMP updated again in 2017 and includes the requirements of 5.4(a). Compliant	Air Quality Management Plan VP9-10-10.3-PN-001	Air Quality Management Plan May 2019 MPL-TUM-ENV-002-2	Air Quality Management Plan May 2019 MPL-TUM-ENV-002-2	The AQMP addresses the requirements of: i) In section 4.1 ii) In section 7 iii) In section 6 iv) In section 6 v) In section 6.6 and app J vi) In section 6.3 vii) In section 9 viii) In section 6.3.2 ix) In section 6.4	Compliant	N/A	
5.4b)	Has the WMP been updated and does it include: i) options to avoid discharge to ground & ambient waters ii) identification of clean & dirty water areas on site maps iii) details of water management measures for clean & dirty water iv) calculations for water balance for waters generated on site v) details of remedial actions in response to exceedances or performance criteria vi) characteristics of wastewater quality & quantities for reuse vii) specification of wastewater reuse areas shall be specified on maps including contingency land viii) contingency plans in the event irrigation land becomes unavailable ix) specific details of wastewater irrigated x) specific details regarding groundwater monitoring	As per 2016 audit.	Water Management Plan VP9-10-10.3-PN-003: Revision: C, June 2017	Water Management Plan June 19 MPL-TUM-ENV-007-2	Water Management Plan June 19 MPL-TUM-ENV-007-2	The WMP addresses the requirements of: i) In section 4 ii) In section 4 iii) In section 4 iv) In section 4 v) In section 4 vi) In section 4 vii) In section 4 viii) In section 4 ix) In section 4 x) In section 4 xi) In section 4	Compliant	N/A	
5.4c)	Has the NMP been updated and does it include: i) procedures to ensure best management practice & best available technology is being considered & implemented ii) procedures to generate suitable for annual environmental auditing iii) identification of all relevant receivers & applicable criteria iv) calculations for water balance for waters generated on site v) procedures for periodic consideration of noise impacts, limits & goals vi) details of management methods & procedures for noise emission control vii) reactive & pro-active strategies for dealing with complaints	NMP action plan updated again 2017. Compliant	Noise Management Plan VP9-10-10.3-PN-004, July 2017	Noise Management Plan July 2019 MPL-TUM-ENV-004-2	Noise Management Plan July 2019 MPL-TUM-ENV-004-2	The NMP addresses the requirements of: i) In section 1, 2 and 6 ii) In Section 9 iii) In Section 4 iv) N/A v) In Section 8 vi) In Section 6 vii) In Section 6.3 and 8.2 viii) In Section 7 and 8	Compliant	N/A	

5.4d)	Has the TMP been updated and does it include: i) driver education programme ii) best noise practice iii) movement schedule iv) specific measures v) specific measures for minimising noise impacts at identified sensitive areas vi) a system for identifying & ensuring conformance with the Plan vii) a continual improvement process	As per 2015 audit and the TMP was updated again in 2017. Compliant	Traffic Management Plan VP9-10-10.3-PN-008, Aug 2017	Traffic Management Plan Aug 2019 MPL-TUM-ENV-006-2	Traffic Management Plan Aug 2019 MPL-TUM-ENV-006-2	The TMP addresses the requirements of: i) In section 6.8 ii) In section 1.3, 4.3 and 6.2 iii) In section 6 iv) In section 6 v) In section 6 and 9 vi) In section 7, 8 and 9 vii) In section 1 and 9	Compliant	N/A	
5.4e)	Has the SMP been prepared that includes: i) detailed identification of soil types & properties within irrigation area ii) a monitoring regime for assessing soil health iii) a detailed description of conditions that would trigger amelioration measures iv) methodologies for soil improvement	As per 2015 audit and the results of the 2017 ECMR indicates the soils are in good health. Compliant	Soil Management Plan VP9-10-10.3-PN-010, Sept 2017	Soil Management Plan Sept 19, MPL-TUM-ENV-005-2,	Soil Management Plan Sept 19, MPL-TUM-ENV-005-2,	The SMP addresses the requirements of: i) In section 4 ii) In section 6 iii) In section 3, 6 and 7 iv) In section 4.7	Compliant	N/A	
EPL 10232									
Administrative Conditions									
A1.1	Is the scheduled activities being carried out on premises authorised as per the EPL?	Current production 2016/2017 676,000 t. Compliant	ECMR 2018	EPL 10232 ECMR 2019 Site observations at the time of the Audit. OEMP and Sub Plans	EPL 10232 ECMR 2020 Site observations at the time of the Audit. OEMP and Sub Plans	Current production 2018/2019 674,831 t. EPL allows for production over 150,000t.	Compliant	N/A	
A2.1	Is the premises located as per the EPL?	Yes the premises are located as per the EPL. Compliant.	Six Maps Cadastral Mapping Address Reference	Six Maps Cadastral Mapping Address Reference	Six Maps Cadastral Mapping Address Reference	Yes the premises are located as per the EPL. Compliant.	Compliant	N/A	
