



Report

Cairncross Waste Management Facility Independent Environmental Audit Report

Port Macquarie-Hastings Council



Document Status

Version	Doc type	Reviewed by	Approved by	Date issued
V1	Draft	Shireen Baguley	Shireen Baguley	6/03/2026
V2	Final	Shireen Baguley	Shireen Baguley	26/03/2026

Project Details

Project Name	Cairncross WMF Independent Environmental Audit
Client	Port Macquarie-Hastings Council
Client Project Manager	Emma Torain
Water Technology Project Manager	Bethany Carlyon
Water Technology Project Director	Shireen Baguley
Authors	Bethany Carlyon, Shireen Baguley
Document Number	26050101_R01v2_Cairncross WMF IAR_Final



COPYRIGHT

Water Technology Pty Ltd has produced this document in accordance with instructions from Hindmarsh (NSW) for their use only. The concepts and information contained in this document are the copyright of Water Technology Pty Ltd. Use or copying of this document in whole or in part without written permission of Water Technology Pty Ltd constitutes an infringement of copyright.

Water Technology Pty Ltd does not warrant this document is definitive nor free from error and does not accept liability for any loss caused, or arising from, reliance upon the information provided herein.

Suite 3, Level 1, 20 Wentworth Street
Parramatta NSW 2150
Telephone (02) 9354 0300
ACN 093 377 283
ABN 60 093 377 283





ACKNOWLEDGEMENT OF COUNTRY

The Board and employees of Water Technology acknowledge and respect the Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of Country throughout Australia. We specifically acknowledge the Traditional Custodians of the land on which our offices reside and where we undertake our work.

We respect the knowledge, skills and lived experiences of Aboriginal and Torres Strait Islander Peoples, who we continue to learn from and collaborate with. We also extend our respect to all First Nations Peoples, their cultures and to their Elders, past and present.



Artwork by Maurice Goolagong 2023. This piece was commissioned by Water Technology and visualises the important connections we have to water, and the cultural significance of journeys taken by traditional custodians of our land to meeting places, where communities connect with each other around waterways.

The symbolism in the artwork includes:

- Seven circles representing each of the States and Territories in Australia where we do our work
- Blue dots between each circle representing the waterways that connect us
- The animals that rely on healthy waterways for their home
- Black and white dots representing all the different communities that we visit in our work
- Hands that are for the people we help on our journey



EXECUTIVE SUMMARY

Port Macquarie-Hastings Council (hereafter referred to as PMHC) operates the Cairncross Waste Management Facility (hereafter referred to as Cairncross Facility) located at 351 Telegraph Point Road, Pembroke NSW 2446 (Lot 1/DP1202080), in the Port Macquarie-Hastings Local Government Area. The facility is licensed by the NSW Environment Protection Agency (EPA) under the Protection of the Environment Operations Act 1997 (POEO Act), Environmental Protection Licence (EPL) number 11189 (EPL 11189). Development consent SSD-5792 was granted 5/11/2019 for an extension to the facility including:

- progressive excavation, landfilling and rehabilitation of three new landfill cells (Stage 1, 2 and 3);
- receiving 3.7 million cubic metres of additional waste in the three new cells; and
- extending the life of the landfill by a further 36 years, until 2056.

The approval was conditional on the adherence of the project to the conditions of consent outlined in the Project Approval.

To meet its post-approval conditions, PMHC requires an independent and suitable qualified contractor to assemble an audit team and undertake an independent environmental audit of the Cairncross Facility. Water Technology was engaged by PMHC to undertake the Independent Audit Program. This document serves as the Independent Environmental Audit report.

This is the second operations audit and it has reviewed the project's compliance via systems, documents, records, and procedures in relation to conditions of the development consent associated with the development.

Condition C14 requires an audit program be prepared:

No later than 4 weeks before the date notified for the commencement of operation, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department.

Condition C15 requires:

C15. Independent Audits of the development must be carried out in accordance with:

(a) the Independent Audit Program submitted to the Department under condition C14 of this consent; and

(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).

As per the amended audit program submitted to the Department of Planning and Environment (now Department of Planning, Housing and Infrastructure) (DPHI) by PMHC on 31/01/2024, an Independent Audit is to be carried out at intervals, no greater than 3 years or as otherwise agreed by the Secretary, i.e. by no later than 31/01/2026, with the audit report due 31/03/2026.

The audit considered a total of 78 conditions of consent of which there were 156 separately assessable sub-conditions (items), and 2 clarifications (A16 and C17). In general, the operations were found to be compliant with the approval consent requirements, having 100 compliances. There were 3 non-compliances. Consequently, 2 corrective actions were raised. 53 conditions were not triggered and 1 opportunity for improvement were identified during this audit.



CONTENTS

ACKNOWLEDGEMENT OF COUNTRY	2
EXECUTIVE SUMMARY	3
1 INTRODUCTION	5
1.1 Background	5
1.2 Audit Scope	5
1.3 Audit Period	6
1.4 Audit Team and Endorsement	6
1.5 Audit Objective	7
2 AUDIT METHODOLOGY	8
2.1 Compliance Evaluation	8
2.2 Audit Criteria	8
2.3 Independent Audit Scope Development	8
2.4 Consultation	8
2.5 Site Inspection	9
2.6 Site Interviews	9
2.7 Compliance Status Descriptors	9
3 AUDIT FINDINGS	10
3.1 Approval and Document List	10
3.2 Audit Summary	10
3.3 Environmental Performance	10
4 RECOMMENDATIONS	16
4.1 Non-Compliances	16
4.2 Recommended Actions	16
5 CONCLUSION	17

APPENDICES

Appendix A DPHI Audit Team Approval
Appendix B Declaration of Independence
Appendix C Audit Checklist Table
Appendix D DPHI Consultation
Appendix E Site Inspection Photographs
Appendix F Audit Action Plan



1 INTRODUCTION

1.1 Background

Port Macquarie-Hastings Council (hereafter referred to as PMHC) operates the Cairncross Waste Management Facility (hereafter referred to as Cairncross Facility) located at 351 Telegraph Point Road, Pembroke NSW 2446 (Lot 1/DP1202080), in the PMHC Local Government Area. The facility is licensed by the NSW Environment Protection Agency (EPA) under the Protection of the Environment Operations Act 1997 (POEO Act), Environmental Protection License (EPL) number 11189 (EPL 11189).

The Cairncross Facility opened for operation in 2001 and is the primary centre for PMHC's waste operations. The site contains; a landfill, Waste Transfer Station (WTS), Organic Resource Recovery Facility (ORRF), Materials Recovery Facility (MRF), and ancillary waste stockpile areas (i.e., scrap metal and green-waste). Approximately 70,000 tonnes of material go to landfill at Cairncross annually, and the landfill site services a population of about 86,000 residents.

As the existing landfill was reaching capacity and there was a need to continue servicing the PMHC LGA, development consent SSD-5792 was granted on 5/11/2019 for an extension to the facility. The expansion works included:

- progressive excavation, landfilling and rehabilitation of three new landfill cells (Stage 1, 2 and 3);
- receiving 3.7 million cubic metres of additional waste in the three new cells; and
- extending the life of the landfill by a further 36 years, until 2056.

The construction of the Stage 1 extension has been completed, along with the independent construction audits and first operations independent audit. Landfilling operations commenced on 20/07/2022, and under condition C15 of the approval requirements, independent audits must be carried out in accordance with the submitted audit program. As per the amended audit program submitted to the Department of Planning and Environment (now Department of Planning, Housing and Infrastructure) (DPHI) by PMHC on 31/01/2024, an Independent Audit is to be carried out at intervals, no greater than 3 years or as otherwise agreed by the Secretary, i.e. by no later than 31/01/2026, with the audit report due 31/03/2026.

1.2 Audit Scope

To meet its post approval conditions, PMHC requires an independent and suitably qualified contractor to assemble an audit team and undertake an independent audit of the Cairncross Facility. The Audit is to be undertaken in accordance with the relevant Conditions of Approval:

C15. Independent Audits of the development must be carried out in accordance with:

- a) the Independent Audit Program submitted to the Department under condition C14 of this consent; and*
- b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).*

It is noted that the Independent Audit Post Approval Requirements (Department 2018) are now superseded by Independent Post Approval Requirements (Department 2020), with approval from DPHI being granted for use of same for this audit (also refer to paragraph 2.2.3).

Water Technology was engaged by PMHC to complete the operations independent audit for the Cairncross Facility in accordance with the post approval requirements. Water Technology is to submit a comprehensive



report (this report) which outlines the audit methodology, findings, and recommended measures or actions that will improve the environmental performance of the project.

Water Technology issued a data request to PMHC for data and records which were used as evidence to demonstrate compliance with the audit criteria set out in the audit table. The data requested was inclusive of:

- Post approval documents required under the Conditions of Approval (including environmental mitigation measures and recommendations provided in environmental management plans)
- All licences and approvals applicable to the development.

The audit was based on the above and included:

- Examination of a sample of administrative, technical and operating documents and records provided both prior to, during and subsequent to the period the auditor was on site;
- Site inspection of the facilities and surrounding areas; and
- Interviews and discussions with key personnel, predominantly.

1.3 Audit Period

The period covered by this report is the period following the end of the first independent environmental audit (1/02/2023) to the date of the commencement of this independent environmental audit at an interval no greater than 3 years after the last audit, i.e. 31/01/2026.

Table 1: Approved audit program for Cairncross Waste Management Facility

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals	PMHC clarification
Construction	Within 12 weeks of the commencement of construction of Stages 1, 2 and 3	N/A	Construction means construction.
Operation (Landfilling component)	Within 26 weeks of the commencement of operation (landfilling component)	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.	Operation means landfilling.
Closure/Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.	Initial audit within 52 weeks of landfill closure. Ongoing annual audits until no longer required as approved by Planning Secretary.

1.4 Audit Team and Endorsement

The audit was undertaken by the following suitably qualified, experienced and independent persons:

- Shireen Baguley MScEng, BEng (Hons), Dip Conservation and Land Management, GradDip Arts (Journalism) Exemplar Global certified Environmental Lead Auditor (125758)– Project Manager and Lead Auditor)
- Bethany Carlyon BEnv – Technical Support, Auditor



The Department of Planning, Housing and Infrastructure approved the above audit team for this audit only on 23/12/2025. The approval documentation is provided as Appendix A. The declaration of independence is provided as Appendix B.

1.5 Audit Objective

This independent environmental audit is in accordance with Condition C15 of SSD 5792. The audit serves to assess the environmental performance of the project with reference to the relevant requirements in the conditions of consent.



2 AUDIT METHODOLOGY

2.1 Compliance Evaluation

Within this audit, compliance is determined through evidence-based evaluation. Verifiable, objective evidence has been collected using the following methods as appropriate to the condition and the circumstances:

- Examination of a sample of administrative, technical and operating documents and records provided both prior to, during and subsequent to the period the auditors were on site;
- Site inspection of relevant locations, activities and processes; and
- Interviews of relevant site personnel.

The evidence used to verify compliance with each requirement has been documented in the Audit Table provided as Appendix C along with any relevant observations or notes.

2.2 Audit Criteria

The Cairncross WMF was audited against the following criteria:

- Development Consent for Application Number SSD 5792, Approved 5 November 2019;
- The Environmental Impact Statement (EIS);
- Department of Planning Industry and Environment (now DPHI) Independent Audit Post Approval Requirements (2020);
- The feedback, requests, and/or comments of relevant agencies consulted; and
- Any other relevant documentation, procedures or plans associated with the project.

