No	Condition	Non Conformance	Auditor Recommendation	Baiada Response	Target date Completion		
	AUDIT NON COMPLIANCES						
1	DA 53/97, Schedule 3, Condition 16	Stored wastewater in the wastewater treatment plant (WWTP) area is not bunded as required by this condition and therefore, this is considered non- compliant. It is noted that bunding was not included in the approved design drawings for the WWTP under DA2018/0443 and SSD-9394 does not include a similar requirement to bund wastewater, that is, only chemicals, fuels and oils are required to be stored within bunds (Condition B61).	Given that DA 53/97 was surrendered on 21/12/21 (refer to Table A-2, SSD-9394, Condition A12), and this condition was superseded by Condition B61, SSD-9394 on 22/01/21, there is no recommendation to address this non-compliance as SSD-9394 does not require wastewater storages to be bunded. The Auditors note an opportunity for improvement (OFI) would be to conduct a review of the integrity of pits and bunds.	In line with the OFI the Pits and bunds shall be reviewed. (Complete Mar 2022)	30 th March 2022 COMPLETED 30.03.22 SS		
2	DA 53/97, Schedule 3, Condition 19	 The Oakburn - Management of Liquid Waste and Contingency Plan (2021 AEMR, Appendix I) and the 2021 OEMP section addressing Liquid Waste do not meet all of the requirements of Condition 19. Specifically, the 2021 OEMP (taken to represent the latest plan) does not: characterise the quantity and quality of wastewater; identify the criteria/limits for the disposal of treated wastewater; and include: detailed plans of pipelines, pumps and other infrastructure and connections to Council's system; a protocol for the investigation, notification and mitigation of identified exceedances of the criteria/limits for the disposal of treated wastewater. 	Review the Liquid Waste elements of the OEMP to address all of the requirements of Condition 19, except those that relate to Stage 2/Project upgrades, including: • characterising the quantity and quality of wastewater; • identifying the criteria/limits for the disposal of treated wastewater; • a plan(s) of the wastewater treatment process showing the key plant / equipment / infrastructure, sampling point(s) and discharge point; and • a protocol for the investigation, notification and mitigation of identified exceedances of the criteria / limits.	 OEMP will be amended to include: Quantity and quality of waste water and limits Description of where to locate plan of WW Treatment system Protocol for notification 	30 th June 2022 COMPLETED 07.04.22 SS		
3	DA 53/97, Schedule 4, Condition 50	The Auditors consider that the AEMRs comply with Condition 50 in most respects except for the presentation of the production data. The Auditors consider Condition 50 is non-compliant on the basis the AEMRs do not conclusively demonstrate that the Limits of Approval have been complied with 100% of the time.	The Auditors note that DA 53/97 was surrendered on 21/12/21 and SSD-9394 does not include the same limits as Condition 6(a) and 6(b). The Auditors recommend that Baiada confirm DPIE's requirements for reporting production data in the Compliance Reports going forward. We also recommend the methodology and basis for reported production data be clearly indicated in the Compliance Report	SSD9394 Condition A6 Requires that production be capped at 1120T Finished production until processing plant is operational. Future Compliance reports will report weekly production T on future reports.	21-22 AEMR April 2022		

				Methodology will be clearly indicated on the report	
4	DA 53/97, Schedule 4, Condition 53	The management plans and programs were reviewed within 3 months of the submission of the 2019 IEA report to DPIE but they were submitted to DPIE 4 days later than the due date.	Ensure that strategies, management plans and programs are reviewed and revised following submission of an IEA in accordance with the requirements of SSD-9394, Conditions C11 to C13.	Tracking will be built into the EMS System for the site to manage items to the SSD Conditions and timelines.	Ongoing
				EMS Hub has requirements more clearly defined	
5	SSD-9394, Condition B8	An odour complaint on 04/04/21 indicates that an offensive odour was likely to have been emitted beyond the boundary of the site. Investigation indicated the odour was sourced from the CAL Biogas Vent.	If it is not already being undertaken, investigate options for odour mitigation for the CAL Biogas Vent (e.g. feasibility study of options) and implement the preferred option to prevent a reoccurrence of an offensive odour emission from the CAL Biogas Vent beyond the boundary of the site.	A Flare for the Vented CAL gas is being installed February 2022	30 th June 2022