A3.1	Are works being carried out as per proposal application?	Yes the works are being carried out as per the original proposal application and subsequent modifications. Compliant.	Site observations OEMP and ECMR 2018	Site observations OEMP and ECMR 2019	Site observations OEMP and ECMR 2020	Plant operations generally in accordance with the EPL and Consent	Compliant	N/A	
Discharges to Air & Water & Applications to Land									
P1.1	Are all the identified points being monitored?	As per 2015 audit and the ECMR. Compliant	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Monitoring points were generally monitored during the reporting period. However one exceptions included a failed NOx analyser (EPL Point 4) that failed after 18 years of service. The unit was offline between July -Dec 2019 while repairs and replacement was organised.	Not-compliant	Equipment replaced during planned shut down.	
P1.2	Points identified in P1.1 are for the purpose of monitoring and/or setting limits for discharges of pollutants to air, soil and water from the point	Discharge limits are analysed in ECMR 2017. Compliant	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	The discharge points nominated in P1.1 are being monitored as per the EPL.	Compliant	N/A	
P1.3	As above	Discharge limits are analysed in ECMR 2017. Compliant	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	The discharge points nominated in P1.1 are being monitored as per the EPL.	Compliant	N/A	
Limit Conditions									
L1.1	Does the project comply with the POEO Act 1997?	Wastewater was discharged into Sandy Creek in this reporting period. An application to discharge appr to Sandy Creek was submitted to the EPA on 30th Sept 2016. Approval from the EPA to discharge was granted on 5th Oct 2016. Compliant.	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	No discharges to Sandy Creek during the reporting period. Some license exceedance have been reported as per the requirements of the EPL	Compliant	N/A	
L2	Have actual loads of assessable pollutant discharges from the premises during the reporting period exceeded the load limit?	Exceeded for Point 1 & 22 Exceedances detailed in ECMR 2016	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Course Particle exceedance detailed in ECMR 2020 and the EPL annual return 2020. Load limit = 31,000kg.	Not-compliant	License fee paid for load exceedance.	
L3	Have any of the concentration limits been exceeded for any monitoring/discharge point ?	Exceedances are detailed in the annual EPL return. Exceedances included: a) Combined particulate emissions, b) Opacity on stack 1 and 2, c) Sox stack 1, d) Particulates stack 1, e) CO point 3, f) Opacity stack 2, g) sulphides stack 2, h) particulates lime kiln duct	8 exceedances in annual return for air quality.	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Exceedances detailed in annual EPL return incl.: 1) Coarse Particulates at Point 1 & Point 22; 2) Oil & Grease limit at Point 10 – Exceeded on 3 occasions; 3) Total suspended solids at Point 10; 4) Opacity Limit at Point 1 (Stack 1); 5) Sulphur dioxide limit at Point 1; 6) Nitrogen oxide limit at Point 1; 7) Nitrogen oxides limit at Point 22 8) Opacity Limit at Point 22; 9) Total Solid Particles at Point 1; 10) Emission monitor failure of Nitrogen Oxides at Point 4.	Not-compliant	A range of maintenance measures were implemented to minimise exceedance.	
L4.1	Has the discharge quantities been exceeded for Points 9 or 10?	Exceedances detailed in annual 2017 return. Compliant	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	No exceedances have occurred for discharges from points 9 or 10.	Compliant	N/A	
L4.2	Has the volume of emissions to air exceeded the volume limit for Point 1?	Exceedances detailed in annual 2016 return. Compliant	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	The mean flow in cubic metres per second were 74.97 and the peak was 95 (limit100).	Compliant	N/A	

L5	Is any offsite generated waste stored, treated, processed, reprocessed or disposed of other than those wastes described in EPL? Are any other wastes other than those described received on site?	Recycled paper is accepted on site - cardboard boxes, paper clippings & commons. Wood residues, standard fuels and non standard fuels are also accepted on site as per the licence and described in the EA	ECMR 2018 Annual EPL Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Recycled paper is accepted on site - cardboard boxes, paper clippings & commons. Wood residues from mills.	Compliant	Standard fuels and non standard fuels are no longer used as terms, change in the Eligible Waste Fuel Guidelines.	
