



Enfield Material Recovery Facility Increased Throughput

Scoping Report

Prepared for:
Re.Cycle Operations Pty Ltd (an entity of Re.Group)

Prepared by:



Planning and
Environmental
Consulting

September 2025

Enfield MRF – Increased Throughput Scoping Report

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Company: Re.Cycle Operations Pty Ltd

Address: Level 19, 100 Miller Street, North Sydney NSW 2060

ABN: 29 656 197 134

DEVELOPMENT

Title: Enfield Material Recovery Facility – Increased Throughput

Description: The Applicant is seeking consent to:

- increase the site's total throughput by 100,100tpa, bringing the total approved throughput from 99,900tpa to 200,000tpa
- extend operating hours.

Project Site Address: 40-42 Madeline Street, Strathfield South NSW 2136

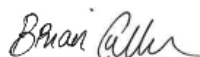
Legal Site Description: Lot 24 DP 1200563

Local Government Area: Strathfield

DECLARATION

This Scoping Report has been prepared by EME Advisory in accordance with the details provided by Re.Cycle and the information available at the time. It is for the sole use of Re.Cycle for the purpose of informing government agencies, the public and other relevant stakeholders.

EME Advisory



Brian Cullinane
September 2025

ABBREVIATIONS

Abbreviation	Definition
AHIMS	Aboriginal Heritage Information Management System
Approved Methods	<i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (EPA, 2017)
ASS	Acid sulfate soils
BDAR	Biodiversity Development Assessment Report
Biodiversity and Conservation SEPP	<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>
CBD	central business district
CDS	container deposit scheme
CLM Act	<i>Contaminated Land Management Act 1997</i>
CSP	ceramic, stone and porcelain
Council	Strathfield Council
DA	Development application
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
dB(A)	A-weighted decibels
District Plan	<i>Eastern City District Plan</i> (GSC, 2018b)
DP	Deposited Plan
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EMEA	EME Advisory
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	Environment Protection Authority
EPBC Act	Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
FIMP	Fire Incident Management Plan
GSC	Greater Sydney Commission
HIPAP	Hazardous Industry Planning Advisory Paper
JRPP	Joint Regional Planning Panel
Km	Kilometre
LA _{eq}	A-weighted, equivalent continuous sound level
LEP	<i>Strathfield Local Environmental Plan 2012</i>
LGA	Local Government Area
LSPS	<i>Strathfield 2040: Local Strategic Planning Statement</i>
mm	Millimetres
MNES	matters of national environmental significance

Abbreviation	Definition
MRF	Material Recovery Facility
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
PCR	Paper and cardboard recycling
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Project Site	40 Madeline Street, Strathfield South
Re.Cycle	Re.Cycle Operations Pty Ltd
Region Plan	<i>Greater Sydney Region Plan (GSC, 2018a)</i>
Resilience and Hazards SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
RMS	Roads and Maritime Service
SEARs	Secretary’s Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIA Guideline	<i>Social Impact Assessment Guideline for State Significant Projects (DPIE,2021)</i>
SSD	State significant development
Standard Instrument	<i>Standard Instrument – Principal Local Environmental Plan (2006)</i>
T	Tonnes
TfNSW	Transport for NSW
tpa	Tonnes per annum
Transport and Infrastructure SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
WARR Act	<i>Waste Avoidance and Resource Recovery Act 2001</i>
Waste Strategy	<i>NSW Waste and Sustainable Materials Strategy 2041—Stage 1: 2021–2027 (DPIE, 2021)</i>

1.	INTRODUCTION.....	1
1.1	Overview	1
1.2	The applicant.....	1
1.3	Project objectives.....	2
1.4	Related development.....	2
1.5	Document purpose	3
2.	PROJECT SITE	4
2.1	Site context	4
2.2	Project site	4
2.3	Zoning.....	4
2.4	Land ownership.....	7
2.5	Existing approved development	7
2.6	Environment Protection Licence.....	11
3.	PROPOSED DEVELOPMENT.....	14
3.1	Overview	14
3.3	The PCR process	16
3.5	Hours of operation	17
3.6	Employment.....	17
4.	STATUTORY AND STRATEGIC CONTEXT	18
4.1	Statutory context	18
4.1.1	Permissibility	18
4.1.2	Planning approval pathway	18
4.1.3	Commonwealth legislation.....	19
4.1.4	State legislation	19
4.1.5	Environmental Planning Instruments	21
4.2.1	NSW Waste and Sustainable Materials Strategy 2041 - Stage 1: 2021–2027.....	23
4.2.2	Draft NSW Waste and Circular Infrastructure Plan	24
4.2.3	Greater Sydney Region Plan – A Metropolis of Three Cities.....	24
4.2.4	Eastern City District Plan	24
4.2.5	Strathfield 2040 - Local Strategic Planning Statement	25
5.	STAKEHOLDER AND COMMUNITY ENGAGEMENT.....	26
6.	ENVIRONMENTAL RISK ASSESSMENT.....	28
7.	ENVIRONMENTAL ASSESSMENT	30
7.1.1	Traffic and transportation	30
7.1.2	Noise.....	30
7.1.3	Air quality and odour.....	31
7.1.4	Hazards and risks.....	32
7.1.5	Social	32
7.1.6	Other issues.....	36
8.	CONCLUSION	39

TABLES

Table 1 Applicant Details.....	2
Table 2 Development consents applicable to the site	7
Table 3 Approved Hours of Operation and Traffic Restrictions	9
Table 4 Operating hours associated with DA 2015/177/3 temporary operations.....	10
Table 5 EPBC Protected Matters Search	19
Table 6 Identified Stakeholders	26
Table 7 Consent 2015/177 Noise Limits.....	31

FIGURES

Figure 1 Site Location.....	6
Figure 2 Existing Approved Site Layout (Including Alterations & Additions Approved Under Modification Application DA2015/177/2).....	12
Figure 3 Land Use Zoning Map.....	13
Figure 4 Social locality.....	35

APPENDICES

Appendix A	Environmental Scoping and Risk Assessment
Appendix B	EPBC Protected Matters Search Tool Results
Appendix C	BDAR Waiver Application

1. Introduction

1.1 Overview

Re.Cycle Operations Pty Ltd (formerly Polytrade Operations Pty Ltd) owns and operates an existing Material Recovery Facility (MRF) at 40-42 Madeline Street, Strathfield South (the site), being Lot 24 in Deposited Plan (DP) 1200563, located in the Strathfield local government area (LGA). The MRF is referred to as the Enfield MRF.

The existing MRF operates under Development Consent DA 2015/177 granted by the former Sydney East Joint Regional Planning Panel (JRPP) under the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It has an approved throughput of 30,000 tonnes per annum (tpa) of paper and cardboard recycling (PCR) and 69,900 tpa of mixed metals (steel, tin, and aluminium), glass and mixed plastics.

A modification to the consent in December 2023 authorised a temporary increase in waste throughput and operating hours in response to a fire at a Re.Group MRF in Hume. The temporary consent expires on 1 July 2027.

The facility also operates under the provisions of an Environment Protection Licence (EPL), EPL 20576, administered by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act). The scheduled activities identified in EPL 20576 are 'resource recovery' and 'waste storage' under clauses 34 and 42, respectively, of Schedule 1 of the POEO Act.

The MRF has been operational since 2021, and in late 2022, the Glass Beneficiation Plant (GBP), which is part of the MRF and partly funded by a Waste Less Recycle More grant, was commissioned.

Re.Cycle is seeking consent to increase the site's total throughput by 100,100tpa, bringing the total approved capacity from 99,900tpa to 200,000tpa. To align with the increased capacity, consent is also sought for an increase in storage limits to 8,000t at any one time (consistent with the temporary DA). The increase in throughput is sought for site operations as a whole rather than specific waste streams or processing types to provide flexibility to manage the facility in response to market conditions whilst also allowing the site to ramp up glass recycling, a large portion of which will come through the MRF process.

Re.Cycle is also seeking consent to extend the existing approved hours of operation to allow the additional materials to be received at the MRF from 4.30am to 6pm, Monday to Saturday (this is consistent with the temporary DA but will revert to 4.30am to 3pm from 1 July 2027; refer **Table 4**). All other activities will be undertaken within the hours currently imposed by Development Consent DA 2015/177, as modified.

The Project is classified as State significant development (SSD) under Division 4.7 of Part 4 of the EP&A Act. Section 23(3) of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) identifies 'development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste' as SSD.

1.2 The applicant

The applicant's details for the Project are provided in **Table 1**.

Table 1 Applicant Details

Applicant's Full Name	Re.Cycle Operations Pty Ltd
Postal Address:	40 Madeline Street, Strathfield South NSW 2136
ABN:	29 656 197 134
Nominated Contact:	Jacqueline Ong (jacqueline.ong@re-group.com)

Re.Cycle is a subsidiary company of the parent company Re.Group Pty Ltd (ABN 76 616 439 779), which is owned by Re.Hold Pty Ltd (ABN 61 616 411 217).

Re.Group is a privately-owned Australian company that operates one of the largest network of recycling facilities across Australia, with operations across NSW, Victoria, Queensland, Western Australia, South Australia and the ACT. It also has operations in New Zealand.

Re.Group and its related entities (including Re.Cycle) employ approximately 900 people and provide recycling services for more than four million Australians across more than 35 local government areas. Re.Group's mission is to design, build, operate and optimise infrastructure that enables the maximum amount of waste to be diverted from landfill and positively re-used as a renewable resource.

1.3 Project objectives

The specific objectives of the Project are to:

- Improve the operational efficiency of the MRF, including the existing glass beneficiation infrastructure, through higher throughput
- Continue to conduct site operations in an environmentally responsible manner to ensure any potential impacts are minimised
- Meet increasing market demand for the recycling of end-of-life glass and ensure reliable access to end markets for processed materials to contribute to the transition to a circular economy, which aims to eliminate waste and circulate products and materials at their highest value.

1.4 Related development

The Materials Recovery Facility was developed pursuant to DA 2015/177, determined by the Sydney East Joint Regional Planning Panel in October 2016. The approval provides for the use of the Site as a 'waste management facility' with an annual processing capacity of 30,000 tonnes per annum (tpa) of paper and cardboard and 69,900 tpa of mixed metals (steel, tin and aluminium), glass & mixed plastics. The approval also provides for the use and redevelopment of existing infrastructure and buildings which are identified in an approved site layout plan. The consent has been modified four times.

Re.Cycle is proposing to modify the existing consent to include:

- Demolition of existing Building 3 and replacement with a larger building extending east to the Site boundary, replacing existing bunkers and car parking (with replacement parking proposed along the northern boundary)

- New enclosed overhead conveyor extending from the south-west corner of Building 2, above the approved bunkers and parallel to Building 1, before spanning the yard and entering the new Building 3
- Installation of new paper polishing equipment and supporting upgrades in Building 3 to achieve 95%+ fibre purity to meet export requirements commencing 1 July 2026
- A new fully enclosed awning (roof and side walls) attached to the MRF receival hall (Building 2) and Building 1, to provide short-term weather protection for overflow materials in limited contingency circumstances (e.g., plant stoppages, peak periods), with all materials cleared into the receival hall within 48 hours.

