Environmental Assessment – Section 75W Modification (Consent 08_0157) Application for Additional Malting Plant Silos, Minto

Prepared for
Joe White Maltings P/L

JOE WHITE MALTINGS

March 2014

Cardno
Shaping the Future

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Document Information

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STATEMENT OF CERTIFICATION

Environmental Assessment prepared under Section 75w of the Environmental Planning and Assessment Act 1979

Environmental Assessment Prepared by:

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Project to which the Environmental Assessment relates:

Project Description:	Proposed expansion to malting plant to add 12 new storage silos, Lot 201 DP 813362, Stonny Batter Road, Minto.

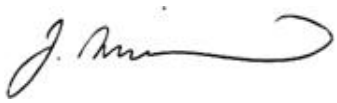
Applicant's Name:	Joe White Maltings Pty. Ltd.
Applicant's Address:	124 – 130 South Terrace ADELAIDE SA 5000

Certification:

I certify that I have prepared this Environmental Assessment and to the best of my knowledge:

- It has been prepared in accordance with the EP&A Act 1979 and the Regulations
- It has been prepared in accordance with the relevant Director General Requirements for the original development dated 15 August 2008
- It does not contain information that is either false or misleading.

Signature:



Date: 13 March, 2014

Executive Summary

Joe White Maltings Pty Ltd (JWM) has commissioned Cardno to prepare this Environmental Assessment (EA) for an additional 12 storage silos at an approved malt processing plant and export grain container packing facility on Lot 201 DP 813362, Stonny Batter Road, Minto.

The existing development on the site was approved in May 2009 and has been operational for some 3 years. It is operating at capacity. With a recent change of ownership of JWM to Cargill, a need has been identified for up to an additional 12 silos to be constructed to allow additional storage capacity on site.

A section 75W modification to the existing approval is sought accordingly.

The proposed development the subject of the modification application comprises 12 steel silos which match the smaller of two silo types already constructed on site. Each silo has a height of 22m, a diameter of 7.31m and a capacity of 721m^3. The silos will be located adjacent to existing silos and analysis bins, within the centre of the site, and will not be discernible in terms of visual impacts external to the site.

The proposed development will not impact on the existing operational capacity of the site, its hours of operations or deliveries nor on the number of operational employees. It is a benign development involving additional storage structures only and there will therefore be minimal, if any, impact on noise, emissions, traffic volumes or risks.

The proposed development will provide JWM with greater flexibility to store product on site for longer periods. This will improve the company's quality testing capacity without adversely impacting on product delivery requirements by allowing grain and/or malt to be stored on site longer.

Public benefit will be an improved quality testing of the product from the site. It is also likely that increased storage will reduce turnover of product and therefore the number of deliveries and dispatch thus reducing truck movements to, from and within the site.

As consent for the original development was issued under Part 3A of the EP&A Act, a section 75W modification application is required for the proposed expansion of the facility to incorporate the additional 12 silos proposed. The Department of Planning and Infastructure (DPI) has advised that only the relevant Director General Requirements (DGR's) from the original Environmental Assessment need to be addressed in this Environmental Assessment (EA) and the Council is the only required referral authority.

The EA assesses these as follows.

***Air Quality & Odour** – the silos perform a storage function only and are covered containers fed by automated overhead conveyors. There are already 16 existing similar or larger silos on the site. As the capacity of the plant will not increase, but product will just be stored longer, there will be no additional dust or odour arising from the additional silos and therefore no impact on air quality.*

***Traffic & Transport** – the majority of receivals and dispatches will continue to be via rail. The silos will not increase the operational output from the site but will allow product to be stored more efficiently onsite. This is only likely to reduce the number of required trips to the site as turnover of product will be reduced with product stored longer and with greater storage capacity. The EA therefore identifies that the development will not detrimentally affect the existing road network or access arrangements.*

***Soil & Water** – there will be no impact on soil or water resulting from the additional silos proposed. The silos will be constructed on existing paved areas of the site.*

***Hazards & Risks** – the EA assesses these in accordance with the proposed development. All risks are considered to be low.*

***Noise & Vibration** – there will be no additional noise or vibration associated with the extra silos once they are erected.*

***Visual** – the silos will be identical to a number of existing silos on site in terms of height, dimensions and material of construction. They will adjoin existing silos which are located internal to the site. They will not therefore have any adverse visual impact on surrounding areas and will not be visible from any residential areas.*

***Greenhouse Gas** – there will be no impact on greenhouse gases associated with the additional storage resulting from the 12 new silos proposed which perform a benign storage role only.*

***Waste** – there will be no adverse impact on waste associated with the additional 12 silos.*

***Development Controls** – the EA demonstrates the development complies with the requirements in the Campbelltown City Council LEP and Sustainable Cities DCP.*

***Developer Contributions** – no additional developer contributions are considered to arise from providing additional storage capacity to the existing development on the site. There will be no increase in operational workforce or additional demand on local infrastructure as a result of the development proposed.*

In summary, the EA demonstrates that there are no adverse impacts or significant risks associated with the development proposed and it therefore does not present a significant danger or have a significant impact on the environment.

The EA concludes that the additional 12 storage silos proposed as an expansion of the existing malting plant and packing facility will not have any significant impacts on the surrounding built or natural environment.

As the development will present no significant impacts in relation to community amenity or on the natural or built environment, it is requested that the DPI support the proposal and the Minister issue an approval to this s75W modification accordingly.

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Appendices

1 Introduction

This section describes the background to the proposal and the reasons for the development.

1.1 Purpose of the Environmental Assessment

In May 2009, approval was granted to Joe White Maltings Pty Ltd (JWM) to construct a malt manufacturing and grain packing plant in Minto (reference 08_0157). The plant was subsequently constructed and is now operating at capacity.

This Section 75W Modification Application assesses a proposal for the construction of up to an additional 12 storage silos on the site. The silos will enable additional and longer term storage on site to meet new quality and operational requirements. **No changes are proposed to the plant's capacity or operational processes or to the existing conditions of consent other than to reflect the additional development proposed.**

The original development consent was granted under Part 3A of the Environmental Planning and Assessment Act 1979 (EP & A Act). This Section 75W Modification Application refers to the development consent granted for the original development (the consent is contained in **Appendix A**).

The malt manufacturing that occurs on site involves processing barley into malt for use in the brewing process. JWM manages the malt manufacturing. The grain packing facility receives barley for JWM and dispatches the malt. Additionally, a variety of grains and pulses, not related to the malting process, are stored and distributed on site for export to customers.

The existing operation's storage facilities both of barley and of malt are currently at or approaching capacity and this Environmental Assessment (EA) examines a proposal to develop up to 12 additional storage silos on site to improve storage capacity. The silos will be of similar height, scale and materials to the existing smaller silos on the site and will be located internal to the site where any visual or other impacts will be minimal and internalised.

The purpose of this Environmental Assessment (EA) is to assess the environmental impacts associated with the construction and use of an additional 12 storage silos on the site.

This EA will provide the Department of Planning and Infrastructure (DPI) and other stakeholders with a document, which details the existing operation and assesses environmental impacts from the proposed development. Given the benign nature of what is proposed, no specialist reports on impacts are considered necessary as no significant adverse impacts will arise from the development now proposed.

1.2 Aims of the Environmental Assessment

This EA aims to demonstrate that:

- The proposed storage silos will adjoin existing silo storage facilities, and match these silos in terms of height, scale and materials of construction.
- The silos will be located internal to the site and will not create any additional visual impact to that already existing when the development is viewed from public vantage points external to the site.
- The proposed silos will improve the operational efficiency of the development but otherwise will not materially alter existing processing or operational aspects of the development.
- There are no environmental constraints or likely adverse impacts which would prevent the proposed development.
- Construction and use of the proposed silos will not have a significant environmental impact but will improve the existing operational efficiency of the plant and the quality of the finished product.

1.3 Scope of the Environmental Assessment

The scope of this EA is to discuss the extent of the environmental impacts from 12 new silos proposed as additional storage facilities on the site.

1.4 Director General Requirements

The original EA was assessed under Part 3A as it was classified by the DoP as a Major Project under the *Environmental Planning and Assessment Act 1979* (as amended).

Director General's Requirements (DGR's) were prepared for the original development (refer **Appendix B**). The Department of Planning and Infrastructure (DPI) has advised that no new DGR's are required for the additional silos proposed however, the relevant DGR's from the original proposal much be examined in light of the expansion of the facility now proposed.

Before release of the DGR's, the DPI consulted with the following public authorities:

- Department of Environment & Climate Change (DECC)
- Campbelltown City Council
- Sydney Water
- Transport for NSW (formerly Railcorp).

Given the nature of development proposed, the DPI has advised that only the Council is likely to be consulted with regard to the additional silos now proposed. Initial discussions on site with the Council's Planning Officer indicated that there are no issues with the existing JWM operation on the site and no likely issues which arise as a result of the additional development now proposed.

Table 1.1 lists the DGR's and identifies which are considered to be relevant to the current proposal and the location of each relevant matter in this document.

Table 1-1 Director General's Requirements (for the original Proposal)

Requirement	If Relevant and, if so, Where Addressed in this Report
General Requirements	
An Executive Summary	Included directly before the Contents pages.
A detailed description of the following: • Historical operations/activities on the site • Existing & approved operations/facilities, including any statutory approvals that apply to these operations and facilities.	History/Site Activities **- Section 2.3** Existing & approved operations - **Section 2.2**
A detailed description of the project, including the: • Need for the project • Alternatives considered, including a justification for the project • Likely staging of the project • Plans of any proposed building works.	Need for the project – **Section 3.1** Alternatives – **Section 3.3** Plans of building works – **Appendix C**
A risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment.	Environmental Risk Assessment – **Section 6**
A detailed assessment of the key issues specified below, and any other significant issues identified in the risk assessment (see above), which includes: • A description of the existing environment, using sufficient baseline data • An assessment of the potential impacts of all stages of the project, including any cumulative impacts, taking into consideration any relevant statutory provisions, and technical or policy guidelines (see below)	Current site description – **Section 2.3** Impacts from different stages – **Sections 7 & 8** Cumulative Impacts – **Section 7.8** Relevant statutory provisions - **Section 4**

• A description of the measures that would be implemented to avoid, minimise, mitigate, remediate, monitor and/or offset the potential impacts of the project, including detailed contingency plans for managing any potentially significant risks to the environment.	Management Measures – **Section 6.5**
A statement of commitments, outlining all the proposed environmental management and monitoring measures.	Draft Statement of Commitments – **Section 10**
A conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the Environmental Planning & Assessment Act 1979.	Conclusion – **Section 11**
A signed statement from the author of the Environmental Assessment, certifying that the information contained within the document is neither false nor misleading.	Signed Statement – **Directly after title pages**
Key Issues	
Air Quality and Odour • An assessment of all air pollutants from all sources during construction and operation and from road and rail transport, including any potential volatile organic compounds, particulates, odour and NOx • Details of all control measures, such as for odour, volatile organic compounds and NOx.	**Not considered relevant to the silo proposal for the reasons outlined in Section 6.3**
Traffic and Transport – including: • A detailed transport impact study of the project on the performance and safety of the surrounding transport network (including road, rail and other public transport) and a description of the measures that would be implemented to upgrade and/or maintain this network over time • An assessment of the potential parking demand of the project • Detailed plans of the proposed layout of the internal road and rail network, site access and parking on site in accordance with the relevant Australian standards.	**Comments on traffic impact are assessed in Section 7.2. No additional parking demand will be generated by the proposed silos nor will there be any impact on the internal road network, parking areas or rail access**
Soil & Water – including: • A detailed water balance for the project, outlining the measures that would be implemented to minimise the use of water on site • Wastewater predictions, and the measures that would be implemented to treat, reuse and/or dispose of this water • The proposed erosion and sediment controls during construction • The proposed stormwater management system • Consideration of the potential salinity, contamination, flooding and acid sulphate soil impacts of the project.	**Not considered relevant to the silo proposal for the reasons outlined in Section 6.3**
Hazards and Risk – including: A Preliminary Hazard Analysis (PHA) of the project, including an assessment of the risks associated with the project, such as from the refrigeration facility and with handling combustible dusts.	**Not considered relevant to the silo proposal for the reasons outlined in Section 6.3**
Noise and Vibration – including: Construction, operation and off site road and rail transportation noise	**Section 7.3**
Visual – including: The design and articulation of the buildings (scale, height and bulk), and proposed lighting and signage; the proposed landscaping of the site; and the visual impacts of the proposal.	**Section 7.4**
Greenhouse Gas – including: Calculations of the scope 1 and 2 emissions from the site, an assessment of the energy use on site, and describe what measures would be implemented to ensure the proposal is energy efficient.	**There is no impact on Greenhouse Gas emissions as outlined in Section 6.3**

Waste – including: Accurate estimates of the quality and nature of the potential waste streams of the project during construction and operation, and a detailed description of the measures that would be implemented to minimise, reuse, recycle and dispose of this waste.	**There is no impact on waste as outlined in Section 6.3**
Development Controls – Demonstrate that the proposal is generally consistent with the development controls in the Campbelltown (Sustainable City) Development Control Plan 2007 and all other relevant development control plans, and justify any inconsistencies between the project and these controls.	**Section 7.6**
Developer Contributions and/or Planning Agreements – Review the project against any relevant contribution plans, and outline what contributions would be made towards the provision of local infrastructure or services.	**As there are no changes to the operational output, workforce or capacity of the development no additional changes to Developer Contributions are warranted as outlined in Section 7.7**
Consultation – During the preparation of the Environmental Assessment, you should consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups or affected landowners. In particular you must consult with the: • Department of Environment and Climate Change • Transport for NSW (formerly Railcorp) • Sydney Water • Campbelltown City Council The consultation process, and the issues raised during this process, must be described in the Environment Assessment.	**Section 5 – given the nature and intent of the silo development proposed, and following liaison with the DoPI, consultation was only undertaken with the Council and not the other agencies listed in the DGR's who were consulted during the assessment and approval of the original plant**

1.5 Overview of Proponent

At the time of the original approval, JWM was a fully owned subsidiary of ABB Grain. ABB Grain was the parent company of Joe White Maltings following a merger between ABB and JWM's former owner, AusBulk in 2004.

