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By email: emma.barnet@planning.nsw.gov.au

**EPA Advice on Environmental Impact Statement – Aussie Skips Recycling – Bellfrog St
Site Upgrades – SSD-67497708**

Dear Ms Barnet

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the proposed Aussie Skips Recycling - Bellfrog Street Site Upgrades (Application SSD-67497708) at 13 Bellfrog Street, Greenacre (the Premises).

The EPA understands that Aussie Skips Recycling Pty Ltd (the Applicant) is seeking approval to upgrade the exiting waste facility which is presently operating at the Premises to enable the following (the Proposal):

- operation of the site as a Resource Recovery Facility
- extended hours of operation of the site
- receipt of additional waste types

The EPA notes that the Applicant is currently undertaking scheduled activities at the Premises, being waste storage under Environment Protection Licence (EPL) no. 21389 (the Licence) issued under the *Protection of the Environment Operations Act 1997* (the POEO Act). The Applicant has indicated the expected scheduled activities under this Proposal will be waste storage and resource recovery. If the Proposal is approved the Applicant will need to apply separately to the EPA to vary its licence.

The EPA has reviewed the following documents that were included with the application:

- *Environmental Impact Statement SSD-67497708 Version 3.0* – 4Pillars Environmental Consulting Pty Ltd – 3 November 2025
- *Appendix 7 - Greenacre Waste Facility State Significant Development Application SSD-67497708 – Air quality impact assessment Version 1* – EMM Consulting Pty Ltd – 21 October 2025
- *Appendix 8 – Greenacre Waste Facility State Significant Development Application SSD-67497708 – Noise and Vibration Impact Assessment Version 2* – EMM Consulting Pty Ltd – 27 October 2025

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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- *Appendix 13 – letter re: Water, Soils and Flooding - Tooker and Associates – 28 October 2025*
- *Appendix 13a – Water Quality Control Report for No. 15 Bellfrog Street, Greenacre – Version 3 – Kozarovski and Partners – 1 April 2013*

The EPA has conducted a review of the information provided for the Proposal, including the EIS prepared by 4Pillars Environmental Consulting Pty Ltd and dated 3 November 2025 and relevant appendices, and has determined that insufficient information has been provided to adequately complete an assessment of the Proposal.

The EIS and appendices do not provide all of the information required by the EPA within the Secretary's Environment Assessment Requirements. Therefore, the EPA is unable to provide recommended conditions of approval for the Proposal at this stage. The matters to be addressed prior to determination are summarised below and detailed in Attachment A.

Matters to be addressed prior to determination

Prior to determination the EPA requires further details addressing the following:

1. Hours of operation
2. Noise
3. Water management
4. Air quality and odour
5. Waste
6. Recourse Recovery Order(s)

Further to the matters to be addressed prior to determination, the EPA would like to reiterate the messaging conveyed in the response to SEARs and letter dated 13 May 2024 (EPA Ref: DOC24/356005) (the Letter) regarding the enclosure of facilities and materials.

The SEARs and the Letter outline the EPA's position that it is best practice for new and upgraded waste facilities to fully enclose storage and processing activities.

The EPA notes that in the EIS two scenarios have been presented:

- Full enclosure of the site
- Partial enclosure of the site, comprised of:
 - the waste receival building
 - waste processing building, including processing plant
 - enclosed elevated conveyor between the two buildings
 - open yard between the building and enclosure.

The Applicant's preferred scenario is the partial enclosure of the site, with the processing plant and storage of material located within a three-sided enclosure. The EPA considers this option has the potential for increased environmental impacts, when compared to a fully enclosed site.

The EPA reiterates its previously communicated expectation that the site is fully enclosed. Controls presented in the EIS are reactive and rely heavily on management measures to mitigate environmental impacts.

The EIS considers full enclosure 'feasible' however the EIS refers to cost as prohibiting full enclosure. No further information has been provided to justify this position. The cost of full enclosure has been carried by other similar businesses, and the EPA considers it appropriate in this situation.

The EPA has not considered Aboriginal cultural heritage, biodiversity or built form and urban design requirements as these are the purview of the Environment, Energy and Science Group and Heritage NSW in the Department of Planning, Industry and Environment.

If you have any questions about this request, please contact Joanne Bell via email at joanne.bell1@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Borysko', with a stylized, cursive script.