L6.1	Has sound pressure level limits been exceeded at any of the listed premises	As per 2016 NMM noise report. Mostly compliant. Weather conditions an issue during monitoring. Implement acoustic treatments at affected receptors.	ECMR 2018 Annual EPL Return 2018 EMM 2018 Annual attended noise monitoring report.	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Day time noise readings are below the required limits. Most of the evening and night time readings could not be used because the results were invalidated by atmospheric conditions. Visy altered the monitoring period to January 2020 but was unable to avoid evening temp inversions and wind speed effects on monitoring.	Not-compliant	Visy to discuss modifying EPL with EPA to align with Mod 4 (Aug 2020). Negotiated agreements.	
L6.2	Has the project adhered to the operating hours specified?	As per 2016 audit and the ECMR. Compliant	ECMR 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	The approved operating hours are 24h/day 7 days per week. Chipper voluntarily stopped between 10PM and 7AM up to Feb 2020. As a result of 2019/20 summer fires chipper now operation 24hrs /day.	Compliant	N/A	
L6.3	Has any noise assessments been undertaken as specified in this condition?	As per 2016 noise report. Mostly compliant. Implement acoustic treatments at affected receptors.	ECMR 2018 Annual EPL Return 2018 EMM 2018 Annual attended noise monitoring report.	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	EMM have completed a attended noise monitoring at adjacent sensitive receivers. Visy altered the monitoring period to January 2020 but was unable to avoid evening temp inversions and wind speed effects on monitoring.	Not-compliant	An alternative time of year less susceptible to inversions need to be chosen for monitoring	
L7.1-7.2	Non-standard fuel conditions	No non-standard fuels are not used on site and have not been used since 2008	ECMR 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	Non-standard fuels are not used on site.	Compliant	A review of fuel used on site against the NSW EPA Eligible Waste Fuels Guideline Dec 2016 is in progress. This may require alteration to the EPL.	
L7.3	Has the minimum exit velocity for Stack 2 been achieved when the recovery boiler is operating at or above 70% of the applicable design firing rate?	EPL condition L7.3, requires a minimum exit velocity of 22.1 m/s when operating at or above 70% of the design firing rate. The current sampling point is located approximately halfway up the stack where the diameter is larger and velocity is lower. The Visy process engineers have used current readings to calculate the velocity at the top of the stack. Based on these calculations the main stack velocity is approximately 24.8m/s which is above 70% of the applicable firing rate.	ECMR 2018 EPL Annual Return 2018	ECMR 2019 Annual EPL Return 2019	ECMR 2020 Annual EPL Return 2020	As per 2017 to 2020 audits.	Compliant	N/A	
Operating Conditions									
O1	Is the licenced activities being carried out in a competent manner?	Materials handled, manufacturing and waste management is planned, monitored and reviewed in a competent manner. Monitoring results indicate that environmental performance continues to improve across the operation.	Observations on site. Review of management plans and records held on site.	Observations on site. Review of management plans and records held on site.	Observations on site. Review of management plans and records held on site.	Materials handling, manufacturing and waste management is planned, monitored and reviewed in a competent and on going manner. Monitoring results indicate that environmental performance is largely compliant and continues to improve were required.	Compliant	N/A	
O2.1	Is all plant and equipment being operated and maintained in an efficient manner and condition?	Plant and equipment is maintained through 'Enterprise Asset Management' which schedules maintenance works through assignment of WO	Observations on site. Review of management plans and records held on site.	Observations on site. Review of management plans and records held on site.	Observations on site. Review of management plans and records held on site.	Plant and equipment are maintained using a systematic planned maintenance system and a range of contractors and internal staff. Planned maintenance shutdowns occur annually and unplanned shut downs are used to complete	Compliant	N/A	