2.3 Independent Audit Scope Development

A project inception meeting was held on 19/01/2026 between PMHC and Water Technology to discuss the steps of the audit, logistics of the site inspection, outstanding information, and documentation/evidence required. Prior to this meeting, PMHC provided preliminary data which included consent conditions, the EPL, management plans, waste records and notifications to DPHI. This information was used to prepare an audit checklist, and indicate which items were relevant and assessable at this stage of the development, and which were not triggered. This table was provided to PMHC for convenience.

The following people attended the meeting:

- Emma Torain, Project Officer Waste and Resource Recovery | Community Utilities, PMHC
- Rachel Bennett, Innovation, Process & Compliance Manager, PMHC
- Shireen Baguley, Lead Auditor – Water Technology
- Bethany Carlyon, Assistant Auditor – Water Technology

2.4 Consultation

Consultation was undertaken with DPHI by Shireen Baguley on 16/01/2026, as part of the audit scope. The purpose of this consultation was to obtain DPHI's input into the scope of the audit and to provide any comments that it felt should be accounted for during the audit.

DPHI's Senior Compliance Officer – Far North Region responded to the consultation request by stating:



I do not have any additional requests beyond the requirements of the 2020 Independent Audit Post Approval Requirements (IAPAR).

The correspondence between Water Technology and DPHI has been provided as Appendix D.

2.5 Site Inspection

The site inspection was undertaken at the Cairncross Waste Management Facility site on Thursday 29/01/2026 following receipt and review of most of the requested documentary evidence. This enabled comparison of site practices with environmental management measures set out in various management plans. The weather was fine. Photographs taken at the site inspection are included in Appendix E.

2.6 Site Interviews

Site interviews and discussions with key personnel, predominantly

- Emma Torain, PMHC - Project Officer Waste and Resource Recovery
- Sean McKinnon, PMHC – Senior Waste Planning Officer
- Michael Davis – Waste Manager
- John Collins – Waste Co-Ordinator
- Andrew Collins – Team Leader Cairncross

2.7 Compliance Status Descriptors

The audit findings were graded in accordance with the following Department of Planning and Environment classifications:

Compliant: The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.

Non-Compliant: The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

Not Triggered: A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

The terms partial compliance, partial non-compliance, not verified or administrative non-compliance were not used.



3 AUDIT FINDINGS

3.1 Approval and Document List

Within the Cairncross Facility Approval, the conditions are set out within a series of schedules. The findings have been attached as a series of documents which reflects this layout.

Thus, the detailed audit findings are presented in the attached schedules (Appendix C).

- Part A Administrative Conditions
- Part B Specific Environmental Conditions
- Part C Environmental Management, Reporting and Auditing

3.2 Audit Summary

The audit considered a total of 78 conditions of consent of which there were 156 separately assessable sub-conditions (items), and 2 clarifications (A16 and C17). In general, the operations were found to be compliant with the approval consent requirements, having 100 compliances. There were 3 non-compliances. Consequently, 2 corrective actions were raised. 53 conditions were not triggered and 1 opportunity for improvement were identified during this audit.

At the completion of the audit, an exit meeting was held with relevant staff in attendance. The meeting consisted of informal discussions on the non-compliances identified and the corrective actions that had been noted during the audit.

Following the audit, further information was provided by PMHC, and discussions undertaken with PMHC. During this period, if evidence was provided that was able to be sourced after the audit period, or a corrective action had been undertaken between the site audit and the preparation of this report, we have recorded it as compliant.

The corrective actions determined through these processes form the basis of the recommended actions list in Appendix F. The recommended actions include notification of non-compliances to DPHI and following upload timelines and identified opportunity for improvement.

3.3 Environmental Performance

This audit has found that the environmental performance of the project is good. PMHC's management has solid systems in place for the management of the development.

Information and documentation were made readily available during the site interviews. Where issues were noted, the site personnel were receptive to incorporating the points for improvement that were noted.

3.3.1 Physical extent of the development

During the site inspection, the physical extent of the development was reviewed against the approved plans and found to comply with the approved development boundary.

An assessment of actual impacts compared to predicted impacts documented in the environmental impact assessment was undertaken. The results are in Table 2.



Table 2: Comparison of actual impacts compared to predicted impacts

Aspect	Comparison of actual impacts compared to predicted impacts
Biodiversity	
A total of 3.4 hectares of Blackbutt - Pink Bloodwood shrubby open forest of the coastal lowlands of the NSW North Coast Bioregion (NR117) would be cleared for the Proposal which would require offsetting with 221 ecosystem credits. No threatened flora species listed under the TSC Act are considered likely to occur in the Development Site. Three threatened fauna species listed under the TSC Act were recorded in the Development Site: Species credits were calculated for these.	Actual impacts in line with predicted impacts. Purchase of credits is tied to Stage 3 so it was not within scope of the audit.
Soils	
Construction and operation of the Proposal would involve clearing of vegetation and significant earthmoving activities which will expose the soil and increase the risk of erosion and sedimentation.	A large sediment basin at the bottom of the site collects and treats surface water runoff.
Water quality: Surface water	
During construction and operation of the Proposal on-site detention basins will be used to capture and treat surface water runoff.	Sediment basins are being used and are treating surface water runoff. Clean water is being directed around the site.
Water quality: Groundwater	
If not managed appropriately, leachate has the potential to migrate outside of the lined landfill cell and result in soil, surface and groundwater contamination.	The leachate barrier and collection system has been installed. Leachate is being directed to the collection system. Leachate in excess of what was anticipated is being generated due to an extended wet period being experienced. To manage this, leachate is being transported offsite to the sewage treatment plant. PMHC is in the process of completing a modification to expand the onsite leachate storage capacity to provide additional storage to accommodate leachate requirements as new subcells are opened up.
Traffic	
The transport network has therefore been identified as having sufficient capacity to cater for the additional traffic	No traffic issues identified.
Greenhouse gas	
The Proposal would generate greenhouse gas (GHG) emissions from the use of machinery, vegetation clearing, transportation of waste, and waste decomposition.	Actual impacts in line with predicted impacts.
Aboriginal heritage	



Aspect	Comparison of actual impacts compared to predicted impacts
The assessments determined two Aboriginal artefacts, albeit of limited archaeological potential and low scientific/archaeological significance, are expected to remain somewhere within the Proposal Site. It is anticipated that these sites will be destroyed during the construction of the Proposal. An Aboriginal Heritage Impact Permit (AHIP) under section 90 of the <i>National Parks and Wildlife Act 1974</i> , or an approval under Part 4 or an Excavation Permit under section 139 of the <i>Heritage Act 1977</i> is not required for SSD that is authorised by a development consent.	Actual impacts in line with predicted impacts
Hazards and risks	
Existing procedures are in place at the Stage E landfill for the safe handling, containment of spills and storage of chemicals on-site.	Actual impacts in line with predicted impacts

3.3.2 Environmental Management Plans and Sub-Plans

A high-level assessment of whether environmental management plan and sub-plans are adequate was undertaken as part of this audit.

The project operates under a Landfill Environmental Management Plan (LEMP) Rev4 dated 15/08/2021, supported by a package of management plans. The requirements of the Conditions of Approval (CoA) and the Environmental Protection Licence (EPL) are incorporated into this framework documentation.

The LEMP was reviewed which also included the below sub-plans:

- Leachate Management Plan - Rev5 dated 14/12/2020
- Interim Leachate Management Plan - Rev2 dated 15/06/2025 (Appendix B of Cairncross Waste Management Facility – Modification of Consent SSD 5792 report)
- Water Management Plan - Rev7 dated 04/06/2021
- Vegetation Management Plan - Rev5 dated 27/08/2021
- Bush Fire & Fuel Management Plan - Rev4 dated 29/10/2020
- Landfill Gas Monitoring Plan - Part of LEMP.

These plans were reviewed in detail as part of the operations independent environmental audit. All plans were found to be adequate during this audit and the site operating in accordance with these plans

3.3.3 Agency Notices

There have been no agency notices.

3.3.4 Compliance Performance

The audit considered a total of 78 conditions of consent of which there were 156 separately assessable sub-conditions (items), and 2 clarifications (A16 and C17). In general, the operations were found to be compliant with the approval consent requirements, having 100 compliances. There were 3 non-compliances.



Consequently, 2 corrective actions were raised. 52 conditions were not triggered and 1 opportunity for improvement were identified during this audit.

A compliance summary is shown in Table 3. The corrective actions determined through these processes form the basis of the recommended actions list in Appendix F.



Table 3: Compliance Summary

Schedule	Number of compliant items	Number of non-compliant items	Number of not triggered items	Actions arising from- non-compliant items	Points for improvement on compliant items	Number of non-compliant Conditions (when items have deemed condition non-compliant)	Non-compliant Conditions (when items have deemed condition non-compliant)
A - Administrative Conditions	15	0	12	0	0	0	N/A
B – Specific Environmental Conditions	58	0	37	0	0	0	N/A
C – Environmental Management, Reporting and Auditing	27	3	4	2	1	3	C5, C8, C16
Total	100	3	53	2	1	3	



3.3.4.1 2023 Initial Operations Independent Environmental Audit

An Initial Independent Audit (Operations) was undertaken on 31/01/2023. The report was provided to Department of Planning and Environment (now DPHI) by PMHC in accordance with its approval requirements, and further PMHC sent a response to DPHI the on 19/07/2023, detailing the responses to the recommendations for the audit. The previous actions against non-compliances from this audit are as follows:

- **Condition B6(b)**

Proposed Action: Ensure processes are in place to record the volume and type of fill to be used when imported soil is sourced for capping material.

Status: Action completed

- **Condition B7(b)**

Proposed Action: Clean up litter at the bottom of the site.

Status: Action completed

- **Condition C18(a)**

Proposed Action: Include the link to the monitoring results on the main project page.

Status: Action completed

3.3.5 Complaints

There have been no complaints to report.

3.3.6 Incidents

There have been no incidents that would threaten to cause material harm to report.

3.3.7 Limitations

The process by which this monitoring report was conducted, including the sample of records selected and the method for examination used, followed established audit protocols and was in accordance with the best professional judgment of the auditor. It should be understood that the audit consisted of sample observations in a short span of time.

As part of the audit report, an action plan has been provided (Appendix F). This plan has been developed by Water Technology in consultation with PMHC. It is expected these actions and the efficacy of them, and any documentation produced to address the points for improvement and non-compliances raised in this audit and satisfy the relevant Condition requirements would be assessed in the next scheduled Independent Environmental Audit.



4 RECOMMENDATIONS

The audit considered a total of 78 conditions of consent of which there were 156 separately assessable sub-conditions (items), and 2 clarifications (A16 and C17). In general, the operations were found to be compliant with the approval consent requirements, having 100 compliances. There were 3 non-compliances. Consequently, 2 corrective actions were raised. 53 conditions were not triggered and 1 opportunity for improvement were identified during this audit.

The corrective actions raised and opportunity for improvement identified form the basis of the recommended actions list (Appendix F). It is required that PMHC reviews the Action List and fills out the columns titled 'Action to be Taken', 'By whom', and 'By when'. As part of the review of the draft report, this list has been reviewed by PMHC, who had no comments.