The modification is being undertaken separately to the SSD application due to the need to have the paper polishing infrastructure in place by 1 July 2026 to meet new standards for export of paper and cardboard.

The modification is expected to be determined prior to the determination of the SSD application. The traffic assessment for the SSD application will consider the existing approved site layout and the layout proposed by the modification to demonstrate that vehicles can access and move through the site safely under both options.

The relationship between the existing consent and the new SSD consent will be considered in further detail in the EIS.

1.5 Document purpose

EME Advisory (EMEA) has prepared this Scoping Report to support a request for Secretary's Environmental Assessment Requirements (SEARs). It provides DPHI and government agencies with information to assist in identifying potential environmental impacts that should be addressed in the EIS, including information on the Project Site and surrounding area, existing approved operations, and the proposed Project.

The Scoping Report:

- Describes the Site context and the Project Site, including surrounding land uses and existing approved operations - **Section 2**
- Describes the proposed Project - **Section 3**
- Outlines the statutory and strategic context for the Project - **Section 4**
- Details proposed community and stakeholder engagement - **Section 5**
- Provides an overview of the environmental scoping and risk assessment undertaken to identify issues to be assessed in the EIS for the Project - **Section 6**
- Identifies key matters to be addressed in the EIS and proposed approach to their assessment - **Section 7.**

The Scoping Report has been prepared consistent with the *State Significant Development Guidelines – Preparing a Scoping Report* (Department of Planning, Industry and Environment [DPIE], 2021).

2. Project site

2.1 Site context

Re.Cycle operates the existing MRF and PCR facility located at 40-42 Madeline Street, Strathfield South, approximately 12 kilometres (km) west of the Sydney Central Business District (CBD) in the Strathfield LGA.

As shown in **Figure 1**, the site is situated on the eastern side of Madeline Street in an established industrial area and is surrounded by various industrial land uses. Directly to the north of the site, there is a civil construction depot (i.e. Shamrock Developments International) and a multi-unit industrial building. A concrete batching plant (operated by Hanson) is located approximately 170 m to the northeast. Adjoining land to the south is occupied by a waste transfer station (i.e. Aussie Skips) and a 4WD/heavy vehicle mechanical repair business (i.e. Pro-Axle Australia). Vacant undeveloped land adjoins the site to the east, while on the western side of Madeline Street, there is a transport and logistics facility (i.e. K&S Freighters) and a smallgoods food provider (i.e. Kaczanowski & Co).

There are low-density residential areas and public recreation areas further to the north, south and east. The nearest residential property is located approximately 70 m to the south-east of the site at No. 2 Chisholm Street, which is separated from the Site by the Aussie Skips site. The nearest public space is Cooke Park, located approximately 100 m to the south of the site. Cooke Park is one of Strathfield's largest and most popular parks and provides a wide range of sporting and recreational facilities, including sportsgrounds, a skate park and a children's playground.

The Cooks River flows in a concrete-lined channel approximately 65 m to the north-east of the site and Cox's Creek, which feeds into the Cooks River, flows in a concrete-lined channel approximately 50 m to the south of the site. There is an unformed portion of Chisholm Street located directly to the east of the site, which is owned by Council.

2.2 Project site

The Project Site comprises a single parcel of land, being Lot 24 DP 1200563, with a total area of approximately 19,000m².

The Project Site includes three large industrial warehouses:

- Building 1, in the northern part of the site, used for glass processing
- Building 2, in the eastern part of the site, used for mixed recyclables processing
- Building 3, in the western part of the site, used for paper and cardboard recycling.

Additional site infrastructure includes office buildings, car parking areas, storage areas, two weighbridges and three site access points from the adjoining Madeline Street. **Figure 2** shows the existing approved site layout.

2.3 Zoning

As shown in **Figure 3**, the Project Site is zoned E4 General Industrial under the provisions of the Strathfield Local Environmental Plan 2012 (Strathfield LEP). The objectives of the E4 General Industrial zone are:

- to provide a range of industrial, warehouse, logistics and related land uses



Scale: 1:6,400

- to ensure the efficient and viable use of land for industrial uses
- to minimise any adverse effect of industry on other land uses
- to encourage employment opportunities
- to enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers
- to minimise fragmentation of valuable industrial land and provide large sites for integrated and large floorplate activities
- to allow for a higher proportion of ancillary office floor space to support high technology, light industrial and small-scale warehouse-related land uses.

All land adjoining the Project Site is also zoned E4 General Industrial. Public recreation land and low-density residential zones are located further to the east and south of the Project Site. Cooks River is zoned as 'SP2 Infrastructure', purposed for stormwater management.

2.4 Land ownership

LC Investment is the owner of the land on which the MRF is located. Landowner's consent will be provided with the development application.

2.5 Existing approved development

Table 2 summarises the development consent history for the site.

Table 2 Development consents applicable to the site

DA No.	Status	Description	Waste Type
DA 93/01	Determined by Council on 16 April 1993.	Paper & cardboard recycling facility.	Waste paper & cardboard.
DA 2011/193 Approval under Part 4 of EP&A Act	Determined by Council on 26 June 2012.	Subdivision for 4 allotments and associated drainage works	N/A
DA 2015/177 Approval under Part 4 of EP&A Act - Designated Development.	Determined by Sydney East JRRP on 26 October 2016 with consent to operate from 5 December 2016.	Use of the site as a Waste Management Facility with an annual processing capacity of 30,000 tonnes of paper & cardboard and 69,900 tonnes of mixed metals, glass & mixed plastics.	Waste paper & cardboard. Commingled recycling (mixed metals, glass & mixed plastics).
DA 2015/177/2 Section 4.55(2) Modification	Determined by Sydney Eastern City Planning Panel on 16 December 2022.	Alterations and additions to an approved materials recycling facility.	Waste paper & cardboard. Commingled recycling (mixed metals, glass & mixed plastics).
DA 2015/177/3 Section 4.55(2) Modification	Determined by Sydney Eastern City Planning Panel on 30 November 2023.	Temporarily change hours of operation & enable processing of additional throughput from 69,000 to 120,000 tpa of mixed metals, glass & mixed plastics. (Note: no change to approved throughput for paper & cardboard of 30,000 tpa).	Waste paper & cardboard. Commingled recycling (mixed metals, glass & mixed plastics).
DA 2015/177/4 S 4.55(1A)	Determined by Council on 17 February 2025.	Modify minor elements of the approved development as it relates to approved noise attenuation, and liquified petroleum gas (LPG) storage for the site.	Waste paper & cardboard. Commingled recycling (mixed metals, glass & mixed plastics).

The Project Site has operated as a paper and cardboard recycling facility since DA 93/1 was granted by Strathfield Council in April 1993. In 2016, DA 2015/177 was granted by the former Sydney East JRPP under the provisions of Part 4 of the EP&A Act, to allow for the continuation of the existing paper and cardboard recycling facility and the construction and operation of a new MRF to process additional waste streams, including mixed metals, plastic and glass.

The development approved under DA 2015/177 included:

- the removal of existing paper and cardboard recycling machinery from Building 1 and appropriate sale/recycling of the machinery
- the sourcing and assembly of new MRF machinery in Building 1
- the sourcing and assembly of new paper and cardboard recycling machinery in Building 2
- construction of two sets of covered bunkers for cleaned glass to the south of Building 1.

Under DA 2015/177, the new MRF machinery in Building 1 would process source-separated dry recyclables from Commercial and Industrial (C&I) and domestic sources (kerbside yellow-top bin). This material is classified as General Solid Waste (non-putrescible) and does not include organic waste.

A glass-cleaning system was included as part of the new MRF machinery to produce clean glass pieces that would be suitable for input into off-site glass recycling process (melting and reforming).

Under DA 2015/177, the following recyclable waste streams are recovered:

- Paper and cardboard
- Mixed metals (steel, tin and aluminium)
- Glass
- Mixed plastics.

The Project Site has an approved throughput of 30,000 tpa of paper and cardboard and 69,900 tpa of mixed-used recyclable materials, including mixed metals (steel, tin and aluminium), glass and mixed plastics. The target material recovery rate is greater than 99% for the paper and cardboard facility and 94% for the mixed metals, glass and mixed plastics.

Modification Application DA2015/177/2 proposed minor alterations and additions to the approved site layout and the use of buildings and storage areas.

Current approved uses for each building are:

- Building 1 MRF – glass beneficiation
- Building 2 MRF – mixed recyclables processing
- Building 3 PCR – paper and cardboard recycling and storage.

Other existing approved buildings and infrastructure on the site include:

- Three office buildings and two lunchrooms utilised by Re.Cycle personnel
- Two weighbridges

- External storage bunkers
- Three site access driveways from the adjoining Madeline Street
- Car parking areas.

All external areas within the Project Site are concrete hardstand, except for a narrow landscaped strip on the western boundary providing vegetation screening along Madeline Street.

Figure 2 shows the existing approved site layout, including the site alterations and additions approved under Modification Application DA2015/177/2.

Heavy vehicles enter the site from Madeline Street, via the main access driveway at the north-west corner of the property. They travel over a weighbridge and along the northern side of the site to the loading area at the rear of Building 1 and the north entrance of Building 2. Heavy vehicles return by the same route, exiting via the weighbridge. Heavy vehicles are typically only on-site for a short period of time for loading and unloading activities. Site operations are supported by front end loaders and forklifts.

The approved hours of operation, along with restrictions imposed by the development consent in terms of traffic generation and roller door openings, are listed in **Table 3**.

Table 3 Approved Hours of Operation and Traffic Restrictions

Waste Stream	Activity	Hours of Operation	Consent Restrictions
Paper and cardboard	Receipt, processing and dispatch	Monday to Saturday, 6am to 10pm	Max. 33 incoming heavy vehicles per day. Max. 5 collection/dispatch heavy vehicles per day. Roller doors to be closed from 6pm and only opened when required for deliveries.
Mixed metals, glass, mixed paper, and mixed plastics	Receipt	Monday to Saturday, 5am to 3pm Note: First delivery permitted from 4.30 am; however, machinery is only permitted to be turned on at 5 am.	Max. 45 incoming heavy vehicles per day. Roller doors to be closed from 3 pm.
	Processing	Monday to Saturday, 5am to 10pm	-
	Dispatch	Monday to Saturday, 5am to 6pm	Max. 9 collection/dispatch heavy vehicles per day.
	Maintenance	Monday to Sunday, 10pm to 5 am	All doors must be closed during facility cleaning and maintenance.

