



ORICA KURRI KURRI ANE PLANT

ANNUAL ENVIRONMENTAL MANAGEMENT REPORT

JULY 2020



Revision	Date	Description	Author	Approver
0		2020 Annual Environmental Report	D Horne Kurri ANE Plant Senior Supervisor	Richard Powell Downstream Manufacturing Manager

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ATTACHMENTS:

2019 Pollution Solutions Report – 3rd Qtr

2019 Pollution Solutions Report – 4th Qtr

2020 Pollution Solutions Report – 1st Qtr

2020 Pollution Solutions Report – 2nd Qtr

2020 Biodiversity Offset Area Monitoring Report

2020 Biodiversity Management Plan

ABBREVIATIONS

ANE	Ammonium Nitrate Emulsion
ANS	Ammonium Nitrate Solution
CEMP	Construction Environmental Management Plan
CSS	Construction Safety Study
DPI	Department of Planning and Infrastructure
EA	Environmental Approval
EMSO	Environmental Management Strategy Operations
EPL	Environment Protection Licence
FHA	Final Hazard Analysis
FSS	Fire Safety Study
HAZOP	Hazard and Operability Study
ktpa	kilo tonnes per annum
OEH	Office of Environment and Heritage
SHEC	Safety, Health, Environment and Community
SHES	Safety, Health, Environment and Security

1 INTRODUCTION

In October 2010 Orica Australia Pty Ltd commenced construction of an Ammonium Nitrate Emulsion (ANE) manufacturing facility located at its Kurri Kurri Technical Centre, NSW. The facility will produce a maximum of 250,000 tonnes of ANE per annum once in full production (**Figure 1**). This plant has been developed to meet an increasing demand for ANE product and projected growth in the mining and quarry / construction sectors in South Eastern Australia. Approval for this project was granted in July 2010 by the Minister for Planning.

The facility began the commissioning process in October 2011 and began production in February 2012.

This document has been prepared to comply with the requirement of the Project Approval (09_0090) as modified that an Annual Environmental Management Report be prepared for the project and relates to August 2019 – July 2020

1.1 Additional Requirements re: Letter dated 28.11.2018

However, for future AEMRs the Secretary requests under Schedule 2, Condition 4, the following inclusions:

- a) **Figures** - Please include figures showing the consent boundary, overlain over a current aerial photograph.

The above requirements should be tabulated within the next AEMR, with a specific reference as to where it has been addressed within the document.

Refer Appendix 5



Figure 1: Site layout

1.3 Facility Description

The facility activities include the following:

- ANE production of up to 250,000 tonnes of product per annum.
- Maintenance of access roads and relevant services infrastructure.
- Operation of storage for raw materials used in the manufacturing process including ammonium nitrate solution (ANS), solid ammonium nitrate, fuel blend ingredients such as palm olein, yubase 3 and diesel oil, thiourea, urea, acetic acid, caustic soda, and water.
- Transport truck weighing, loading, and unloading facilities and management.
- Management of the facility office, control room, switch room and quality control laboratory.
- Management of contractors and visitors.

2 FACILITY REQUIREMENT

As a condition of the project consent, this facility is required to prepare an Annual Environmental Management Report.

Under Schedule 4, Condition 2,

1. *This facility Annual Environmental Report (AEMR) will include the following.*
 - a) *identify the standards and performance measures for the facility.*
 - b) *describe the works carried out in the past 12 months and the works to be carried out in the next 12 months.*
 - c) *include a summary of complaints received in the past year and provide comparison with previous years.*
 - d) *report results of monitoring required by the approval and EPL for this facility.*
 - e) *provide analysis of monitoring results in the context of relevant criteria and limits, previous monitoring results and the predictions made in the EA.*
 - f) *identify any trends in monitoring results over the life of the facility; and*
 - g) *report on compliance with the project approval, summarise non-compliances in the previous 12 months and report on actions taken to rectify non-compliances.*

3 FACILITY STANDARDS AND PERFORMANCE MEASURES

This facility meets the standards and conditions detailed in the following documents:

- Project Approval 09-0090 dated 26 July 2010.
- Modification Application MP 09_0090 MOD 1.
- Modification Application MP 09_0090 MOD 2.
- Schedules 2 to 4 of Project Approval.
- Environmental Approval dated December 2009.
- Response to Submissions report dated March 2010.
- Independent Environmental Audit December 2019

The key standards and performance measures for the operating facility include:

	Standard	Performance Measure	Comment
Noise Management	Noise generated from the operation of the facility does not exceed 35dB (A) at nearest residential receptor at any time.	Proponent shall conduct a Noise Audit for the premises within 3 months of the commencement of operation of the ANE Facility or as otherwise agreed by the Director-General.	Large buffer area around plant. Noise controls have been incorporated into design and equipment selection. The Noise Audit has been completed and submitted to the DPI, no actions were required from the audit.
Air Quality	Dust	All trucks leaving or entering the facility with loads have their loads covered. Trucks movements associated with the facility do not track dirt onto the public road network.	Requirement incorporated into the Environmental Management Plan.
Soil and Water Discharges	Section 120 of the <i>Protection of the Environment Operations Act 1997</i>	Bundling to comply with all relevant Australian Standards and the OEH's Storing and Handling Liquids: Environmental Protection, Participants Manual.	Facility is designed to meet bunding requirements.
Lighting	Australian Standard AS4282(INT)-Control of Obtrusive Effects of Outdoor Lighting	Facility Lighting complies with the requirements of the standard.	Lighting compliance has been assessed during the design phase.
Production Limits	Production not to exceed prescribed levels.	ANE – 250ktpa	Production limits are monitored and documented weekly. Limits not exceeded.

4 FACILITY STATUS

4.1 Facility Progress Review During the previous 12 months covered by this report normal production activities have been undertaken and include:

- 12% production decrease over reporting year.
- Proportional reduction in heavy vehicle movements to support raw materials and production schedule.
- Plant operating at 46% of Licence Limit of 250,000 T/pa.
- Traffic management and site access.
- Production of ANE, cooled ANE, and Companion Solution.
- Unloading of raw materials.
- Loading tankers with ANE.
- Maintenance management and associated activities.
- Contractor & Visitor Induction and Management.

- Change to plant operating hours March 2020
- Roster change implemented March 2020

4.2 Planned Facility Progress

- Maintain ANE production annual tonnage.

4.3 Significant Activities Undertaken in the Reporting Period

- Adoption of SAP 4S system to align Global Business Units
- Covid 19 management Policies implemented March 2020

4.4 4.4 Important Initiative Planned in the Next Reporting Period

- Review of plant efficiency and product manufacturing rates

5 ENVIRONMENTAL MONITORING AND COMPLAINTS SUMMARY

5.1 Environmental Monitoring

Following the commissioning of the ANE Plant, monitoring is undertaken to assess compliance with relevant conditions as outlined in the Project Approval and the EPL.

5.2 Community Complaints

27.07.2010 – 26.07.2011	27.07.2011 – 26.07.2012	27.07.2012 – 26.07.2013
No Complaints	One unsubstantiated complaint	No Complaints
27.07.2013 – 26.07.2014	27.07.2014 – 26.07.2015	27.07.2015 – 26.07.2016
No Complaints	No Complaints	No Complaints
27.07.2016 – 26.07.2017	27.07.2017 – 26.07.2018	27.07.2018 – 26.07.2019
No Complaints	No Complaints	No Complaints
27.07.2019 – 26.07.2020		
No Complaints		

6 FACILITY COMPLIANCE

A review of the status of compliance with the operation of this facility is detailed in the table below.

6.1 Summary of Key Facility Compliance Activities

Issue	Condition	Requirement	Compliance Status
Schedule 3: Specific Environmental Conditions	1	Undertake the following studies and submit to DPI Director-General for approval:	
	a)	<ul style="list-style-type: none"> Fire Safety Study (FSS) 	Complied. The FSS was submitted on 9 February 2011 and a response was received from Fire Rescue NSW (FRNSW) on 3 May 2011. Formal review completed by SHERPA 17.11.2017 minor changes with no impact on fire scenarios.
	b)	<ul style="list-style-type: none"> Hazard & Operability Study 	Complied. The HAZOP was submitted to the DPI 15 February 2011. DPI approved the study on 18 February 2011. Hazop Actions completed.
	c)	<ul style="list-style-type: none"> Final Hazard Analysis 	Complied. The Phase 1 FHA was submitted to the DPI on 8 February 2011. DPI approved the study on 18 March 2011.
	d)	<ul style="list-style-type: none"> Construction Safety Study 	Complied. The Construction Safety Study was submitted to DPI on 8 February 2011. Approval was obtained from DPI on 18 February 2011.
	2	Undertake the following studies and submit to DPI Director-General for approval: <ul style="list-style-type: none"> Emergency Plan (update) Safety Management Plan 	Completed SPM currently under review
	6	Comply with the requirements of the Director-General in relation to conditions 1-5.	Complied
	10	Prepare a Road Transport Protocol prior to the commencement of construction and operation.	Complied. Updated June 2020, approved by DPIE 27.07.2020