It is the responsibility of PMHC to monitor the progress of the Action List items and ensure close-out.

4.1 Non-Compliances

The audit considered a total of 78 conditions of approval, of which there were 156 separately assessable items derived from the conditions of approval. Three conditions (3 items) were found to be non-compliant. Table 3 provides the details of the compliance status of the project. The full details of the audit findings are provided in the schedules in Appendix C.

4.2 Recommended Actions

Actions to address non-compliances:

- C8 PMHC to notify Department within 7 days of any non-compliance.
- C5 and C16(c) Future documents to follow timelines outlined.

Opportunity for improvement

- C18(vi) Summary of monitoring is not comprehensive at present, but simply pages of tables. No explanation about results, if any were exceeding the limit and why. This would make it difficult for the public to digest.

There were 2 recommended actions for the 3 non-compliant items, as listed within Table 3. The corrective actions have been determined through the audit processes plus the opportunity for improvement, form the basis of the recommended actions list (Appendix F). It is required that PMHC reviews the Action List and fills out the columns titled 'Action to be Taken', 'By whom', and 'By when'. It is the responsibility of PMHC to monitor the progress of the Action List items and ensure close-out.



5 CONCLUSION

Water Technology undertook the 2026 Operations Independent Environmental Audit for the development identified as SSD-5792 of Cairncross Waste Management Facility. This document serves as the Independent Environmental Audit report.

The Cairncross Facility was audited against the following criteria:

- Development Consent for Application Number SSD 5792, Approved 5 November 2019.
- Department of Planning Industry and Environment (DPIE) Independent Audit Post Approval Requirements (2020).
- The feedback, requests, and/or comments of relevant agencies consulted.
- Any other relevant documentation, procedures or plans associated with the project.

Consultation was undertaken by Shireen Baguley on 16/01/2026 as part of the audit scope and in line with the conditions. DPHI's response was only to ensure that the requirements of the 2020 Independent Audit Post Approval Requirements (IAPAR) were satisfied.

The audit reviewed the Cairncross Facility's compliance via systems, documents, records, and procedures in relation to conditions of associated with the facility's operation.

The audit considered a total of 78 conditions of consent of which there were 156 separately assessable sub-conditions (items), and 2 clarifications (A16 and C17). In general, the operations were found to be compliant with the approval consent requirements, having 100 compliances. There were 3 non-compliances. Consequently, 2 corrective actions were raised. 53 conditions were not triggered and 1 opportunity for improvement were identified during this audit.



APPENDIX A DPHI AUDIT TEAM APPROVAL



Department of Planning, Housing and Infrastructure

Reference: SSD-5792-PA-38

Rachel Bennett
Innovation Process & Compliance Manager
Port Macquarie-Hastings Council

23/12/2025

Sent via the Major Projects Portal only

Subject: Cairncross Landfill Expansion - Independent Audit Team Proposal – Water Technology

Dear Rachel,

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Cairncross Waste Management Facility Expansion (**Project**). The request was submitted as required by Schedule 2, Condition C14 of SSD-5792, as modified (**Consent**), and the 2020 Independent Audit Post Approval Requirements (**IAPAR**) to NSW Department of Planning, Housing and Infrastructure (**Department**) on 23 December 2025.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Condition C15 of the Consent, and Section 3.1 of the IAPAR, as nominee of the Planning Secretary, I agree to the following independent audit team from Water Technology Pty Ltd:

- Shireen Baguley (Lead Auditor).
- Bethany Carlyon (Assistant Auditor).

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the IAPAR. Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development. The Department notes the same independent auditor cannot conduct more than three consecutive operational audits.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.

Department of Planning, Housing and Infrastructure

- The Lead Auditor must attend the site inspection component of the audit.
- Please append a signed Declaration of Independence Form for all members of the audit team to the audit report.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Astrid Christensen, Senior Compliance Officer, on 9274 6170 or email compliance@planning.nsw.gov.au.

Yours sincerely

Nick Ballard

Nick Ballard
Team Leader – Far North Region
Compliance

As nominee of the Planning Secretary



APPENDIX B DECLARATION OF INDEPENDENCE



Declaration of Independence Form - Auditor

Project Name	Cairncross Landfill Initial Independent Audit
Consent number	SSD 5792
Description of Project	Undertake an operational independent audit to assess compliance with SSD 5792 and associated documents.
Project Address	351 Telegraph Point Road, Pembroke, NSW, 2446.
Proponent	Port Macquarie-Hastings Council
Date	23/12/2025

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Shireen Baguley
Signature	
Qualification	Exemplar Global Certified Lead Environmental Auditor (125758)
Company	Water Technology



APPENDIX C AUDIT CHECKLIST TABLE



Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
A1 Obligation to Minimise Harm to the Environment	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the development, and any rehabilitation required under this consent	All phases	This audit	The site is being well run and managed. Mitigation measures as required are in place and these work to minimise risk of material harm to the environment.	Compliant
A2 Terms of Consent	The development may only be carried out: (a) in compliance with the conditions of this consent;	All phases	Conditions of consent This audit	The development is being carried out in compliance with the conditions of this consent with the few exceptions as noted elsewhere in these schedules.	Compliant
	(b) in accordance with all written directions of the Planning Secretary;	All phases	Planning Secretary Written Directions if Applicable	Proponent advised no written directions	Not Triggered
	(c) in accordance with the EIS and RTS Modification Assessments;	All phases	ETS and RTS Modification Assessments This audit	Compliance to the extent outlined in these schedules	Compliant
	(d) in accordance with the Development Layout in Appendix 1; and	All phases	Conditions of consent Appendix 1 Verified during site inspection This audit	Works onsite viewed and appear to be in accordance with the layout in Appendix 1.	Compliant
	(e) in accordance with the management and mitigation measures in Appendix 2.	All phases	Conditions of consent Appendix 2 Verified during site inspection This audit	Following the site inspection and desktop assessment, it was concluded that no evidence was sighted which indicates that PMHC did not carry out the development in accordance with the management and mitigation measures in Appendix 2 during the reporting period.	Compliant
A3 Terms of Consent	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, Reports covering 01/02/23-31/01/2026 or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and	At any phase	Planning Secretary Written Directions if Applicable	PMHC advised there has there have been no written directions from the secretary	Not Triggered
	(b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	At any phase	Planning Secretary Written Directions if Applicable	There have been no written directions from the secretary	Not Triggered
A4 Terms of Consent	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	At any phase	Planning Secretary Written Directions if Applicable	There have been no written directions from the secretary	Not Triggered
A5 Limits of Consent	This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.	All phases	Not applicable	Works have commenced onsite as per January 2021 and as such this condition does not apply.	Not Triggered
A6 Limits of Consent	The Applicant must not receive more than: (a) 150,000 tonnes of general solid waste (putrescible) waste per year on site for landfill disposal;	All phases	Summary waste reports for the periods 12/11/22-11/11/2023, 12/11/2023-11/11/2024 and 12/11/2024-11/11/2025. Weighbridge Reports covering 01/02/23-31/01/2026 Annual Returns covering 01/02/23-31/01/2026	Summary waste reports for the periods 12/11/22-11/11/2023, 12/11/2023-11/11/2024 and 12/11/2024-11/11/2025. Assuming "Net" in these reports signifies tonnes of waste. The weighbridge report uses different category names for the types of waste, so a bit hard to match. However, the total for all waste types received in 22-23 = 101,241.14 TPA, 23-24 = 121,980.51 TPA and 24-25 =77,988.47 TPA. Documents: Cairncross waste to landfill classification 12.11.23 – 11.11.24.xlsx & Cairncross waste to landfill classification 12.11.24 – 11.11.25.xlsx show Putrescible (t) as 43,520 and 44,030, which is below the 150,000 t/yr limit.	Compliant
	(b)50,000 tonnes of general solid waste (non-putrescible) and asbestos waste per year on site for landfill disposal;	All phases	Waste Records 01/02/23-31/01/2026 Weighbridge Reports covering 01/02/23-31/01/2026 Annual Returns covering 01/02/23-31/01/2026	Summary waste reports for the periods 12/11/22-11/11/2023, 12/11/2023-11/11/2024 and 12/11/2024-11/11/2025. Assuming "Net" in these reports signifies tonnes of waste. The weighbridge report uses different category names for the types of waste, so a bit hard to match. However, the total for all waste types received in 22-23 = 101,241.14 TPA, 23-24 = 121,980.51 TPA and 24-25 =77,988.47 TPA. Documents: Cairncross waste to landfill classification 12.11.23 – 11.11.24.xlsx & Cairncross waste to landfill classification 12.11.24 – 11.11.25.xlsx show Non-Putrescible (t) as 35,404 and 24,135, which is below the 50,000 t/yr limit.	Compliant
	(c) the quantity of waste required to meet the final landform profile described in the RTS and shown in Appendix 4	At Stage 3	Waste Records 01/02/23-31/01/2026 Weighbridge Reports covering 01/02/23-31/01/2026 Annual Returns covering 01/02/23-31/01/2026	As the development is still at Stage 1, it is not near its final landform yet, however review of waste Records 01/02/23-31/01/2026 sighted for this period confirmed that the landfill received wastes that were below the threshold limits specified in condition A6a and A6b.	Compliant
A7 Notification of Commencement	The date of commencement of operation of the development must be notified to the Department in writing, at least one month before that date.	One month before commencement of Stage 1	Evidence of department notification one month prior to commencement	From the last Independent Audit Reports covering 01/02/23-31/01/2026 by Molino Stewart (now Water Technology) it was stated that a letter from Michael Magalhaes, Waste Manager (PMHC) dated 27 November 2020 to Heidi Waters (DPIE) outlines that construction was anticipated to commence in January 2021. The letter is dated at least one month prior to commencement date.	Compliant
A8 Notification of Commencement	The Applicant must notify the Department in writing at least one month before the commencement of landfilling in Stage 1, Stage 2 and Stage 3 of the development	One month before commencement of Stage 1, Stage 2 and Stage 3	Evidence of department notification one month prior to commencement of landfilling	A letter from Sean McKinnon Acting Waste Manager (PMHC) dated 8th April 2022 to Heidi Waters (DPIE) was sighted by the Compliance Officer. The letter outlines the intent to commence landfilling after 6th May 2022. The commencement date ended up being 20th July 2022.	Compliant
A9 Evidence of Consultation	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) Consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and	All phases	Evidence of consultation with relevant party (overall compliance dependent on outcome of relevant conditions)	As per the 2023 audit, conditions B11(b), B17(b), B27(a) and B34(a) requiring consultation with relevant parties were deemed compliant, which remains the case for this audit. Condition B26 was deemed not triggered. In 2026, Condition B26 is deemed compliant. A letter from DPIE (dated, 19 October 2021) to PMHC sighted, providing Secretary approval for the VMP Rev 5 dated 27 August 2021, prepared by Arcadis was sighted along with the VMP. Section 5.2.5 of the VMP provides for the agreed timing for establishing the koala connectivity corridor.	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
	(b) Provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	All phases	Evidence of consultation with relevant party (overall compliance dependent on outcome of relevant conditions)	As per the 2023 audit, conditions B11(b), B17(b), B27(a) and B34(a) requiring consultation with relevant parties were deemed compliant, which remains the case for this audit. Condition B26 was deemed not triggered. In 2026, Condition B26 is deemed compliant. A letter from DPIE (dated, 19 October 2021) to PMHC sighted, providing Secretary approval for the VMP Rev 5 dated 27 August 2021, prepared by Arcadis was sighted along with the VMP. Section 5.2.5 of the VMP provides for the agreed timing for establishing the koala connectivity corridor.	Compliant
A10 Staging, Combining And Updating Strategies, Plans or Programs	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	All phases	Relevant strategy/plan or program, if applicable	Not applicable. The staging is referring to documents associated with the development, not the actual staging of the landfill itself as that has already been approved.	Not Triggered
	(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	At any phase	Relevant strategy/plan or program, if applicable	Not applicable. The staging is referring to documents associated with the development, not the actual staging of the landfill itself as that has already been approved.	Not Triggered
	(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	All phases	Relevant strategy/plan or program, if applicable	Not applicable. The staging is referring to documents associated with the development, not the actual staging of the landfill itself as that has already been approved.	Not Triggered
A11 Staging, Combining And Updating Strategies, Plans or Programs	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	All phases	Relevant strategy/plan or program, if applicable	Not applicable. The staging is referring to documents associated with the development, not the actual staging of the landfill itself as that has already been approved.	Not Triggered
A12 Staging, Combining And Updating Strategies, Plans or Programs	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	All phases	Relevant strategy/plan or program, if applicable	Not applicable. The staging is referring to documents associated with the development, not the actual staging of the landfill itself as that has already been approved.	Not Triggered