O2.2	Is monitoring equipment being properly calibrated and maintained and serviced?	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	ECMR 2018 Ektimo Stack Testing Report Jan 2018	ECMR 2019 Ektimo Stack Testing Report 2019	ECMR 2020 ECOTEC Calibration Report Feb 2020	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A	
O2.3	Where maintenance, calibration and operation are detailed as part of the standards listed in the licence limits or monitoring sections of this licence, then the maintenance, calibration or operation must be undertaken in accordance with the standard.	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	ECMR 2018 Ektimo Stack Testing Report Jan 2018	ECMR 2019 Ektimo Stack Testing Report 2019	ECMR 2020 ECOTEC Calibration Report Feb 2020	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A	

M1.2	Are all records that are required to be kept by the EPL: a) Legible b) Cover at least 4 years c) Produced in a legible form for EPA	All records are kept electronically and in a legible format	Internal electronic monitoring records. Reports from external consultants.	Internal electronic monitoring records. Reports from external consultants.	Internal electronic monitoring records. Reports from external consultants.	All records are kept electronically and in a legible format	Compliant	N/A	
M1.3	Are the following records kept for any samples collected for the purpose of this EPL: a) Date of sampling b) Time of sampling c) Point of sampling d) Name of person sampling	COC and sample run sheets from McMahon Consultants contain this information	Ektimo Emission Testing Report Sept 2017 and March 2018. Farm and Environmental Monitoring Report 2017-2018. Ektimo Stack Testing Report Jan 2018. EMM 2018 Annual attended noise monitoring report	ECMR 2019 Annual Return 2019 Farm and Environmental Monitoring Report 2018-2019 Weather data Water storage Records 2016-2020	ECMR 2020 Annual Return 2020 Farm and Environmental Monitoring Report 2019-2020 Water storage Records 2016-2020 Weather data	The records cited included the: date of sampling, time of sampling, point of sampling and the name of person sampling.	Compliant	N/A	
M2.1-2.3	Are the specified monitoring points being monitored at the set frequencies using the sampling method specified?	Point 1,22 - Flow, data not continuous Point 2 - Flow & Moisture, data not continuous Point3 - Flow, data not continuous Point 10 - missed one sample due to incorrect sampling method	ECMR 2018. Annual Return 2018.	ECMR 2019 Annual Return 2019 Farm and Environmental Monitoring Report 2018-2019	ECMR 2020 Annual Return 2020 Farm and Environmental Monitoring Report 2019-2020	Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable. Equipment malfunctions on the NOx analyser after 18 years of service. Equipment ordered and is to be replaced ASAP.	Not-compliant	Ensure sufficient spare parts are held on hand for timely repairs to sensors.	
M3.1	Is the required monitoring being undertaken as per the specified methodology?	Laboratory Reports show that monitoring is being undertaken as required NATA accredited lab for all test methods - 14601	ECMR 2018. Annual Return 2018. Ektimo Emission Testing Report Sept 2017 and March 2018. Farm and Environmental Monitoring Report 2017-2018. Ektimo Stack Testing Report Jan 2018. EMM 2018 Annual attended noise monitoring report	ECMR 2019 Annual Return 2019 Farm and Environmental Monitoring Report 2018-2019	ECMR 2020 Annual Return 2020 Farm and Environmental Monitoring Report 2019-2020	Laboratory Reports show that monitoring is being undertaken as required NATA accredited lab for all test methods - 14601	Compliant	N/A	
M3.2-3.3	Are all air emission monitoring points and equipment operating as per the Approved Methods for Sampling & Analysis of Air Pollutants in NSW?	Ektimo Emission Testing Report 2016 lists approved methods in section 4 . Compliant	Ektimo Emission Testing Report Sept 2017 and March 2018. Ektimo Stack Testing Report Jan 2018.	Ektimo Emission Testing Report 2018 and March 2019. Ektimo Stack Testing Report Jan 2019.	Ektimo Emission Testing Report Sept 2019 and March 2020. Ektimo Stack Testing Report Jan 2019.	Ektimo Emission Testing Report 2018 lists approved methods in section 4 . Compliant	Compliant	N/A	
M4	Are the load calculations being carried out in accordance with the protocol set out for the fee-based activity classification listed in the Administrative Conditions of the EPL?	All monitoring data that is reported in the Annual Returns & ECMR is undertaken on the premise location identified in the Administrative Conditions of this EPL	ECMR 2018. Annual Return 2018.	ECMR 2019. Annual Return 2019.	ECMR 2020. Annual Return 2020.	All monitoring data reported in the EPL Annual Return 2020 is used calculate the load calculations in accordance with the protocol listed in the Administrative Conditions of the EPL.	Compliant	N/A	