Since the plant has been constructed, JWM has again been sold, being purchased by private Australian firm, Cargill in November 2013 (see www.cargill.com.au).

Cargill has a company philosophy of operating in a sustainable responsible manner. The following statement is derived from the Corporate Responsibility statement found on the company's website:

When Cargill began in 1865, our business was founded on the belief that "our word is our bond." Today, as a diversified global company still grounded in a culture of trust and respect, this remains the standard by which we do business. We operate with integrity and accountability. We are committed to feeding the world in a responsible way; reducing our environmental impact; and improving the communities where we live and work. We are passionate about our goal to be the global leader in nourishing people and operating responsibly across the agricultural, food, industrial and financial markets we serve.

Cargill serves the country's large grain export industry and operates in several agricultural and industrial areas. These include oilseed and meat processing, grain and oilseed storage, and flour milling. Cargill Australia' headquarters are located in Melbourne.

JWM is a subsidiary of Cargill and continues to produce malt and to specialise in packaging wheat, barley, legumes and pulses from country storages into containers for export.

A production capacity of 500,000 million tonnes makes Joe White Maltings Australia's largest malting company. JWM malting plants are strategically positioned in all six Australian states close to international

ports and transport links or to Australia's premium barley growing areas. The grain packaging business approved on site is now part of Cargill's operations.

Being part of the Cargill group means that Cargill's corporate philosophy is being adopted throughout JWM's operations. It is Cargill's more stringent testing and quality requirements that have led to the need to store product on site longer for increased testing prior to dispatch. This has directly resulted in the need for additional storage capacity and is why this capacity in the form of additional silo space is being sought even though there are no changes proposed to the capacity of the plant's operations or to the production volumes at the site.

1.6 Background and Requirement

JWM has malting plants in Tamworth, Perth, Port Adelaide, Devonport and Minto. The company produces product for export and domestic use. The Minto Plant was constructed to meet increasing customer demand overseas particularly in SE and north Asia. From the outset the plant has been operating at full capacity to meet demand. The malt manufacturing involves processing barley into malt for use in the brewing process and JWM manages the malt manufacturing. The grain packing facility also operating on site receives barley for JWM and dispatches the malt. Additionally, PGS receives and packs into containers a variety of grains and pulses, not related to the malting process, for export customers.

The Minto site has been in successful operation since being commissioned in 2011. The plant is currently at full capacity. To improve operational efficiencies and to meet the high quality standards of the new parent company, Cargill, additional storage capacity is being sought. The proposed works are to improve storage capacity only and are not intended to increase production levels. Up to 12 new silos are proposed as they are considered the maximum that can be provided without impacting on existing site operations given the space limitations of the site.

1.7 Structure of this document

This EA describes key elements of the proposed development for which JWM are seeking a modified Project Approval. It is set out as follows:

- **Section 2** describes the existing site use and the proposed development
- **Section 3** reviews the need for the project, alternatives to the proposed development and consequences of not proceeding
- **Section 4** assesses relevant Federal, State and Local legislation applicable to the proposed development
- **Section 5** lists relevant stakeholders and consultation undertaken
- **Section 6** provides an Environmental Risk Assessment
- **Section 7** assesses key relevant environmental impacts extracted from the DGR's to the original proposal
- **Section 8** assesses any secondary environmental impacts
- **Section 9** identifies matters in relation to construction management
- **Section 10** provides a draft statement of commitments
- **Section 11** concludes this EA.

2 Site Details and Proposed Development

This section describes the existing use of the subject site and the proposed development.

2.1 Site Location

The site is located at 11 Stonny Batter Road in Minto, approximately 5km north of Campbelltown in Sydney's south western suburbs (refer to **Figure 2-1**).

This location is approximately 50km from the port of Port Botany and has access to the main Sydney to Melbourne railway line via an approved rail siding connecting through the adjoining Macarthur Intermodal Shipping Terminal (MIST) site. The site has access to the Hume Highway/F5 Freeway, which is located approximately 7km away. The links to the highway are predominately via industrial areas and along arterial status roads.

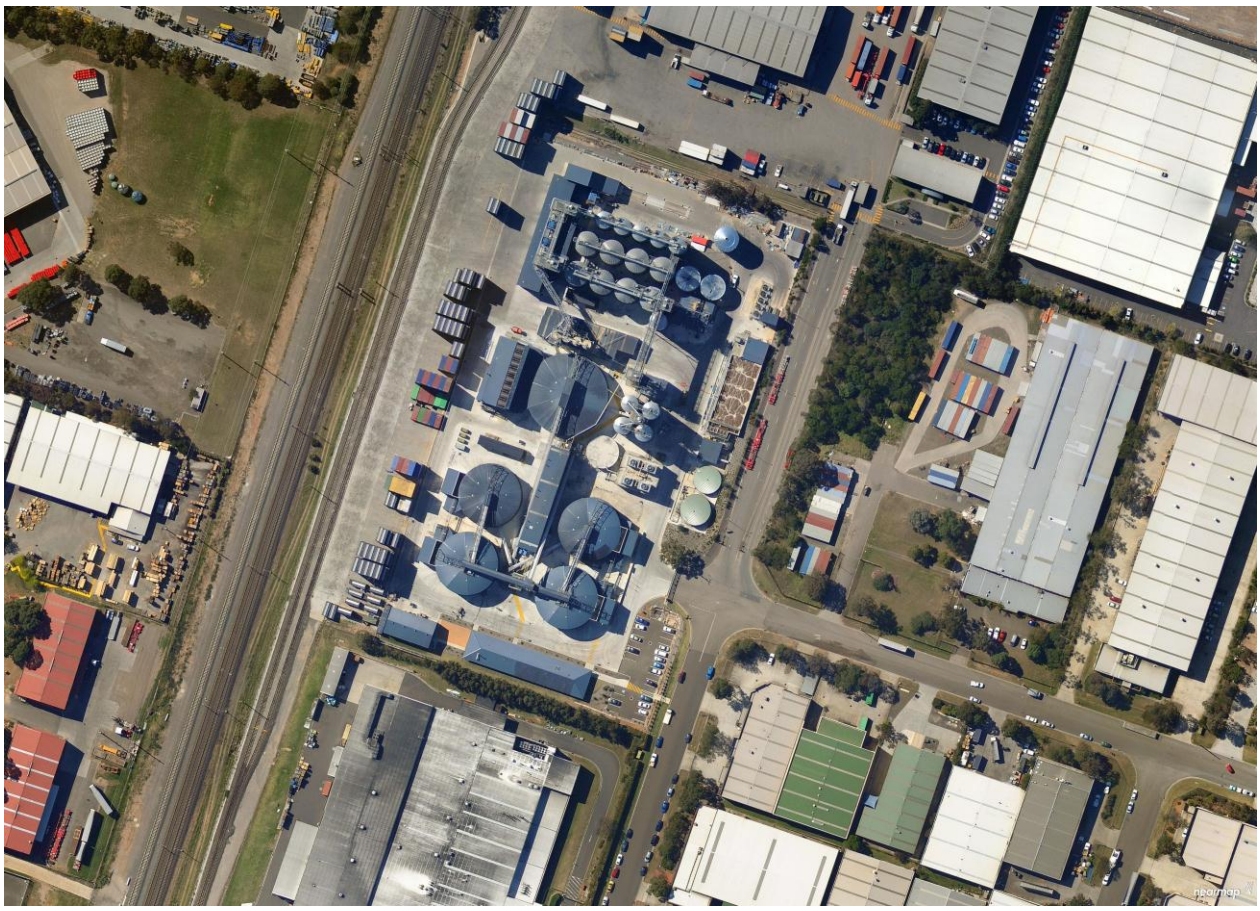


Figure 2-1 Aerial View of Site

Source: NearMap

The legal description of the site is Lot 201 DP 813362. It was formerly known as the old "Hudson Site". It is situated within the Minto Industrial Area and is adjoined by industrial uses and the railway line, which runs along the western boundary (refer to **Figure 2-2** overleaf).

Immediately adjacent to the site to the north is the Macarthur Intermodal Shipping Terminal (MIST).

The site fronts Stonny Batter Road, which is accessed off Pembroke Road. All access to the site is via secured gates accessed from Stonny Batter Road.

Figure 2-2 Site in context of surrounding industrial area *Source: NearMap*

2.2 Existing Approvals (refer Appendix A)

May 2009 The Minister granted Part 3A approval for demolition of existing buildings, and for construction and operation of a malting plant and grain distribution centre (ref: 08_0157) (refer **Appendix A**).

April 2012 A Section 75W Modification Application was approved to allow raw and processed product to be transported via road and rail as required rather than just by rail (also in **Appendix A**).

2.3 Current Site Development

As shown in **Figure 2-3**, the site has been developed and is used for the JWM malting manufacturing plant and grain packing facility. The site has been in operation since construction was completed in 2011.

Figure 2-3 Site from Stoney Batter Road showing existing development *Source: Site Visit 02/14*

The following figures show the existing silos on the site as at February 2014 as well as the location of the proposed new silos.

Figure 2-4 Site of proposed eastern most silos adjacent to existing matching silos

Figure 2-5 Site of western most silos

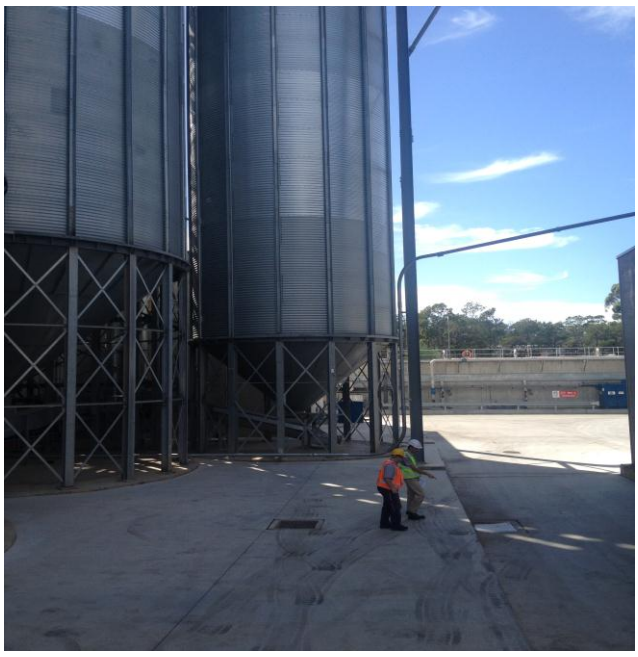


Figure 2-6 Site of two new silos in front of MCC3

Figure 2-7 Conveyor above existing silos (to be extended)

2.4 Existing Site Environment

2.4.1 Existing Site Appearance

The existing site comprises a new state of the art malt and grain packing facility. Development on site comprises 4 germination vessels, a kiln, 16 silos (of which 10 are large and 6 are smaller and of the size of the 12 proposed), 4 analysis bins, covered automated overhead conveyors, a plant room, a water treatment plant, water tanks, effluent tanks, grain transfer station, ancillary facilities and an administration office, maintenance shed and car park.

The site is accessed via security gates and operates 24 hours a day, 7 days a week throughout the year, although deliveries and dispatch are confined to the hours stipulated in the project approval.

The modern exterior of the industrial development of the site contributes to the positive urban renewal of the Minto industrial area.

2.4.2 Existing Air Quality Environment

As required by the approval, air quality is regularly monitored and meets both project approval and EPA licensing requirements. Whilst there is a distinctive 'grain baking' smell in the vicinity of the site, this was anticipated and modelled and is not offensive, particularly relative to other industrial uses in the Minto Industrial Area.

Discussions with Council offices indicate there have been no complaints, including odour complaints, since the facility became operational some 3 years ago. Air quality will continue to be monitored in accordance with approval requirements. There will be no impact on air quality as a result of the additional silos proposed in this application.