6	SSD- 9394, Condition B12	The Auditors consider that the OMP does not adequately address the following C1 requirements.	Review the OMP and OEMP be reviewed and revised to address the identified gaps, in particular, improving the objectives and targets, ensuring consistency between the OMP and OEMP, ensuring all potential odour sources under normal and abnormal conditions are assessed and compliance reporting requirements are better defined. Also ensure that the OMP complies with Condition C1 requirements	Ammendment will be made to the OMP. (OMP & OEMP reissued 08.04.22 to include the amend)	30 th June 2022 COMPLETED 08.04.22 SS
7	SSD-9394, Condition	The quantity of Sodium Hydroxide Solution stored onsite exceeds the Table 3 limit. The Packing Group of the stored chemical is also a higher risk Packing Group than shown in Table 3.	Review the chemical storage quantities and reduce the quantity of Sodium Hydroxide stored onsite to comply with Table 3 limits and/or seek a modification of this condition to increase the limit for Sodium Hydroxide stored onsite, and correct any factual inaccuracies in Table 3.	Request will be made to increase the limit for Sodium Hydroxide stored on site. See email Pam Morales GW has spoken to PSA	30 th June 2022
	B60			Request will be made to correct factual inaccuracies in Table 3 at next review of SSD – draft list See email Pam Morales	Next mod for SSD
8	SSD-9394, Conditions C5, C1 & C6	The 2021 OEMP does not adequately meet all of the requirements of Condition C5, including Condition C1 requirements, particularly the relevant statutory	Review and revise the OEMP to more completely and consistently meet Condition C1 requirements for all of the environmental aspects and impacts, which should be consistent with the site's	GW has spoken to PSA Amendments will be made to the OEMP to more completely meet Condition C1.	30 th June 2022 COMPLETED 08.04.22 SS

-	1	EUEITEA Buildu Response to			
		requirements, limits, performance measures and specific performance indicators. The 2021 OEMP generally meets Condition C6 requirements except that it does not include a procedure to respond to any non-compliance, which may or may not be an incident (as defined under SSD-9394), and under Condition C1 is defined as "specifically including any exceedance of the impact assessment criteria and performance criteria". This is considered non-compliant as an OEMP should clearly define and differentiate incidents and non- compliances and notification requirements under SSD-9394 and other approvals (e.g. EPL 7566, the LTWSA). Management plans are also required to meet Condition C1 requirements. The Auditors consider that the OMP does not adequately address the following C1 requirements.	environmental aspects and impacts register / risk assessment, as well as the requirements of SSD- 9394. There should be clear links between identified environmental hazards, the control measures, required performance indicators and monitoring and reporting requirements with a particular focus on any regulatory limits and requirements. The OEMP should also describe the procedure(s) to respond to "any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria)", which may or may not be an incident.	(Reissue of the OEMP 07.04.22 and OMP 28.03.22)	
9	SSD- 9394, Condition C15	Baiada did not submit a non-compliance notification in accordance with this condition when DPIE made Baiada aware on 10/08/21 that they were not complying with Condition C23, Access to Information.	Submit a non-compliance notification to DPIE regarding: • the non-compliance with Condition A23 (the subject of DPIE's letter dated 10/08/21) in accordance Conditions C15 and C16; and • the non-compliance with Condition C19 (failure to upload 2021 AEMR and notify DPIE within required timeframes) in accordance with Condition C16. This is in order to ensure that the reason(s) for the non-compliances are investigated and appropriate actions undertaken to address the non-compliances and prevent a reoccurrence. It is suggested that non-compliances are managed in a similar manner to incidents (within the meaning of SSD-9394, i.e. notifiable incidents) and recorded on the Incident/Complaint Register. Also refer to the findings and recommendations for Conditions C5 and C6 and procedures for responding to any non- compliance, which is considered to be one action for preventing a reoccurrence (i.e. provision of clear instructions).	Noted shall be reported in line with requirements Letter with regards to Non- Compliance submitted via portal to DPIE 25.02.22	30 th April 2022