Issue	Condition	Requirement	Compliance Status
	12	Within 6 months of approval implement the offset strategy to the satisfaction of the director general	Complied An application was submitted to OEHL to enter into a Voluntary Conservation Agreement.
	15	Implement Vegetation Clearing Protocol	Complied Vegetation Clearing Protocol was included in the EMSO and followed for clearing of the site prior to the commencement of construction.
	16	Carry out all reasonable and feasible measures to minimise dust generated by the Project / Facility	Complied EMSO included measures to control dust. All road surfaces sealed for permanent operation.
	17	Trucks entering or leaving the Project site must have their loads covered and must not track dirt onto public roads	Complied. Measures for the control of dust were included in the CEMP.
	18	Noise generated from the construction and operation of the project shall not exceed 35dB(A) at nearest residential receptor	Complied. Post start up Noise Audit completed
	20	Implement the recommendations of the 'Bushfire Threat Assessment' included with the EA and also any additional bushfire hazard reduction measures outline in the Submissions Report	Complied Requirements included in the design.
	21	Compliance with section 120 of Protection of the Environment Operation Act 1997	Annual Environmental Return submitted to EPA
	22	Ensure that all chemicals are stored in appropriately bunded areas	Complied. EMSO included requirements for management of materials. Design incorporates bunding requirements. Daily shift Housekeeping checks completed and documented.
	23	Prepare a Soil and Water Management Plan	Complied. Measures for the control of erosion and sediment were included in the Construction Environmental Management Plan. Operational Soil and Water management plan reviewed and revised June 2020, approved by DPIE 27.07.2020
	24	A Stormwater Management Plan must be included in the design	Complied.

Issue	Condition	Requirement	Compliance Status
			CEMP included these requirements, where applicable to construction. Operational Stormwater management plan incorporated into Soil and water management plan reviewed and revised June 2020, approved by DPIE 27.07.2020
	25	An Erosion and Sediment Control Plan is to be prepared	Complied. EMSO included an Erosion and Sediment Control Plan. Operational Erosion Control management plan incorporated into Soil and water management plan reviewed and revised June 2020, approved by DPIE 27.07.2020
	26	Ensure that lighting associated with the Project complies with the latest version of <i>Australian Standard AS 4282(INT)-Control of Obtrusive Effects of Outdoor Lighting</i>	Complied A consultant was engaged to provide a report on external lighting to ensure compliance.
	27	Waste to be classified in accordance with <i>DECCW Guidelines 2008</i> and disposed of to approved premises	Complied. Measures for the control of waste were included in the EMSO. Registered Waste disposal provider engaged for production operations
	28	In the event that skeletal remains, or an Aboriginal object is identified, all construction activities that will or would have the potential to impact on indigenous heritage item(s), shall cease until the DECCW is consulted and their directions complied with	Complied. CEMP and EMSO included requirements. Aboriginal groups were consulted during the construction period.
Schedule 4: Environmental Management, Reporting and Auditing	1	Prepare and implement an Environmental Management Strategy for the Facility to the satisfaction of the Director-General.	Strategy reviewed and revised June 2020, approved by DPIE 27.07.2020
	2	Prepare an Annual Environmental Management Report and submit to the DPI Director-General <ul style="list-style-type: none"> a. Identify the standards & performance measures for the Facility b. Describe the works carried out in the past 12 months and the works to be carried out in the next 12 months c. Include a summary of complaints received in the past year and provide comparison with previous years d. Report results of all monitoring required by this approval and an EPL for the Facility e. Provide analysis of monitoring results in the context of relevant criteria and limits, previous monitoring results and the predictions made in the EA f. Identify any trends in monitoring results over the life of the Facility 	Submission of this document is the fifth annual report <ul style="list-style-type: none"> a. See section 3 this report b. See section 4.3 and 4.4 above c. See section 5 this report d. See Appendix 1 e. See Appendix 2