M5	Is meteorological data being collected & analysed for monitoring Point 8 for the following parameters - Wind speed, direction, sigma theta, temp at 2m, temp at 10m, solar radiation?	Visy Farm & Recovery Boiler 2 collect this information - hourly summary	ECMR 2018.	ECMR 2019. Annual Return 2019.	ECMR 2020. Annual Return 2020. Weatheration Website for two onsite stations (roof & farm)	Two meteorological monitoring stations commissioned in 2014 are located to the southeast of the mill site (Monitoring Point 8) and on top of the Recovery Boiler B building (Monitoring Point 7)	Compliant	N/A	
M6	Are legible records of all pollution complaints being kept including: a) Date & time b) Method of complaint c) Personal details d) Nature of complaint e) Action taken by licensee f) If no action, why Are records being kept for at least 4 years and are the able to be produced to EPA officer?	ECMR 2017 Appendix 3 Yes, entered into Vault Refer to CA Condition 4.3	ECMR 2018 Appendix 9 Cited VAULT records for the reporting Period.	ECMR 2019 Appendix 9 Cited VAULT records for the reporting Period.	ECMR 2020 Appendix 9 Cited VAULT records for the reporting Period.	All complaints received are entered into the VAULT complaint system when received. The complaints cited included the details required in EPL M6. Refer to CA Condition 4.3	Compliant	N/A	
M7	Is a telephone complaints line being operated and is the public aware of this number?	As per 2016 audit and unchanged. Compliant	Visy Website Observations on cited. Minutes of CCC meetings.	Visy Website Observations on cited. Minutes of CCC meetings.	Visy Website Observations on cited. Minutes of CCC meetings.	Details are provided on the Visy Web site. Details on sign at front security gate and the gate is staffed 24/7. Details given out CCC meeting each 1/4.	Compliant	N/A	
M8	Are the following parameters being monitored for Point 9 & 10: a) volume of liquid discharged b) mass of solids applied to area c) mass of pollutants emitted to air at the specified frequency and via specified methods?	As per 2016 audit and unchanged. Compliant	ECMR 2018. Annual Return 2018. Farm and Environmental Monitoring Report 2017-2018.	ECMR 2019 Annual Return 2019 Farm and Environmental Monitoring Report 2018-2019	ECMR 2020 Annual Return 2020 Farm and Environmental Monitoring Report 2019-2020	Flow meter monitored for Point 9. Two flow meters used to calculate Point 10 = discharge to wastewater treatment - reclaimed water. Sludge (252KL) applied to land is monitored on application and sampled monthly, and the results recorded and reported	Compliant	N/A	
M9	Non-standard Fuels	No non-standard fuels have been used this reporting period or since 2008	ECMR 2018.	ECMR 2019	ECMR 2020	No non-standard fuels have been used this reporting period or since 2008	Compliant	N/A	
Reporting Conditions									

R1.1-1.2	Is an AR being prepared for each reporting period and does it include: a) A Statement of Compliance b) A Monitoring and Complaints Summary?	The 2017 AR included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA. ECMR 2017 was email to EPA & D&PE.	Emails to NSW EPA and DP&E providing the ECMR 2018. 2018 EPL Annual Return lodgement Advice.	Emails to NSW EPA and DP&E providing the ECMR 2019. 2019 EPL Annual Return lodgement Advice.	Emails to NSW EPA and DP&E providing the ECMR 2019. 2019 EPL Annual Return lodgement Advice.	The 2019/20 Annual Return included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA. In addition it was accompanied by and Annual Return Submission 2019/20. ECMR 2019/20 was email to EPA & D&PE.	Compliant	N/A	
R1.3-1.4	Where this licence is transferred from the licensee to a new licensee.... Where this licence is surrendered by the licensee or revoked	This EPL has not been transferred or revoked. Compliant	EPL Register EPL 10232	EPL Register EPL 10232	EPL Register EPL 10232	This EPL has not been transferred or revoked. Compliant	Compliant	N/A	
R1.5	Was the AR supplied to the EPA by registered post no later than 60 days after the end of the reporting period?	AR supplied to the EPA by registered post no later than 60 days after the end of the reporting period. Compliant	Annual Return 2018 lodgement advice Cited.	Annual Return 2019 lodgement advice Cited.	Annual Return 2020 lodgement advice Cited.	Annual return lodge within the 60 day period.	Compliant	N/A	