10	SSD- 9394, Condition C16	Baiada did not submit non- compliance notifications for the Condition C19 and condition C23 non- compliances, in accordance with Condition C16. This is considered to be a separate non-compliance to the Condition C15 noncompliance because all of the required information was not provided and there is no evidence that the non-compliances have been investigated and what actions have been undertaken to address the non-compliances and prevent a reoccurrence.	Refer to the recommendation for NC8, which also addresses NC9	Noted shall be reported in line with requirements Letter with regards to Non- Compliance submitted via portal to DPIE 25.02.22	30 th April 2022
11	SSD- 9394, Condition C18	The 2021 AEMR and Compliance Report did not meet all of the requirements of Condition C18 and the Compliance Reporting Post Approval Requirements (Department 2020) (CRPAR 2020), as required and detailed in Table A-2 in relation to this condition. The Department reviewed the 2021 AEMR and considered it to generally satisfy the reporting requirements of the consents. DPIE required Baiada to ensure that the future Compliance Report layout complied with CRPAR 2020	In line with DPIE's requirement all future Compliance Reports comply with CRPAR 2020 requirements and include graphs of data to facilitate easy identification of trends and performance against limits and other targets	Noted shall be reported in line with requirements CRPAR 2020 guidelines given to SLR for the preparation of the 2021/22 CR	21-22 AEMR March 202 3 2
12	SSD- 9394, Condition C19	The 2021 AEMR was uploaded to the Oakburn SSD- 9394 website more than 60 days after the report was submitted to DPIE on 07/05/21. The Department was not notified of the upload to the public website 7 days prior to uploading the 2021 AEMR to the website.	Review and revise the Register of Portal & Website Uploads to include additional fields to prompt due dates for when reports must be uploaded and when DPIE must be notified by, as applicable, in addition to when reports were actually submitted and notified.	Shall be reviewed and revised accordingly. EMS Hub has requirements more clearly defined	30 th April 2022 COMPLETED 30.03.22 SS
13	SSD- 9394, Condition C23	Information required to be published on Baiada's public website was missing and therefore, not accessible to be public. The missing information is detailed in Audit Table A-2, Condition C23.	Review the website and upload the identified missing information as soon as practicable. Establish a process to ensure the required information is uploaded on a regular basis and within any required timeframes.	Noted will action Website is being modified to allow for requirements of the DA - GW	30 th April 2022 COMPLETED 30.03.22 SS

No	Condition	Recommendation	Auditor Recommendation	Baiada Response	Target date Completion	
	CONTINUAL IMPROVEMENT					
			DA 53/97 – Sch	edule 3		
1	Cond 16	Stored wastewater in the WWTP area is not bunded as required by this condition and therefore, this is considered non-compliant. A concrete pit was observed to have a pipe through it, which was subsequently plugged following a release outside the pit. The incident report did not identify the pipe as a contributing factor to the leak escaping the pit.	Review the bunding requirement for stored wastewater on a risk management basis for the protection of the environment and human health. Conduct a review of the integrity of pits and bunds that includes checking that there are no pipes through the bunds or pit walls that are open / unblocked.	The Pits and bunds shall be reviewed. Note that some pits on site are just that and not designed to be bunds. These shall be noted in the Pits and Bunds Register on the EMS Hub	30 th March 2022	
2	Cond 27	The operation hours are not specified in the OEMP.	Specify the operation hours in the OEMP	Noted will be included in OEMP 4. Site Operation A. Site Operation Table 1 below taken from SSO9394, Part 8 Specific Environmental conditions B1 stipulates hous of work for the site and any earthworks and construction. Works on the site and any earthworks and construction. Works on the site and any earthworks and construction. Works on the site and any earthworks and construction. Works and construction. Works on the site and any earthworks and construction. Works on the site and any earthworks and construction. Works and construction. Works on the site and any earthworks and construction. Works and construction. Works and construction. Works and construction. A. Rendering Hours of Work The existing Rendering plant typically operates from Sunday evening till Saturday attermoon 24 hrs a day. The site is manned on occasion outside these hours.	30 th June 2022 COMPLETED 08.04.22 SS	