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
A13 Compliance	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	All phases	Solid Waste SOP Manual (February 2025): SOP42 Training Procedures SOP55 Chain of Responsibility SOP34 Operational Non-Conformances (Manual includes document training provisions and staff acknowledgement mechanism) Training records: Training History Records.xlsx; Accreditations.xlsx; Copy of Accreditations Cairncross staff.xlsx Landfill Environment Management Plan (LEMP) Rev4 dated 15/08/2024, prepared by Arcadis Staff interviews Staff training records	LEMP Rev4 dated 15/08/2021 sighted. Section 5.2 lists a summary of relevant licence and approval conditions under the required training. This section also states that besides the waste services coordinator, all staff must undertake training about the types of waste accepted at the facility and asbestos management procedures. Documented training and responsibility frameworks exist (SOP42, SOP55) and a non-conformance process exists to drive corrective instruction where requirements are not met (SOP34). This strengthens evidence that Council has a structured mechanism to communicate operational obligations. PMHC advised All staff are inducted with the most recent version of the Solid Waste Management Operational Policies, Standard Operating Procedures and Safe Work Method statements which covers conditions of consent. 13 staff are attached at the facility. Accreditations register includes a broader cohort of personnel associated with Waste/Cairncross (12 names identified in the register's "Section" field entries relevant to Waste/Cairncross). Council has now confirmed the current Cairncross staff cohort (13 personnel) in email of 28/1/26. Training extracts provided in this tranche only cover 2 staff members; these records show only 1 completed 'Asbestos Awareness in the Workplace' on 21/01/2026. Sighted staff and contractor induction material onsite for new starter and contractors for various roles. Council is using a 'Pulse' system, it shows the asbestos training. Council is working towards this being a collated system of training records	Compliant
A14 Operation of Plant and Equipment	All plant and equipment used on site, or to monitor the performance of the development, must be: (a) maintained in a proper and efficient condition; and	All phases	Solid Waste – Management Policies, SOPs and SWMS (Jan 2026) – relevant operational procedures for waste receipt, load inspection/rejection, asbestos/hazardous waste handling, landfill operational controls (cover/compaction), dust/track-out controls, incident/non-conformance management.	Via SOP, documented procedures are in place describing the required control(s) Maintenance records for 2x excavators which occurred on 20/1/25 and 10/2/25 and for Tana 9/1/25 and 19/2/25. Equipment gets serviced as needed.	Compliant
	(b)operated in a proper and efficient manner.	All phases	Accreditations (20) spreadsheet Accreditations (30) spreadsheet 28/1/26 Copy of Accrediations Cairncross staff spreadsheet Training History Records (5) spreadsheet Plant pre-start check records Plant servicing / maintenance records for major plant items Service reports (Jan–Feb 2025) Competency/licence evidence: accreditation register(s) listing plant competencies and driver licences; Verification of current Competency/Staff training Records for operating plant and equipment Solid Waste SOP Manual (Feb 2025): SOP41 Safe Use and Repair of Equipment SOP28 Landfill Compactor SOP10 Excavator Operation SOP52 Front End Loader (FEL) Operation SOP53 Excavator Operation – Pushing down transfer bin waste	Accreditations (20) spreadsheet says some drivers licences have expired. Most in order. the two accreditation datasets contain discrepancies and show some items recorded as expired (e.g., driver licence entries) while another dataset records differing status for the same person.Verification of current Competency/Staff training Records for operating plant and equipment Council has now confirmed the current Cairncross staff cohort (13 personnel) in email of 28/1/26. Training extracts provided in this tranche only cover 2 staff members; these records show only 1 completed 'Asbestos Awareness in the Workplace' on 21/01/2026. (see A13) Sighted Pulse system where the other staff member has active asbestos for supervisor and awareness. Sighted contractor records for new swarters and other contractors for site work e.g. litter ,asset mgr etc Site inspection: verified that interim controls (spill kits/drip trays/clean-up procedures) are implemented where leaks are identified pending repair.	Compliant
A15 Utilities and Services	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	All phases	Service provider approvals if relevant Staff interviews	During the audit interview, PMHC advised that no utility works were carried out during the reporting period.	Not Triggered
A16 Applicability of Guidelines	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	All phases	Noted	Clarification only.	
A17 Applicability of Guidelines	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	All phases	Staff interview re Planning Secretary Written Directions if Applicable	During the audit interview, PMHC advised that no written directions were received during the reporting period.	Not Triggered