Larissa Borysko
Unit Head - Operations
NSW Environment Protection Authority

Attachment A

The EPA requires the Applicant to provide additional information to enable the EPA to adequately access the Proposal and the potential environmental impacts. The information is required to inform licensing considerations consistent with Section 45 of the POEO Act, including:

- (c) *The pollution caused or likely to be caused by the carrying out of the activity or work concerned and the likely impact of that pollution on the environment.*
- (d) *The practical measures that could be taken –*
 - (i) *To prevent, control, abate or mitigate that pollution, and*
 - (ii) *to protect the environment from harm as a result of that pollution.*

The required additional information is detailed below.

1. Hours of operation

The Applicant has indicated the proposed operating hours for the Premises in the EIS.

The Hours of Operation are included in *Table 3: Proposed development overview*.

Processing is proposed to occur Monday to Saturday 7:00 AM – 6:00 PM, with no Processing to occur on Sundays and Public holidays.

Transport – tipping and loading is proposed to occur Monday to Saturday 5:00 AM to 10:00 PM, and Sunday and Public holidays 7:00 AM to 6:00 PM.

Low impact activities, as defined in the Glossary are proposed to occur 24 hours, every day.

The Glossary includes the term *Ancillary Low Impact Uses* and defines these as “*Operation of the mechanical workshop (including the movement of heavy vehicles in the process of being repaired, or that have been repaired); cleaning of the site via small equipment such as bobcat sweeper, pressure washers etc.; use of a vacuum truck emptying stormwater water pits and tanks; cleaning equipment; truck and mobile plant maintenance (within workshop); Material Recovery Plant maintenance and general Site maintenance; Sampling and testing of materials.*”

Mobile and stationary plant is listed in *Table 5: Mobile and stationary plant list*, along with when individual items of plant will be operating.

Comparison of the proposed operating hours included in Table 3 and the listed operating hours of plant and machinery in Table 5 is contradictory to the proposed hours of operation. It is not clear if the morning shoulder period (5:00 AM – 7:00 AM) is included in the night time period (10:00 PM – 7:00 AM) or if the indicated machinery operation in the night time period is to occur during the period 10:00 PM – 5:00 AM.

The EPA requires additional information to determine if the proposed operating hours are appropriate for the site.

The EPA requires the Applicant to:

- Define “Processing” and include a list of all equipment and vehicles required to be operating while processing is occurring and where these equipment and vehicles will operate
- Define “Transport – tipping and loading” and include a list of all equipment and vehicles required to be operating while processing is occurring and where these equipment and vehicles will operate
- Clarify the information included in Table 5:
 - Will the machinery listed as being operational during the night period of (10:00 PM – 7:00 AM) be operating during this period, outside of the morning shoulder period of 5:00 AM – 7:00 AM?

- Confirm the term “low impact activities” is as defined within the glossary and how these activities were determined as being low impact.

2. Noise

The EPA has reviewed the *Greenacre Waste Facility State Significant Development Application SSD-67497708 – Noise and Vibration Impact Assessment* (Version 2, EMM, 27 October 2025) (NIA).

The EPA notes that in Table 1.2, the NIA identifies that the SEARs require “consideration of annoying characteristics of noise”. However, no assessment of annoying or low frequency characteristics has been undertaken.

The EPA requires the Applicant to:

- undertake an assessment of annoying characteristics and low frequency in line with Fact Sheet C of the Noise Policy for Industry.

3. Water management

The EPA has reviewed *Section 7 Water, Soils and Flooding* of the EIS and Appendices 13 and 13a.

The EPA has determined that the information in Section 7 and Appendices 13 and 13a did not provide sufficient information for the EPA to assess the potential water impacts from the Proposal and has not adequately addressed the requirements of the SEARs. The EPA requires the Applicant to address the matters set out below and provide the required additional information in order to adequately assess potential impacts to waters.

The SEARS required a detailed assessment of the impacts to soil and water, including:

1. “a surface and groundwater water discharge assessment in accordance with relevant EPA guidelines, including an assessment of potential impacts on watercourses, riparian areas, key fish habitat and recreational fishing, groundwater, and groundwater-dependent communities nearby”, and
2. “characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria using a MUSIC water quality model (including details of the contaminants of concern that may leach from the waste into the wastewater and proposed mitigation measures to manage any impacts to receiving water and monitoring activities and methodologies)”, and
3. details of any surface or groundwater mitigation, management and monitoring activities and methodologies”.