3	Cond 40	Evacuation Area 2 is located in the vicinity of the LNG tanks and within the impact zones for a vapour cloud explosion, tanker BLEVE (Boiling Liquid Expanding Vapour Explosion) and storage tank BLEVE. Therefore, the Auditors consider that this may not a good location for an evacuation area.	Review and update the Safety Management System Emergency Dangerous Goods Manifest based on the latest version of the site Emergency Plan and in light of the 2020 Risk Assessment conducted by Lote Consulting Pty Ltd.	Back up Evacuation area Comments noted will be considered at next review	30 th June 2022	
4	Cond 45	Facility personnel advised that there may be no other industries with the same or similar operations to compare the facility's energy and water usage ratios against, and set	Review and revise the 2021 OEMP to identify the targets used (i.e. energy and water usage ratios of the development), their basis and justify why benchmarks for	Noted will be considered in next review of OEMP.	30 th June 2022 COMPLETED 08.04.22 SS	

5	DA 53/97 – Schedule 4 – Condition 48	benchmarks for, industry best practice in accordance with Condition 45(b). The 2021 OEMP, which now incorporates the Water and Energy Efficiency Program (WEEP), does not meet the requirement of Condition 45(b) and does not justify why benchmarks for industry best practice have not been set. The incident investigation for the 'Gasket blown on Cal discharge line to SBR' (30/01/21) did not address the issue of the pipe through the pit wall, which was a contributing factor to the release of wastewater from the pit to ground	industry best practice are not used if that is the case. Ensure that incident reports address all of the contributing factors / root causes to an incident	National to review incident reports for root cause analysis suitability on future incident reports.	ONGOING
		ground			
	Condition	Opportunity for		Baiada Response	Target date
		Recommendation			Completion
			SSD-9394	1	
6	A2	The Auditors observe that Condition A2(e) refers to the management and mitigation measures in Appendix 3; however, the management and mitigation measures are in Appendix 4. This error is repeated in Condition B3, B72. Condition B6 also incorrectly references Appendix 3, which should be Appendix 2.	Ask DPIE to correct the appendix references in the next modification of the consent.	Noted: Will request. This and other errors already identified.	Next mod for SSD COMPLETED 30.03.22 SS Emailed to PMorales and have received response
7	A32	The 2021 OEMP references the "Waste Classification Guidelines: Part 1 Classification of Waste", which is slightly incorrect and should be EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Review and revise, as necessary, the 2021 OEMP and any other management plans required under this consent to ensure that correct references are used for any guideline, protocol, Australian Standard or policy	Noted will action - 10. Waste Management 10.1. Classification of Waste The classification of Oakburn waste has been performed referencing the <i>EPA's Waste</i> <i>Classification Guidelines: Part 1 Classifying Waste (EPA 2014).</i> The different waste types are listed, tracked and managed through the Waste Classification Tab – OAKBURN EMS Hub.	30 th June 2022 COMPLETED 04.03.22 SS
8	AN1	The site has an Obligations Listing on the EMS Hub. The Auditors noted that SSD-9394 was not	The site has an Obligations Listing on the EMS Hub. The Auditors noted that SSD-9394	This is in error the SSD is included in the Obligation listing	COMPLETE

		The Auditors note as an OFI that	Obligation Listing. SSD-9394		
		SSD-9394 be included in the	should be included in the		
		Obligation Listing.	Obligation Listing.		
9		The Auditors observe that the	Review and revise the OEMP to	Noted will action 12.6. Dust Mitigation	30 th June 2022
		site's 2021 OEMP does not refer to	address dust as a hazard and	I accordance with SSD9394 PART B Specific Environmental Conditions B17 the site	COMPLETED
		dust as a hazard and does not	include mitigation measures to	has taken reasonable steps including sealed or paved Heavy vehicle movement paths to prevent nuisance dust creation around the site and the maintenance of a large	04.03.22 SS
		include dust mitigation measures	ensure compliance with this	grassed area and Landscaping to further mitigate dust creation.	