Issue	Condition	Requirement	Compliance Status
		g. Report on compliance with the facility approval, summarise non-compliances in the previous 12 months and report on actions taken to rectify non-compliances	f. Monitoring Point 2. Results have shown a stable trend compared to previous reporting period. g. See Appendix 3
	3	Notify the Director-General and any other relevant agencies of any incident with actual or potential significant off-site impacts	Four Incidents of potential Non-Compliance to the Road Transport Protocol have been reported to DPIE during the period of this report. There were No community impacts, No Injuries and No Environmental Impacts.
	4	An independent Environmental Audit within two years of commencement of operations at the ANE Facility and every 3 years thereafter. The audit will. <ol style="list-style-type: none"> a. Be conducted by a suitable, experienced, and independent expert whose appointment has been endorsed by the Director General b. Assess the environmental performance of the Facility and its effect on the surrounding environment c. Assess whether the Facility is complying with the relevant standards, performance measures and statutory requirements d. Review the adequacy of any strategy / plan / program required under the approval; and if necessary, e. Recommend measures or actions to improve the environmental performance of the Facility and / or any strategy / plan / program required under the approval 	An independent Auditor was appointed and endorsed by the Director General to carry out the audit in the last quarter of 2019. Audit c/w recommendations was submitted 11.12.2019
	5	The following information regarding the Facility is included on the website: <ul style="list-style-type: none"> • Copy of all current statutory approvals. • Copy of the current environmental management strategy and associated plans and programs. • Copy of any Annual Reports (over the last 5 years). • Copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and Any other matter required by the Director-General	Copies of information relating to the facility are included on the Orica Mining Services website (www.oricamining.com)

7 APPENDIX 1: DISCHARGE & MONITORING POINT 1 AND POINT 2**DISCHARGE & MONITORING POINT 1 as at 27.07.2012 -- 26.07.2013**

Discharge to Utilisation Area.

Low	Average	High
5250L/day	6875L/day	8500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2013 – 26.07.2014

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6350L/day	8500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2014 – 26.07.2015

Discharge to Utilisation Area.

Low	Average	High
4625L/day	6063L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2015 – 26.07.2016

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2016 – 26.07.2017

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2017 – 26.07.2018

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2018 – 26.07.2019

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2019 – 26.07.2020

Discharge to Utilisation Area.

Low	Average	High
0/day	5000L/day	7200L/day

Max Limit 16800L/day

Note: Work from home policy main office areas introduced in March due to Covid 19

Appendix 1(cont.)**DISCHARGE & MONITORING POINT 2 as at 27.07.2019 – 26.07.2020**

Wet weather discharge, overflow pipe from water treatment systems 'Stormseptor System' (Pit 17) located at the south-eastern corner of the Ammonium Nitrate Emulsion Production Facility.

POLLUTANT	UNIT OF MEASURE	NO. OF SAMPLES REQUIRED BY LICENCE	NO. OF SAMPLES YOU COLLECTED AND ANALYSED	LOWEST SAMPLE VALUE	MEAN OF SAMPLE	HIGHEST SAMPLE VALUE
AMMONIA	Milligrams per litre	28	28	0.09	0.53	1.71
CONDUCTIVITY	Micro Siemens per centimetre	28	28	16	67.54	197
NITROGEN (TOTAL)	Milligrams per litre	28	28	0.3	1.81	5.8
Oil and Grease	Mg/L	28	28	<5	0.79	8
PH	PH	28	28	5.67	7.34	9.93
TOTAL DISSOLVED SOLIDS	Milligrams per litre	28	28	<10	45.57	132
TOTAL SUSPENDED SOLIDS	Milligrams per litre	28	28	<5	60.54	247

8 APPENDIX 2: EXTRACTS FROM QUALITY ASSURANCE DOCUMENT WITHIN THE EPL

L2 Volume and Mass Limits

2019 Pollution Solutions Report – 3rd Qtr

2019 Pollution Solutions Report – 4th Qtr

2020 Pollution Solutions Report – 1st Qtr

2020 Pollution Solutions Report – 2nd Qtr

(Refer to attached reports)

The Orica Australia Technical Centre is compliant with condition L2 and its subsection.

To ensure condition L2 of the sites licence is conformed with, quarterly assessments on the sites treatment plant by a NATA accredited company are undertaken. Part of this quarterly assessment includes the review on the quantity of discharge. From this review an average daily output is identified of which is approximately 50% below the current daily licence limit.

Quantity of discharge amount was consistent with previous year.

L3 Noise Limits

The Orica Australia Technical Centre is compliant with condition L3 and all of its subsections.

A noise survey conducted on April 2012 by independent consult Umwelt during production phase identified compliance with condition L3. No complaints have been received relating to noise generated by the site.

For the period of this report there have been no breach of noise limits and no complaints received.

This survey is readily accessible if an authorised officer of the EPA requests it.

L4 Potentially Offensive Odour

The Orica Australia Technical Centre is compliant with condition L4 and its subsection.

No potentially offensive odours were identified at the site.