A Water Discharge assessment prepared as required by the SEARs has not been provided. The EIS includes assumptions about the quality of water to be discharged from the site and stated that “a discharge characterisation assessment, which will be designed and implemented in the 12 months following commencement of operations under an SSD Consent” would be undertaken. The EPA does not consider this approach adequate to manage potential impacts to water.

The Applicant provided a MUSIC model prepared for the existing Consent and dated 2013 (Appendix 13a). The EPA does not consider the provided information to accurately or adequately address the proposed site operation and changes to the on-site water management, nor does it consider potential interaction with contaminants of concern, related to the waste types being proposed to be received at the premises.

The Applicant has not provided details of surface or groundwater mitigation, management and monitoring activities and methodologies that can be used to assess if these are appropriate and adequate for reducing impacts from the Premises.

The Applicant proposes to re-use captured water for dust suppression across the Premises. The information provided in the EIS did not include details of how the level of contamination would be determined prior to its re-use, during its ongoing use, nor did the EIS outline any proposed testing or treatment(s).

The EPA requires the Applicant to:

- provide a water discharge impact assessment that addresses the SEARs requirements so that impacts to the receiving environment can be assessed.
- provide an up-to-date characterisation of water quality at the point of discharge
- provide details of any surface or groundwater mitigation, management and monitoring activities and methodologies so that impacts to the receiving environment can be assessed.

The information submitted by the Applicant has not provided a justification to permit water to be discharged off-site. The current EPL for the Premises does not permit discharge from the site. Condition L1.2 states that “*any water that has come in contact with waste, or any hardstand area of the Premises must not be discharged from the premises at any time*”. The proposed water management system outlined in the application does not indicate segregation of water based on where it was captured. Therefore, all water captured at the site should be considered to be contaminated.

The EPA considers it consistent with the current EPL for the Premises and other waste facility licences to maintain Condition *L1 Pollution of Waters* on the licence to prevent discharge from the site and ensure sufficient water storage is maintained to prevent discharge. If the Applicant considers that discharge may be required, investigation of alternate disposal methods should be undertaken.

4. Air quality and odour

The EPA has reviewed the EIS and the *Greenacre Waste Facility State Significant Development Application SSD-67497708 – Air quality impact assessment* (Version 1, EMM, 21 October 2025) (AQIA). The AQIA has assessed potential impacts for two scenarios:

- Scenario 1: All waste storage, handling and processing within the waste receival building and the processing building, with an enclosed conveyor transferring waste from the receival building to the processing building. Trucks delivering waste would traverse the open concrete yard between the weighbridge and receival building. No waste would be stored, handled or processed outside. This scenario is representative of the proposed development.
- Scenario 2: All waste storage, handling and processing within a single building. Trucks delivering waste would be within the building once they leave the weighbridge. No waste would be stored, handled or processed outside.

For the purposes of providing a response the EPA has focused on the assessment of impacts for the as proposed design (Scenario 1).

Additional PM₁₀ (24 hour) exceedances are predicted.

The AQIA predicts one (1) additional exceedance of the PM₁₀ (24 hour) impact assessment criteria of 50 ug/m³ at residential and industrial receptors. The predicted exceedances are found on days where existing air quality accounts for between 82% and 98% of the predicted exceedance.

Further information is requested; particularly on how proposed reactive management measures could manage predicted exceedances.

The design of the proposal includes a number of mitigation measures, that have been accounted for in the assessment of impacts. These measures include:

- Tipping of inbound waste material and loading of processing circuit hopper will be within an enclosed building.
- All process equipment and waste storage bays will be within a building.

- All conveyors will be covered.
- No waste will be stored, handled or processed outside.
- Dust suppression sprays in the receival building and misters on building openings.
- Waste suppression will be installed on the fixed process plants within the processing building.
- Dust extraction will be installed on the fixed processing plant within the process building, with extracted air directed to a baghouse.
- Water will be used for dust suppression in the concrete yard.
- The concrete yard will be routinely cleaned to minimise dust build up.