	В9		condition.	During any construction works additional mitigation methods are employed as per SSD9394 PART B Specific Environmental Conditions B18 including	
	23			(i) Exposed surfaces and stockpiles supressed by regular watering or alternate	
				suppression method. (ii) Covered loads on all trucks entering or leaving the site	
				 (iii) Methods employed to prevent dirt being tracked onto public roads (iv) Public roads to be kept clean where used by trucks performing works on the 	
				site. (v) Progressive land stabilisation to minimise exposed surfaces.	
10		The Auditors found that whilst the	Review and revise the OMP and	Noted will review and action as appropriate	30 th June 2022
-		2021 OMP generally meets the	OEMP as considered appropriate		COMPLETED
		requirements of Condition B12 and	to address the identified gaps, in		30.03.22 SS
		Condition C1 in relation to	particular, improving the		
		requirements for management	objectives and targets, ensuring		
		plans, but there were a number of	consistency between the OMP		
	B12	gaps and inconsistencies that	and OEMP, ensuring all potential		
		could be improved. Please refer to	odour sources under normal and		
		Table A-2 in relation to this	abnormal conditions are		
		condition as there are too many to	assessed and compliance		
		refer to here	reporting requirements are		
			better defined. Also ensure that		
			the OMP complies with Condition		
		The 2021 OEMP does not address	C1 requirements Review and revise the OEMP or	Natad will action	30 th June 2022
11		soil management or more		Noted will action	COMPLETED
	B20	specifically, prevention of soil	other plan or procedure to address this requirement and		30.03.22 SS
	620	contamination from imported soil	ensure that the required records		50.05.22 33
			are kept.		
		The 2021 OEMP does not in the	Review and revise the OEMP and	Noted will action: Protected species not included. No requirements for	30 th June 2022
12		Auditors' opinion, adequately	associated procedures to	this in the SSD. Noxious weeds system documents how these weeds	50 June 2022
		describe how pests are managed.	differentiate between pests and	should be identified.	COMPLETED
		Conversely, it does not describe	protected species and describe	13.6. Pests, Vermin and Priority Weed Management	04.03.22 SS
		how protected species, such as	how protected species and describe	13.6.1. Pests and Vermin	07.00.22 00
	B42	snakes or native vegetation	managed.	The Rendering site maintains a contract with an external Pest Control Contractor	
	D4Z	required to be conserved, are	managea.	which includes monthly servicing for Rodents and spiders. This contract can be extended to control any other Pests of concern as required by the site. Records of	
		managed		these services are maintained by the site.	
		managea		13.6.2. Priority Weed Management	
				The Rendering site follows the Baiada National procedures for Noxious Weeds with	
				regular inspections and treatment of priority weeds under the System. Records of these inspections are maintained by the site.	