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
Waste Management					
B1 Receipt, Storage and Handling of Waste	The Applicant must only receive waste on site that is authorised for receipt by an EPL.	All phases	Solid Waste SOP Manual (Feb 2025): SOP24 Inspection of Loads SOP7 Waste Classification Assessments SOP22 Hazardous Substances/Dangerous Goods Management SOP47 WasteMan Software; SOP44 Vehicle Records Waste Records during audit period LEMP Rev4 dated 15/08/2021, prepared by Arcadis 2023, 2024, 2025 Annual Returns Waste records / weighbridge summaries within audit period (01/02/2023–31/01/2026) (e.g. Summary Waste Report 12/11/2024–11/11/2025). PIRMP (Public Website Version 2023/2024) and PMHC website PIRMP PDF (Nov 2025 version) Site inspection and staff interviews : weighbridge, transfers station, waste separation Waste acceptance decision-making correspondence (e.g., North Haven Surf Club septic/grease trap solids email chain).	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.1 states types of waste acceptable and explicitly lists hazardous wastes as excluded from disposal at the landfill. It also states that loads containing excluded waste will not be accepted and will be diverted from the site. SOPs outline receipt controls: load inspection (SOP24), classification processes (SOP7) and management pathways for hazardous substances (SOP22), supported by transaction/record systems (SOP47/SOP44). Acceptable waste types received based on 2023-2025 waste records. No non-compliances in 2023-2025 annual returns relating to waste types. Waste records show the site manages a range of streams including items labelled as hazardous/chemicals (e.g., "Paint <100L", "Fluorescent Tubes", "Hazardous By-Catch"), and other special streams (e-waste, car batteries, solar panels). Noted in waste records some minor amounts reported to be onsite. Interviews to clarify acceptance of hazardous wastes: Any hazardous wastes identified at weigh bridge are moved to the transfer station and then taken offsite to Kingfisher. The transfer station is outside of the boundary area. Hazardous/chemical streams are managed solely in the Transfer Station/CRC function (not landfilled); The PIRMP confirms that household hazardous materials are received at the Transfer Station, stored in a designated hazardous materials area, transferred to Port Macquarie ETS where they are removed by an EPA hazardous waste contractor, within an EPL-linked framework. This supports that these streams are managed as segregated/temporary storage for offsite removal, rather than being accepted for landfill disposal. Correspondence regarding septic/grease trap solids demonstrates that where waste streams are not clearly pre-classified/authorised, the site applies a conservative approach and does not accept the material without appropriate classification/authorisation	Compliant
B2 Receipt, Storage and Handling of Waste	The Applicant must ensure any waste generated on the site is classified in accordance with the EPA's Waste Classification Guidelines 2014 or its latest version and disposed of to a facility that may lawfully accept the waste.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Solid Waste SOP Manual (Feb 2025): SOP7 Waste Classification Assessments; SOP57 Waste Vouchers; SOP22 Hazardous Substances/Dangerous Goods Management Summary waste reports x3 covering 12/11/23-11/11/25 2023, 2024, 2025 Annual Returns 3x emails with waste classification reports/procedures (Rix, North Haven Surf Club, Koree Island, Owen St Port Macquarie) PIRMP (Public Website Version 2023) – describes household hazardous materials storage and regular collection by EPA hazardous materials contractor (Cleanaway).	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.1 mentions classifications of waste acceptable. No non-compliances on 2023-2025 annual returns based on waste classification. Sighted 3x emails with examples of Council's due diligence and requiring waste classification prior to accepting the waste. The SOP manual evidences a classification framework (SOP7) and traceability mechanisms (SOP57). The PIRMP documents a lawful offsite management pathway for household hazardous materials (designated storage area and contractor collection).	Compliant
B3 Receipt, Storage and Handling of Waste	The Applicant must provide details of the quantity, type and source of wastes received on the site to the EPA and the Planning Secretary when requested.	All phases	Correspondence with EPA/Planning Secretary if received. Solid Waste SOP Manual (Feb 2025): SOP47 WasteMan Software; SOP44 Vehicle Records; SOP47.1 WasteMan Deleted Transaction Reports; SOP57 Waste Vouchers 2023, 2024, 2025 Annual Returns Staff interviews	The LEMP documents a weighbridge-based waste acceptance system that records key details for incoming loads, supporting the ability to produce quantity and type (and, via customer/vehicle records, source) when required. Waste tracking managed through WasteMan weighbridge software. Waste reporting outputs provided demonstrate the facility can compile and present waste receipt data for defined periods. The SOP manual demonstrates systems exist to generate auditable waste datasets (SOP47/SOP44/SOP47.1) No EPA/Planning Secretary request for B3 information was made during this audit period; annual returns and routine EPA interactions occurred.	Not Triggered
B4 Waste Monitoring	From the commencement of landfilling, the Applicant must monitor incoming waste for the development. The Applicant must: (a)document the quantity, type and source of wastes received on site via a controlled tracking system;	All phases	Product by time compliance report 12.11.23 to 11.11.24 acts as controlled tracking system log Waste Records for period LEMP Rev4 dated 15/08/2021, prepared by Arcadis 2023, 2024, 2025 Annual Returns	LEMP version 4 dated 15/08/2021 sighted. Section 2.2.4 mentions that timeframe, scope and responsible party for waste monitoring. Waste is tracked on an internal system whereby reports can be produced for certain sites/dates. Sighted 2023-2025 waste records, quantity and types are listed.	Compliant
	(b)ensure that staff receive adequate training to be able to recognise and handle any hazardous waste, asbestos or prohibited waste.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Solid Waste SOP Manual (Feb 2025): SOP24 Training Procedures; SOP24 Inspection of Loads; SOP2 Asbestos Removal and Disposal; SOP22 Hazardous Substances/Dangerous Goods Management; SOP25 Incident Reporting Staff induction material Asbestos awareness training records for all staff - new spreadsheet 28/1/26	LEMP version 4 dated 15/08/2021 sighted. Section 5.2 states that besides the waste services coordinator, all staff must undertake training about the types of waste accepted at the facility and asbestos management procedures. SOPs provide clear procedural controls for recognising/handling asbestos and hazardous materials (SOP2, SOP22) and a load inspection control (SOP24), supported by a training framework (SOP42). Competency/Staff training Records for operating plant and equipment Council has now confirmed the current Cairncross staff cohort (13 personnel) in email of 28/1/26. Training extracts provided in this tranche only cover Andrew Collins and Jason (Ronald) Cooper; these records show Ronald Cooper completed 'Asbestos Awareness in the Workplace' on 21/01/2026.	Compliant
B5 Landfill Operations	The Applicant must: (a) minimise the exposed or cleared areas at the landfill;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP6.1 Control and Placement of Waste; SOP5 Covering of Waste & Litter Control; SOP39.2 Cairncross weekly checklist (includes "Active tipping face less than 20m x 30m... or as small as practicable"). weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 states that staff will restrict the tipping face to about 600 m2 (e.g. 30 m x 20 m), depending on the level of demand and where health and safety considerations allow Documented controls exist and weekly checklist includes tipping face size control. The weekly SOP39.2 inspection checklists provide direct operational evidence that: -the tipping face is controlled, waste is compacted and covered, cover supply is available and exposed surfaces not present. Site inspection found good management with cleared areas minimised.	Compliant
	(b) ensure a compaction of 650 kilograms per cubic metre is achieved for each 50,000 tonnes of waste disposed on the site;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Volumetric surveys; Volumetric Survey / LFIC – June 2023 (signed) reporting average compaction rate ~0.72 t/m³. Volumetric Survey Checklist & LFIC – June 2025 reporting average compaction rate ~0.82 t/m³.	LEMP Rev4 dated 15/08/2021, prepared by Arcadis. Section 2.2.2.2 states deposited waste will be progressively consolidated and compacted in layers of about 500 mm depth, using a compactor. Layers of compacted waste will be built up during the day's operations to a maximum depth of 2 m. It also states that the intermediate cover will be compacted to reach a saturated hydraulic conductivity of less than 1x10-5 m/s with a compaction of 95% standard maximum dry density. Compaction rates between June 2023-2025 ranged between 720-850 kg/cubic m.	Compliant
	(c) cover all landfilled waste in accordance with the requirements of the EPA's Environmental Guidelines: Solid Waste Landfills 2016 or its latest version;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP5 Covering of Waste & Litter Control weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 states that as required by the Landfill Guidelines, waste will be covered daily and at intermediate stages of operation to minimise odour, dust, litter, the presence of scavengers and vermin, the risk of fire, rainwater infiltration into the waste (and therefore the amount of leachate generated) and the emission of landfill gas. It also states that during filling of Stages 1 and 2, a clay deficit is expected for each stage (see Table 3-2). Clay from Stage E excavation is not available for daily cover during filling of Stages 1 and 2 therefore daily cover material and clay will need to be externally sourced. For Stage 3, sufficient clay is expected to be available for daily cover from the landfill excavation The weekly SOP39.2 inspection checklists provide direct operational evidence that:-the tipping face is controlled, waste is compacted and covered, cover supply is available and exposed surfaces not present Site inspection - only a very small area of exposed tip face	Compliant
	(d) ensure cover material is either overburden or Virgin Excavated Natural Material (VENM), or another alternative material approved in writing by the EPA;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LFIC / stockpile information (June 2025) – tracking of stockpiles including VENM and other materials. Staff interviews Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 states that daily cover will comprise natural site soils and will be applied at a minimum thickness of 150 mm. Existing daily cover is sourced from clay stockpiled from the Stage 1 landfill excavation and other sources as required. It also states that cover material will be sourced from excess excavated material from landfill cells. PMHC staff advised VENM won onsite is used for cover material Site inspection: provide/sight cover placement and cover is ready to be placed at the end of the day. Sufficient cover available . Will need to be further examined next audit	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
	(e) maintain at least two weeks of cover material on the site; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Volumetric Survey Checklist and LFIC – June 2025 (includes capacity/void calculations and stockpile information). Landfill Stockpile information and survey plan – June 2025 (stockpile locations and volumes). Signed volumetric survey forms (e.g., June 2023; July 2024) evidencing periodic measurement/reporting. Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 states that As progressive lifts of waste are added to previously placed and compacted waste, the cover is stripped away in advance of filling over at least 50% of the area to be filled daily to allow for long-term vertical movement of leachate. LEMP commits to maintaining sufficient cover material on site. Stockpile plans demonstrate that stockpiles are identified and quantified at least at survey points. Survey/LFIC documentation provides quantified records of landfill volumes and identifies stockpile volumes/types (including fill-related materials), demonstrating that records of volume and type are maintained in a structured and auditable form. The weekly SOP39.2 inspection checklists provide direct operational evidence that: the tipping face is controlled, waste is compacted and covered, cover supply is available and exposed surfaces not present Site inspection: there is sufficient material demonstrating ≥2 weeks supply confirmed during site inspection.	Compliant
	(f) ensure landfill cells are capped progressively during operation.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Survey documentation/stockpile plan noting capped areas/subsidence/vegetation on older capped cell areas (June 2025; Dec 2023 plan). Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 states an intermediate cover of 300 mm will be applied to surfaces which will be unused for a period of 90 days or more. It also states that covered sections of the landfill will be graded to drain rainfall runoff away from the tipping face. verified during site inspection that there has been temporary capping in place (300mm). On next lift this will be stripped back and filled to final height. Final capping will occur by next audit.	Compliant
B6 Imported Soil	The Applicant must: (a) ensure that only VENM, Excavated Natural Material (ENM), or other material approved in writing by EPA is used for capping the landfill;	All phases	LFIC / volumetric reporting and stockpile plans (e.g., June 2025 stockpile information) – demonstrates VENM stockpiles are tracked and quantified. LEMP Rev4 dated 15/08/2021, prepared by Arcadis Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2 states that during filling of Stages 1 and 2, a clay deficit is expected for each stage (see Table 3-2). Clay from Stage E excavation is not available for daily cover during filling of Stages 1 and 2 therefore daily cover material and clay will need to be externally sourced. Management documentation supports that capping/cover materials are intended to be limited to overburden/VENM (and, by extension, compliant with the B6 requirement), and stockpile records show VENM is tracked on site. PMHC advised capping has not commenced and daily cover material is sourced on site.	Not Triggered
	(b) keep accurate records of the volume and type of fill to be used; and	All phases	Volumetric Survey Checklist and LFIC – June 2025 (includes capacity/void calculations and stockpile information). Landfill Stockpile information and survey plan – June 2025 (stockpile locations and volumes). Signed volumetric survey forms (e.g., June 2023; July 2024) evidencing periodic measurement/reporting.	Survey/LFIC documentation provides quantified records of landfill volumes and identifies stockpile volumes/types (including fill-related materials), demonstrating that records of volume and type are maintained in a structured and auditable form. Capping has not commenced.	Not Triggered
	(c) make these records available to the EPA and the Planning Secretary upon request.	All phases	Staff interview	Capping has not commenced.	Not Triggered
B7 Litter and Pest Control	The Applicant must: (a) implement suitable measures to prevent the unnecessary proliferation of litter both on and off site, including the installation and maintenance of a mesh fence of not less than 1.8 metres high around the perimeter of the active landfill cell; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Weekly checklists. SOPS Covering of Waste & Litter Control SOP39.2 Site Inspection and Audit Checklists – Cairncross Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.3.8 states all litter fences, perimeter fences and gates are inspected daily and cleared of litter as required. Weekly checklists allow for verifying whether the fencing is in good condition. SOPS Covering of Waste & Litter Control (daily covering for Cairncross; litter control purpose; includes cover thickness and frequency; also states "two weeks' worth of cover material must be available onsite"). SOP39.2 Site Inspection and Audit Checklists – Cairncross (Frequency: WEEKLY; includes "Good housekeeping... litter collected" and perimeter fence line checks). The SOP manual provides documented litter control measures through operational covering and housekeeping controls (SOPS) and weekly inspection prompts (SOP39.2). This supports that litter management is an embedded operational control. Sighted staff clearing the area outside of the boundary fence (see photo) and the inside of the site was tidy.	Compliant