In addition to these mitigation measures, the proponent proposes to install and operate real-time particulate matter monitoring units at the boundary of the facility. The AQIA outlines that the monitoring would be used to inform a trigger action response plan to facilitate the reactive management of particulate matter emissions from the site. Further information is requested on the reactive management measures.

Additional Information

1. Predicted impacts for the typical scenario have not been provided

The AQIA has considered emissions and potential impacts from 'typical day' operations and 'busy day' operations. The AQIA outlines that model predictions from 'typical day' operations are not predicted to exceed cumulative impact assessment criterion. However, the ground level concentrations for the 'typical day' operations have not been provided.

Recommendation: Revise the AQIA to include the predicted impacts for the 'typical day' operations.

2. Further information on how the trigger, action, response plan could manage the predicted additional PM₁₀ exceedances.

Table 7.3 of the AQIA presents the cumulative ground level concentration (glc) for the proposed design of the project for 'busy day' operations. The cumulative ground level concentrations account for emissions for the proposed project, existing background air quality, and the Heidelberg Materials site. For the assessed industrial receptors, a maximum PM₁₀ glc of 54.8 ug/m³ is presented, and for the residential receptors a maximum PM₁₀ glc of 51.3 ug/m³ is presented. The AQIA outlines that one (1) additional PM₁₀ exceedance is predicted. Figures 7.2 and 7.3 show the contributions from existing background, the proposal and the Heidelberg site. The contributions from the proposal to the additional exceedances have not been provided in tabular form to understand more specifically the actual predicted contributions.

Section 8.4 of the AQIA outlines a commitment to using real-time particulate matter monitors at the site. The monitors are proposed to be used to inform a trigger action response plan (TARP) to facilitate reactive management of particulate matter emission from the site. Further detailed information is requested to demonstrate how the proposed monitoring and TARP could manage the predicted PM₁₀ exceedances.

Recommendation: Revise the AQIA to:

- (a) Include numerical glc contributions from the premises to the predicted PM₁₀ exceedances.
- (b) Demonstrate how a proposed trigger, action, response plan could prevent the predicted additional PM₁₀ exceedances. The demonstration should include presentation of predicted glcs (site contributions and existing background) accounting for potential triggers and actions that could be implemented into the TARP.

5. Waste

Waste Types

The SEARs required that the EIS include detailed information regarding each of the waste types that are intended to be received at the Premises, including but not limited to sources, types and quantities of each waste. Insufficient information has been provided regarding waste types.

The Applicant must clearly define all waste types in accordance with the POEO Act and ensure they are classified according to the EPA's *Waste Classification Guidelines 2014* (as amended from time to time). For example, the EIS does not clearly set out the types of waste proposed to be received, and the waste types are described differently through the EIS:

- “will accept and recycle, construction and demolition (C&D) waste, commercial and industrial (C&I) waste and non-putrescible municipal solid waste (MSW), including building and demolition (B&D) wastes such as brick, asphalt, concrete and metals”
- The waste types to be received on Site will consist of the following materials (and equivalents):
 - Brick, ceramics, asphalt, concrete, paper and cardboard, timber/wood (including treated timber and engineered wood), plastics, gyprock, rubber, glass, metals (ferrous and non-ferrous), GSW soils (<CT1), VENM.
 - These may be accepted in mixed or segregated loads.
 - These waste types may be accepted from three waste streams, namely:
 - Construction & Demolition waste (C&D);
 - Commercial & Industrial wastes (C&I); and
 - Non-putrescible Municipal Solid Waste (MSW).

The EPA requires the Applicant to:

- i. provide further detailed information regarding each of the waste types proposed to be received at the Premises. The information must include:
 - a. Details of the source(s) of the waste types proposed to be received at the Premises
 - b. A description of each individual waste type that will be received at the Premises as per the EPA *Waste Classification Guidelines* and clause 49 of Schedule 1 of the POEO Act
 - c. This must include all waste types to be received.

Waste Received v Waste processed

The EIS states that “the site is currently permitted to receive an annual combined throughput of waste material of 199,000 tonnes (t) in any 12-month period”.

Condition L2.3 of the EPL states that “the quantity of material to be received at the Premises must not exceed 199,000 tonnes in any 12-month period”.

Confirmation is sought that the throughput referenced in the EIS is the maximum tonnage received at the facility in any 12-month period, i.e. a maximum of 199,000 tonnes will be received at the Premises in any 12-month period. The received material would then be processed, and the processed amount would not exceed 199,000 tonnes in any 12-month period.