DA 2015/177/3 provides for extended operating hours and additional truck movements associated with the temporary approval for increased waste receipt and processing in response to fire damage to Re.Group's Hume MRF. It also provides for an increase in storage capacity to 8,000t at any one time. The temporary DA ends on 30 June 2027, after which the operating hours and truck numbers revert to the hours indicated in **Table 3** and storage reverts to 4,200t per DA 2015/177. The temporary operating hours are shown in **Table 4**

Table 4 Operating hours associated with DA 2015/177/3 temporary operations

Waste Stream	Activity	Hours of Operation	Consent Restrictions
Paper and Cardboard	Receipt, processing and dispatch	Monday to Saturday, 6am to 10pm	Maximum of 33 incoming heavy vehicles per day. Maximum of 5 collection (dispatch) heavy vehicles per day. Roller doors to be closed from 6pm and only opened when required for deliveries.
	CLOSED	10pm to 6am Monday to Saturday and closed all day Sunday.	
Mixed metals, glass and mixed plastics	Receipt	Monday – Saturday 5am to 6pm Note: First delivery permitted from 4:30 am; however, processing machinery only permitted to be turned on at 5am. Sunday 8am-6pm	Maximum of (65) incoming vehicles per day Roller doors to be closed from 6pm
	Processing	Monday to Saturday, 5am to 10pm Sunday 8am-6pm	-
	Dispatch	Monday to Saturday, 5am to 6pm Sunday 8am-6pm	Maximum of twelve (12) collection vehicles per day
	Maintenance	Monday to Sunday, 10pm to 5am 10pm Saturday until 6pm Sunday	

DA 2015/177/4 granted consent for minor alterations to existing site infrastructure to improve noise attenuation to neighbouring areas.

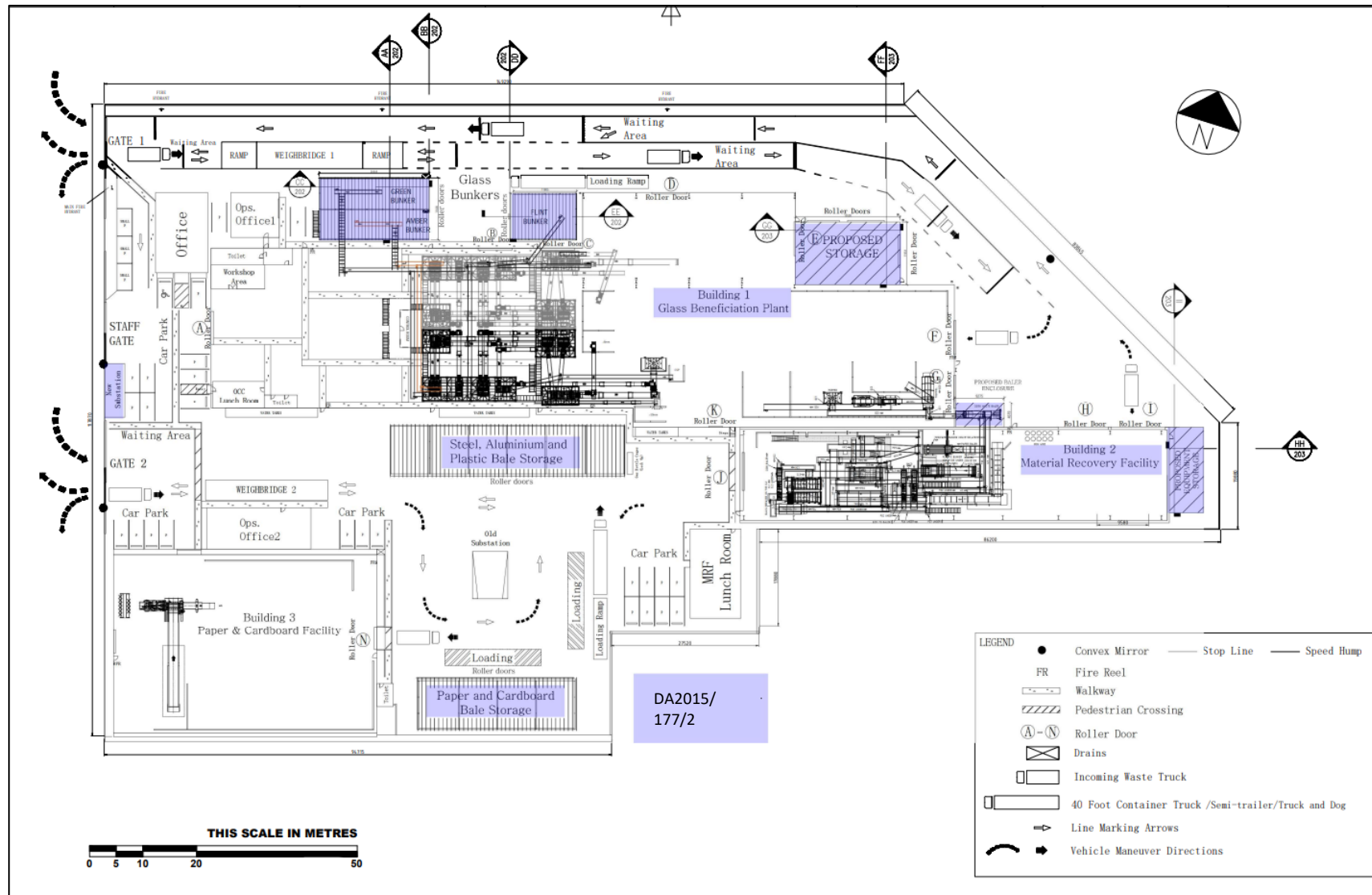
2.6 Environment Protection Licence

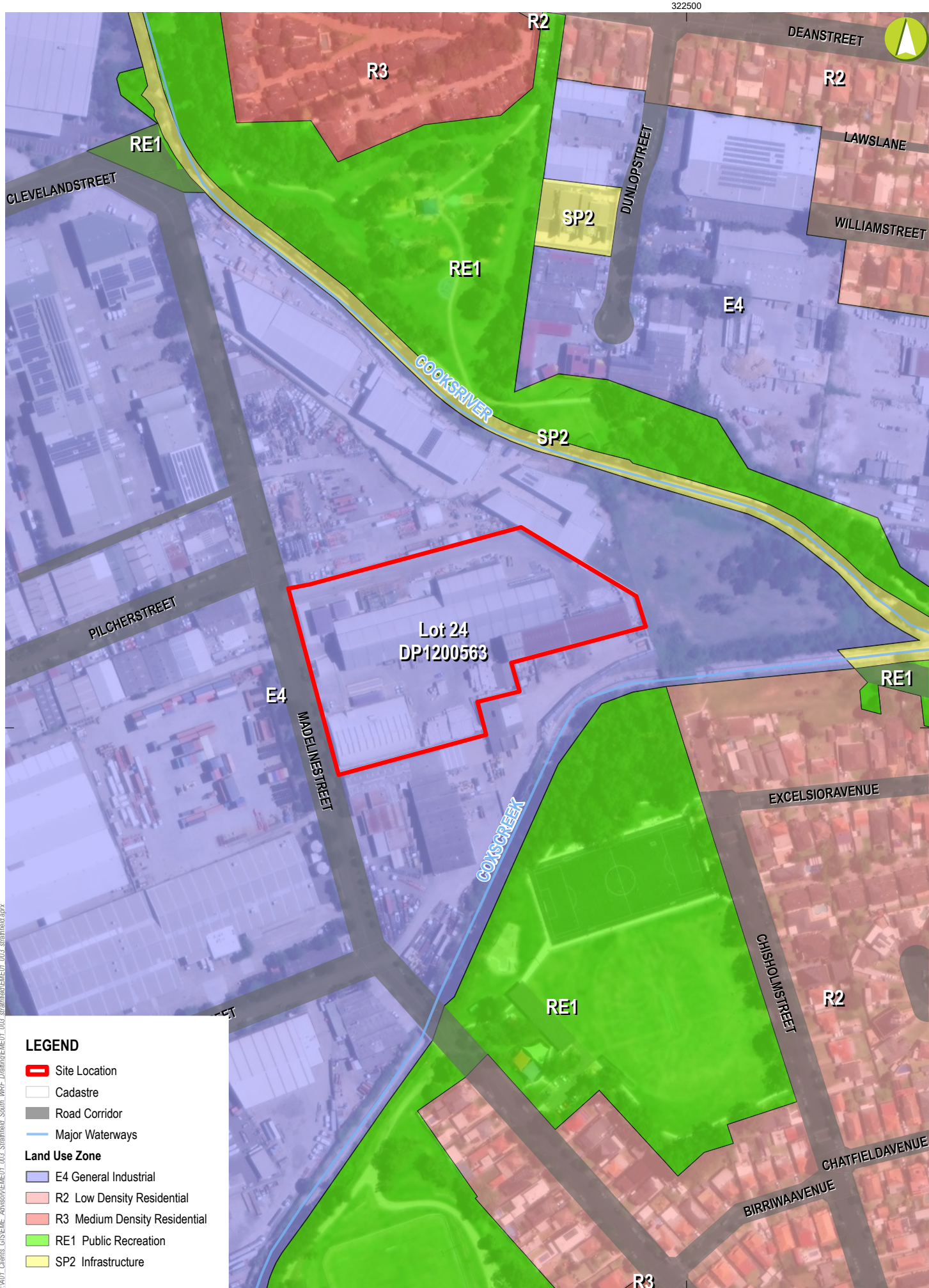
The facility operates under the provisions of EPL 20576 administered by the EPA under the POEO Act. The listed scheduled activities are 'resource recovery' and 'waste storage' under clauses 34 and 42, respectively, of Schedule 1 of the POEO Act.

In accordance with condition L2.3 of EPL 20576, permitted waste types and their limits are:

- Glass, plastic, paper, and metal waste – no more than 120,000tpa
- Paper or cardboard – no more than 30,000tpa.
- Condition L2.4 limits the amount of waste materials permitted on site at any one time to 6,300 T.
- Condition L3 sets noise limits that must not be exceeded in specified residential areas.

Figure 2 Existing Approved Site Layout (Including Alterations & Additions Approved Under Modification Application DA2015/177/2).

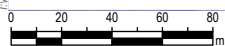




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LEGEND

- Site Location
- Cadastre
- Road Corridor
- Major Waterways
- Land Use Zone**
- E4 General Industrial
- R2 Low Density Residential
- R3 Medium Density Residential
- RE1 Public Recreation
- SP2 Infrastructure



Scale: 1:3,000

3. Proposed development

3.1 Overview

The Enfield MRF is a critical asset of strategic importance to both Re.Cycle and NSW, particularly given Sydney's limited MRF capacity. As one of only three primary MRFs operating in metropolitan NSW, it plays a vital role in recycling infrastructure, resource recovery, and the State's transition to a circular economy.

The GBP, commissioned in 2022 with support from a Waste Less, Recycle More grant, can meet the growing demand for glass recycling in NSW but is currently underutilised. By increasing throughput, the facility can divert more glass from landfill and increase higher order use of end-of-life glass to reduce reliance on virgin materials.

Re.Cycle is seeking consent to increase the site's total throughput by 100,100 tpa, bringing the approved capacity from 99,900tpa to 200,000tpa. This will allow the site to increase glass recycling and maximise the built capacity of the existing GBP and MRF, significantly boosting NSW's recycling capacity.

Rather than assigning fixed tonnages to specific waste streams, the throughput increase is sought for the entire facility, allowing flexibility to adapt to market conditions while ramping up glass recovery - a large portion of which will come through the MRF. It is aligned with NSW's *Waste and Sustainable Materials Strategy 2041* and will support the NSW Government's initiatives to address landfill shortages and reduce carbon emissions through better waste and materials management.