2.4.3 Existing Traffic Environment

JWM continues to operate in accordance with the approval commitments to maximise use of the MIST container terminal with the vast majority of deliveries and product dispatch being by rail. The additional silos proposed will not increase the number of traffic movements to the site which may in fact decrease as product will be held longer and dispatched less frequently given silo turnover of product will be in longer cycles. Accordingly it was not considered necessary to undertake a traffic impact assessment.

Traffic associated with construction of the new silos will be managed in accordance with a Construction Management Plan anticipated to be a condition of this s75w modification application. This will be prepared once the staging of construction is known as this has yet to be determined. JWM are considering options as to how many silos will be constructed over what timeframe. This will be determined once approval is granted and will also be contingent upon the availability of the silo structures (imported from Canada) as well as by operational considerations associated with minimising disturbance to existing operations.

2.4.4 Existing Noise Environment

Other than the minimal noise generated by the automated overhead conveyors when they are in use, there is no noise associated with the use of the current silos and none is anticipated with the new silos proposed. All loading and unloading of the silos would occur through the overhead conveyors (which will be extended to the new silos) and be during daylight hours. Therefore, any noise would not only be minimal (as would be expected of modern industrial operations) but would also not occur at night.

In any event there are existing conditions of approval which would be retained dealing with the maximum noise levels that can be emitted from the site and these would be retained and complied with.

2.4.5 Existing Visual Environment

There are already 16 steel silos which are of uniform material and height. There are two sizes in terms of girth. The new silos would be the smaller size (ie a diameter of 7.31m) matching adjacent smaller silos to allow for overhead conveyor extension and to minimise adverse visual impact by ensuring integration with existing development.

Appendix C contains the modification plans of the proposed development; comprising the site plan, elevations and an Iso View of the development once all 12 new silos are erected. It can be seen that the new development would be indistinguishable from the existing development from a visual impact perspective. It is doubtful any of the new silos would be visible or distinguishable as such external to the site including from any residential or recreational areas.

2.5 Site Operations

2.5.1 General Description and Current Operations

The current malting plant produces up to 130,000 tonnes of malt a year on site as allowed for under the current approval. The current approval also allows JWM to import up to 270,000 tonnes of barely or other grains annually and to export up to 140,000 tonnes of grain and 130,000 tonnes of malt a year from the site. The plant is operating at capacity and operational efficiencies are hampered by a lack of storage facilities onsite. This has been exacerbated since the acquisition by Cargill of JWM as Cargill has a quality requirement to undertake additional quality testing both of the grain utilised in the malting process and of the malt product itself prior to dispatch. This increases the need for additional onsite storage facilities as the grain and malt have to be stored on site longer.

The proposed additional silos are therefore not to facilitate increased production but are merely intended to allow product to be stored longer on site prior to use or dispatch.

Other than the need for 10-15 contractors required during the silo construction stage (estimated to last up to 8 months if developed in a single stage), there will be no change to operational staff numbers, hours of operation, or production levels as a result of the additional silos. Their construction will not impact on existing vehicular access or parking arrangement and landscaping of the site will not be affected as the proposed silos will be installed over existing paved surfaces adjacent to existing silos and analysis bins, and not in areas currently landscaped.

2.5.2 The Proposed Development

The existing layout of the site will remain. There will be no demolition of existing development. A further 12 storage silos are proposed and will match the existing smaller silos on site already.

The silos will be supplied by Allied Grain Systems, have a height of 22m, a diameter of 7.31m and a capacity of 721m^3.

As shown in **Figure 2-8,** the silos will be situated within the existing lot boundary and will not affect access to the site or other operational facilities.

Figure 2-8 Location of proposed silos

2.5.3 JWM Proposed Site Operation

There will be no change to current operation of the malt manufacturing and grain packing facility other than to extend the storage capacity on the site by construction up to 12 new silos. The proposed development is not intended to increase production but only to provide adequate storage to assist the plant's operational efficiency and quality testing capacity.

2.5.4 Packing Plant

There will be no change to the existing packing plant associated with this proposal.

2.5.5 Automation

There will be no change to the existing automation of the plant associated with this proposal other than to extend the existing overhead conveyors (shown clearly on **Figure 2-8**) to the new silos and to connect these extended conveyors to the onsite automation system.

2.5.6 Staff

There will be no change to the number of current operational staff on site as a result of the proposed expansion comprising the 12 silos. However, it is estimated that 10-15 contractors would be employed for up to 8 months to install the new silos (if they are all erected at the same time).

2.5.7 Hours of Operation

There will be no change to the existing hours of operation associated with this proposal. The plant operates 24 hours per day, 7 days a week and will continue to do so. The use of conveyancing belts, including to serve the new silos, will continue to largely operate only between 6am and 6pm.

2.5.8 Landscaping

There will be no change to the existing landscaping on site. As shown on **Figure 2-8**, the silos will be built on existing hard stand (paved) areas of the site away from the site boundaries and the existing landscaped areas.

2.5.9 Signage

No additional signage is proposed as part of this proposal.

2.5.10 Structure Construction

The silos will be of galvanised construction manufactured in Canada and then brought to the site to be erected in the same manner as the existing silos on site were erected. Exposed supporting structures will be of galvanised steel.

3 Alternatives and Justification

3.1 Need for the project

The current Minto malting plant lacks sufficient storage silos to operate an efficient process which meets the company's new quality testing requirements which necessitate product being stored on site longer.

The proposed development will not increase the output of the plant but will allow improved storage facilities to meet ongoing operational requirements and new quality testing requirements and standards.

3.2 Justification for the proposed development

The proposed development is not designed to increase revenue or production but to ensure the current demand is met whilst improved quality testing can be undertaken with product able to be stored longer on site. By installing 12 new storage silos to the existing development, the plant can operate more efficiently facilitating the improved testing and quality control of product before it is dispatched into domestic and international markets.

3.3 Alternatives to the proposed development

Due to the nature of the facility, storage silos within close proximity to the site are essential for the plant's operation. The proposed silos are required to increase storage capacity and allow continual operation of the malting plant whilst facilitating ongoing quality testing of product prior to use in and/or dispatch from the plant. There are therefore no alternatives to the proposed development which would not compromise either the quality of the product due to additional handling associated with off site storage or the level of quality testing JWM is seeking to implement prior to product leaving the plant. This is therefore the preferred option.

3.4 Consequences of not proceeding

If the silos are not constructed, JWM will continue to meet minimum quality standard requirements. However, the higher quality standard the company is seeking to implement by increased storage and testing of product on site would either be lost or the efficiency of operation or ability to meet demand compromised. This is because the plant is already operating at full capacity and if the existing silos need to hold the product longer to meet the company's increased quality focus, current supply turnaround times would be reduced and ability to meet existing and ongoing demand also reduced accordingly.

4 Regulatory Framework

This section outlines the current regulatory framework that applies to the JWM proposal and considers policies relevant to the malting plant.

4.1 Planning Approach

Assessment of the project in accordance with the provisions of the Environmental Planning & Assessment (EP&A) Act 1979.

The Department of Planning and Infrastructure (DPI) confirms that an Environmental Assessment (EA) for a section 75W modification of a consent issued under Part 3A of the EP&A Act is required. The Minister will be the consent authority for the proposed development.

Other legislation, guidance and policies are applicable to the JWM expansion proposal based on the nature of the work, environmental factors and geographical location. A discussion of the relevant regulatory framework is below.

4.2 Federal Legislation

4.2.1 Environmental Protection and Biodiversity Conservation Act 1999

There are no aspects of the expansion proposal which trigger considerations under this legislation.

4.3 NSW Legislation

4.3.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) legislates the Town Planning process for all developments in NSW. Where projects are approved by the Minister under Part 3A of the Act, as the JWM facility was, there is a requirement for any modification to that consent under section 75W of the Act, to also be determined by the Minister on advice from the DPI.

The EP&A Act defines numerous objectives. The objectives considered relevant to the original malting plant and packing facility proposal were to encourage:

- The proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment
- The promotion and co-ordination of the orderly and economic use and development of land
- The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats
- Ecologically sustainable development
- The sharing of the responsibility for environmental planning between the different levels of government in the State.

The malting plant and packaging facility were approved and now operate under these objectives. The proposed expansion of the development by the addition of 12 storage silos also meets these objectives. It will provide additional storage facilities to ensure the plant continues to operate efficiently at maximum capacity but will enhance the quality of the product without any adverse environmental, social or economic implications.

4.4 State Environmental Planning Policies

4.4.1 State Environmental Planning Policy (Major Projects) 2005

Schedule 1 sub-clause 3 of the Major Projects SEPP identifies the following use as a major project:

3 Agricultural produce industries and food and beverage processing

Development that employs 100 or more people or has a capital investment value of more than $30 million for any of the following purposes:

(a) abattoirs or meat packing, boning or products plants; milk or butter factories; fish packing, processing, canning or marketing facilities; animal or pet feed; gelatine plants; tanneries; wool scouring or topping; rendering plants, or

*(b) cotton gins; cotton seed mills; sugar mills; sugar refineries; grain mills or silo complexes; edible or essential oils processing; breweries; distilleries; ethanol plants; soft drink manufacture; fruit juice works; canning or bottling works; bakeries; small goods manufacture, **cereal processing** or margarine manufacturing; wineries, or*

(c) organic fertiliser plants or composting facilities or works, or

(d) any purpose that the Minister considers constitutes an agricultural produce industry or food and beverage processing.

(emphasis added)

4.4.2 SEPP 55 – Remediation of Land

Land contamination studies were undertaken with the original EA. There were no records indicating site contamination. No further assessment needs to be undertaken with this Section 75W Application.

4.5 Regional Environmental Plans

4.5.1 Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment

This proposed development has no further impact on Regional Environmental Plan (deemed SEPP) than the overall development of the site which was approved in May 2009.

4.6 Local Planning Controls

4.6.1 Campbelltown Local Environment Plan 2002

The subject site is zoned 4(a) General Industrial under the Campbelltown (Urban Area) LEP 2012. As this proposal is to be assessed under Part 3A of the EP&A Act compliance with this LEP is not compulsory. However, the assessment below identifies that the proposed development complies with this LEP.

12 Zone 4 (a)—General Industry Zone

(1) What land is within Zone 4 (a)?

Land is within Zone 4 (a) if it is shown coloured mauve on the map.

(2) What are the zone objectives and what effect do they have?

The objectives of this zone are:

(a) to encourage activities that will contribute to the economic and employment growth of the City of Campbelltown, and

(b) to allow a range of industrial, storage and allied activities, together with ancillary uses, the opportunity to locate within the City of Campbelltown, and

(c) to encourage a high quality standard of development which is aesthetically pleasing, functional and relates sympathetically to nearby and adjoining development, and

(d) to protect the viability of the commercial centres in the City of Campbelltown by limiting commercial activities to those associated with permitted industrial, storage and allied development, and

(e) to ensure development will not be carried out unless the consent authority is satisfied that the processes to be carried on, the transportation to be involved, or the plant, machinery or materials to be used, do not interfere unreasonably with the amenity of the area.

Except as otherwise provided by this plan, consent must not be granted for development on land within this zone unless the consent authority is of the opinion that carrying out the proposed development would be consistent with one or more of the objectives of this zone.

(3) What development may be carried out without consent?

Development may be carried out on land within this zone without consent for the purpose of:

drainage; forestry; utility installations.

(4) What development may be carried out only with consent?

Development which is not included in subclause (3) or (5) may be carried out with consent on land within this zone.

(5) What development is prohibited?

Development is prohibited on land within this zone if it is for the purpose of:

boarding-houses; bulky goods retailing; caravan parks; commercial premises (other than those associated with, or ancillary to, any other permissible development and located on the same site as that development); dwellings (other than conjoint dwellings); exhibition homes; extractive industries; hazardous industries; hazardous storage establishments; hospitals; institutions; liquor stores; offensive industries; offensive storage establishments; places of assembly; religious establishments (other than those in existing industrial buildings); retail plant nurseries; roadside stalls; shops (other than those primarily intended to serve people employed or occupied in land uses permitted in the industrial zones).

The proposed works are permissible with development consent and are considered an ancillary addition to the original development. The plant will continue to function within the terms of its original approval.

4.7 Development Control Plans

The original EA was assessed against the *Campbelltown (Sustainable Cities) DCP 2007* which has now been superseded. *Campbelltown (Sustainable Cities) DCP 2012* now applies to the site.

4.7.1 Campbelltown (Sustainable City) DCP 2012

There are no controls with this DCP which affect the proposed works.

4.7.2 Section 94 and 94A Plans

Section 7.6 contains an assessment of the proposed malting plant and packing facility in terms of Campbelltown City Council Section 94 & 94A Plans.

5 Consultation

This section describes consultation undertaken as part of this EA.

5.1 Statutory Bodies

Cardno, on behalf of JWM, has consulted with the following Government bodies prior to the preparation of the EA.

5.1.1 Department of Planning and Infrastructure

Consultation with the DPI confirmed that the proposed development would need to be approved as a section 75W modification to the original Part 3A approval. No new DGR's were required however, this EA needed to address the relevant provisions of the DGR's for the original application. If there were determined to be no adverse external impacts, referral would not be required other than to the local Council.

