



Our ref: DOC26/125489

The Principal Planning Officer
Planning and Assessment Division
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Via: NSW Major Projects Portal

Attention: Rasmus Attenkamp

EPA Advice on SSD Modification Application (MP06_0159-Mod-7)

Dear Mr Attenkamp,

I am writing in response to your request for the NSW Environment Protection Authority (**EPA**) to comment on Public Authority Consultation (PAE)-106728221 – Modification Application (MP06_0159-Mod-7) for the proposed construction of ancillary operational infrastructure at the Visy Pulp and Paper Mill, located at 1302 Snowy Mountains Highway, Tumut (**premises**).

The EPA has reviewed the following documents:

- MP06_0159 Modification 7 | Visy Pulp and Paper Mill – prepared by GHD Pty Ltd and dated 29 January 2026 (**modification report**).

The EPA understands the proposed modification includes the following.

1. Construction of a third black liquor tank (BLT) to supplement existing capability.
2. Construction of an additional cooling tower adjacent to existing cooling towers.
3. Expansion of the existing concrete bunded evaporation plant area to service the new BLT.
4. Construction of a two megalitre (ML) dam in the northeast section of the premises to capture runoff associated with a new re-use material storage and loading area.
5. Proposed changed orientation of the 'bleached kraft pulp (BKP) storage shed', previously approved in 'Mod 5 – 2022', but not yet constructed.
6. Increase in the size of the 'machine clothing storage shed' approved in Mod 6, through addition of a bay and increased height.
7. Amendment to consent condition pertaining to Fire Safety Studies and related documents requiring approval by the NSW Rural Fire Service; i.e., approving authority to be amended to Fire & Rescue NSW, as advised by the Department of Planning, Housing and Infrastructure.

The EPA has responsibilities for pollution control and environmental management under the *Protection of the Environment Operations Act 1997 (Act)*. Visy Pulp and Paper Pty. Ltd. (**licensee**) hold Environment Protection Licence No. 10232 (**licence**), issued pursuant to the Act for scheduled activities being undertaken at the premises.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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Please note, all activities associated with the proposed modification will be subject to regulation by the EPA in accordance with the licence, including those which may result in potential offsite impacts during both the construction and operational phases of the proposal.

Based on the information provided, the EPA does not object to the proposed modification, however, provides the following additional comments and recommendations for consideration.

1. Matters to be addressed with conditions (see Attachment A)

- a. Odour
- b. Construction of 2ML runoff dam
- c. Sediment and erosion controls

Should the modification application be approved, we recommend that the licensee contact the EPA directly about any concerns relating to variation of the licence that may result from the modification of the consent.

If you have any questions about this matter, please contact Hannes Badenhorst via email at info@epa.nsw.gov.au.

Yours sincerely



NICK VAN LIJF
Unit Head – Operations
NSW Environment Protection Authority

3 March 2026

ATTACHMENT A – RECOMMENDED CONDITIONS

The EPA recommends the Department of Planning, Housing and Infrastructure (DPHI) consider the following conditions as part of their determination of the application (MP06_0159-Mod-7), should the proposed modification of the consent be approved.

Odour

Following a review of the modification report, the EPA is concerned that the potential for additional odours from the proposed ancillary infrastructure has not been adequately assessed in accordance with the relevant guidelines.

Additionally, whilst we note the modification report suggests that the frequency of complaints have decreased in recent years, the EPA continues to receive community reports of alleged odour and air quality impacts from the premises.

Recommendation

1. DPHI to require the Applicant to clearly demonstrate that the proposed modification will not result in any additional air quality, dust or odour impacts and consider including the following condition.
 - 1.1. *Prior to construction of the ancillary operational infrastructure associated with MP06_0159-Mod-7 the proponent must complete a quantitative assessment of the potential air quality, dust and odour impacts of the proposed development, during both construction and operational phases of the project. The assessment must be undertaken by a suitably qualified person or consultant and is to be completed in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2022).*
2. DPHI to consider the following additional odour related conditions.
 - 2.1. *The proponent must not cause or permit the emission of offensive odour beyond the boundary of the premises.*
 - 2.2. *If in the opinion of an EPA authorised officer emissions of offensive odour have been released from the premises, the EPA may require a comprehensive odour audit to be completed by a suitably qualified person or consultant in accordance with the Technical framework: Assessment and Management of odour from stationary sources in NSW (DEC 2006) and associated Technical notes: Assessment and Management of odour from stationary sources (DEC 2006).*

The scope and timing of the audit is to be approved in writing by the EPA prior to the audit being undertaken. Should a comprehensive odour audit be required, the proponent must submit a copy of the odour audit findings by email to the EPA at info@epa.nsw.gov.au within seven days of receiving the report, as well as a description of the measures that will be implemented to mitigate and prevent any offensive odour impacts from occurring.

Construction of 2ML runoff dam

The modification report states that the proposed 2ML runoff dam will be engineered to meet applicable standards and take into account the results of appropriate geotechnical testing. The report also states that the dam will be constructed with earthen materials and lined with high density polyethylene (HDPE) material.

Recommendation

3. DPHI to consider including a condition requiring an appropriate Construction Quality Assurance report to be prepared and submitted for the construction of the proposed runoff dam as follows.

- 3.1. *Following the construction of the 2ML runoff dam, and prior to the acceptance of any wastewater from the premises, the proponent must submit a Construction Quality Assurance (CQA) report to the EPA by email to info@epa.nsw.gov.au.*

The QCA report must be prepared by a suitably qualified and independent person or consultant and must, at a minimum, include:

- a. detailed documentation and supporting evidence of the works undertaken, the testing performed, and the quality assurance procedures implemented;*
- b. a description of any deviations from the approved designs, methods or specifications;*
- c. a professional opinion from a qualified and experienced CQA practitioner confirming that the works comply with the approved design, methods and specifications.*

Sediment and erosion controls

The EPA notes that the modification report does not provide sufficient details regarding controls that will be implemented to address potential impacts to soils and surface waters during the construction activities associated with the proposal. Whilst we note that the modification report states that the existing sediment and erosion controls implemented at the premises are considered adequate to address any potential impacts from the proposal, it is unclear as to whether potential impacts specific to 'construction activities' have been appropriately considered, as these would be expected to fall outside the scope of 'normal' onsite operations.

Recommendation

4. DPHI to consider including a condition requiring a soil and water management plan to be prepared and implemented at the premises and/or to update any existing plans of this nature, as appropriate, to account for the proposed construction activities under MP06_0159-Mod-7. Where a new plan is to be prepared, we recommend the following condition.
 - 4.1. *A Soil and Water Management Plan (SWMP) must be prepared by a suitably qualified person or consultant and implemented at the premises prior to the commencement of any construction works associated with the development. The SWMP should identify reasonably foreseeable risks relating to soil erosion and surface/ground water quality and must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP should be prepared in accordance with the requirements for such plans outlined in the NSW Government Guidelines - Managing Urban Stormwater: Soils and Construction (Landcom, 2004).*