The EPA requires the Applicant to:

- Confirm the total tonnage proposed to be received at the Premises in any 12-month period.

Waste Storage

Section 3.4.5 Waste and product storage of the EIS includes information of stockpile heights proposed at the Premises for different material types.

Stockpile height of non-combustible material is proposed to be limited to six metres, and stockpile height of combustible material is proposed to be limited to four metres.

The EPA recommends a consistent stockpile height be implemented at the Premises regardless of the combustibility of the stored material.

Recommendation:

That stockpile height for all materials to be stored at the Premises be limited to four metres to maintain consistency and ensure compliance with the fire safety guideline.

This is consistent with EPL conditions in place and other licensed waste facility EPLs.

Waste Management

The Proposal includes the intention to receive construction and demolition (C&D) waste at the Premises.

If material that meets the definition of C&D waste is approved to be received at the Premises, operations at the Premises must meet the requirements of the *Standards for managing construction waste in NSW* (2019 or as amended from time to time).

Section 3.4.4 Waste inspection of the EIS includes information on the waste inspection part of the waste receipt process. It identifies that if a prohibited waste is found to have been deposited/tipped on the site and the delivery vehicle is no longer on site, it will generally require:

- The area (potentially the entire Waste Receipt Building) to be isolated;
- The Site Supervisor and then the Co-COOs to be notified;
- The situation to be assessed by the Environmental Manager. The Site will be closed should the Environmental Manager deem the hazard to be significant enough to warrant such action.

However, further detail on how the Applicant will manage the material identified as a prohibited waste/ non-conforming waste is not provided.

The EPA requires the Applicant to:

- Provide evidence that the Proposal meets all C&D standards, including providing maps as necessary to show how all requirements will be met
- Provide details of how receipt of prohibited waste/non-conforming waste would be dealt with following its identification.

Waste Processing

Section 3.4.6 Waste processing of the EIS states that the Material Recovery Plant will include “*air separation: to separate light material (e.g. plastics and paper)*”.

The provided process flow for the proposed plant (Figure 6) and the Predicted proportion and weight of materials passing through each part of the MRF plant (Figure 7) don't clearly identify the location where the air separation of plastics and paper will occur, and where these materials will be stored following their separation.

The EPA requires the Applicant to:

- confirm that the light materials referenced in the EIS are the items separated in the air separation step
- identify any other anticipated waste types to be separated in the process
- provide a flow diagram for the processing of light material (plastic and paper)
- identify the post-processing storage location for light material
- outline mitigation measures to prevent the stored light material (paper and plastic) from entering the environment
- provide anticipated stored tonnage
- identify fate of separated light material.

6. Resource Recovery Order(s)

The SEARs required that the EIS include detailed information of any materials to be produced under a Resource Recovery Order (RRO) and the controls proposed for meeting the conditions of each RRO and justification of the need for receipt of waste included in a RRO, and details of the quality of outputs produced and the final dispatch locations.

The EPA has reviewed the EIS and insufficient information has been provided about how the site will process material(s) under a RRO, how the conditions of each RRO will be met, the justification of the need for receipt of waste included in a RRO, how the quality of outputs produced under a RRO are quantified, and final dispatch locations for RRO product.

“Recovered fines or soils” is listed in Table 4 as being a product processed at the Premises under the RRO category, yet the EIS only states *“that if the material is processed to a standard that meets a Resource Recovery Order, it may be sent for direct reuse”* and that *“Processed materials may either be exported to other recycling or remanufacturing Sites, or, if the material is processed to a standard that meets a Resource Recovery Order, it may be sent for direct reuse”*.

Further, the Applicant states in the EIS that *“Procedures to establish the lawfulness of unlicensed Sites prior to export of RRO materials are already established”*. However, none of this detail is provided.

The EPA requires the Applicant to:

- i. provide the further detailed information below:
 - a. Clearly identify each RRO the Applicant proposes to produce material under, and provide:
 - i. Details of any materials to be produced under a RRO
 - ii. The controls proposed for meeting the conditions of each RRO
 - iii. Justification of the need for receipt of waste included in a RRO
 - iv. Details of the quality of outputs produced
 - v. Final dispatch locations for all material produced under a RRO