5.1.2 Campbelltown City Council

A meeting was organised onsite with the Development Assessment Manager of Campbelltown City Council. Accompanied by Cardno and JWM representatives, the Council Officer toured the existing facility and noted the nature of the existing silos (which the proposed silos would replicate) and the proposed location of the new silos. Cardno were advised that there had been no complaints received by the Council as a result of the operation of the existing plant and that no external impacts were considered likely arising from the new silos. The only potential issue was that of visual impact but the location of the proposed silos meant that they would be largely screened by or integrated with the existing silos and they would be unlikely to be seen from public vantage points external to the site.

Accordingly, the Council did not believe advertising or public notification of the proposal would be necessary.

5.1.3 Other bodies

Given the benign nature of the storage silos proposed internal to the site, no other referral bodies were identified or consulted.

5.2 Community

The proposed development comprises additional storage silos only which complement and mirror the existing storage silos onsite in terms of scale, height, materials and form. They will be located internal to the site, primarily adjacent to existing silos and connected by an extension of the existing overhead conveyor system. It is unlikely they will be visible from public vantage points external to the site, and if they are, they would be indistinguishable from the existing silos and development which are of a modern nature relative to other developments located in the Minto Industrial Area.

The proposal does not involve any change to the operational capacity of the plant, any increase in the volume of traffic to/from the site, or any increase in the number of employees post construction. Nor will it have any adverse offsite impacts. The silos are proposed purely to improve the operational efficiency of the plant and allow improvements in the quality testing arrangements of the product it produces.

The site is located more than 400m from any residential properties and is amidst older industrial development. There have been no complaints from the community about its operations since it commenced operations 3 years ago.

For these reasons, and in particular the fact that there are no adverse external impacts associated with the proposal, consultation with the community was not undertaken nor is it considered necessary. Discussions with the Council confirmed this conclusion.

6 Environmental Risk Assessment

This section identifies risks associated with the proposed development and the identified management measures.

6.1 Introduction

The DGR's for the Environmental Assessment for the original plant required that an environmental risk assessment be undertaken for the project's specific construction and operational risks (refer **Appendix B**). Such an assessment was prepared for the total plant including the original 16 silos which form part of the current plant.

The overall risk assessment remains relevant to the operation of the facility. The following risk assessment in this EA relates only to the 12 new silos proposed. Accordingly most of the risk items identified for the total plant (ie associated with the malt production process itself) are not relevant for the proposed silos which will perform a storage function only.

6.2 Risk Categories

The basis for identification of environmental risks is an appreciation of the site location and an understanding of the proposed silos, which are replicas of existing silos on site used for a similar purpose.

The risk assessment was based on an index formed from the perceived likelihood of an occurrence, and the subsequent consequence of that occurrence using the process outlined in the Australian Standard *AS/NZS 4360:2004 Risk Management*.

Both likelihood and consequence were measured on a scale of 1 – 5 (with 1 corresponding to improbable/negligible and 5 corresponding to frequent/catastrophic). A subsequent index was developed and all identified risks classified as belonging to either 'Low', 'Moderate' or 'High' risk categories (**Table 6.1**). This is a conservative index, emphasising the number of Moderate and High risks identified.

Table 6.1- Environmental Risk Assessment Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Catastrophic
Improbable	Low	Low	Low	Moderate	Moderate
Remote	Low	Low	Low	Moderate	High
Occasional	Low	Moderate	Moderate	High	High
Probable	Moderate	Moderate	Moderate	High	High
Frequent	Moderate	High	High	High	High

6.3 Excluded Risk Categories

The risk assessment does not consider the following environmental risk categories which formed part of the risk assessment for the overall plant and therefore would apply to any new development on the site including the new silos but are not directly or specifically relevant to the expansion/additional silos for the reasons outlined overleaf:

Risk Category Included For Overall Plant	***Reason for Not Including in this EA***
Odour and Air Quality	There will be no odour or air quality issues associated with the new silos which perfom storage functions only
Water/wastewater	There is no water or wastewater usage associated with the silos
Flooding	There are no flooding issues associated with the silos that are not already addressed in the risk assessment for the entire plant
Trade Waste	There will be no trade waste associated with the new silos which perform storage functions only
Heritage	There are no heritage issues associated with the new silos which will be erected over existing hard stand areas developed as part of the new plant
Energy Use	There is no additional energy use associated with the additional silos other than marginal additional automated conveyor belt lengths. However, this will likely be offset with less turnover of stored product with longer storage periods.
Flora and Fauna	There are no flora or fauna issues associated with the new silos which will be erected over existing hard stand areas developed as part of the new plant
Health	There are no health risks which arise specifically associated with the new silos proposed
Vermin	There are no additional vermin risks which arise specifically associated with the new silos which will be vermin protected to the same degree as the existing silos
Fire Hazard	There are no additional fire risks which arise specifically associated with additional silos as they are sealed containers in which only storage is undertaken
Climatic Conditions	There are no additional climate condition risks which arise specifically associated with the new silos proposed
Natural Hazards	There are no additional natural hazard risks which arise specifically associated with the new silos proposed
Greenhouse Gas Emissions	There will be no Greenhouse Gas Emissions generated from the new silos which perform storage functions only

6.4 Environmental Risk Assessment Summary

Table 6.2 overleaf summarises the environmental impacts associated with the development of the 12 new silos, assigns a risk for each, and provides comments and/or mitigation strategies for each as appropriate.

Table 6.2 – Environmental Risk Assessment

Environmental Impact	Process/Activity	Potential Impacts from New Silos	Risk	Comments and Mitigation Actions
Traffic and Transport	On site construction traffic	Pedestrian incident associated with construction traffic	**LOW**	JWM controls all access to and within the site. The location of the proposed silos will be known to onsite workers and is internal to the site. The silos are transported as component parts assembled on site. A Traffic Management Plan for the construction phase will be prepared and implemented.
	Off site construction traffic	Road traffic incident resulting from changed transport routes	**LOW**	Detailed and visible signing of road changes and speed limits will be provided when the silos are brought to the site.
Noise	Construction of silos	Exceedence of acceptable noise limits during construction, particularly at sensitive receivers	**LOW**	No noise complaints were received or exceedences experienced for the entire plant which included 16 silos. Erection of an additional 12 silos internal to the site will have less impact and will comply with noise levels set for the original consent. The nearest residential receiver is 400 m from the site.
	Operation of silos	Exceedence of acceptable noise limits during operation, particularly at sensitive receivers	**LOW**	As was determined for the plant overall, the location of the works and nature of the area diminishes the likelihood of noise levels exceeding DECC guideline. The only operational noise associated with the silos will be the filling/emptying of the silos done by covered and automated overhead conveyors during daylight hours and these currently operate with the existing silos with minimal noise emissions.
On-Site Movement	Movement of pedestrians around the site	Worker incident associated with construction	**LOW**	There are designated pedestrian areas around the plant. “Hi-vis” vests are a requirement for all pedestrian movements around the site. Where the silos are to be erected in areas currently used by pedestrians, these areas will be cordoned off and developed in accordance with a Construction Management Plan.
Visual Amenity	Construction of silos	Disturbance to visual amenity during construction	**LOW**	The silos will be located adjacent to existing silos and analysis bins internal to the site and away from general public view.

			The industrial nature of the area and distance from sensitive receivers (such as houses) will minimise any impact. Viewing of the new silos from public vantage points, including their construction, is considered to be unlikely or indistinguishable from existing silos and the plant itself.
Existence of additional silos on site	Disturbance to visual amenity from the silo structures	**LOW**	The silos are suitable structures within an industrial area and replicate existing silos on site. The topography, surrounding buildings and tall trees obstruct views from the majority of residential areas. Viewing of the new silos from public vantage points is considered to be unlikely or indistinguishable from existing silos and the plant itself.

6.5 Risk Management for the site

6.5.1 General Site Operations

There will be no changes proposed to the operation of the existing malting plant other than to provide additional storage capacity and less areas of hard stand surrounding the plant. All impacts associated with the installation and operation of the 12 new storage silos are considered to be low risk.

Management of risk, given what has already been identified and implemented to manage the risk associated with the overall plant and the existing silos, will therefore largely be confined to the construction phase.

6.5.2 Personnel Safety – Outdoor Operations Areas

All personnel at the site are suitably qualified and safety trained to operate the plant, including the loading and unloading of the storage silos and associated infrastructure. There will be no changes in staffing numbers or operations of the site associated with the new silos other than providing additional capacity and an extended conveyance system. As the new silos are replicas of existing silos used on site, no additional safety training is required.

7 Environmental Impacts

This section describes the potential environmental impacts identified from the malting plant.

7.1 Overview of Environmental Assessment

JWM are an Australian company who have been in operation for 140 years. They have established and operate 8 malting plants in 6 states and have an enviable operational and safety record. They have an ongoing commitment to invest in the latest technologies to ensure their operations are sustainable and efficient. Their extensive experience and industry knowledge demonstrated by their existing operational plants will ensure that environmental impacts are minimised and any issues addressed in the operation of the facility, including for the expansion of the Minto plant by the addition of 12 new silos.

The proposed new silos, as with the existing JWM facility at Minto, will incorporate and maintain appropriate environmental standards and comply with all NSW Government policies and legislation. JWM will continue to conduct all operations in an environmentally sensitive manner in order to protect the environment and to minimise potential impacts upon the community. They will do so under an EPL.

7.2 Traffic and Transport

There is considered to be no specific or adverse impact associated with the new silos on the traffic network or operations. During construction, a Traffic Management Plan will form part of the Construction Management Plan. The existing access arrangements for product delivered to the site and dispatched from the plant will remain but the number of dispatch vehicles will likely reduce as the product will be stored longer and with more storage capacity on site.

7.3 Noise and Vibration

There will be no vibration impacts associated with the erection or use of the silos.

The silos are for storage purposes only and there will therefore be minimal increase in operational noise associated with the use of the silos relative to that currently emitted from the plant (including the existing silos). There will be some noise during the delivery and erection of the new silos and associated with the use of the extended overhead conveyors. However, the nearest sensitive receiver is 400m from the site, there were no noise issues or exceedences during the construction of the overall plant or of the existing silos, and the new silos will be erected internal to the site during daylight hours in accordance with the Construction Management Plan.

The new silos will meet the overall noise emissions permissible from the plant in accordance with the current approval and proponent commitments.

7.4 Visual

The proposed silos will match existing smaller silo structures on site in terms of height, size, scale and appearance.

The site is located in a natural valley. The valley runs north – south with higher land located to the east and west. In the locality of the subject site, the land rises more steeply to the east and slightly drops in height to the west. The low point of the valley is Bow Bowing Creek, which is located approximately 715m west of the subject site. Bow Bowing Creek is approximately 40m AHD, the subject site is approximately 55m AHD and the junction of Stonny Batter Road and Pembroke Road is approximately 75m AHD.

The current and surrounding use of properties is industrial in nature. The proposed silos will be located internal to the site, away from site boundaries and adjacent to existing silos and analysis bins of a similar or larger scale. It is unlikely that the proposed silos will be visible from public vantage points external to the site and, even if they are viewed, they will be indistinguishable as new development relative to the existing development on the site.

It is therefore concluded that there will be no adverse visual impact associated with the development. This finding was confirmed during the site visit undertaken with Council's Assessment Officer and JWM representatives.

7.5 Other

The following factors were assessed under the original EA and no change will occur as a result of the proposal:

> External Lighting

> Signage

> Landscaping

> Odour or Air Quality

> Water/Wastewater Useage

> Flooding

> Trade Waste

> Heritage, flora or fauna

> Energy Use

> Health Risks

> Vermin

> Fire Hazard

> Climatic Conditions

> Natural Hazards

The commitments made and conditions imposed on the development and operation of the overall facility in the original approval will continue to apply notwithstanding the modifications proposed to the storage capacity of the site under this Section 75W application.

7.6 Development Controls

The proposed silo storage facilities will match existing silos to maintain the building form and character of the existing development. The amount of car parking spaces will not change from the approved development proposal and remain adequate for workers and visitors with no change to either workers or visitors expected post construction as a result of the additional silos.

There will be no change to landscaping at the site as the proposed silos will be installed on existing hard surfaces and the silos will be substantially setback from existing property boundaries and immediately adjoin existing silos or analysis bins which are of a similar appearance, height, scale and structure.

7.7 Developer Contributions

As the proposed additional storage silos will not have any impact on the production levels or operational workforce associated with the existing plant, no additional developer contributions to those paid upon approval of the original plant in 2009 are considered warranted or appropriate.

7.8 Cumulative Impacts

The definition of a cumulative assessment can be:

> *"The cumulative impacts on the environment both direct and indirect, which result from the development and operation of the proposed silos, added to other past, present and reasonably foreseeable future development proposals and activities in the region affected by the proposed development."*

Cumulative impacts relate to compounding effects and interactions arising from developments proposed or under implementation within the locality or at a similar time which together impact on the natural or built environment. This ensures consideration of environmental impacts from JWM is not isolated from surrounding developments.