The proposed changes to the existing approved hours of operation would allow the additional material to be received at the MRF from 4.30am to 6pm, Monday to Saturday (this is consistent with the temporary DA but will revert to 4.30am to 3pm from 1 July 2027; refer **Table 4**). All other activities will be undertaken within the hours currently imposed by Development Consent DA 2015/177/2.

No additional buildings, plant or equipment or changes to the site layout will be required. The Project will increase the total materials received and processed on the site from the currently approved 99,900 tpa to 200,000 tpa.

Other than the throughput increase and extended operating hours, the Project will not involve any significant changes to the existing site, site layout or built form. Notably:

- There will not be any changes to the existing approved throughputs and processing activities for the other recyclable waste streams received at site, being mixed metals and mixed plastics. The Project will only increase the throughput capacity for glass.
- There will not be any construction works or any additional buildings, plant or equipment, required to accommodate the additional waste processing capacity of the existing facility.
- While there will be an increase in traffic generation (i.e. approximately 58 additional trucks per day delivering materials, plus 6 additional employee vehicles per day), there will not be any changes to the on-site traffic circulation or external transportation routes currently used by trucks/vehicles to and from the site.
- There will not be any change to on-site car parking requirements or arrangements, with the current car parking areas sufficient to accommodate the existing and proposed parking needs.
- There will not be any changes to existing customer and visitor arrangements.

3.2 Current MRF and GBP process overview

The MRF process involves the receipt of commingled recycling from kerbside and commercial recycling collections, which are sorted into material groups and baled, ready for transport off-site and subsequent manufacturing into recycled packaging and other products. An overview of the existing process at the MRF is provided below. The Project does not propose to alter the existing operations, other than to increase the throughput by an additional 100,100 tpa.

Stage 1 – Receival

Vehicles carrying comingled recyclables currently enter the Project Site from the adjoining Madeline Street via the main site access ('Gate 1') and pass over the weighbridge ('Weighbridge 1') to record the gross weight of the vehicle and the licence plate registration. When leaving the premises following offloading, the vehicle enters the same weighbridge, which records the tare weight of the vehicle, date of delivery, and origin and type of waste delivered.

Incoming trucks containing mixed recyclables or single stream glass drive to the rear of the site, and the operator of a Front End Loader (FEL) directs the trucks containing mixed recyclables to discharge their load at the MRF Receival Area at the rear of Building 2. The FEL operator also visually inspects loads for significant levels of contamination. If unacceptable levels of contamination are detected, the truck would be re-loaded and directed to a suitably licensed facility for disposal. Load rejections are recorded. Accepted loads are then consolidated within the shed and loaded onto conveyors to be processed.

Single-stream glass is sent directly to the glass beneficiation facility in Building 1. This includes glass from the Container Deposit Scheme (CDS) collections or other independent collections of glass bottles. Inputs are deposited onto an intake stockpile on the floor of Building 1.

Stage 2 - Processing

The MRF includes a series of conveyors that provide a constant and controlled flow of material through the system. Mixed recyclable material is sent through a series of trommel screens, an optical sorting system and an eddy current to separate material according to size and type (plastics, paper/cardboard, steel, aluminium, glass, and residual contaminants for disposal). Non-recyclable contaminants are removed, baled and disposed of in accordance with the approved methods.

Once separated, plastics, metal (aluminium and steel) and paper/cardboard are sent via conveyor to a separate baler to be baled and temporarily stored. Once baled, recovered materials (excluding glass) are transferred by forklift and stored in the enclosed material bunkers located adjacent to Building 3 (refer to **Figure 2**) before being loaded onto trucks and transferred to relevant destinations for further processing. Additional DA-approved enclosed storage bunkers are being constructed on the southern side of Building 1 (refer to **Figure 2**) and a temporary awning located where the old substation used to be provides extra undercover storage whilst the new bunkers are being built (refer to **Figure 2**).

Glass outputs from the MRF are transferred via internal conveyors to the glass beneficiation facility in Building 1, for further processing and separation into different colour fractions.

Stage 3 – Cleaning (glass)

Glass is then subject to a cleaning process to remove lids, labels and other contaminants. This process includes:

- Optical equipment to shoot out plastic and paper
- An X-ray machine to shoot out ceramic, stone and porcelain (CSP)
- Magnets to pull ferrous metals
- Eddy currents to repel non-ferrous metals.

Stage 4 – Processing (glass)

Glass is sized and sorted by colour using advanced glass optical sorting technology. This system sorts the glass into three colour categories, being green, amber and flint and into two size categories, being large glass (8 to 50 millimetres [mm]) and small glass (3 to 8 mm).

Stage 4 - Offtake

The processed glass streams are stored in separate glass storage bunkers, located on the northern side of Building 1 (refer to **Figure 2**), prior to being transported via B-double trucks (up to 34 tonnes per load) to glass manufacturing facilities elsewhere to make new recycled glass bottles. These off-take trucks enter and exit the Project Site via Gate 1, utilising Weighbridge 1.

3.3 The PCR process

The PCR facility currently operates out of Building 3 and accepts source separated paper and cardboard material from commercial and industrial sources.

Stage 1 – Receival

Trucks carrying source separated paper and cardboard material enter the Project Site from the adjoining Madeline Street via the Gate 2 and pass over the weighbridge ('Weighbridge 2') to record the gross weight of the vehicle and the licence plate registration. When leaving the premises following offloading, the vehicle enters the same weighbridge, which records the tare weight of the vehicle, date of delivery, and origin and type of waste delivered.

Incoming trucks drive to Building 3, and the operator of a front-end loader (FEL) directs the trucks to discharge their load within this building. The FEL operator also visually inspects loads for significant levels of contamination. If unacceptable levels of contamination are detected, the truck would be re-loaded and directed to a suitably licensed facility for disposal. Load rejections are recorded.

Stage 2 – Baling

Accepted loads are baled and either stored temporarily within the building or transferred by forklift and stored in the enclosed material bunkers located adjacent to Building 3 (refer to **Figure 2**). Additional DA-approved enclosed storage bunkers are being constructed on the southern side of Building 1 (refer to **Figure 2**) and a temporary awning located where the old substation used to be provides extra undercover storage whilst the new bunkers are being built (refer to **Figure 2**).

Stage 3 – Off-take

Baled paper and cardboard are loaded onto trucks and transferred to off-takers. These trucks enter the site via Gate 2, utilising Weighbridge 2.

3.4 Site access

There are no changes to the way in which materials are unloaded and processed by the MRF or the GBP under this proposal, nor will there be changes to the contamination protocol. There will also be no change to the way tonnes and other details are recorded on either weighbridge.

Trucks carrying source separated paper and cardboard material will continue to enter the Project Site via Gate 2 and pass over Weighbridge 2 and deposit these materials in the waste receival area.

There will be no changes to off-take access for all baled or processed material.

The Project will generate the following additional traffic:

- Up to 58 heavy vehicles daily associated with delivering additional glass, commingled recyclables, and paper and cardboard to the site
- Up to 13 heavy vehicles daily associated with collecting and transporting processed materials from the site
- Up to six light vehicles daily for the additional six staff

All heavy vehicles exiting the Project Site are required to travel north along Madeline Street. Heavy vehicles are prohibited from travelling south on Madeline Street, with concrete chicanes set up on the road adjacent to Cooke Park.

The primary transport route for heavy vehicles traveling to and from the Project Site will continue to be Madeline Street, Cleveland Street and Cosgrove Road to connect to the Hume Highway and wider road network. This road network is extensively utilised by heavy vehicles associated with the various operations within the industrial estate in which the Project Site is situated and it has sufficient capacity to cater for the relatively small increase in traffic generation associated with the Project.

3.5 Hours of operation

The proposed changes to the existing approved hours of operation would allow the additional material to be received at the MRF from 4.30am to 6pm, Monday to Saturday (this is consistent with the temporary DA but will revert to 4.30am to 3pm from 1 July 2027). All other activities associated with the MRF and the PCR will be undertaken within the hours currently imposed by Development Consent DA 2015/177/2.

3.6 Employment

The Project will generate an additional six full-time positions.

Under the existing development consent, a maximum of 24 employees are permitted to be present on the site at any one time.

Currently, the facility operates on a rotating two-shift basis so that there is a maximum of 19 employees present on the site at any one time (i.e. four office staff, a satellite health and safety manager working across several sites, and 14 personnel working in the MRF and the PCR facility per shift).

Under the proposal, there will be a maximum of 22 employees present on the site at any one time (i.e. five office staff and 17 personnel working in the MRF and the PCR facility per shift).

4. Statutory and strategic context

4.1 Statutory context

4.1.1 Permissibility

The Project is characterised as a ‘waste or resource management facility’ defined in the *Standard Instrument – Principal Local Environmental Plan* (Standard Instrument) as:

Waste or resource management facility means any of the following -

- (a) a resource recovery facility,
- (b) a waste disposal facility,
- (c) a waste or resource transfer station,
- (d) a building or place that is a combination of any of the things referred to in paragraphs (a)–(c).

More specifically, the Project is characterised as a ‘resource recovery facility’ defined in the Standard Instrument as:

Resource recovery facility means a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.

Note—Resource recovery facilities are a type of **waste or resource management facility**

The Project Site is zoned E4 General Industrial under the provisions of the Strathfield LEP (see **Figure 4**). According to the Land Use Table in Part 3 of the LEP, waste or resource management facilities are prohibited in the E4 General Industrial zone as a category of development not identified as being permissible without consent or permissible with consent.

Division 23 of Chapter 2 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) permits development for the purpose of waste or resource management facilities with consent on land within a ‘prescribed zone’. Section 2.151 of the SEPP confirms that the E4 General Industrial zone is a prescribed zone. Therefore, pursuant to subsection 2.152(1), the Project is permissible with development consent.

4.1.2 Planning approval pathway

As the Project proposes to increase the processing capacity of the existing waste management facility from 99,900 tpa to 200,000 tpa, it is classified as SSD under Division 4.7 of Part 4 of the EP&A Act in accordance with Section 23(3) of Schedule 1 of the Planning Systems SEPP. This section identifies the following development as SSD:

23 Waste and resource management facilities

- (3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.

The Project will require development consent from the Minister (or delegate) or the Independent Planning Commission under Division 4.7 of Part 4 of the EP&A Act.

4.1.3 Commonwealth legislation

Environment and Biodiversity Protection Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is administered by the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) and provides a legal framework to protect and manage nationally important flora, fauna, ecological communities, water resources and heritage places defined as “matters of national environmental significance” (MNES). An action that will have, or is likely to have, a significant impact on a MNES or a significant impact on the environment of Commonwealth land must be referred to the Commonwealth Minister for a decision on whether assessment and approval is required under the EPBC Act.

A search of the online Protected Matters Search Tool for the Project Site (including a 2 km buffer around the Site) was undertaken in July 2025. The results are provided in **Appendix B** and summarised below in **Table 5**.