	(b) inspect and clear the site (and surrounding area, where necessary) of litter on at least a weekly basis.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Weekly checklists. SOPS Covering of Waste & Litter Control SOP39.2 Site Inspection and Audit Checklists – Cairncross Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.3.8 states all litter fences, perimeter fences and gates are inspected daily and cleared of litter as required. Weekly checklists allow for verifying whether the fencing is clean. SOPS Covering of Waste & Litter Control (daily covering for Cairncross; litter control purpose; includes cover thickness and frequency; also states "two weeks' worth of cover material must be available onsite"). SOP39.2 Site Inspection and Audit Checklists – Cairncross (Frequency: WEEKLY; includes "Good housekeeping... litter collected" and perimeter fence line checks). Sighted staff clearing the area outside of the boundary fence (see photo) and the inside of the site was tidy.	Compliant
B8 Litter and Pest Control	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Weekly checklists. Solid Waste SOP (Feb 25) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.2.2 Waste process and cover states 'as required by the Landfill Guidelines, waste will be covered daily and at intermediate stages of operation to minimise odour, dust, litter, the presence of scavengers and vermin, the risk of fire.' Section 6.3.5.4 Noxious weeds notes the weeds present and in Table 6.8 says 'Management and disposal of weeds (including declared noxious weeds) in accordance with requirements of the Biosecurity Act 2015; and Weeds management measures are discussed in Section 2.3.10 of this plan. Weekly checklists include pests and vegetation checks. No issues sighted onsite	Compliant
	(b) inspect the site on a regular basis to ensure these measures are effective, and pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area. <i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Biosecurity Act 2015.</i>	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Weekly checklists. Solid Waste SOP (Feb 25) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.3.10 discusses weeds management measures. Weekly checklists include pests and vegetation checks. No issues sighted onsite.	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
Leachate					
B9 Leachate Barrier and Collection System	The Applicant must design, install and manage the leachate barrier and collection system in accordance with the requirements of the EPA's Environmental Guidelines: Solid Waste Landfills 2016 or its latest version, or as otherwise approved by the EPA.	All phases	SSD-5792-MOD-1 Instrument (B9 amended) Council response to DPE RFI (28 Aug 2023) explaining need for "otherwise approved by EPA" and referencing EPA/EPL conditioning of the Interim Leachate Management Plan. Arcadis Mod Report (16 Jan 2023) incl. Appendix B ILMP (v2 15/06/2022) and Appendix C options assessment EPL 11189 (version 21 May 2025): O6.3–O6.5; E2.1 Cairncross Leachate Status Report 12 Jul – 25 Jul 2025. Cairncross Leachate Status Report 26 Jul – 11 Sept 2025. Cairncross Leachate Status Report 12 Sept – 10 Oct 2025. Cairncross Leachate Status Report 11 Oct – 16 Nov 2025. Cairncross Leachate Status Report 17 Nov – 21 Dec 2025 Solid Waste SOP Manual (Feb 2025); SOP27 Leachate Quality Monitoring; SOP29 Leachate Collection and Disposal System – Capped Landfill (not active); SOP39.2 checklist (includes leachate eruption, leachate system inspection prompts). Verified during site inspection	SSD 5792 Mod 1 approved by DPE on 31 August 2023 proposed to modify the leachate- barrier and collection system to increase the leachate storage capacity of the landfill in order to manage the risk of significant leachate generated from the landfill cells in Stage 1. EPL now explicitly requires leachate barrier/collection design and installation consistent with EPA Solid Waste Landfills (2016) Minimum Standards and equivalent/better performance, and requires the leachate system to capture all leachate generated (O6.3–O6.5). EPL also imposes a current compliance driver via E2.1 quarterly ILMP progress reporting from 1 July 2025, indicating EPA oversight of ILMP completion/implementation SOPs support ongoing leachate monitoring/inspection practices (SOP27; SOP39.2). Leachate status reporting demonstrates ongoing management of the leachate collection and storage system, including monitoring of rainfall and internal cell pressure, documented valve operations, routine leachate removal and disposal (including transition to in-house transport and disposal to Port Macquarie STP under a trade waste agreement from 21 Oct 2025), bunding repairs/thickening (10 Sept 2025) and inclusion of leachate laboratory test results. Notwithstanding the above, the status reporting also records a cell leak and failure of interim bunding (22 May 2025) directing leakage to the southern sediment dam, with sucker trucks and pumping used to manage impacts. This indicates the leachate barrier/collection system has not fully contained leachate at all times and has required interim containment/response measures. PMHC advised that: - leachate is managed per the Leachate Management Plan, 2020. - the implementation of the interim plan has commenced:- Pad is under construction,- Procurement for tank is being progressed (PO raised),- Leachate treatment system design being finalised - contractor engaged. Sighted pad construction onsite. The tipping area is kept as small as possible, and the landfill is filled in stages from the completed sections outward, allowing for maximum compaction and minimum water infiltration.	Compliant
B10 Leachate Barrier and Collection System	All above ground storage tanks containing material that may cause material harm must be bunded or have an alternative spill containment system in place.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Operational Compliance Report- site inspection comment that the two leachate storage tanks were satisfactorily bunded. Mod 1 RFI response & Department assessment – notes proposed additional tanks would not be in a bunded area (relevant if constructed). EPL 11189 (version 21 May 2025): O6.3–O6.5; E2.1 Solid Waste SOP Manual (Jan 2026): SOP4 Clean-up of Oil Spills on Land; SOP9 Environmental Emergency Response; SOP25 Incident Reporting; SOP39.2 checklist ("Chemicals and hazardous materials properly stored (eg. bunding is adequate)..." Staff interview weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024)	LEMP Rev4 dated 15/08/2021 sighted. Section 5.2.2 discusses the bunding required. The LMP Rev 5 describes the existing leachate storage tanks as located within a clay-bunded area designed to capture overflow/spills, and earlier compliance inspection records state the two leachate storage tanks were satisfactorily bunded. Mod 1 documentation identifies that proposed additional tanks would not be bunded (and therefore would require an alternative spill containment system if installed). However, in the audit inception meeting 19/01/2026, Rachel stated that in practice the tank gets emptied and the leachate is trucked and transported offsite. EPL now explicitly requires leachate barrier/collection design and installation consistent with EPA Solid Waste Landfills (2016) Minimum Standards and equivalent/better performance, and requires the leachate system to capture all leachate generated (O6.3–O6.5). EPL also imposes a current compliance driver via E2.1 quarterly ILMP progress reporting from 1 July 2025, indicating EPA oversight of ILMP completion/implementation The weekly inspection checklist includes a line under water quality/housekeeping to the effect that chemicals/hazardous materials are properly stored and bunding is adequate with no evidence of leakage/spills (ticked in the samples shown). This is supportive evidence of routine bunding/containment checks.	Compliant
B11 Leachate Management Plan	Prior to the commencement of landfilling, the Applicant must prepare a Leachate Management Plan (LMP) to the satisfaction of the Planning Secretary. The LMP must: (a) be prepared by a suitably qualified and experienced person(s);	Stage 1	ILMP dated 15/06/2022 LMP Rev5 dated 14/12/2020, prepared by Arcadis - status update Qualifications of person preparing LMP Rev5 dated 14/12/2020, prepared by Arcadis - status updateEvidence of secretary satisfaction prior to commencement of landfilling	Letter from Chris Ritchie (DPE) dated 23/12/2020 sighted states that DPE was satisfied with Leachate Management Plan, Revision 5, dated 14 December 2020, prepared by Arcadis Pty Ltd. Qualifications and experience of author (Doug Craven) detailed on page 2 of LMP.	Compliant
	(b) be prepared in consultation with the EPA;	Stage 1	Staff interview ILMP dated 15/06/2022 LMP Rev5 dated 14/12/2020, prepared by Arcadis - status update Evidence of consultation with EPA	A letter from Scott Hunter of EPA dated 11/12/2020 was sighted which indicates that the EPA has reviewed the management plans. For SSD 5792 MOD 1 changes, correspondence between Sean McKinnon of Council and Jarrod Grimston of NSW EPA in the period between 23/06/2022 to 29/11/2022 demonstrated a consultative process in the preparation and design of the Interim Leachate Management Plan.	Compliant
	(c) detail measures to collect and store all leachate and prevent leachate from escaping to surface water, groundwater or the surrounding soils;	Stage 1	Leachate Management Plan Containing Content in line with condition	LMP Rev5 dated 14/12/2020 prepared by Arcadis sighted. Section 5 details measures to collect and store all leachate and prevent leachate from escaping to surface water, groundwater or the surrounding soils.	Compliant
	(d) include best management practices and best available technology to reduce the potential for surface water to be contaminated with leachate during landfilling;	Stage 1	Leachate Management Plan Containing Content in line with condition	LMP Rev5 dated 14/12/2020 prepared by Arcadis sighted. Section 5.3, 5.4 and 5.5 includes best management practices and best available technology to reduce the potential for surface water to be contaminated with leachate during landfilling.	Compliant
	(e) detail contingency measures for managing any leachate contamination in groundwater, surface water and surrounding soils.	Stage 1	Leachate Management Plan Containing Content in line with condition	LMP Rev5 dated 14/12/2020 prepared by Arcadis sighted section 5.5. and 6 details contingency measures for managing any leachate contamination in groundwater, surface water and surrounding soils.	Compliant
B12 Leachate Management Plan	The Applicant must: (a)not commence landfilling until the LMP required by condition B1 1 is approved by the Planning Secretary; and	Stage 1	Evidence of secretary satisfaction prior to commencement of landfilling	Letter from Chris Ritchie (DPIE) dated 23/12/2020 sighted states that DPIE was satisfied with Leachate Management Plan, Revision 5, dated 14 December 2020, prepared by Arcadis Pty Ltd.	Compliant
	(b)implement the most recent version of the LMP approved by the Planning Secretary for the duration of the development.	All phases	ILMP Evidence of secretary satisfaction prior to commencement of landfilling - development and implementation of ILMP, Cairncross Leachate Status Report 12 Jul – 25 Jul 2025. Cairncross Leachate Status Report 26 Jul – 11 Sept 2025. Cairncross Leachate Status Report 12 Sept – 10 Oct 2025. Cairncross Leachate Status Report 11 Oct – 16 Nov 2025. Cairncross Leachate Status Report 17 Nov – 21 Dec 2025 Pump maintenance records	23 Jan 2026 covering email states that the Arcadis v5 plan is not superseded, and that the "interim system is considered an addendum"; it also states implementation activities have commenced (pad construction, tank procurement, treatment system design). The 2025 leachate status reports show the site is actively managing leachate through operational controls and transport arrangements, which is consistent with implementing leachate management measures, Mod 1 provides the formal framework for the interim system and explains why it was needed; the 2025 status reports provide evidence of ongoing management and response measures following leachate issues, including a leak and bunding works. Invoices for pump maintenance with descriptions of works done. Serviced as needed approximately twice a year.	Compliant
Surface Water and Groundwater					
B13 Erosion and Sediment Control	Prior to any surface disturbance for Stage 1, Stage 2 and Stage 3, the Applicant must install and maintain suitable erosion and sediment control measures on site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004). Discharge Limits	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis WMP Rev7 dated 04/06/2021 prepared by Arcadis Any evidence of maintenance of measures during construction period e.g. reports, photos etc weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024 Verified during site inspection current erosion/sediment controls are installed and maintained in accordance with the WMP	Construction audits for Stage 1 constructions works found adequate erosion and sediment control in place prior to Stage 1 works commencing. LEMP Rev4 dated 15/08/2021 sighted. Appendix A2 lists a summary of mitigation measures, SW-09 and SW-11 address this condition. SW-09- Erosion potential from internal unsealed roads will be minimised by considering the following: • route selection; • construction and post-construction erosion control measures; • undertaking design which includes consideration of road grades, clearing widths, batters, surface drainage, table drains, culverts, revegetation, road surface materials. SW11 - All erosion control structures will be maintained. Controls will be inspected regularly and after any significant rainfall (more than 10 mm in a day) and will be repaired as necessary. WMP Rev7 dated 04/06/2021 prepared by Arcadis sighted. Sections 4.3.2/4.3.3 relate to surface water management - erosion and sediment control. Verified as implemented during Stage 1 works. Stage 2 and Stage 3 not commenced. Site inspection verified current erosion/sediment controls are installed and maintained in accordance with the WMP	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
B14 Discharge Conditions	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis WMP Rev7 dated 04/06/2021 prepared by Arcadis Condition C7 incident / correspondence summary – EPA observed sediment-laden water from truck wash area leaving premises boundary (Jan 2024). EPA Annual Return 2024 – leachate overtopped waste cell, mixed with surface water and flowed to sediment basin (Apr 2024). Leachate Status Report (11 Sept 2025) – bunding failure (22 May 2025) directing leakage to southern sediment dam; recovery actions taken. Weekly Site Inspection Lists (12.11.23–11.11.24) – routine checks for leachate system inspection and bunding/spill controls (context). Details of water management onsite; Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. The WMP (Appendix C) provides mitigation measures and procedures to prevent pollution and complies with the requirements of section 120. WMP Rev7 dated 04/06/2021 sighted. Revision 7 of WMP dated 4/6/2021 was approved by the Planning Secretary via a letter from Chris Ritchie (DPE) dated 11/6/2021. The 2024 Annual Return details an incident with leachate: <i>following a significant weather event, the leachate collection system in the waste cell was overtopped by leachate resulting in some leachate moving outside the cell. No leachate moved outside the boundary of the premises as a result of this incident.</i> The action taken is listed as: <i>Council is awaiting advice from its technical consultant on leachate management options. In the interim, leachate levels are being managed by the removal of leachate by trucking it offsite to an appropriate licensed facility. Council is awaiting on technical advice from its consultant on the options for the management of leachate including installing additional storage capacity.</i> Further records of leachate leakage directed to a sediment dam (May 2025 event described in Sept 2025 reporting). EPA observed sediment-laden water from the truck wash area leaving the premises boundary (Jan 2024). Since then improved controls have been put in place, to direct any wheel wash to the fire dam.	Compliant