The original EA concluded that there were no significant detrimental impacts from the malting plant and grain packing facility. The proposed works are not affecting the output volumes or production processes associated with the plant and are proposed for storage purposes only. Therefore the proposed development is not considered to have any adverse cumulative impact on the site itself or on its surrounds.

8 Secondary Environmental Impacts

8.1 Utilities

Electricity, gas and water supply will not be affected by the proposed development. The storage silos require none of these utilities.

8.2 Vermin

The presence of feral animals onsite is undesirable due to health and safety requirements. Feral animals, such as the Black Rat (*Rattus rattus*) and the House Mouse (*Mus domensticus*) are potential feeders of spilled barley grain. Rats are capable of transmitting the diseases leptospirosis and Salmonellosis to humans (Wilson et at, 1992). Pigeons are also possible site pests, which again feed on spilled grain.

As with the existing plants and storage silos, JWM will ensure the maintenance of strict health standards throughout the storage process. The silos are designed to be filled and emptied by overhead conveyors and to be sealed to preclude the entry of vermin. JWM employees will immediately clean any grain or product spills as occurs with the existing silos. In the event of any vermin being located onsite, appropriate control measures are in place.

As an export facility, the plant complies with Australian Quarantine Inspection Service (AQIS) standards. These require a higher level of hygiene and monitoring than domestic based industries. The same requirements will equally apply to the new silos.

8.3 Fire

The fire risks and protocols were assessed under the original EA. The current operation complies with industry standards as will the additional silos.

Extensive interlocks are provided between motors, switchboards and conveying or elevating systems, with shut down and alarm default settings. A full fire control panel for both the JWM & PGS facilities links to appropriate fire stations and completes the fire prevention and control system. The new silos and extended automated overhead conveyors will be integrated into this system.

All site personnel complete full fire response training, with Fire Wardens trained and appointed. Fire safety equipment is also in place around the plant as required by the fire authorities.

8.4 Heritage (European and Aboriginal)

Other than in the landscaped areas, the site is entirely developed with buildings, structures or hard surface areas. Issues of heritage values were assessed prior to the site being approved for development of the existing JWM plant. Campbelltown City Council has confirmed that the land is not within a designated Conservation Area and there are no items of environmental heritage recorded for the site.

8.5 Ecological Sustainable Development

Ecologically Sustainable Development is founded upon four basic principles to ensure that proposed developments minimise their ecological footprints. These are:

- The precautionary principle
- Inter-generational equality
- Conservation of biological diversity and ecological integrity
- Improved valuation, pricing, and incentive mechanisms in relation to environmental factors.

The JWM malting plant and grain packing facility continues to meets these four guiding principles through ongoing operations. The proposed silo storage facilities will also meet these principles.

9 Demolition and Construction Management

There is no demolition required to install the silo storage facilities.

A Construction Management Plan (CMP) will be prepared for the new silos whether developed in stages or as a single development. The CMP will include a Traffic Management Plan to offset any impact on the local traffic network when the 12 silos are delivered.

The CMP will also meet the following relevant commitments contained within the approved Environmental Management Plan for the existing plant:

- Noise – no works outside 7am to 5pm Monday to Saturday.

The noise assessment for the original plant identified that the construction of the silos is unlikely to have any significant impact on the surrounding area

10 Statement of Commitments

This sections sets out commitments that JWM and Cargill will abide by upon approval of this Section 75W Modification Application.

The ongoing operation of the malting plant and grain packing facility will remain as approved and the 12 new silos will be integrated into this operation. This EA proposes no changes to the current commitments other than to reiterate those of particular relevance to the new silos and/or to add additional commitments as outlined in **Table 10.1** below.

Environmental risk mitigation measures will continue to be enforced to guarantee safety and compliance in accordance with the original EA.

Table 10.1 – Commitments

Objective	Commitment
Construction Works	
• Safe working environment. • Minimise environmental impact.	• Construction Management Plan to be prepared for the works and submitted with the Construction Certificate. • Compliance with the existing Environmental Management Plan and EPL for the Minto site including provisions relating to construction works. • All works conducted in accordance with relevant construction legislation.
Operation of Silos	
• Safe working environment.	• Site specific and job specific OH&S training for all staff. • Provision of information regarding safe working practices for the development. • Identification of pedestrian walkways around silos in locations where dangers may be present. • Separation, where possible, of pedestrians and vehicles. • Requirement for appropriate personal protective equipment to be worn onsite. • Appropriate number of staff to receive first aid training.
Noise Management	
• Responsible management of JWM construction noise. • Responsible management of JWM site operational noise.	• Care taken to avoid excessive noise during construction. • Demolition and construction works only between 7am – 5pm Monday to Saturday. • Ensure maintenance of equipment to limit noise emissions. • Repair of any equipment that fails and results in excessive noise emissions without undue delay.
Visual	
• Minimise visual impacts from site.	• Use of galvanised silos to reduce light reflection.
Environmental Monitoring	
• To ensure compliance with any Environmental Protection Licence (EPL) issued for the malting plant and packing facility.	• Ongoing implementation of the site's Environmental Management Plan which documents environmental monitoring in accordance with the EPL. Modifications to the EMP and EPL as may be required to incorporate the additional 12 silos.
Landscaping	
• Minimise any adverse visual impact of the JWM operations on surrounding community.	• No landscaping will be removed or affected as a consequence of the construction of the additional 12 silos proposed by this application.

11 Conclusion

This section highlights the key findings of the EA and concludes the report.

Joe White Maltings (JWM) will continue the successful operation of the Minto plant and propose to enhance this by the provision of an additional 12 storage silos.

The development represents an opportunity to increase the storage facilities currently at the site to allow a more efficient operation and to enhance product quality. The proposed development will not increase output of the malting plant which will continue to operate in accordance with the consent conditions of the original approval. It will however assist JWM in meeting the demands of existing clients whilst enhancing product quality testing capacity.

The JWM malting plant at Minto continues to add value to the NSW agricultural industry and the proposed expansion with additional silos will assist in ensuring a quality downstream product (malt) from NSW agricultural produce (barley).

The malting plant and grain packing facility will continue to operate in accordance with the current approval under Part 3A and approved modifications. No changes to the conditions of consent are sought except as may be required to reflect the additional 12 silos proposed.

In summary, the project involves the installation of 12 new storage silos which match a number of smaller silos already existing on the site. They will be appropriately located internal to the site to minimise disruption on existing operations, maximise efficiency and minimise any visual impact on the surrounding area.

There will be no change to the operational workforce but up to 15 contractor jobs will be created during the construction phase expected to last 8 months if the silos are all erected together or proportionally should they be staged.

This EA concludes that there are no adverse environmental impacts associated with the expansion of the existing facility in the manner proposed.

Environmental Assessment

APPENDICES

Cardno
Shaping the Future

Environmental Assessment

APPENDIX A
CURRENT APPROVALS INCLUDING MODIFICATION APPROVAL

Cardno
Shaping the Future

Project Approval

Section 75J of the *Environmental Planning and Assessment Act 1979*

I approve the project referred to in Schedule 1, subject to the conditions in Schedules 2 to 4.

These conditions are required to:

- prevent, minimise, and/or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the project.

The Hon Kristina Keneally MP
Minister for Planning

Sydney 12 May 2009

SCHEDULE 1

Application Number:	08_0157
Proponent:	Joe White Maltings Pty Ltd
Approval Authority:	Minister for Planning
Land:	Lot 201 DP 813362 - Stonny Batter Road, Minto
Project:	Minto Malting and Grain Project

TABLE OF CONTENTS

DEFINITIONS

AEP	Annual Exceedence Probability flood event
BCA	Building Code of Australia
Construction	All demolition and construction works to be undertaken on site
Council	Campbelltown City Council
Day	The period from 7am to 6pm on Monday to Saturday, and 8am to 6pm on Sundays and Public Holidays
DECC	Department of Environment and Climate Change
Department	Department of Planning
Director-General	Director-General of Department of Planning, or delegate
EA	Environmental Assessment titled *Proposed Malting Plant and Packaging Facility, Lot 201 DP 813362, Stonny Batter Road, Minto*, volumes 1 and 2, dated November 2008 and the Proponent's response to the issues raised during the exhibition period
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
Evening	The period from 6pm to 10pm
Incident	An incident causing or threatening material harm to the environment, and/or an exceedance of the limits or performance criteria in this approval
Minister	Minister for Planning, or delegate
Ministry of Transport	New South Wales Ministry of Transport
Night	The period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and Public Holidays
Offensive Odour	See definition in the *Protection of the Environment Operations Act 1997*
POEO Act	*Protection of the Environment Operations Act 1997*
Project	The development as described in the EA
Proponent	Joe White Maltings Pty Ltd, or its successors
Reasonable and Feasible	Reasonable relates to the application of judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements. Feasible relates to engineering considerations and what is practical to build.
RailCorp	Rail Corporation New South Wales
RBL	Rating Background Level as defined in the DECC's *Industrial Noise Policy*
RTA	Roads and Traffic Authority
Site	The land referred to in Schedule 1
Statement of Commitments	The Proponent's commitments in Appendix 2.

SCHEDULE 2
ADMINISTRATIVE CONDITIONS

Obligation to Minimise Harm to the Environment

1. The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the project.

Terms of Approval

2. The Proponent shall carry out the project generally in accordance with the:
   (a) EA;
   (b) site plan (see Appendix 1);
   (c) statement of commitments (see Appendix 2); and
   (d) conditions of this approval.

3. If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of the inconsistency.

4. The Proponent shall comply with any reasonable requirement/s of the Director-General arising from its assessment of:
   (a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with this approval; and
   (b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence submitted by the Proponent.

Limits of Approval

5. This approval shall lapse if the Proponent does not substantially commence the building works associated with the project within 5 years of the date of this approval.

6. The Proponent shall not:
   (a) import more than 270,000 tonnes of malting barley or grain a year onto the site;
   (b) produce more than 130,000 tonnes of malt a year on site; and
   (c) export more than 140,000 tonnes of grain and 130,000 tonnes of malt a year from the site.

7. The Proponent shall ensure that all the grain and barley imported onto the site, and all the malt and grain exported from the site, occurs via the adjoining rail siding to the Main Southern Railway. However, in exceptional circumstances, the Proponent may ignore these restrictions for short periods with the written approval of the Director-General.

Structural Adequacy

8. The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.

   Notes:
   - *Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.*
   - *Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.*

Demolition

9. The Proponent shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.

10. Prior to the commencement of demolition works, the Proponent shall prepare a Demolition Work Plan in consultation with Council, and to the satisfaction of the Director-General. This plan must:
    (a) Describe the measures that would be implemented on site to ensure compliance with *Australian Standard AS 2601-2001: The Demolition of Structures*; and
    (b) Include the details of the demolition contractor.

    Following approval, the Proponent shall implement the plan to the satisfaction of the Director-General.

Protection of Public Infrastructure

11. The Proponent shall:
    (a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters, footpaths), in consultation with Council, and submit a copy of this report to the Department prior to the commencement of demolition works;
    (b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and
    (c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

Operation of Plant and Equipment

12. The Proponent shall ensure that all plant and equipment used on site is maintained and operated in a proper and efficient manner.

Developer Contribution

13. Prior to the commencement of operations, the Proponent shall pay Council $50,000 as a contribution towards the provision of infrastructure and services for the employees of the project.

Management Plans

14. With the approval of the Director-General, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.

SCHEDULE 3
SPECIFIC ENVIRONMENTAL CONDITIONS

AIR QUALITY

Offensive Odours

1. The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.

Nitrogen Oxide Emissions

2. The Proponent shall implement Best Available Control Technology to minimise, as far as practicable, the nitrogen oxide emissions of the project to the satisfaction of the DECC.

Dust

3. The Proponent shall implement all reasonable and feasible measures to minimise dust generated by the project.

4. During construction, the Proponent shall ensure that:
   (a) all trucks entering or leaving the site that could generate dust have their loads covered;
   (b) trucks associated with the project do not track dirt onto the public road network; and
   (c) public roads used by these trucks, in the vicinity of the site, are kept clean.

Independent Air Quality Audit

5. Within 6 months of the commencement of operations on site, the Proponent shall commission and pay the full cost of an Independent Air Quality Audit of the project. This audit must be conducted by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Director-General. During the audit, this expert must:
   (a) consult with DECC and the Department;
   (b) measure all key odour sources and audit the effectiveness of the odour controls on site;
   (c) audit the air emissions of the project criteria, and in particular the nitrogen oxide emissions;
   (d) determine whether the project is complying with conditions 1, 2 and 3 above; and, if necessary,
   (e) recommend measures to minimise the odour or air emissions of the project.

6. Within 2 weeks of this audit being completed, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to DECC and the Director-General with an action plan for the implementation of any recommendations contained in the audit report.

SOIL AND WATER

Water Pollution

7. The Proponent shall not cause or permit any waters to be polluted, as defined under Section 120 of the POEO Act.

Wastewater Discharges

8. The Proponent shall ensure that all of the wastewater discharged from the site is discharged to sewer under a trade waste agreement with Sydney Water.