	B45	The 2021 OEMP does not explicitly	Review and revise the OEMP to	Noted will action	30 th June 2022
		state that waste generated outside	include the requirement that		

B46	the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal. The requirement to retain all sampling and waste classification data for the life of the development is not explicitly stated in the 2021 OEMP	waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal Review and revise the OEMP to include the requirement to retain all sampling and waste classification data for the life of the development in accordance with the requirements of the	 13.2. Receival of waste In accordance with SSD9394, PART B Specific Environmental Conditions, Condition; B45 no wastes generated from outside the site will be accepted onto the site for storage, treatment, processing, reprocessing or disposal. 12.2 Emergency Disposal and Disposal Protocol Noted will action inclusion into the OEMP that records will be held electronically for the life of the project. continually reducing the number of and quantity of wastes that go to landfill. All waste classification and sampling data to be retained electronically for the life of the development in accordance with SSD9394, PART B Specific Environmental Conditions, Condition; B46. 11.2. Receival and Disposal of waste	COMPLETED 04.03.22 SS 30 th June 2022 COMPLETED 30.03.22 SS
B52	The OEMP does not explicitly address all of the requirements of Condition B52 (e.g. covering of loads, keeping turning areas clear) as they relate to the Existing Development. The Auditors are not suggesting that all of the requirements should be addressed in the OEMP but keys aspects of traffic management could be addressed more holistically (e.g. not impacting public roads / local roads / footpaths, covering loads).	EPA. Review and revise the OEMP as considered appropriate to address the traffic and access requirements as they relate to ongoing operations of the Existing Development.	Noted will action improvements to OEMP in this regard and refer to Rendering Site - Traffic Management plan for additional detail. 12. Traffic and Access 12.1. Construction Traffic Management Plan A Construction Traffic Management Plan conjunction with the Construction Environmental Management Plan (CEMP) prior to the commencement of the Integrated processing plant development in accordance with SSD9394, PART B Specific Environmental Conditions, Condition; B47 and B48. 12.2. Existing Rendering Plant - Traffic Management Plan The existing rendering plan maintains and operates under the Oakburn - Traffic Management Plan (IMS-MAN-1000-OAK). This document considers items such as roadwork, access, parking, traffic flow and general operating conditions. This document has been developed in accordance with the requirements of SSD9394, PART B Specific Environmental Condition; B51 and B52.	30 th June 2022 COMPLETED 30.03.22 SS
B63	The Auditors note that the Bird Life Monitoring Plan (BLMP) indicates that laser lights are a common visual deterrent. However, they could only be used in compliance with Condition B74 and presumably any requirements of Tamworth Regional Airport	In the event that it is proposed to use lasers as a mitigation method, ensure that the method complies with Condition B74 and approval is sought from Tamworth Regional Airport.	Noted	
B76	The Auditors observe that the Neighbour Call Register does not identify the residences consistent with Figure 2, Appendix 2, but does include Tamworth Airport Management. The call register	The Auditors recommend that Baiada: a. Review and revise the Oakburn – Neighbour Call Register so that the Figure 2 sensitive	Call register to be updated to include Sensitive receivers R1 thru R4 where not already included.	30 th March 2022 COMPLETED 30.03.22 SS

does not include the TRC or Registered Aboriginal Parties.	receivers are identified (i.e. R1 to R4); b. Identify the relevant interested stakeholders that are required to be consulted in accordance with this condition; and c. Obtain in writing if stakeholders have particular consultation requirements (e.g. only	Form DAKBURN - Neighbour Call Register % Atte Residence CONTACT TIME PERSON % Atte Residence 6760 7996 CALLED SPOREN TO 1 Class Output Lane) 6760 7996 CALLED SPOREN TO 1 Tamwordh Airport Management 6767 75547 CALLED SPOREN TO 1 Lincoln Grove 0408 658 774 CALLED CALLED SPOREN TO 1 Salan Words 0417 441 688 CALLED CALED CALLED CALLED	
	during specific stages of the development or only at a requested frequency).	 Updates to OEMP include stakeholder consultation at each stage. Aboriginal parties will be included in this communication 6.communication 6.1. Baiada Website The Baiada Poultry Pty Ltd website will be updated in line with SSD9394 Part C Environmental Management, Reporting and Auditing, Condition C19,21 and 23 with appropriate notification to the department prior to upload. 6.2. Communication with Stakeholders 6.2.1. Neighbours and Nearby Residents Communication with nearby residents is via call around of range of nearby residents / or business. This is to check that there have been no negative effects as part of the Site's operation. This check is documented on sites Oakburn – Neighbour Call Register. This call around is to be completed at least quarterly. 6.2.2. Customers Customers are contacted in accordance with the sites Change Notification Procedures. 6.2.3. Legislative Stakeholder Communication with Legislation / Development Approval / Code of practice / Regulation. Stakeholders will also be consulted as per the site PIRMP when activated In relation to the site development key stakeholders will be notified via email and directed to the publicly available website for updated documents at each stage of the process. Aboriginal parties will be included in this communication. STAGE 1: Existing Rendering Plan STAGE 2: Commencement of Construction of Processing Plant (with Ongoing Rendering Operation) STAGE 3: Processing and Rendering Operation 	30 th June 2022