Table 5 EPBC Protected Matters Search

Matter of National Significance	Finding
World Heritage Properties	None
National Heritage Places	None
Wetlands of International Importance (Ramsar)	None
Listed Threatened Ecological Communities	8
Listed Threatened Species	58
Listed migratory species	14
Commonwealth Marine Areas	None
Great Barrier Reef Marine Park	None

As all external areas within the Project Site are concrete hardstand (except for a narrow landscaped strip along the Madeline Street frontage) and the Project will not involve any new ground disturbance, the Project is highly unlikely to have any impact on any MNES listed under the EPBC Act and will not result in any impact to the environment of Commonwealth land. As such, referral to the Commonwealth Minister is not required.

4.1.4 State legislation

Environment Planning and Assessment Act 1979

The EP&A Act is the principal legislation overseeing the assessment and determination of development proposals in NSW. The objects of the Act generally seek to promote the orderly use and development of land, the conservation of natural and artificial resources, and good design of the built environment.

As outlined in **Section 4.1.2**, the Project is classified as SSD. Accordingly, development consent is sought under Division 4.7 of Part 4 of the EP&A Act. The SSD application will be accompanied by a detailed EIS prepared in consultation with DPHI and other relevant State and local government agencies, neighbouring landholders/occupiers, and the wider community.

The EIS will be prepared in accordance with Divisions 2 and 5 of Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and will address the SEARs, the *State Significant Development Guidelines* (DPIE, 2021) and any other issues raised during community and stakeholder engagement activities. The aim will be to present a comprehensive and focused evaluation of the Project, including environmental, social, and economic considerations.

Pursuant to section 4.42(1) of the EP&A Act, an EPL under Chapter 3 of the POEO Act cannot be refused if development consent is granted and must be issued “substantially consistent” with the SSD consent.

Protection of the Environment Operations Act 1997

The POEO Act is administered by the EPA and establishes the State’s environmental regulatory framework and includes licensing requirements for certain activities. The existing MRF operates under the provisions of EPL 20576, covering the scheduled activities of ‘resource recovery’ and ‘waste storage’ under clauses 34 and 42, respectively, of Schedule 1 of the POEO Act.

A variation to the EPL is required to increase the limit on waste receipt by an additional 100,100 tpa (L2.3), increase the amount of waste permitted on the premises at any one time to 8,000 tonnes (L2.4), and to amend the hours of operation at the MRF (L4.2).

Contaminated Land Management Act 1997

The general objective of the *Contaminated Land Management Act 1997* (CLM Act) is to establish a process for investigating and (where required) remediating land that the EPA considers to be contaminated significantly enough to require regulation under Division 2 of Part 3 of the CLM Act.

The Project does not involve any ground disturbance and will not result in a more sensitive land use, a change of land use or any additional land use. As such, assessment in relation to potential existing contamination is not warranted. The primary use and core characteristics of the existing MRF will remain unchanged.

Waste Avoidance and Resource Recovery Act 2001

The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) aims to ensure that resource management options are considered against a hierarchy of the following order:

- (i) *avoidance and reduction of waste,*
- (ii) *re-use of waste,*
- (iii) *recycling, processing or reprocessing waste,*
- (iv) *recovery of energy,*
- (v) *disposal,*

Where waste materials cannot be avoided or products reused, resource recovery (i.e. recycling, processing or reprocessing) is considered a beneficial option for maximising resource efficiencies. Re.Cycle’s MRF recycles waste streams that would otherwise be sent to landfill, and the proposed Project will increase the MRF’s capacity for glass beneficiation. This supports the waste avoidance hierarchy in the WARR Act.

The WARR Act establishes the *NSW Waste and Sustainable Materials Strategy 2041 - Stage 1: 2021–2027* (DPIE, 2021) (Waste Strategy), which focuses on waste reduction and recycling strategies in addition to the environmental benefits and economic opportunities in waste management.

The EIS will further outline the role the Project has in supporting the waste avoidance hierarchy, the objectives of the Waste Strategy, and the role it plays in the circular economy for waste in NSW.

4.1.5 Environmental Planning Instruments

Environmental planning instruments (EPIs) are local environmental plans (LEPs) and State Environmental Planning Policies (SEPPs) made under Part 3 of the EP&A Act. EPIs guide development and land use across the State and provide the site-specific development controls relevant to the Project Site.

The EPIs identified in the below sub-sections are potentially relevant to the Project and will be addressed in further detail in the EIS.

State Environmental Planning Policy (Planning Systems) 2011

One of the aims of Chapter 2 of the Planning Systems SEPP is to identify development to which the SSD assessment and determination process under Division 4.7 of Part 4 of the EP&A Act applies. As outlined in **Section 4.1.2**, the Project is classified as SSD pursuant to sub-section 23(3) of Schedule 1 of the Planning Systems SEPP.

State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 2 of the Transport and Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across NSW by improving regulatory certainty and efficiency through a consistent planning regime and providing greater flexibility in the location of infrastructure and service facilities.

Section 2.121 of the SEPP specifies that the consent authority for any of the traffic-generating developments listed in Schedule 3 must refer the DA to Transport for NSW (TfNSW) and take into consideration any submission received from TfNSW, the accessibility of the site and any potential traffic safety, road congestion or parking implications. Waste or resource management facilities are listed under Schedule 3 of the Transport and Infrastructure SEPP and require referral for a development of any size or capacity. The Application will be referred to TfNSW for comment.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 of the Biodiversity and Conservation SEPP aims to protect the biodiversity values of trees and other vegetation in non-rural areas of the State and to preserve the amenity values of these areas through the preservation of trees and other vegetation.

Chapter 2 of the SEPP applies to the Sydney and Newcastle metropolitan areas and other land in NSW zoned for urban purposes, for environmental conservation, environmental management, or environmental living. Section 2.3 of the SEPP lists the specific LGAs and land use zones to which Chapter 2 applies. Strathfield LGA is listed, as is the E4 General Industrial zone. Therefore, Chapter 2 of the SEPP is applicable to the Project Site.

As all external areas within the Project Site are concrete hardstand (with the exception of a narrow landscaping strip along the Madeline Street frontage) and the Project will not include any vegetation clearance or ground disturbance, the Project is highly unlikely to have any impact on local biodiversity.

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 3 of the Resilience and Hazards SEPP regulates hazardous and offensive development and aims, amongst other things, to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact.

Section 3.2 of the SEPP defines “potentially hazardous industry” and “potentially offensive industry” as follows:

potentially hazardous industry means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality—

(a) to human health, life or property, or

(b) to the biophysical environment,

and includes a hazardous industry and a hazardous storage establishment.

Potentially offensive industry means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

The Project does not include the transport, storage or use of any potentially hazardous goods, and the MRF will continue to implement a suite of environmental mitigation and management practices. The Project should not pose a significant risk to the locality, human health, life or property or the biophysical environment. Regardless, a preliminary risk screening will be undertaken in accordance with the document *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33* (Department of Planning, 2011). Should the preliminary screening indicate that the Project is potentially hazardous, a preliminary hazard analysis (PHA) will be prepared in accordance with relevant Hazardous Industry Planning Advisory Paper(s).

In most cases, compliance with the requirements of environmental licensing (for example, an EPL) is sufficient to demonstrate that a Project is not an offensive industry.

Chapter 4 of the Resilience and Hazards SEPP aims to promote the remediation of contaminated land to reduce the risk of harm to human health and the environment. The Project does not involve any ground disturbance activities and will not result in a more sensitive land use, a change of land use or any additional land use. As such, assessment in relation to potential existing contamination is not warranted.

State Environmental Planning Policy (Sustainable Buildings) 2022

The Sustainable Buildings SEPP encourages the design and construction of more sustainable buildings across NSW to help meet climate change targets. The SEPP requires a consent authority to consider a number of matters when deciding whether to grant consent, including:

- minimisation of waste from construction and demolition

- reduction in energy demand
- generation and storage of renewable energy
- minimising the consumption of potable water.

The SEPP applies to the following non-residential development:

(a) the erection of a new building, if the development has an estimated development cost of \$5 million or more, or

(b) alterations, enlargement or extension of an existing building, if the development has an estimated development cost of \$10 million or more.

As the Project does not involve new building works, the SEPP would not apply.

Strathfield Local Environmental Plan 2012

The Project Site is zoned E4 General Industrial under the provisions of the Strathfield LEP. According to the land use table in Part 3 of the LEP, waste or resource management facilities are not permitted in the E4 General Industrial zone. However, as discussed in **Section 4.1**, although the Project is prohibited under the provisions of the Strathfield LEP, it is permissible pursuant to sub-section 2.152(1) of the Transport and Infrastructure SEPP.

The Project Site is mapped on the Strathfield LEP Acid Sulfate Soils (ASS) Map as Class 4 and Class 5 land.

In accordance with Clause 6.1 of the LEP, development consent is required for the carrying out of works:

- more than 2 metres below the natural ground surface, or works by which the water table is likely to be lowered more than 2 metres below the natural ground surface on Class 4 land
- within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres AHD and by which the water table is likely to be lowered below 1 metre AHD on adjacent Class 1, 2, 3 or 4 land.

As the project will not involve any ground disturbance or exposure of soils, risks associated with ASS are negligible.

The Project's consistency with this clause and all other relevant provisions of the Strathfield LEP will be fully addressed in the EIS.

4.2 Strategic context

4.2.1 NSW Waste and Sustainable Materials Strategy 2041 - Stage 1: 2021–2027

The Waste Strategy is informed and driven by the WARR Act (see **Section 4.1.4**). It aims (among other things) to encourage waste reduction and recycling as NSW transitions to a circular economy, resulting in less waste and emissions. The Waste Strategy outlines actions to take over a 6-year period to deliver on long-term objectives.

The Waste Strategy identifies the importance of implementing a circular economy for waste, which aims to eliminate waste and reduce the continual use of new resources. Circular systems employ reuse, sharing, repair, refurbishment, remanufacturing and recycling to use resources efficiently and minimise the creation of waste, pollution and carbon emissions. The circular economy aims to keep products, equipment and infrastructure in use for longer in contrast to the traditional linear economy, which has a “take, make, dispose” model of production.

The EIS will detail the role the Project has in supporting the waste avoidance hierarchy, the objectives of the Waste Strategy, and the role it plays in the circular economy for waste in NSW.

4.2.2 Draft NSW Waste and Circular Infrastructure Plan

The NSW Government published the first chapter of the Draft NSW Waste and Circular Infrastructure Plan in May 2025. The draft chapter highlighted the need to increase recycling and to protect scarce landfill airspace in the Sydney Region which is expected to reach capacity by the end of the decade. It notes the need to prioritise effort higher up the waste hierarchy and enable a circular economy, to reduce the amount of residual waste disposed to landfill.

The Project supports the objectives of the Draft Plan by increasing the recycling capacity for glass, which is a growing waste stream.

4.2.3 Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan: A Metropolis of Three Cities* (Greater Sydney Commission [GSC], 2018a) (Region Plan) provides the basis for strategic planning for the Greater Sydney region by setting out a 40-year vision and establishing a 20-year plan to manage growth and change.

To meet the needs of a growing and changing population, the vision seeks to transform Greater Sydney into a metropolis of three integrated and connected cities:

- the Western Parkland City
- the Central River City
- the Eastern Harbour City.