Bunding

9. All chemicals, fuels and oils shall be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) shall be designed and installed in accordance with the:
   (a) requirements of all relevant Australian Standards; and
   (b) DECC's *Storage and Handling Liquids Environmental Protection - Participant's Manual*.

Erosion and Sediment Control Plan

10. During construction, the Proponent shall implement appropriate erosion and sediment controls on site, in accordance with the relevant requirements in Landcom's (2004) *Managing Urban Stormwater: Soils and Construction* manual to the satisfaction of the Director-General.

Stormwater Management Plan

11. The Proponent shall prepare and implement a Stormwater Management Plan for the project to the satisfaction of the Director-General. The plan/s must:
    (a) be prepared in consultation with Council and RailCorp;
    (b) be submitted to the Director-General for approval prior to the commencement of construction;
    (c) be prepared in accordance with DECC's *Managing Urban Stormwater: Council Handbook*, and the *Campbelltown (Sustainable City) Development Control Plan Volume 2 - Engineering Design for Development* (as amended); and
    (d) include details of:
        - pre and post development flows;
        - water quality;
        - stormwater detention, treatment and control infrastructure; and
        - measures to maintain this infrastructure and the proposed monitoring of stormwater quantity and quality during operation of the project.

Water and Energy Efficiency

12. The Proponent shall ensure the project is energy and water efficient, and comply with industry best practice, to the satisfaction of the Director-General.

13. The Proponent shall prepare and implement a Water and Energy Efficiency Program for the project to the satisfaction of the Director-General. The program must:
    (a) be approved by the Director-General prior to the commencement of building works;
    (b) compare the proposed energy and water usage ratio of the project to other existing malting facilities, and set benchmarks for industry best practice;
    (c) describe the measures that would be implemented onsite to ensure the project is water and energy efficient and uses the best available technology; and
    (d) include a program to monitor and report on the efficiency of the measures implemented, and ensure the project remains energy efficient over time.

    Note: The Proponent may submit Energy & Water Savings Action Plans to satisfy the requirements of this condition..

Geotechnical

14. Prior to carrying out any building works within 25 metres of the Main Southern Railway corridor, the Proponent shall prepare a Construction Plan for the works in consultation with RailCorp, and to the satisfaction of the Director-General. The plan must describe the measures that would be implemented to ensure that the works do not compromise the safety and structural integrity of the rail infrastructure facilities in the rail corridor, nor the safe and efficient operation of this infrastructure. Following approval, the Proponent shall implement the plan to the satisfaction of the Director-General.

NOISE

Construction Noise

15. The Proponent shall comply with the construction hours and noise goals in Table 1, unless otherwise agreed with the DECC.

Table 1: Construction Hours and Noise Goals

Activity	Day	Time	Noise Goal
Construction	Monday – Friday	7am to 6pm	RBL + 10 dB(A)
	Saturday	7am to 1pm	RBL + 10 dB(A)
	Saturday	1pm to 5pm	RBL + 5 dB(A)
	Sunday and Public Holidays	Nil	

Notes:

- *Construction activities may be conducted outside the hours in Table 1 provided that the activities are not audible at any residence beyond the boundary of the site;*
- *Emergency work to avoid the loss of life, property and/or prevent environmental harm may be undertaken outside the hours in Table 1; and*
- *Deliveries of oversize equipment may occur outside these hours, if required by the RTA or NSW police.*

Operational Noise Limits

16. The Proponent shall ensure that noise generated by the project's operations does not exceed the noise limits presented in Table 2.

Table 2: Project Noise Limits (dB(A))

Location	Day	Evening	Night	
	$L_{Aeq\ (15\ minute)}$	$L_{Aeq\ (15\ minute)}$	$L_{Aeq\ (15\ minute)}$	$L_{A1\ (1\ minute)}$
Nearest residence (9 Borthwick Street, Minto)	45	40	40	50

Note: Noise generated by the project is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy.

17. During the night time period, roller doors are to be kept closed and loading and unloading activities, such as rail carriage shunting or truck movements on site, are to be kept to a minimum.

Note: Loading and unloading activities and truck movements during the night time period may only occur on site in exceptional circumstances.

TRANSPORT

Vehicle Queuing, Parking and Transport

18. The Proponent shall ensure that:
    (a) the internal road network and parking on site complies with Australian Standards *AS 2890.1:2004* and *AS 2890.2:2002*;
    (b) vehicular access to the site is constructed in accordance with the requirements of Council;
    (c) all parking generated by the project is accommodated on site, and that no vehicles associated with the project shall park on the public road system at any stage;
    (d) the project does not result in any vehicles queuing on the public road network; and
    (e) suitable parking for bicycles and associated facilities including change rooms are provided at the facility,

    to the satisfaction of the Director-General.

Traffic Management Plan

19. The Proponent shall prepare and implement a Construction Traffic Management Plan for the project to the satisfaction of the Director-General. The Plan must:
    (a) be prepared in consultation with the RTA and Council;
    (b) be submitted to the Director-General for approval prior to the commencement of demolition works;
    (c) nominate routes for the heavy vehicles accessing the site;
    (d) provide details on restrictions proposed for the hours that heavy vehicles may access the site; and
    (e) describe the measures that would be implemented to manage traffic safety during the construction of the project.

HAZARDS

Fire Safety Study

20. Prior to the commencement of construction, the Proponent shall prepare Fire Safety Study for the project to the satisfaction of the NSW Fire Brigades and Director-General. This study must be prepared in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 2, Fire Safety Study Guidelines* and the New South Wales Government's *Best Practice Guidelines for Contaminated Water Retention and Treatment Systems*. Following approval, the Proponent shall implement the study to the satisfaction of the NSW Fire Brigades and Director-General.

Pre-Commissioning Studies

21. Prior to commissioning the project, the Proponent shall prepare the following to the satisfaction of the Director-General:
    (a) an Emergency Plan prepared in accordance the Department's *Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines*; and
    (b) a Safety Management System prepared in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.*

    Following approval, the Proponent shall implement the above studies to the satisfaction of the Director-General.

WASTE

22. During the demolition, construction and operation of the development the Proponent shall implement all reasonable and feasible measures to minimise the waste generated by the development.

23. The Proponent shall ensure that all waste generated by the project is classified in accordance with the DECC's *Waste Classification Guidelines: Part 1 Classifying Waste,* and disposed of appropriately.

VISUAL

Design

24. Prior to the commencement of any building works, the Proponent shall prepare detailed architectural and landscaping design plans for the buildings and landscaped areas to be constructed on site to the satisfaction of the Director-General. These plans must:
    (a) be prepared in consultation with Council;
    (b) demonstrate the treatments are of sufficient design quality to minimise the visual impact of the project, and include a variety of materials and external finishes;
    (c) illustrate the existing and proposed elevations of the site, how the facilities would sit on-site (describing any cut and fill required) and any retaining walls, etc proposed;
    (d) demonstrate that all habitable buildings would be a minimum of 150mm above the 1% AEP overland flow level for the site where applicable; and
    (e) illustrate the location, species and mature height of plants to be established at the site, noting that the species selected shall be low water demand and locally indigenous.

    Following approval, the Proponent shall implement the study to the satisfaction of the NSW Fire Brigades and Director-General.

Reflectivity

25. The Proponent shall implement all reasonable and feasible measures to minimise the reflectivity of the larger structures on site, particularly the silo structures, to the satisfaction of the Director-General.

Lighting

26. The Proponent shall ensure that lighting associated with the project:
    (a) complies with the latest version of Australian Standard *AS 4282(INT)-Control of Obtrusive Effects of Outdoor Lighting*; and
    (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties, the Main Southern Railway or the public road network.

Signage and Fencing

27. The Proponent shall not install any fencing or signage on site without the written approval of the Director-General. In seeking this approval, the Proponent shall:
    (a) submit detailed plans of the proposed fencing or signage, which have been prepared in consultation with Council; and
    (b) demonstrate that the proposed fencing or signage is consistent with the relevant requirements in *Campbelltown (Sustainable City) Development Control Plan*.

VERMIN CONTROL

28. The Proponent shall implement all reasonable and feasible measures to control on site to the satisfaction of the Director-General.

SCHEDULE 4
ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

ENVIRONMENTAL MANAGEMENT STRATEGY

1. The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The Strategy must:
   (a) be submitted to the Director-General for approval prior to the commencement of construction;
   (b) be updated to the satisfaction of the Director-General prior to the commencement of operations on site;
   (c) identify the statutory and other obligations that apply to the project;
   (d) describe the procedures that would be implemented to:
      - keep the local community and relevant agencies informed about the operation and environmental performance of the project; and
      - receive, handle, respond to, and record any complaints that are received;
   (e) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project; and
   (f) include a copy of the various studies, plans and programs required under this approval.

2. The Proponent shall update this strategy to the satisfaction of the Director-General, following each independent audit, or as directed by the Director-General.

INCIDENT REPORTING

3. The Proponent shall notify the Director-General of any incidents associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director-General with a detailed written report on the incident, and any action that has subsequently been taken in relation to this incident.

AUDITING

Work-As-Executed Plans

4. Prior to commencement of operations, the Proponent shall submit work-as-executed plans to the Director-General of the development on site. These plans must be prepared by a suitably qualified and experienced expert, and must include plans showing the work as executed plans laid over the approved plans to demonstrate that the development has been carried out in accordance with the approved plans.

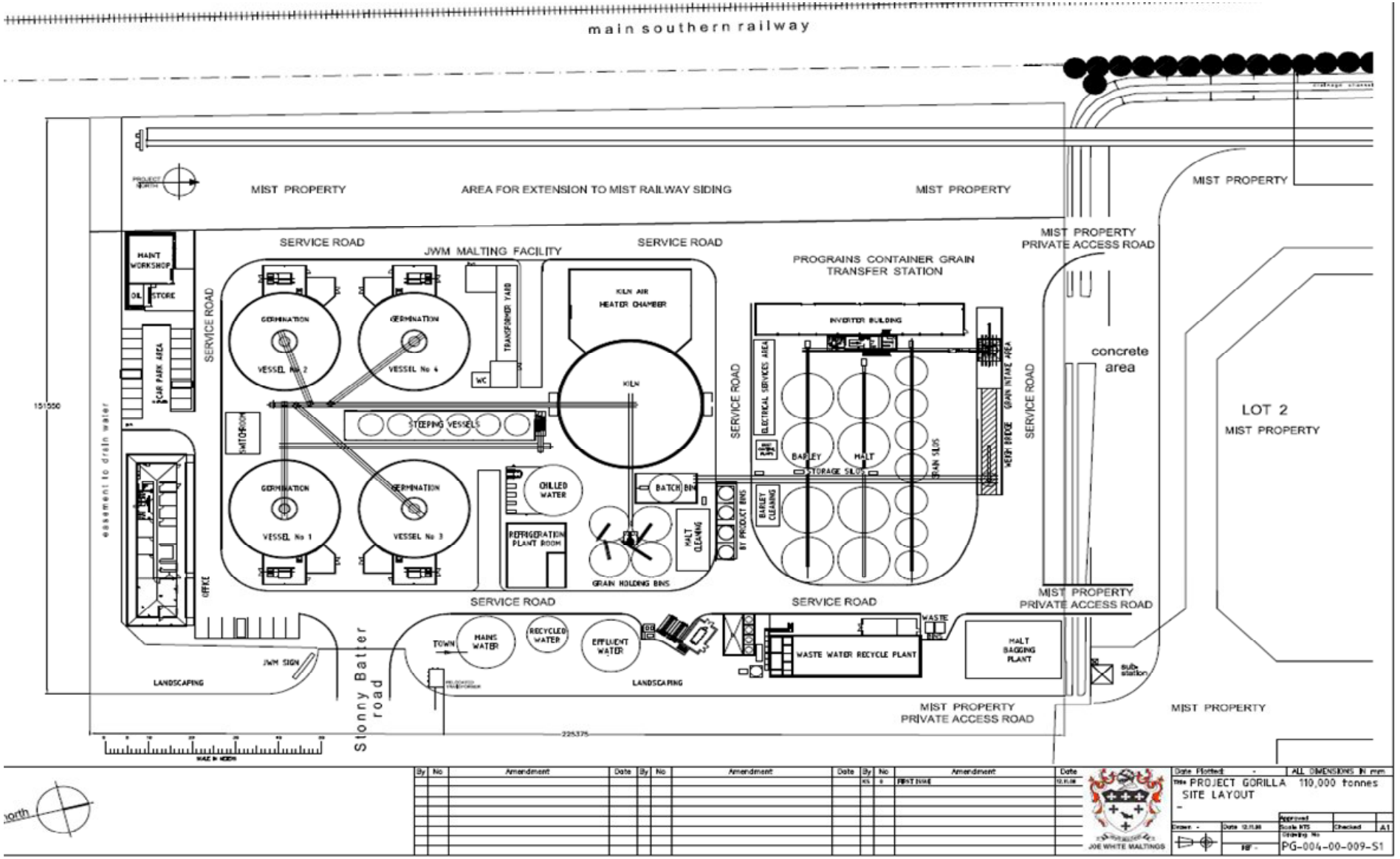
Independent Environmental Audit

5. Within 12 months of the commencement of operations, and every 3 years thereafter unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:
   (a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;
   (b) be undertaken in consultation with DECC and Council;
   (c) assess the environmental performance of the project, and whether it is complying with the relevant standards, performance measures, and statutory requirements;
   (d) review the adequacy of any strategy/plan/program/system required under this approval; and, if necessary;
   (e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy/plan/program/system required under this approval.