B15 Groundwater Collection System Design	The Applicant must provide detailed technical specifications and full construction plans of the groundwater collection system for consideration by the EPA, prior to construction of the groundwater collection system.	Stage 1	Evidence of provision of GW system details to EPA prior to construction	As per the 2023 audit report, findings for condition B15 were reported as compliant.	Compliant
B16 Groundwater Collection System Design	The Applicant must obtain relevant water access licence/s in accordance with the Water Management Act 2000, if the development will intercept groundwater.	Stage 1	Water licences if applicable	As per the 2021 audit, Letter to EPA from Ashley Grummit (PMHC) dated 14 September 2020 sighted that addresses the queries raised by the EPA's review including that: "PMHC has addressed the water access licence in the water management plan. While we anticipate licensing thresholds will not be exceeded, we will liaise with the Department of Industry, Lands and Water Division as required." Following a review by NRAR and comments by same, PMHC emailed DoI Water (NRAR) 11/3/21 noting that its review indicates than less than 3 ML/yr is predicted, and it can apply for the licensing exemption. Jane Curran (NRAR) confirmed in email dated 6/04/2021 that PMHC response had been forwarded to DPE Water. Letter from Alison Collaros (NRAR) dated 14/03/2021 sighted. Listed three items to recommended but not required prior to approval. WMP updated 19/04/2021 to include consultation with DILWD and NRAR comments (section 1.4), email confirmation sighted that WMP uploaded to portal 19/04/2021. The 2025 compliance report also noted that the trigger had not been tripped. To verify this, PMHC advised it is investigating installation of flow meter to measure groundwater flow and to discuss exemption process with the Natural Resources Access Regulator (NRAR).	Compliant
B17 Water Management Plan	Prior to the commencement of landfilling, the Applicant must prepare a Water Management Plan (WMP) to the satisfaction of the Planning Secretary. The WMP must: (a)be prepared by a suitably qualified and experienced person(s);	Stage 1	WMP Rev7 dated 04/06/2021, prepared by Arcadis Qualifications of person preparing WMP Rev7 dated 04/06/2021, prepared by Arcadis - listed within WMP Rev7 dated 04/06/2021, prepared by Arcadis Evidence of secretary satisfaction prior to commencement of landfilling	Relevant qualifications of author listed. Revision 7 of WMP dated 4/6/2021 was approved by the Planning Secretary via a letter from Chris Ritchie (DPE) dated 11/6/2021.	Compliant
	(b)be prepared in consultation with the EPA and DOI Lands and Water Division;	All phases	Evidence of consultation with EPA and DOI Lands and Water Division	WMP Section 1.4/Appendix A shows Scott Hunter of EPA and Jane Currem of DoI Water (NRAR) were both consulted in the preparation of the WMP.	Compliant
	(c)include a Groundwater Management Plan (GMP), detailing: (i) baseline data on groundwater levels and quality; (ii) a program to monitor groundwater levels and quality; (iii) the measures to be implemented to prevent contamination of groundwater with leachate; (iv)groundwater discharge water quality trigger values and management measures for groundwater not suitable for discharge; (v)contingency measures for managing any detected groundwater contamination; (vi)the water licence requirements for the development.	All phases	Listed within WMP Rev7 dated 04/06/2021, prepared by Arcadis	The Groundwater Management Plan (GMP) is part of the WMP. i) Sections 4.4/5.1.3. ii) Section 5.4. iii) Section 5.4.5. iv) Section 5.4.1. v) Section 5.4.4. vi) Section 3.4.	Compliant
	(d)include a Surface Water Management Plan (SWMP), detailing: (i) measures to divert clean surface water away from operational areas of the site; (ii)a program to monitor surface water flows and quality; (iii) trigger levels for investigating any potential adverse surface water impacts; (iv) a protocol for investigation and mitigation of exceedances of the surface water trigger levels.	All phases	Listed within WMP Rev7 dated 04/06/2021, prepared by Arcadis	The SWMP is part of the WMP (Section 4.3). i) Section 4.3.5. ii) Section 4.4. iii) Section 4.4.8. iv) Section 4.4.8.	Compliant
B18 Water Management Plan	The Applicant must: (a)not commence landfilling until the WMP required by condition BI 7(a) is approved by the Planning Secretary; and	Stage 1	Evidence of secretary satisfaction prior to commencement of landfilling	Revision 7 of WMP dated 4/6/2021 was approved by the Planning Secretary via a letter from Chris Ritchie (DPE) dated 11/6/2021.	Compliant
	(b)implement the most recent version of the WMP approved by the Planning Secretary for the duration of the development.	All phases	Evidence of WMP Rev7 dated 04/06/2021, prepared by Arcadis implementation (current version) Site inspection required	Revision 7 of WMP dated 4/6/2021 was approved by the Planning Secretary via a letter from Chris Ritchie (DPE) dated 11/6/2021. Site inspection found that controls are in place.	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status								
Odour and Air Quality Limits													
B19 Limits	The Applicant must ensure the development does not cause or permit the emission of any offensive odour(as defined in the POEO Act)	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP5 Covering of Waste & Litter Control SOP39.2 Cairncross weekly checklist ("Evidence of excessive odours") Complaints Register dated 07/01/2026 EPA Annual Returns 2023–2025. RWDI Air Quality/Odour Assessment (July 2023) (context) weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.6.3 contains odour mitigation measures, primarily training and use of proprietary bacterial odour control agent for injection into the leachate return line, when required . The weekly inspection checklists include a specific line confirming "excessive odours not present" (ticked on the samples shown). Three relevant complaints in the current complaints register. Two investigated with no further action. One where resident consultation occurred, no further issues after the initial complaint. Noted: that the odour investigation occurred when raining and odour is suppressed.	Compliant								
B20-Limits	The Applicant take all reasonable steps to minimise dust generated during all works authorised by this consent.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP45 Wheel Wash Inspection; SOP46 Wash-bay System Operation and Maintenance SOP39.2 Cairncross weekly checklist ("Visual dust emissions managed...", "Plant washed down as required", "Bitumen road free of sediment...") Complaints Register dated 07/01/2026 Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.6.3 contains odour and dust mitigation measures: the active tipping face will be kept as small as practicable, vehicles will be maintained and serviced according to the manufacturer's specifications and engines will be switched off when not in use, vehicles will be limited to a speed limit of 20 km/h, Appropriate dust management practices will be maintained, including use of washing down as required and reducing drop heights from loading and handling equipment, where possible and the complaints management procedures currently in place at the Cairncross WMF will be continued for the future landfill stages, including maintenance of the existing Complaints Register. The manual provides practical dust/track-out control procedures and weekly inspection prompts for dust emissions and hardstand/road condition. Site documentation and records demonstrate dust controls are intended and supported, including availability/maintenance of a water cart (P0470) and routine pre-start/maintenance systems. The checklists include routine controls relevant to dust and exposed surfaces (e.g., checks for dust and confirmation exposed surfaces are not present). This supports that "reasonable steps" and surface minimisation controls are being implemented as part of routine inspections. No relevant complaints in the current complaints register. Minimal dust observed during site inspection.	Compliant								
B21 Limits	The Applicant must ensure that: (a)exposed surfaces and stockpiles are suppressed by regular watering;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP39.2 checklist (dust emission management), SOPs generally, weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Complaints Register dated 07/01/2026 Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.6.3 contains odour and dust mitigation measures. No relevant complaints in the current complaints register. The checklists include routine controls relevant to dust and exposed surfaces (e.g., checks for dust and confirmation exposed surfaces are not present). This supports that "reasonable steps" and surface minimisation controls are being implemented as part of routine inspections. water cart observed whilst onsite.	Compliant								
	(b)all trucks entering or leaving the site with loads have their loads covered;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP24 Inspection of Loads; SOP55 Chain of Responsibility (duty and control framework). weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Complaints Register dated 07/01/2026 Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.6.3 contains odour and dust mitigation measures; all trucks entering and leaving the premises carrying loads will be covered at all times, except during loading and unloading. No relevant complaints in the current complaints register. The checklists include routine controls relevant to dust and exposed surfaces (e.g., checks for dust and confirmation exposed surfaces are not present). This supports that "reasonable steps" and surface minimisation controls are being implemented as part of routine inspections. During site inspection, trucks entering were covered.	Compliant								
	(c)trucks associated with the development do not track dirt onto the public road network; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP45 Wheel Wash Inspection; SOP46 Wash-bay O&M; SOP39.2 checklist ("Bitumen road free of sediment..."). Complaints Register dated 07/01/2026 Incident Notification, Reporting and Response summary (Feb 2025) referencing wheel wash/sediment matter. (Condition C7 - Incident Notification, Reporting and Response 2024) weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.6.3 contains odour and dust mitigation measures, appropriate dust management practices will be maintained, including use of washing down as required and reducing drop heights from loading and handling equipment, where possible . No relevant complaints in the current complaints register. The checklists include routine controls relevant to dust and exposed surfaces (e.g., checks for dust and confirmation exposed surfaces are not present). This supports that "reasonable steps" and surface minimisation controls are being implemented as part of routine inspections. An EPA-notified wheel wash/sediment matter is recorded, indicating potential risk relevant to preventing dirt tracking onto public roads. Subsequently, the drainage from the wheel wash was diverted to the fire water dam. No issued observed during site inspection	Compliant								
	(d)rehabilitation works are carried out progressively on site to minimise exposed surfaces.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP16 Final Capping Placement; SOP39.2 checklist (erosion/capping condition checks). weekly site inspection/audit checklists covering 6/10/2022–24/11/2023 and 12/11/2023–11/11/2024) Complaints Register dated 07/01/2026 Landfill stockpile information and survey plan (June 2025) noting observations consistent with older capped/vegetated areas.	Not up to rehabilitation stage	Not Triggered								
Noise													
B22 Hours of Work	The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary. Table 1 Hours of Work <table><tr><th>Activity</th><th>Period</th><th>Time</th></tr><tr><td rowspan="2">Operation</td><td>Monday – Friday</td><td>7 am to 6 pm</td></tr><tr><td>Saturdays, Sundays and Public Holidays</td><td>8 am to 5 pm</td></tr></table>	Activity	Period	Time	Operation	Monday – Friday	7 am to 6 pm	Saturdays, Sundays and Public Holidays	8 am to 5 pm	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis SOP31 Landfill Operations Out of Hours (Cairncross-specific out-of-hours offloading procedure) WasteMan Weighbridge reports x3 for 01/02/2023-11/11/23, 12/1/2023-11/11/2024 and 12/11/2024-11/11/2025 Complaints Register dated 07/01/2026 Transactions by time (01/02/2023–11/11/2023) Transactions by time (12/11/2024–11/11/2025)	LEMP Rev4 dated 15/08/2021 sighted. The operating hours match those in the condition. SOP31 evidences that Council has a defined out-of-hours landfill operations process, including escalation for emergency out-of-hours operation. Weighbridge reports provided show a small number of entries show times outside B22 hours (both pre-7:00 am and post-6:00 pm on weekdays). Most of these are manual transactions so may be entries from other days (e.g. weigh bridge not open on Sundays, the report contains an embedded note stating: "Docket numbers starting with 'CM' denote a manually entered ticket. These are for Sunday transactions when the weighbridge is unstaffed.") or they may be transactions for the ORRF or MRF and therefore unrelated to Council's site. Weighbridge staff have been advised to only record transactions for the ORRF or MRF prior to 7am. "CM" records are manual transactions. The post-6:00 pm entries are concentrated on 3 February 2023 and are clearly labelled to a customer reference "Storm Damage February 2023 PMHC" (e.g., green waste / debris type streams), continuing to approximately 22:32. That said, B23 a) would apply in the event that there was any early access, given the location. No relevant complaints in the current complaints register.	Compliant
Activity	Period	Time											
Operation	Monday – Friday	7 am to 6 pm											
	Saturdays, Sundays and Public Holidays	8 am to 5 pm											
B23 Hours of Work	Works outside of the hours identified in condition B22 may be undertaken in the following circumstances: (a)Works that are inaudible at the nearest sensitive receivers;	All phases	Details, if this situation is applicable	N/A	Not Triggered								
	Works outside of the hours identified in condition B22 may be undertaken in the following circumstances: (b)Works agreed to in writing by the Planning Secretary;	All phases	Details, if this situation is applicable	N/A	Not Triggered								
	Works outside of the hours identified in condition B22 may be undertaken in the following circumstances: (c)for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or	All phases	Details, if this situation is applicable	N/A	Not Triggered								
	Works outside of the hours identified in condition B22 may be undertaken in the following circumstances: (d)where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	All phases	Transactions by time (01/02/2023–11/11/2023) showing after-hours entries on 03/02/2023 associated with "Storm Damage February 2023 PMHC"	The transaction report records after-hours activity on 03/02/2023 associated with storm damage response and would be considered an emergency response scenario	Compliant								
B24 Noise Limits	The Applicant must ensure noise generated by operation of the development does not exceed the noise limits in Table 2. Table 2 Noise Limits <table><tr><td>Location#</td><td>Day LAeq(15-minute)-dB(A)w</td></tr><tr><td>Monitoring Point 10#</td><td>35#</td></tr><tr><td>Monitoring Point 11#</td><td>35#</td></tr></table> Note 1: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for noise monitoring locations. 2. LAeq (15-minute) dB(A) is the equivalent continuous sound level over a 15 minute period, measured as A-weighted.	Location#	Day LAeq(15-minute)-dB(A)w	Monitoring Point 10#	35#	Monitoring Point 11#	35#	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Complaints Register dated 07/01/2026	LEMP Rev4 dated 15/08/2021 sighted. Section 5.2 lists the hours of operation and mitigation measures under the required training. Section 6.3.1 lists mitigation measures to ensure noise limits are not exceeded, such as maintenance of equipment, use of silencers and the use of broadband alarms in place of tonal alarms. No relevant complaints in the current complaints register. Thus, no noise monitoring undertaken for this period.	Compliant		
Location#	Day LAeq(15-minute)-dB(A)w												
Monitoring Point 10#	35#												
Monitoring Point 11#	35#												