9 APPENDIX 3: PROJECTED ANE ANNUAL TONNAGES BETWEEN 2011 AND 2023 WITH TOTAL DAILY TRUCK MOVEMENTS

Year	Total Truck Movements - Projected	Total Truck Movements – Actual Average / day	Total Tonnes - Projected	Total Tonnes - Actual
2011	50	1	125,000	0
2012	55	26	137,500	40,657
2013	60	34	150,000	111,310
2018	80	50	200,000	123,007
2019	No projection	45	No projection	129,888
2020	No projection	37	No projection	114,394
2023	100		250,000	

Comment: Adoption of A-Double tankers for ANE and ANS delivery have contributed to reduction in vehicle movements.

Non-Compliance to Road Transport Protocol

Date	Incident	Event No.	Corrective Actions Completed
26.11.2019	Acetic Acid Delivery Truck Parked on George Booth Drive 1 hour	2019-00052979	Yes, RTP re-issued
16.01.2020	ANE Tanker Parked on George Booth Drive 1 hour	2020-00054378	Investigation completed, haulage contractor notified, 2019 RTP re-issued
26.01.2020	Emulsifier delivery tanker parked on George Booth Drive 3 Hours	2020-00054690	Investigation completed, haulage contractor notified & 2019 RTP re-issued to haulage contractor.
14.04.2020	Emulsifier tanker exited site using incorrect route	2020-00057013	Investigation completed, updated RTP re-issued, positive confirmation received from transport company that deficiencies have been addressed

10 APPENDIX 4: IEA RECOMMENDATIONS

MP 09_0090 Schedule 3. Condition 5.b Implementation of Recommendations					
Condition / Issue	Recommendation	Orica Response	Enablon Reference	Due Date	Status
Schedule 3, Condition 2	Orica should submit the revised Emergency Plan to regulators as soon as possible to ensure alignment with the overall Environmental Management Strategy – Operations, dated 2018. The proponent should submit and seek formal approval of the revised Emergency Plan from DPIE.	Submit latest revision of ERP to DPI&E for approval as well as all other required Agencies		31.02.2020	Completed
Schedule 3, Condition 10 Schedule 4, Condition 3	The RTP should be updated to include a criteria for internal and external incident reporting processes. At present, the RTP requires that all drivers report incidents immediately to their supervisor and the ANE Production Facility Senior Manufacturing Supervisor. The RTP does not identify a clear process or format for reporting traffic incidents and does not provide a criteria for determining if incidents require internal or external notification.	Update reporting process in Road Transport Protocol document		26.06.2020	Completed
Schedule 3, Condition 11	Orica should ensure that appropriate scheduling and tracking is undertaken for the submission of audit reporting to regulators. This will ensure that audit reporting is submitted in accordance with timelines specified in approval conditions.	Raise repeating task list to initiate regular reviews are completed to ensure audit planning takes place		14.02.2020	Completed

<p>Schedule 4, Condition 1</p>	<p>As it has currently been prepared, the EMS notes that it only covers the ANE facility and not the Technical Centre. Given that the Project Approval now covers the entire facility and the Project is defined under the Project Approval as including the ANE Facility and the continued operation of the Technical Centre, the EMS and other associated plans and programs should be updated to ensure that they cover all parts of the site as relevant.</p>	<p>The EMS was originally developed around the construction of the ANE plants pre, during and post construction process with an intent to capture all environmental legislative obligations of the project. In comparison, the site Environmental plan is the management of activities of the site based on a risk-based approach. These 2 plans as a result need to be kept separate however reviewed together to ensure consistency.</p>		<p>N/A</p>	<p>N/A</p>
<p>Schedule 4, Condition 5</p>	<p>Orica should seek to confirm in writing with DPIE if the documents that were identified as missing from the website (Emergency Plan and Fire Safety Study) need to be uploaded (noting Orica’s concerns regarding security sensitive information contained within them). The errors with the links to Appendix 3 and 5 of the Environmental Assessment should be fixed.</p>	<p>To ensure Security risks are minimised Orica does not communicate the contents of these plans publicly, but they are distributed to all Emergency Services and Statutory bodies as required by various conditions and approvals</p>			<p>As Noted,</p>

<p>Revised Management Plans</p>	<p>Orica should follow up and seek formal written approval from DPIE for all management plans that have been revised and resubmitted in accordance</p>	<p>Orica to Request Department Approval with the Project Approval so that they can be implemented onsite.</p>		<p>14.02.2020</p>	<p>Complete</p>
<p>EPL4121</p>					
<p>Condition L3.4</p>	<p>Meteorological data to be used for determining meteorological conditions for attended noise monitoring should be obtained from the site meteorological station.</p>	<p>Annual noise testing no longer a requirement. Communicate location of weather-station and requirement to reference in any future analysis</p>	<p>N/A</p>	<p>Ongoing</p>	<p>N/A</p>

11 APPENDIX 5: SITE BOUNDARY AERIAL IMAGE