6. Within 1 month of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit report.

7. Within 3 months of submitting an audit report to the Director-General, the Proponent shall review and if necessary revise the strategy/plans/programs required under this approval to the satisfaction of the Director-General.

APPENDIX 1: PROJECT LAYOUT PLAN



APPENDIX 2: STATEMENT OF COMMITMENTS

Objective	Commitment
Demolition & Construction Works	
• Safe working environment. • Minimise environmental impact.	• Construction Management Plan to be prepared for the works and submitted with the Construction Certificate. • Preparation of a specific Environmental Management Plan for the Minto site demolition & construction works. • All works conducted in accordance with relevant demolition and construction legislation.
Operation of Malting Plant & Packing Facility	
• Safe working environment.	• Site specific and job specific OH&S training for all staff. • Provision of information regarding safe working practices for the development. • Identification of pedestrian walkways around plant in locations where dangers may be present. • Separation, where possible, of pedestrians and vehicles. • Requirement for appropriate personal protective equipment to be worn onsite. • Appropriate number of staff to receive first aid training.
Air Quality	
• Minimise & manage emissions of dust, odour & oxides of nitrogen.	• Operation of development within DECC criteria and limits in relation to emission of dust, odour and oxides of nitrogen. • Installation of dust monitor onsite to record emission levels. • Regular site cleaning to remove dust. • Installation of nitrogen dioxide monitor and retention onsite until base line emissions are identified.
Traffic & Transport	
• Provision for alternative modes of transport to the private car.	• Bike racks to be provide near the office building. • Shower facilities to be provided for staff use in the office block.
Soil Management	
• Prevention of soil erosion.	• Compliance of demolition, construction and ongoing operation with a Soil & Water Management Plan for the site.
Water Management	
• Minimise use of potable water on site. • Effective management of onsite storm water. • Prevention of water pollution.	• Reduction in freshwater use through the implementation and operation of a world's best practice water recycling facility. • Capture of rain water from roof of office building and storeroom in tanks. • Use of rainwater to irrigate landscaping when feasible. • Implementation of 4, 5 or 6 star rated water appliances in the proposed office to minimise potable water use. • Implementation and maintenance of an appropriate stormwater management system to channel water to Council's drainage system and ensure runoff does not flow onto adjoining land. • Compliance of demolition, construction and ongoing operation with a Soil & Water Management Plan for the site.
Noise Management	
• Responsible management of JWM demolition and construction noise. • Responsible management of JWM site operational noise.	• Care taken to avoid excessive noise during demolition and construction. • Demolition and construction works only between 7am – 5pm Monday to Saturday. • Ensure maintenance of equipment to limit noise

	emissions. • Repair of any equipment that fails and results in excessive noise emissions without undue delay. • JWM to commission a noise assessment 6 months after the site becomes operational. Mitigation measures taken if noise emissions are found to breach appropriate NSW guidelines or legislation.
Visual	
• Minimise visual impacts from site.	• Control of external illumination to reduce spillage. Specific attention paid to ensure direction of lights is not towards the RailCorp rail line. • Colourbond colouring selected to reduce visual impact and use of galvanised silos to reduce light reflection.
Greenhouse Gases	
• Minimise the production of greenhouse gas emissions associated with JWM operations.	• Implementation of energy reduction measures as identified in this EA. • Implementation of world best technology for the capture and reuse of heated air in the kilning process. • Implementation of world best technology gas burners in the kilning process.
Waste	
• Minimise waste from ongoing operations. • Ensure appropriate disposal for waste streams.	• Recycling of process water for reuse in the malting process. • Location of bins onsite for different waste streams and education of staff where to dispose of waste to maximise recycling. • Investigation of local opportunities for the reuse of dry and sludge organic waste.
Environmental Monitoring	
• To ensure compliance with any Environmental Protection Licence (EPL) issued for the malting plant and packing facility.	• Development and implementation of an Environmental Management Plan for the Minto facility which documents environmental monitoring in accordance with the EPL.
Landscaping	
• Improve the visual amenity of JWM on surrounding community.	• Implement landscaping generally in accordance with concept scheme.

Notice of Modification

Section 75W of the *Environmental Planning and Assessment Act 1979*

As delegate for the Minister for Planning and Infrastructure, I hereby modify the project approval to in Schedule 1, subject to the conditions in Schedule 2.

Heather Warton
A/Executive Director
Major Projects Assessment

Sydney 20th April 2012

SCHEDULE 1

Application Number:	08_0157
Proponent:	Joe White Maltings Pty Ltd
Approval Authority:	Minister for Planning
Land:	Lot 201 DP 813362 - Stonny Batter Road, Minto
Project:	Minto Malting and Grain Project

SCHEDULE 2

1) **Delete the following references from Definitions and Schedules 2, 3 and 4:**

DECC	Department of Environment and Climate Change
RTA	Roads and Traffic Authority

2) **Insert the following references in Definitions and Schedules 2, 3 and 4:**

Department	Department of Planning & Infrastructure
Director-General	Director-General of Department of Planning & Infrastructure, or delegate
EPA	Environmental Protection Authority
Minister	Minister for Planning & Infrastructure, or delegate
RMS	NSW Roads and Maritime Service

3) **Replace Condition 2 Schedule 2 with the following:**

2. The Proponent shall carry out the project generally in accordance with:
   a. EA;
   b. site plan (see Appendix 1);
   c. statement of commitments (see Appendix 2);
   d. Modification Application 08_0157 - Mod 1 with supporting documentation by Cardno dated 11 December 2011 and 14 December 2011; and
   e. conditions of this approval.

4) **Replace Condition 7 Schedule 2 with the following:**

7. The Proponent shall ensure that the Project:
   a) does not import more than 54,000 tonnes per annum of grain and barley by road;
   b) does not export more than 25,000 tonnes per annum of malt and grain by road; and
   c) imports/exports all remaining grain and malting barley via the rail siding to the Main Southern Railway.

   However, in exceptional circumstances, the Proponent may be exempt from these restrictions for short periods with the written approval of the Director-General.

5) **Replacing Condition 19 Schedule 3 with the following:**

19. The Proponent shall prepare and implement an Operational Traffic Management Plan for the Project to the satisfaction of the Director-General. The Plan must:
   a. be prepared in consultation with the RMS and Council;
   b. be submitted to the Director-General for approval prior to the commencement of importation or exportation of grain, barley or malt to/from the site via road;
   c. nominate routes for the heavy vehicles accessing the site;
   d. provide details on restrictions proposed for the hours that heavy vehicles may access the site;
   e. describe the measures that would be implemented to manage traffic safety during operation of the project; and
   f. describe the measures that would be implemented to manage heavy vehicle driver behaviour and traffic noise associated with the development.

APPENDIX B
ORIGINAL DIRECTOR GENERAL REQUIREMENTS

Cardno
Shaping the Future

NSW GOVERNMENT
Department of Planning

Major Development Assessment
Manufacturing and Rural Industries
Contact: Megan Webb
Phone: (02) 9228 6495
Fax: (02) 9228 6466
Email: megan.webbl@planning.nsw.gov.au
Level 4 Western Gallery
23-33 Bridge Street
GPO Box 39
SYDNEY NSW 2001

Our Ref: S02/00615

Mr Philip Paton
Cardno Pty Ltd.
278 Keira St
Wollongong NSW 2500

Dear Mr Paton

Director-General's Requirements
Minto Maltings Project
Application Number – 08_0157

The Department has received your application for the Minto Maltings Project.

I have attached a copy of the Director-General's requirements for the project. These requirements have been prepared in consultation with the relevant Government agencies, and are based on the information you have provided to date. I have also attached a copy of the agencies' comments for your information.

Please note that the Director-General may alter these requirements at any time.

If your proposal is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. It is your responsibility to contact the Department of Environment, Water, Heritage and the Arts in Canberra (6274 1111 or http://www.environment.gov.au) to determine if the proposal requires an approval under the EPBC Act. The Commonwealth Government has accredited the NSW environmental assessment process, so if it is determined that an approval is required under the EPBC Act, please contact me immediately as supplementary Director-General's requirements may need to be issued.

I would appreciate it if you would contact the Department at least two weeks before you propose to submit your Environmental Assessment for the project. This will enable the Department to determine the:

- applicable fee (see Division 1A, Part 15 of the Environmental Planning and Assessment Regulation 2000);
- consultation and public exhibition arrangements; and
- number of copies (hard-copy or CD-ROM) of the Environmental Assessment that will be required for exhibition purposes.

Once it receives the Environmental Assessment, the Department will review it in consultation with the relevant agencies to determine if it adequately addresses the Director-General's requirements, and may require you to revise it prior to public exhibition.

The Department is required to make all the relevant information associated with the project publicly available on its website. Consequently, I would appreciate it if you would ensure that all the documents you subsequently submit to the Department are in a suitable format for the web, and arrange for an electronic version of the Environmental Assessment to be hosted on a suitable website during the exhibition period.

If you have any enquiries about these requirements, please contact Megan Webb on 9228 6495 or megan.webb@planning.nsw.gov.au.

Yours sincerely

K.E.O

Chris Wilson
Executive Director
Major Project Assessment
As delegate for the Director-General

Director-General's Requirements

Section 75F of the *Environmental Planning and Assessment Act 1979*

Application Number	MP 08_0157
Project	The Minto Maltings Project, which includes development of a malt plant with an annual capacity of 110,000 tonnes, a grain packaging plant and associated infrastructure.
Location	Lot 201 Stonny Batter Road, Minto
Proponent	Joe White Maltings Pty Ltd
Date of Issue	August 2008
General Requirements	The Environmental Assessment of the project must include: • an executive summary; • a detailed description of the following: - historical operations/activities on the site; and - existing and approved operations/facilities, including any statutory approvals that apply to these operations and facilities; • a detailed description of the project, including the: - need for the project; - alternatives considered, including a justification for the project; - likely staging of the project; and - plans of any proposed building works; • a risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment; • a detailed assessment of the key issues specified below, and any other significant issues identified in the risk assessment (see above), which includes: - a description of the existing environment, using sufficient baseline data; - an assessment of the potential impacts of all stages of the project, including any cumulative impacts, taking into consideration any relevant statutory provisions, and technical or policy guidelines (see below); - a description of the measures that would be implemented to avoid, minimise, mitigate, remediate, monitor and/or offset the potential impacts of the project, including detailed contingency plans for managing any potentially significant risks to the environment; • a statement of commitments, outlining all the proposed environmental management and monitoring measures; • a conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the *Environmental Planning & Assessment Act 1979*; • a signed statement from the author of the Environmental Assessment, certifying that the information contained within the document is neither false nor misleading.
Key Issues	• **Air Quality and Odour**; – an assessment of all air pollutants from all sources during construction and operation and from road and rail transport, including any potential volatile organic compounds, particulates, odour and NO_X; and – details of all control measures, such as for odour, volatile organic

	compounds and NO_x; • **Traffic and Transport** – including: – a detailed transport impact study of the project on the performance and safety of the surrounding transport network (including road, rail and other public transport) and a description of the measures that would be implemented to upgrade and/or maintain this network over time; – an assessment of the potential parking demand of the project; and – detailed plans of the proposed layout of the internal road and rail network, site access and parking on site in accordance with the relevant Australian standards. • **Soil & Water** – including: – a detailed water balance for the project, outlining the measures that would be implemented to minimise the use of water on site; – wastewater predictions, and the measures that would be implemented to treat, reuse and/or dispose of this water; – the proposed erosion and sediment controls during construction; – the proposed stormwater management system; and – consideration of the potential salinity, contamination, flooding and acid sulfate soil impacts of the project; • **Hazards and Risk** – including a Preliminary Hazard Analysis (PHA) of the project, including an assessment of the risks associated with the project, such as from the refrigeration facility and with handling combustible dusts; • **Noise and Vibration–** including construction, operation and off-site road and rail transportation noise; • **Visual** – including the design and articulation of the buildings (scale, height and bulk), and proposed lighting and signage; the proposed landscaping of the site; and the visual impacts of the proposal; • **Greenhouse Gas** – including calculations of the scope 1 and 2 emissions from the site, an assessment of the energy use on site, and describe what measures would be implemented to ensure the proposal is energy efficient; • **Waste** – including accurate estimates of the quantity and nature of the potential waste streams of the project during construction and operation, and a detailed description of the measures that would be implemented to minimise, reuse, recycle and dispose of this waste; • **Development Controls** – demonstrate that the proposal is generally consistent with the development controls in the *Campbelltown (Sustainable City) Development Control Plan 2007* and all other relevant development control plans, and justify any inconsistencies between the project and these controls; • **Developer Contributions and/or Planning Agreements** – review the project against any relevant contribution plans, and outline what contributions would be made towards the provision of local infrastructure or services;
References	While not exhaustive, the following attachment contains a list of the guidelines, policies, and plans that may be relevant to the project.
Consultation	During the preparation of the Environmental Assessment, you should consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups or affected landowners. In particular you must consult with the: • Department of Environment and Climate Change; • RailCorp; • Sydney Water; • Campbelltown City Council. The consultation process, and the issues raised during this process, must

	be described in the Environmental Assessment.
Deemed refusal period	60 days

Guidelines, Policies and Plans

Aspect	Policy /Methodology
Air Quality	
	Protection of the Environment Operations (Clean Air) Regulation 2002
	Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (DEC)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC)
Odour	
	Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
	Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
Transport	
	Guide to Traffic Generating Development (RTA)
	Road Design Guide (RTA)
	State Environmental Planning Policy (Infrastructure)
Soil and Waters	
	Acid Sulfate Soil Manual (ASSMAC)
	Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (ANZECC & NHMRC)
Soil	National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC)
	State Environmental Planning Policy No. 55 – Remediation of Land
	Managing Land Contamination - Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA)
	Contaminated Sites: Sampling Design Guidelines (NSW EPA)
	Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (NSW EPA)
	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC)
Surface Water	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	Managing Urban Stormwater: Council Handbook. Draft (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control. Draft (EPA)
	Managing Urban Stormwater: Soils & Construction (Landcom)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (DEC)
Groundwater	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)