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	Not triggered	ECMR 2018. Annual Return 2018.	ECMR 2019. Annual Return 2019.	ECMR 2020. Annual Return 2020.	The pollutant load was calculated and the return lodge on time.	Compliant	N/A	
R1.7	Has a copy of the AR been retained?	Copy viewed	Annual Return 2018.	Annual Return 2019.	Annual Return 2020.	Copy of the signed return was available at the time of the audit.	Compliant	N/A	
R1.8	Was the AR been certified by either the licence holder or by a person approved by the EPA?	Certified by Anthony Joseph Pratt & Jeanne Pratt. Compliant	Signed Annual Return 2018.	Annual Return 2019.	Annual Return 2020.	Certified by Anthony Joseph Pratt, Director & Robert Andrew Kaye, Company Secretary.	Compliant	N/A	
R1.9	In addition to the documents specified in Clause R1.1, the licensee must supply the following documents to the EPA : (a) A copy of the relevant environmental report/s produced in accordance with the requirements of Conditions 11 and 12 of the Development Consent; and (b) Independent Environmental Audit in accordance with Condition 71 of the Development Consent.	ECMR 2016 emailed to EPA Annual Environmental Audit Action Plan emailed to EPA	Email Cited at the time of Audit from MD Visy to DP&E and NSW EPA.	Email Cited at the time of Audit from MD Visy to DP&E and NSW EPA.	Email Cited at the time of Audit from MD Visy to DP&E and NSW EPA.	The ECMR 2020 and Independent Audit emailed EPA and DP&E concurrently.	Compliant	N/A	
R2	Were any notifications of environmental harm made to EPA & if so was written details of the notification provided to the EPA with in 7 days of the incident occurring?	No notifications made	No notifications made	No notifications made	No notifications made	No notifications made	Compliant	N/A	
R3	Written report to the EPA required when and EPA Officer suspects an event has occurred that may have environmental impacts.	Not triggered	Not triggered	Not triggered	Not triggered	A written request from and EPA officer has not occurred in relation to an event during the reporting period.	Compliant	N/A	
R4	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year. R4.2 The Annual Waste Summary Report must be submitted to the EPA via the online Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	N/A	Annual WARRP Report 2017-2018 for Visy Pulp and Paper EPL 10232	No longer a condition	No longer a condition	No longer a condition	Not triggered	N/A	
General Conditions									
G1	Is a copy of the licence kept on site & available for inspection by any employee or agent?	Available on website & through Matt O'Donovan	Current EPL Cited	Current EPL Cited	Current EPL Cited	An electronic and hard copy of the EPL was held and cited at the time of the audit.	Compliant	N/A	
Special Conditions									
E1 to 7	Non-standard fuels must not be burnt unless:.....	No non-standard fuels have been used this reporting period or since 2008	ECRM 2018	ECMR 2019. Annual Return 2019.	ECMR 2020. Annual Return 2020.	No non-standard fuels have been used this reporting period or since 2008	Not triggered	A review of fuel used on site against the NSW EPA Eligible Waste Fuels Guideline Dec 2016 is in progress.	
E8	Is sludge from the Wastewater Treatment Plan being disposed of in accordance with 'Wastewater Treatment Plan Sludge Disposal By Land Application on Site - Procedure No. VP9-10-10.4-OP-035, dated 25/05/08?	Sludge is being disposed of as per procedure and spread on farm The sludge is sampled and tested monthly	ECMR 018 Annual Return 2018 Farm and Environmental Monitoring Report 2017-2018			Sludge is being disposed of as per procedure and spread on farm The sludge is sampled and tested monthly	Compliant	N/A	
Consultation									
NSW EPA									

1	The EPA request that the audit addresses the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to waste generated at the premises.	N/A	ECMR 018 Annual Return 2018		Waste Removal Records 2019-2020 citing tonnes to Woodlawn. AEMR 2020, ch 3.6 table 13	Waste that is subject to a resource recovery orders (orders) and resource recovery exemptions (exemptions) has been applied to land under the orders and exemptions. The waste has been used at Woodlawn for the rehabilitation of an acid tailings dam. "The Woodlawn PHR acid mine tailings trial Order and Exemption August 2019. This diverted 1600t of powerboiler flyash and 7800t of dregs and grits from landfill for use in tailings dam rehabilitation.	Compliant	N/A	
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