The Region Plan establishes 10 directions supported by 40 objectives that outline the framework for the city’s liveability, productivity and sustainability. Direction 9, being ‘An Efficient City’, recognises the importance of responding to anticipated growth through strategic land use for the management of water, energy, resources and waste to reduce costs, carbon emissions and environmental impacts. Direction 9 is supported by three objectives, including ‘Objective 35: More waste is re-used and recycled to support the development of a circular economy’.

The EIS will address the Project’s role in supporting the relevant directions and objectives of the Region Plan.

4.2.4 Eastern City District Plan

The Region Plan sets the planning framework for the following five districts that make up the Sydney region:

- Central City

- Eastern City
- North District
- South District
- Western City.

The Project Site is situated within the Eastern City district, and the *Eastern City District Plan* (GSC, 2018b) (District Plan) sets out the planning priorities and actions for implementing the Region Plan at a district level. Planning priorities relevant to the Project include:

- Planning Priority E12 – Retaining and managing industrial and urban land services
- Planning Priority E19 – Reducing carbon emissions and managing energy, water and waste efficiently.

The EIS will address the Project's role in supporting the relevant planning priorities of the District Plan.

4.2.5 Strathfield 2040 - Local Strategic Planning Statement

The *Strathfield 2040 Local Strategic Planning Statement* (LSPS) (Strathfield Council, 2020) outlines Council's long-term vision for land use, development and infrastructure provision within the LGA, giving effect to the more broadly established directions set out in the Region Plan and District Plan.

Planning priorities under the LSPS relevant to the Project include:

- Planning Priority 3 - Freight corridors and local servicing meet needs with minimal impact on neighbourhoods and centres
- Planning Priority 10 - Industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighbourhoods
- Planning Priority 14 - The Cooks River and Parramatta River catchments and waterways are healthy and accessible.

The EIS will address the Project's role in supporting the relevant planning priorities and actions of the LSPS.

5. Stakeholder and community engagement

5.1 Objectives

A Stakeholder and Community Engagement Strategy will be prepared for the Project and included in the EIS. The key objectives of the strategy will be to:

- Identify key stakeholders and community members for engagement
- initiate and maintain open and transparent communications
- Provide an understanding of the regulatory approval process for the Project
- Provide information about the Project to create awareness and help the local community understand the Project and predicted environmental and social impacts
- Actively engage with stakeholders and seek input into the Project by providing opportunities for stakeholders to identify key issues for consideration and provide feedback on proposed development and mitigation measures.

A Stakeholder and Community Engagement Strategy will be prepared in accordance with the Department's *Undertaking Engagement Guidelines* (DPIE, 2021) and will describe consultation activities to be undertaken during the preparation of the EIS.

5.2 Identified stakeholders

Table 6 lists the key stakeholders identified for communication and engagement throughout the Project. Other stakeholders may be identified during the implementation of the community and engagement strategy and will be engaged with as appropriate.

Table 6 Identified Stakeholders

Government Agency	Community and Other Stakeholder Groups
• DPHI • EPA • TfNSW • Strathfield Council • NSW Fire and Rescue	• Neighbouring operators and landholders • Local residents, including nearby residents of Belfield • Wider community

5.3 Consultation to date

Consultation and engagement activities undertaken to date in relation to the Project have included the following:

DPHI

- February 2025 – a Project brief was provided to DPHI to introduce the Project, provide an overview of the existing approved site operations, the intended planning approval pathway and the proposed approach to engagement and environmental assessment. A scoping meeting was attended by representatives from Re.Cycle, DPHI and EMEA.

- September 2025 – a follow up meeting was held with DPHI to discuss the scoping report prior to lodgement.

5.4 Proposed consultation activities

A range of consultation activities will be undertaken during the preparation of the EIS to seek input to the Project from various stakeholders and the wider community. These consultation activities will include:

- **Notification:** Prior to the lodgement and publication of the Scoping Report, a newsletter will be distributed to neighbouring businesses and residences providing information about the Project, where to find the Scoping Report and where to find additional information.
- **Website:** A Project website will be developed to provide information on the Project and act as a point of contact for interested stakeholders.
- **Community Consultation Meeting:** During the preparation of the EIS, a community consultation meeting will be held with key stakeholders to offer in-depth discussions and to provide an opportunity to raise any concerns relating to the Project.

The EIS will document any issues raised during consultation activities and detail how these issues will be addressed by the Project.

Following the exhibition of the EIS, Re.Cycle will prepare a Submissions Report to respond to issues raised by government agencies, stakeholders and the public.

6. Environmental risk assessment

A qualitative risk assessment and scoping summary table is provided in **Appendix A**. The assessment has been prepared to:

- identify and prioritise the issues relating to the Project that represent a risk to the local environment and surrounding populace
- determine the level of assessment required to address each identified issue within the EIS.

The potential risks have been ranked as “low”, “medium” or “high” (residual risk taking in to account the availability of mitigation measures) for assessment depending on their likelihood of occurrence and the potential consequences if they did occur. The risk rankings are defined as follows:

- **High Risk:** Potential for significant impacts to environment and people and the effectiveness of mitigation measures is uncertain. A detailed level of assessment is required.
- **Medium Risk:** Potential for impacts to environment and people but effective mitigation measures are available and well understood. A detailed level of assessment is required.
- **Low Risk:** No or limited potential for impacts to environment and people. Detailed assessment is not warranted and will be addressed by a desktop assessment in the EIS.

A copy of the completed risk assessment is included as **Appendix A**. The risk assessment outcomes are summarised as follows:

- Medium Risk Ranking:
 - Traffic and Transport
 - Noise and Vibration
 - Air Quality
 - Hazards and Risk
 - Contamination
 - Social Impact.
- Low Risk Ranking:
 - Soils and Water
 - Visual Amenity
 - Waste Management
 - Biodiversity
 - Aboriginal Heritage
 - Non-Aboriginal Heritage.

The risk assessment did not identify any risks with a residual risk ranking of “high”. This is attributed to the following:

- The Project Site is an existing operational MRF, and all external areas within the Project Site are concrete hardstands, with the exception of a narrow, landscaped strip along the Madeline Street frontage
- The Project will not involve any changes to the existing site operations other than an increase in throughput and associated traffic movements and an increase in employment.

7. Environmental assessment

This section identifies the key environmental issues and other issues associated with the Project that will be addressed in the EIS.

7.1 Key issues

7.1.1 Traffic and transportation

The Project will generate the following additional traffic:

- Up to 58 heavy vehicles daily associated with delivering additional glass, commingled recyclables, and paper and cardboard to the site;
- Up to 13 heavy vehicles daily associated with collecting and transporting processed materials from the site;
- Up to six light vehicles daily for the additional six staff.

The existing site access driveways from Madeline Street and the existing internal site arrangements for manoeuvring, loading and unloading, and, when necessary, queuing, are expected to be sufficient to support the additional vehicles required for the Project, however, this will be confirmed during the EIS.

The primary transport route and associated road network is used extensively by heavy vehicles and should have sufficient capacity to cater for the relatively small increase in traffic generation associated with the Project.

A specialist consultant will be engaged to assess the traffic-related issues associated with the Project in a quantitative operational traffic impact assessment carried out in accordance with TfNSW's *Guide to Traffic Impact Assessment* (TfNSW, 2024) and other relevant guidelines and standards. This assessment will identify existing baseline conditions and forecast traffic volumes for the Project, including peak traffic generation and any impacts on the operational efficiency and/or safety of the public road network, including heavy vehicle routes. The assessment will also consider the suitability of existing site access arrangements and movement of vehicles through the site. It will also identify any additional traffic controls and mitigation measures required.

Consultation will be undertaken with Council and TfNSW to ensure any traffic-related concerns are sufficiently addressed during the preparation of the EIS.

7.1.2 Noise

The Project Site is located within an industrial estate with various industrial operations and significant heavy-vehicle traffic. The nearest public space is Cooke Park (see **Figure 1**), located approximately 40 m to the south of the Project Site at its nearest point and separated from the Project Site by another industrial facility. The nearest residential area is approximately 70 m to the southeast of the Project Site at its nearest point. The industrial facility adjoining the Project Site to the south has a significant existing noise wall structure along its southern boundary following Cox's Creek, which appears to provide noise mitigation to the nearby residential area.

Noise emissions from the existing facility must not exceed the noise limits listed in Development Consent DA 2015/177, as listed in **Table 7** below.

Table 7 Consent 2015/177 Noise Limits

Location	Noise Limits dB(A)			
	Day ¹ LA _{eq} (15 minute)	Evening ² LA _{eq} (15 minute)	Night ³ LA _{eq} (15 minute)	Night ³ LA _{eq} (1 minute)
17 Excelsior Avenue	45	42	42	58
150 Dean Street	41	40	40	54
79 Madeline Street	40	37	37	52
1 Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays. 2 Evening is defined as the period from 6pm to 10 pm. 3 Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.				

The primary sources of noise from the Project will be operational noise associated with the additional glass processing which will be undertaken in an enclosed building), heavy vehicle traffic generation, and loading and unloading activities. All unloading activities will be undertaken within the buildings, whilst loading will occur within Building 2 and/or enclosed storage bunkers.

There will be an increase in traffic generation, however there will not be any changes to the transportation routes currently used by heavy vehicles to and from the Site.

The noise assessment will also assess the potential impacts of extended operating hours.

A specialist acoustic consultant will be engaged to assess noise emissions and potential impacts associated with the Project in a quantitative operational noise impact assessment carried out in accordance with the *Noise Policy for Industry* (EPA 2017) and *NSW Road Noise Policy* (DECCW 2011). Realistic worst-case operational scenarios will be modelled to assess the potential combinations of noise sources, including potential cumulative noise. The assessment will also address the need for any additional noise mitigation measures.

Consultation will be undertaken with the EPA and Council to ensure any noise-related concerns are sufficiently addressed during the preparation of the EIS.

7.1.3 Air quality and odour

While the Project Site is located within an industrial estate, there are public recreation areas and residential areas within close proximity. Air quality within the area is expected to be influenced by the existing industrial operations and heavy vehicle traffic.

Odour emissions from the Project are likely to be minimal, given there are no putrescible materials currently received at the site or proposed to be received, and all processing and storage will be undertaken within enclosed buildings and bunkers. Particulate matter emissions from the Project are anticipated to be low, given that glass processing will be undertaken within the existing Building 1, which is an enclosed building fitted with an appropriate dust extraction system. Commingled materials are also processed within an enclosed building. Trucks entering and exiting the Project Site will be required to have their loads covered, except during loading and unloading.

A specialist consultant will be engaged to undertake an air quality impact assessment for the Project in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (EPA, 2017) (Approved Methods). The assessment will include a cumulative assessment of existing air emission sources and will address the need for any additional mitigation measures. The assessment will also include an assessment of the combined air quality impacts of the Project and the neighbouring Aussie Skips site.

Consultation will be undertaken with the EPA and Council to ensure any air quality concerns are sufficiently addressed during the preparation of the EIS.

7.1.4 Hazards and risks

The Project does not include the transport, storage or use of any potentially hazardous goods, and the MRF will continue to implement a suite of environmental mitigation and management practices. The Project should not pose a significant risk to the locality, human health, life or property or the biophysical environment. Regardless, a preliminary risk screening will be undertaken in accordance with Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 (Department of Planning, 2011). Should the preliminary risk screening indicate that the Project is potentially hazardous, a preliminary hazard analysis will be prepared for inclusion in the EIS in accordance with relevant Hazardous Industry Planning Advisory Papers.