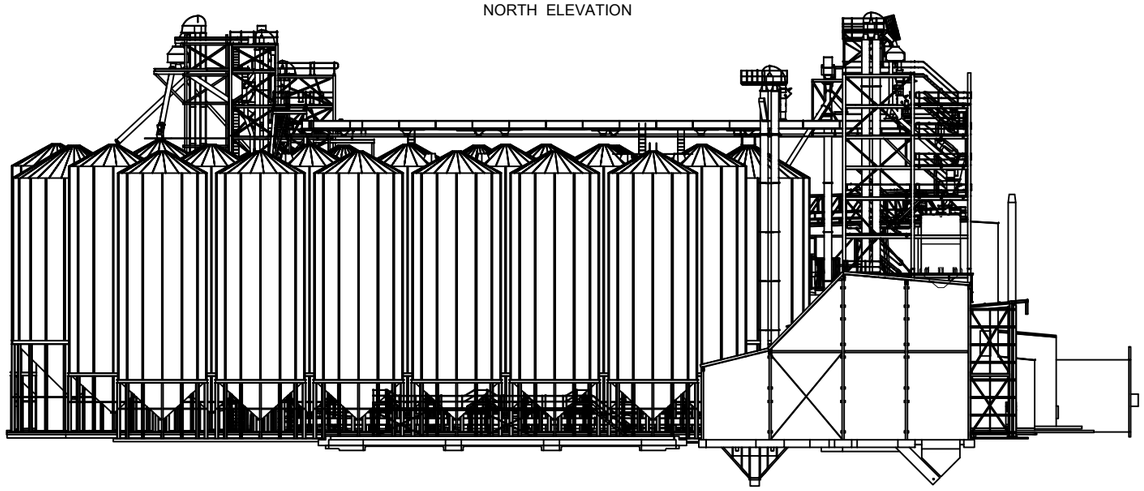
	NSW State Groundwater Policy Framework Document (DLWC)
	NSW State Groundwater Quality Protection Policy (DLWC)
	NSW State Groundwater Quantity Management Policy (DLWC) Draft
	The NSW State Groundwater Dependent Ecosystem Policy (DLWC)
	Guidelines for the Assessment and Management of Groundwater Contamination (DECC) Draft
Hazard and Risk	
	AS/NZS 4360:2004 Risk Management
	HB 203:2006 Environmental Risk Management – Principals and Process
	State Environmental Planning Policy No 33– Hazardous and Offensive Development (SEPP 33)
	Planning Advisory Paper No. 6 – Guidelines for Hazardous Analysis (DUAP)
	Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning (DUAP)
Noise	
	NSW Industrial Noise Policy (DECC)
	Environmental Criteria for Road Traffic Noise (NSW EPA)
	Environmental Noise Control Manual (DECC)
Visual	
	Control of Obtrusive Effects of Outdoor Lighting (Standards Australia, AS4282)
Greenhouse Gas	
	National Greenhouse Accounts (NGA) Factors
	Guidelines for Energy Savings Action Plans (DEUS)
Waste	
	Waste Avoidance and Resource Recovery Strategy (Resource NSW)
	Waste Classification Guidelines (DECC)

Environmental Assessment

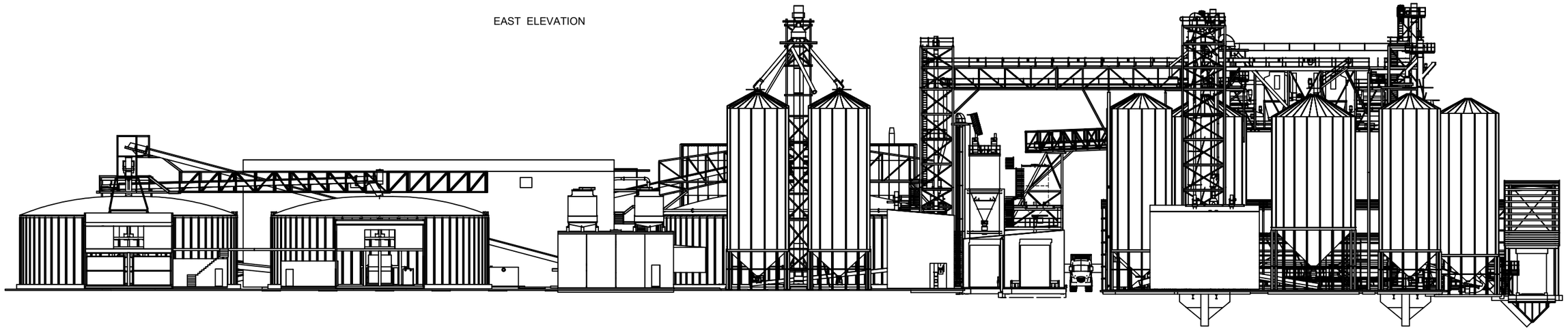
APPENDIX C
MODIFICATION PLANS

Cardno
Shaping the Future

NORTH ELEVATION



EAST ELEVATION



0 5 10 20 30 40 50

SCALE IN METERS

By	No	Amendment	Date

By	No	Amendment	Date

By	No	Amendment	Date
KS	0	AS BUILT SITE PLAN – FOR REVIEW	03.07.12
KS	A	AS BUILT SITE PLAN – APPROVED	23.11.12
KS	B	NEW WEIGHBRIDGE ADDED	29.04.13
KS	C	PROPOSED FUTURE SILOS ADDED	19.11.13
KS	D	NEW SILOS & ELEVATIONS ADDED (ELEVATIONS S2)	11.02.14

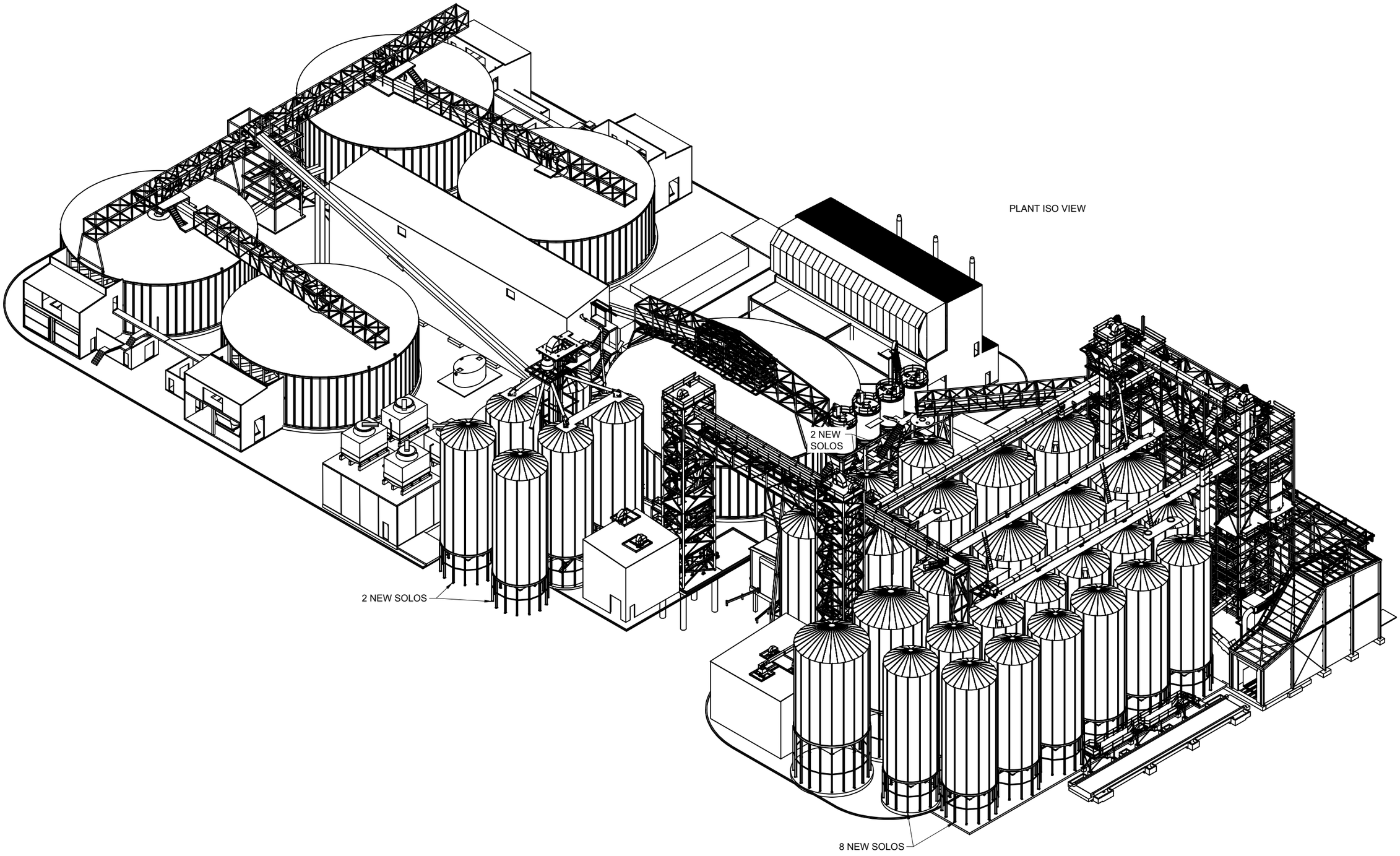
JOE WHITE MALTINGS

Date Plotted: - ALL DIMENSIONS IN mm

Title PROJECT GORILLA
SITE PLAN – PROPOSED NEW SILO ELEVATIONS
SHEET 2

Drawn KLS	Date 03.07.12	Scale 1:250	Checked	A1
		Approved		
	REF–	Drawing No	PG–004–00–229–C–D	

PLANT ISO VIEW



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JOE WHITE MALTINGS

Date Plotted: - ALL DIMENSIONS IN mm

Title PROJECT GORILLA
SITE– PROPOSED NEW SILOS ISO VIEW
SHEET 3

Drawn KLS | Date 03.07.12 | Approved | Scale NTS | Checked | A1

REF–

Drawing No PG–004–00–229–C–D

PROJECT NORTH

RAIL SIDING - CONTAINER STORAGE

CONTAINER GRAIN TRANSFER STATION

MAINTENANCE

WORKSHOP

STORE

OFFICE

GERMINATION

GERMINATION

VESSEL No 2

VESSEL No 4

COMP Room

MCC 1 & 2

STEEP TANKS

KILN ∅ 33m

OUTLOADING

WEIGH BRIDGE

BY PRODUCTS

MCC 3

INTAKE PIT & BUILDING

WEIGH BRIDGE

NEW SILO

SECONDARY EFFLUENT TANK

PRIMARY EFFLUENT TANK

REFRIGERATED CHILLED WATER 500,000 LIT

SLURRY TANK & PUMP

ANALYSIS BINS

MALT CLEANING

BARLEY CLEANING

GERMINATION

GERMINATION

VESSEL No 1

VESSEL No 3

REFRIGERATION PLANTROOM

CAR PARK

GAS 4380x4000

SITE BOUNDRY

STEEP CHILLED WATER TANK 500,000 LIT

RECYCLED WATER 300,000 LIT

WATER TREATMENT PLANT

SITE BOUNDRY

0 5 10 20 30 40 50

SCALE IN METERS

By	No	Amendment	Date
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JOE WHITE MALTINGS

Date Plotted: - ALL DIMENSIONS IN mm

Title PROJECT GORILLA

SITE PLAN – PROPOSED NEW SILOS

SHEET 1

Drawn KLS | Date 03.07.12 | Approved | Scale 1:300 | Checked | A1

REF-

Drawing No PG-004-00-229-C-D