A Fire Incident Management Plan (FIMP) will be prepared to assess the potential fire risks associated with the Project. The potential sources of fire at the site will be reviewed to assess whether the existing fire protection systems are appropriate for the risks. The FIMP will be prepared following the guidance in Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 Fire Safety Study Guidelines (Department of Planning, 2011).

A review of the existing buildings and structures will be completed by a fire engineer to ensure compliance with relevant requirements of Fire Safety in Waste Facilities (Fire and Rescue NSW 2020) and the Building Code of Australia.

7.1.5 Social

Background

The Project Site is situated within an established industrial estate, with low-density residential areas and public recreation areas to the north, south and east. The nearest residential area is approximately 70 m to the southeast of the Project Site at its nearest point and separated from the site by another industrial facility and vacant land. The nearest public space is Cooke Park, approximately 40 m to the south of the Project Site at its nearest point and separated from the site by another industrial facility.

Social locality

A specialist will be engaged to prepare a social impact assessment (SIA) in accordance with the *Social Impact Assessment Guideline for State Significant Projects* (DPE, February 2023) and the *Technical Supplement: Social Impact Assessment Guideline for State Significant Projects* (DPE, February 2023). The outcomes of the Stakeholder and Community Engagement Strategy will inform the SIA in terms of defining community concerns and expectations. The results of other impact assessments, particularly those related to amenity, will also inform the SIA.

The Guideline requires a Phase 1 SIA to be undertaken at the Scoping Report Stage to determine the size and scale of likely social impacts of the project and, in turn, the scope of the SIA. This involves gaining an initial understanding of the social locality for the Project, being the area where social impacts are likely to be experienced, characterisation of the communities in the social locality and the likely social impacts.

The social locality for the SIA considers the geographical extent of potential impacts (including both local and regional impacts) to communities as a result of the Project. It is the area in which people are most likely to experience social impacts, including direct and indirect impacts as a result of the Project. These people could include businesses, workers, residents, or visitors to the area.

The social locality for the study area includes the Strathfield South Statistical Area Level 2 (SA2) and the Belmore-Belfield SA2. Refer to **Figure 5**. Indirect impacts may also be experienced in the broader region, which is based on the Strathfield LGA, which provides a basis to compare and analyse data from the social locality.

Community characteristics

At the 2021 Census, the social locality had a total resident population of 23,968 people, representing 52.6 per cent of the population of the Strathfield LGA, which had a total resident population of 45,593 people. The social locality had a slightly older age profile than the Strathfield LGA, with a median age of 38 years (South Strathfield SA2) and 39 years (Belmore-Belfield SA2) compared to 33 years (Strathfield LGA).

The social locality had a higher proportion of children (0-14 years) and a higher proportion of people aged 45 years and over, compared to the Strathfield LGA, which may indicate a potentially older residential population near the Project.

At the 2021 Census, both the social locality and the Strathfield LGA had a lower proportion of Aboriginal and/or Torres Strait Islander residents compared to NSW, at about 0.5 per cent and about 0.4 per cent, respectively. The social locality has a higher proportion of residents born overseas when compared to NSW and a higher proportion of residents who spoke a language other than English at home compared to NSW.

The Index of Relative Socio-economic Advantage and Disadvantage (IRSAD) summarises information about the economic and social conditions of people and households within an area, including both relative advantage and disadvantage measures. A low score indicates a relatively greater disadvantage and a lack of advantage in general.

When considering the IRSAD scores of the social locality, the Strathfield South SA2 has relatively high levels of advantage and relatively low levels of disadvantage, with a decile score of 8. This is compared to the Belmore-Belfield SA2, which has a decile score of 5. The Strathfield LGA also has low levels of disadvantage and high levels of advantage, with a decile score of 10.

The IRSAD scores suggest the Strathfield South SA2 and Strathfield LGA have a low representation of vulnerable people, households and/or communities, however, these groups of people may have a higher representation in the Belmore-Belfield SA2.

The Strathfield Council's 2035 Community Strategic Plan captures the community's core values and priorities. It places significant importance on safety, easy transportation access, and the maintenance of a clean and secure environment. It highlights a commitment to community well-being, where diversity is pivotal in creating healthy, active, and secure local environments. The community's strong connection to open spaces and preservation of canopy cover are viewed as integral to promoting Strathfield's healthy and active communities.

The Community Strategic Plan 2035 identified ‘healthy and active communities’ as an imperative to ‘Community wellbeing’. Strategies to achieve this include ‘managing open space, recreation and community facilities and programs to provide fair access and meet community, leisure and recreational needs’ and promoting ‘healthy and active living programs.

The Plan also emphasises the celebration and nurturing of local identity, making neighbourhoods genuinely liveable and inclusive spaces. Social cohesion and cultural diversity are viewed as positive local area strengths that make Strathfield a welcoming place to live. The plan reveals that 83% of the community strongly embraces its multicultural, diverse, and accepting atmosphere.

Cooke Park, which hosts six community sporting teams, as well as playground and skate park facilities, is the closest social infrastructure located near the Project.

Figure 4 Social locality



Potential social impacts

Potential social impacts associated with the Project may include:

- Community concerns about the additional traffic generation on the road network
- Community concerns about the potential for additional noise and/or air quality emissions during operations
- Likely positive impacts associated with increased employment at the MRF
- Positive impacts associated with supporting the waste avoidance hierarchy and contributing to the circular economy for waste in NSW.

The SIA will describe the potential positive and negative impacts of the Project for the local community and social values of the local area, including relevant mitigation for potential adverse social impacts.

7.1.6 Other issues

Surface water

The site is located within an industrial catchment incorporating a minor drainage and trunk drainage network, which discharges in a north-west direction to the Cooks River.

The Cooks River flows in a concrete channel located approximately 30m from the eastern boundary of the site. Cox's Creek, also a concrete channel, is located to the south of the site. The Project Site is not mapped as flood-labile land.

The site includes on-site detention storage and stormwater quality controls in the form of gross pollutant traps and a cartridge filtration system.

The site is fully covered by hardstand or other structures such that the overall impermeable extent of the Project will not change. There will be no change to surface water runoff as a result of the Project, which can be managed through existing stormwater infrastructure on the site.

The Project will occur within enclosed buildings and will not involve the use of water or any chemical agents. As such, there will not be any process runoff or wastewater. In addition, the loading, unloading and storage areas are all covered and exclude the ingress of stormwater.

The Project does not warrant a detailed surface water or groundwater impact assessment as there will be no changes to the surface water runoff quantity and quality. Surface water management measures implemented in recent years will continue to operate.

Soils

All external areas within the Project Site are concrete hardstands, with the exception of a narrow, landscaped strip along the Madeline Street frontage. The Project Site is mapped in the LEP as containing Class 4 and Class 5 ASS. Such soils can become an issue following ground disturbance activities and for the footings of any new buildings or structures.

The Project does not involve any ground disturbance activities. Issues associated with Acid Sulfate Soils (ASS), erosion and sedimentation, or existing soil contamination are unlikely to arise and can be managed through standard soil management measures.

Hazards and risks - contamination

Previous development applications at the site have confirmed there are no known sources of contamination at the site and a low risk of encountering contamination due to existing hardstand over the site and the avoidance of ground disturbance.

Council's assessment of DA 2015/177 noted:

The site is not located in an area of investigation under Part K of the Strathfield Consolidated DCP 2005 (SCDCP 2005), which identifies past known landfill and potentially contaminated sites in the Strathfield local government area. Accordingly, there does not appear to be a need for further investigation of the site.

Visual

As there are no changes to the existing built form, the visual amenity of the area will not be altered by the Project.

Waste management

The Project will not result in any significant change to the management and storage of waste on the site, which will continue to be carried out in accordance with the existing EPL and relevant conditions of consent.

Currently, the waste processing activities carried out on-site generate approximately 4,190 tpa of non-recyclable residual wastes, which are baled and transported off-site for disposal to landfill. The increase in the volume of residual wastes generated on-site as a result of the proposal will be insignificant.

All glass receipt, processing and MRF activities will continue to be carried out within the confines of Building 2 to avoid the generation of leachate by storm events. Processing systems are dry and do not generate any wastewater. Storage of cleaned and sorted glass fractions will be stored in external storage bunkers to the north of Building 1, while other baled materials will be stored on site. The site and adjacent street frontage are cleaned daily to remove any loose litter or material in accordance with the existing conditions of consent.

Biodiversity

The Project Site is an existing MRF located within an established industrial estate. All external areas within the site are concrete hardstands, with the exception of a narrow, landscaped strip along the Madeline Street frontage. The nearest vegetated areas are located immediately to the east of the site in a vacant block adjacent to the Cooks River and in Cooke Park, approximately 40 m to the south of the Project Site at its nearest point.

As the Project does not include land disturbance works, it is highly unlikely to have any impact on local biodiversity and a detailed assessment is therefore not warranted. A Biodiversity Development Assessment Report (BDAR) waiver application has been prepared and included as **Appendix C**.

Aboriginal heritage

The Project Site is an existing resource recovery facility located within an established industrial estate. All external areas within the Project Site are concrete hardstands, with the exception of a narrow, landscaped strip along the Madeline Street frontage. A search of the *Aboriginal Heritage Information Management System* (AHIMS) in March 2025 did not reveal any previously recorded Aboriginal sites within the Project Site.

Given that the Project does not include any land disturbance works or changes to existing built form, and there are no previously identified Aboriginal heritage items on the site, the risk of impacts to Aboriginal heritage is nil, with no further assessment warranted.

Non-Aboriginal heritage

A search of the State Heritage Register, which lists historic heritage items deemed to be of State significance, did not return any references for the area surrounding the Project Site. There are also no heritage items listed in the Strathfield LEP in the area surrounding the Site.

On this basis, the Project does not pose any risk to historic heritage and no further assessment is warranted.

8. Conclusion

Re.Cycle is seeking development consent to increase the throughput of the site by 100,100tpa, bringing the total approved throughput from 99,900tpa to 200,000tpa (the Project). The application also seeks to extend operating hours. The Project is classified as SSD under Division 4.7 of Part 4 of the EP&A Act in accordance with section 23(3) of Schedule 1 of the Planning Systems SEPP. This section identifies 'development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste' as SSD.

The Project objectives are:

- improve the operational efficiency of the MRF including the existing glass beneficiation infrastructure
- continue to conduct site operations in an environmentally responsible manner to ensure any potential impacts are minimised
- meet increasing market demand for the recycling of end-of-life glass
- contribute to the transition to a circular economy, which aims to eliminate waste and circulate products and materials at their highest value.

This Scoping Report has been prepared to support a request for Secretary's Environmental Assessment Requirements. It provides DPHI and government agencies information to assist in identifying potential environmental impacts that should be addressed in the EIS, including information on the Project Site and surrounding area, existing approved operations and the proposed Project.

Appendix A – Scoping Summary Table

ENVIRONMENTAL SCOPING AND RISK ASSESSMENT

Environmental scoping is the process used to identify the issues that will be assessed in the EIS. The methodology used for environmental scoping for the Project involved the following steps:

- Ascertain a high-level understanding of the existing environment of the site (e.g. for traffic and transport, existing traffic volumes) based on a review of mapping and previous environmental studies undertaken for the site.
- Identification of the aspects of the Project that may interact with the existing environment to identify potential impacts (e.g. changes to traffic volumes and patterns as a result of Project operations).
- Preliminary assessment of the potential impact combining the *likelihood* of the impact with the and the *consequence*, or severity, of the impact should it occur. Consideration is also given to cumulative impacts, where the receiving environment is affected from the combination of a Project's impacts and the impacts of other approved developments. The concepts of likelihood and consequence are commonly used in risk assessments and have been used in a simple form for the purpose of the environmental scoping exercise, and are described as follows:
 - *Likelihood* of impact (negative or positive) refers to the impact that would result considering mitigation measures. This recognises that for many issues, mitigation is an integral part of the Project. Likelihood rankings are applied based on the descriptions below.

	Description
Almost Certain	Common occurrence or assumed to occur
Likely	Expected, or known to occur
Possible	Not expected, but could happen
Improbable	Could occur under certain scenarios, but is uncommon to occur
Rare	Practically impossible to occur

- The *consequences* of the impact considers the scale of the impact, the nature of the impact and the sensitivity of the receiving environment for applicable environmental matters. The receiving environment can be affected by a combination of the Project's impacts and the impacts of other developments (i.e. cumulative impacts). Whereby the scale and nature of the impact are small, and the receiving environment is not sensitive to impacts, a lower ranking is applied. If the scale and nature of the impact are large and the receiving environment is sensitive to impacts, a higher ranking is applied. A 'common sense' approach is adopted for the assigning of ratings with a mixture of scale, nature and sensitivity of impacts, noting that an activity might have an impact at a small/discrete scale, however the nature of impact may pose a significant risk to human life or health, as such a 'severe' ranking is applied.

Consequences Ranking	Possible Context for Impacts	Example of Consequences
Severe	<i>Scale:</i> Any <i>Nature of Impacts:</i> Direct <i>Receiving Environment:</i> High sensitivity	• Posing a significant risk to human health, or life (i.e. a warehouse storing flammable goods igniting, or the pollution a nearby drinking water resource) • Causing harm or death to flora or fauna (without the appropriate regulatory consent) • Damage to a heritage listed building, place or item (without the appropriate regulatory consent)
Major	<i>Scale:</i> Any <i>Nature of Impacts:</i> Direct / Indirect <i>Receiving Environment:</i> Medium-High sensitivity	• Significant air pollution, above licenced emission limits • Pollution incidents, causing or threatening material harm to the environment, which must be notified to the EPA • Consistent noise nuisance causing sleep disturbance at a suburb-wide scale • Generating significant traffic, above approved capacity levels, placing strain on the road network • Soil sterilisation
Moderate	<i>Scale:</i> ≤ suburb-wide <i>Nature of Impacts:</i> Direct / Indirect <i>Receiving Environment:</i> Low-Medium sensitivity	• Consistent noise nuisance to nearby residents • Traffic causing significant queuing on a public road • Sediment runoff experienced, impacting neighbouring properties, requiring a management response • Minor spill, not causing material harm to the environment
Minor	<i>Scale:</i> ≤ neighbouring properties <i>Nature of Impacts:</i> Direct / Indirect <i>Receiving Environment:</i> Low sensitivity	• Intermittent noise nuisance to neighbouring properties • Minor sediment runoff experienced, requiring a management response • Minor dirt tracking onto a public road
Negligible	<i>Scale:</i> Localised to Project Site <i>Nature of Impacts:</i> Indirect <i>Receiving Environment:</i> Low sensitivity	• No measurable variance to the existing amenity (e.g. noise, air quality or visual) or impact is generally acceptable • Replacement of landscape screening (with appropriate regulatory consent)

- Use the above information to determine the risk ranking of the identified potential environmental impacts associated with the Project. Potential risks have been ranked as “low”, “medium” or “high” (residual risk taking in to account the proposed mitigation measures) for assessment depending on their likelihood of occurrence and the potential consequences if they did occur. The risk rating matrix below yields the risk ranking based on the combination of the identified likelihood and consequence. Identified risk rankings guide the level of assessment required to address each identified risk within the EIS, as follows:
 - **Low:** The Project will have a negligible impact, or the likelihood is so low that an impact is not likely to occur. A desktop assessment may be required; however, specialist assessment is not warranted.

- **Medium:** Potential impacts are unlikely to have a significant consequence. Specialist assessment may be required to fully understand potential impacts however mitigation measures are generally well understood.
- **High:** Environmental impacts are likely to occur and have potential for significant consequences. The effectiveness of mitigation is uncertain. The Project would require a specialist assessment to understand impacts and the effectiveness of mitigation measures.

		Likelihood				
		Almost Certain	Likely	Possible	Improbable	Rare
Consequence	Severe	High	High	High	Medium	Medium
	Major	High	High	Medium	Medium	Low
	Moderate	High	Medium	Medium	Low	Low
	Minor	Medium	Medium	Low	Low	Low
	Negligible	Low	Low	Low	Low	Low

The environmental scoping process is designed to allow decisions to be made using professional judgement and the best-available information at the time. It is not expected that detailed technical assessment is carried out at this stage to inform the scoping process. However, it is expected that where there are data gaps or points of uncertainty in relation to an issue, precaution is adopted, and the issue is treated as key.

The use of the above assessment categories generally follows the approach described in *DPIE's State significant development guidelines – preparing a scoping report* (DPIE, 2021b). The Guideline describes a process to identify which elements of the receiving environment (matters) are potentially impacted by a proposed development and the level of assessment needed understand the impact and mitigation measures.

The scoping process also considers cumulative impacts requiring assessment, where the elements of the receiving environment are affected from the combination of a Project's impacts and the impacts of other committed and approved projects as outlined in *DPIE's Cumulative Impact Assessment Guidelines for State Significant Projects* (DPIE, 2021c)

Table A summarises the outcomes of the environmental scoping exercise, listing the identified likelihood and consequence of an impact, and the risk ranking applied.

Table A Environmental Scoping Outcomes

Environmental Matter	Description of Impacts	Likelihood	Consequence	Risk Rating	Ref.
Traffic and Transport	Traffic – access and parking: - Although the overall volume of traffic accessing the site will increase, the Project Site is unlikely to require new site access arrangements. The site has sufficient parking to accommodate the increase in the number of employees. The adequacy of the existing site access and loading area to cater for increased loading/unloading activities will be confirmed through detailed assessment. If existing access arrangements are not suitable it may lead to queuing into the site with potential consequences for local traffic along Madeline Road. Traffic – network performance (operation): - The Project will generate an increase in overall truck movements to and from the site, as the overall waste quantity being processed would increase. The adequacy of the road network to cater for the Project will be confirmed through detailed assessment.	Almost Certain	Minor	Medium	Section 7.1.1
Noise and Vibration	Noise – Glass Beneficiation Facility (operation): - Increased operations of the glass beneficiation facility will result in an increase to existing noise emissions. Unloading/loading of glass materials is likely to be the activity with greatest amenity impact as a result of increased operations. Noise emissions are expected to reach neighbouring properties and may be heard by nearby residential receivers, however, the noise barrier on the neighbouring Aussie Skips site will reduce these effects. Noise – Increased transportation: - Increased truck movements to and from the site is likely to result in noise emissions. Noise emissions associated with truck movements are expected to reach neighbouring properties and may be heard by nearby residential receivers.	Almost Certain	Minor	Medium	Section 7.1.2
Air Quality	Air quality – fugitive dust emissions: The unloading of glass materials at the facility may result in fugitive dust emissions. Where dust emissions occur, fugitive dust may impact on neighbouring properties and nearby residential receivers.	Possible	Moderate	Medium	Section 7.1.3
Hazards and Risk	Fire Risk – operations Assessment of fire risks and the suitability of existing controls to address the risk including the ability of firefighting equipment to access the site and buildings.	Possible	Moderate	Medium	Section 7.1.4

	Hazards – operations Preliminary risk screening of the transport and storage of dangerous goods to identify the need for a Preliminary Hazard Analysis				
Social Impact	Social impact (negative): The Project may result in impacts (real and perceived) to the surrounding neighbourhood amenity (such as traffic, noise and air quality) given the increase in throughput at the site. Social impact (positive): The Project will result in an increase to employment at the MRF and is expected to contribute to supporting the circular economy for waste in NSW (i.e. recycling and reuse of glass materials).	Likely	Minor	Medium	Section 7.1.5
Soils and Water	Surface water – runoff: - There is no proposed increase to the impervious area of the site. Existing stormwater measures for the site include on-site detention storage and stormwater quality controls in the form of gross pollutant traps and a cartridge filtration system. Existing surface water management infrastructure is designed to mitigate runoff risks. Surface water – water quality: - The Project Site is in close proximity to Cooks River and Coxs Creek, two concrete stormwater drains. Any runoff and associated impacts to water quality would be limited to rainfall events, however, the site includes on-site detention storage and stormwater quality controls in the form of gross pollutant traps and a cartridge filtration system. Surface water runoff is not anticipated as the existing management infrastructure is designed to mitigate runoff risks. Soils - erosion and sediment impacts: - The Project does not involve ground disturbance activities such that erosion and sedimentation dispersion is not anticipated as a result of the Project. Soil – contamination - The Project does not involve ground disturbance activities such that potential for disturbance of contaminated soil is unlikely.	Improbable	Moderate	Low	Section 7.1.6
Visual Amenity	Landscape and visual – built form: The Project does not involve changes to the built form. A qualitative assessment of visual impacts will be undertaken with a focus on the consistency of the built form with the existing site and surrounding area.	Rare	Negligible	Low	Section 7.1.6

Waste	Waste - operations Currently, processing activities carried out on-site generate approximately 4,190 tpa of non-recyclable residual wastes, which are baled and transported off-site for disposal to landfill. The increase in the volume of residual wastes generated as a result of the Project will be insignificant.	Rare	Negligible	Low	Section 7.1.6
Biodiversity	Biodiversity: The site is fully developed with hardstand and other structures. Previous studies have not identified any biodiversity values on the site and the potential for impact is negligible. A BDAR waiver will be sought.	Rare	Negligible	Low	Section 7.1.6
Aboriginal Heritage	Aboriginal Heritage: The Project does not involve any ground disturbance activities and relates to increased throughput. Given that the Project does not include any land disturbance works or construction works, it is highly unlikely to have any impact upon Aboriginal heritage. An exemption for the standard ACHAR requirement will be sought.	Rare	Negligible	Low	Section 7.1.6
Non-Aboriginal Heritage	Non-Aboriginal Heritage: There are no non-Aboriginal heritage items on or near the Project Site itself. The Project is highly unlikely to have any impact upon non-Aboriginal heritage.	Rare	Negligible	Low	Section 7.1.6

Appendix B EPBC Protected Matters Search Tool Results

Appendix C BDAR Waiver Application