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
Biodiversity					
B25 Offsets	Prior to any clearing works for Stage 3, the Applicant must retire the following ecosystem and species credits, as determined in accordance with the OEH's Framework for Biodiversity Assessment (FBA) and the Biobanking Assessment Methodology 2014 (BAM). (a)221 ecosystem credits to offset the removal of 3.4 hectares of Blackbutt-Pink Bloodwood Shrubby Open Forest of the Coastal Lowlands of the NSW North Coast Bioregion;	Stage 3	Receipts of purchased offsets in line with B25(a)	Council is filling Stage 1 currently; Stage 3 has not commenced	Not Triggered
	(b) 84 species credits to offset the removal of koala habitat;	Stage 3	Receipts of purchased offsets in line with B25(b)	Council is filling Stage 1 currently; Stage 3 has not commenced	Not Triggered
	(c) 248 species credits to offset the removal of Green-Thighed Frog habitat; and	Stage 3	Receipts of purchased offsets in line with B25(c)	Council is filling Stage 1 currently; Stage 3 has not commenced	Not Triggered
	(d) 3 species credits to offset the removal of Southern Myotis habitat. Note: If the Applicant seeks a variation to the offset rules, the Applicant must demonstrate that reasonable steps have been taken to find like-for-like offsets in accordance with Section 10.5.4.2 of the FBA and Appendix A of the OEH's NSW Biodiversity Offsets Policy for Major Projects 2014, Koala Connectivity Corridor.	Stage 3	Receipts of purchased offsets in line with B25(d)	Council is filling Stage 1 currently; Stage 3 has not commenced	Not Triggered
B26 Koala Connectivity Corridor	The Applicant must establish and maintain the koala connectivity corridor shown in Figure 1 in Appendix 1. The Applicant must determine the timing for establishing the koala connectivity corridor in consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science. The agreed timing must be included in the Vegetation Management Plan required by condition B27	All phases	Evidence of timing determination and consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science VMP Rev5 dated 27/08/2021, prepared by Arcadis Verified during site inspection regrowth	Sighted the Vegetation Management Plan (VMP) Revision 5 dated 27 Aug 2021. Sighted the DPE approval letter for the plan dated 19 Oct 2021. Sighted DPE Biodiversity and Conservation response to consultation dated 13 May 2021 in Appendix 1 of the VMP. DPE was consulted on 10 March 2021. Section 5.2.5 of the VMP states that " The koala connectivity corridor will be demarcated from other area within 6 months of the approval of this plan. This will involve marking out the exact boundaries and installing some bunting." Planting at the corridor will be undertaken within 2 years of the VMP approval. The VMP was approved on 19 October 2021 and according to Council, planting the Koala Corridor commenced in May 2023.	Compliant
B27 Vegetation Management Plan	Within two years of the date of this consent and no later than prior to the commencement of Stage 2, the Applicant must prepare a Vegetation Management Plan (VMP) to the satisfaction of the Planning Secretary. The VMP must: (a) be prepared in consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science;	Stage 1	VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of secretaries satisfaction with VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science	SSD 5792 was granted on 5 Nov 2019 while SSD 5792 Mod 1 was granted on 31 August 2023. The preparation of the VMP started on 27 Feb 2020, approximately 4 months after SSD 5792 consent approval. DPE Biodiversity and Conservation was consulted on 10 March 2021 via email and a response from the Department was received on 13 May 2021.The final version of the plan was submitted to DPE on 27 Aug 2021 and approved on 19 Oct 2021. Note: The timing of this condition was revised from two years (SSD 5792) to 12 months (SSD 5792 Mod 1).	Compliant
	(b) detail the measures for managing impacts of the development on the Rawdon Creek Nature Reserve in accordance with the Guidelines for developments adjoining land managed by the Office of Environment and Heritage (OEH, 2013);	Stage 1	VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of secretaries satisfaction with VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science	Section 5.7 refers to the Guidelines for developments adjoining land managed by the Office of Environment and Heritage (OEH, 2013) and sets out the risks and mitigation measures that will be implemented to reduce the risk to Rawdon Creek Nature Reserve in Table 5-4.	Compliant
	(c) detail the procedures for coordinated management of the koala connectivity corridor on the southern boundary, the Strategic Fire Advantage Zone on the south-eastern boundary and the established biodiversity offset area to the west of the site; and	Stage 1	VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of secretaries satisfaction with VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of consultation with the Biodiversity and Conservation Division of the Department of Environment, Energy and Science	Section 5.2 of the VMP addresses the koala connectivity corridor management which states aspects of integrated management of adjacent areas including the SFAZ. Section 5.3 addresses revegetation which makes specific mention of the koala connectivity corridor.	Compliant
	(d) detail the fencing to be installed, the timing for installation and how this will prevent access by koalas and other fauna into the landfill.	Stage 1	Evidence of Secretary's satisfaction with VMP Rev5 dated 27/08/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis containing required detail as per condition within secretary's letter	Section 5.2.4 addresses fencing strategy pre- and post-construction phases to prevent migration of koalas, and other fauna onto the landfill site.	Compliant
B28 Vegetation Management Plan	The Applicant must implement the most recent version of the VMP approved by the Planning Secretary for the duration of the development	All phases	Evidence of Secretary's satisfaction with VMP Rev5 dated 27/08/2021, prepared by Arcadis Evidence of implementation - eg receipts/bush regen contractor's reports	The Vegetation Management Plan (VMP Revision 5 dated August 2021 was approved by DPE on 19 October 2021. The letter of approval was sighted by the Compliance Officer. Planting within the Koala Corridor needs to be done within two years from the date of approval of the VMP, due by 19 October 2023. During the 2023 audit site inspection, it was sighted that the Koala Corridor has been planted.	Compliant
Hazards and Risk					
B29 Dangerous Goods	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines — Applying SEPP 33 at all times.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Details of DGs stored and handled onsite Documentation to show how this is in line with SEPP Guidelines Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 2.2.1.3 lists excluded wastes, including hazardous wastes. Section 5.2 lists hazardous substances and dangerous goods management as part of the required training for staff. Section 6.3.10 lists potential hazards and mitigation measures in place to minimise these hazards, primarily focusing on work procedures on the weighbridge and inspections. DGs stored in onsite workshop. These are in a secured area, bundled and MSDS presented.	Compliant
Fire Management					
B30 Defendable Space	The Applicant must establish a defendable space around the operational areas of the landfill to allow for emergency service personnel to undertake property protection activities. The defendable space shall be a minimum 10 metres in width and managed as an inner protection area (IPA) as outlined in section 4.1.3 and Appendix 5 of Planning for Bush Fire Protection (NSW RFS 2006) and the NSW Rural Fire Service Standard for Asset Protection Zones	All phases	Bushfire and Fuel Management Plan Rev4 dated 29/10/2020, prepared by Arcadis Site inspection checklists Landscape contractor receipts etc Verified during site inspection	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis sighted. Section 5.3 refers to defendable space which specifies: "A 20 m wide Defendable Space will be provided to each leachate tank (See Figure 2-5). A minimum of 10m Defendable Space will be provided around operational areas of the landfill". Site inspection in 2021 and 2023 against the defendable space plans provided confirmed this was being provided. implementation and maintenance verified during inspection	Compliant
B31 Defendable Space	The Applicant must establish a 6 metre wide trafficable space with adequate access for a fully laden 15 tonne (GVM) Rural Fire Service / State Forests Category 1 Tanker around the perimeter of the landfill. The trafficable space may be contained within the defendable space area required by Condition B30.	All phases	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis Site Plans/WAE plans Verified during site inspection	Bushfire and Fuel Management Plan version 4 dated 29/10/2020 sighted. Section 5.4 page 26 includes requirement for temporary fire breaks including:" The temporary fire breaks will include a 6 m access track which provides adequate access for a fully laden 15 tonne (GVM) Rural Fire Service State Forests Category 1 Tanker (Category 1 Tanker)." 2021 and 2023 site inspection against the plans provided verified this is in place, and there is a road around the perimeter of the existing landfill and the newly constructed cell which encompasses 1A to 1E, and a portion of 1B to 1F. Verified during site inspection that a continuous 6 m trafficable access track exists around the current landfill perimeter and is maintained to an all-weather standard;	Compliant
B32 Defendable Space	Any hazardous materials storage, buildings and open space areas must be located a minimum 50 metres from unmanaged vegetation.	All phases	Verified during site inspection	TE25002 Compliance Audit 2025 – explicitly states the auditor observed hazardous materials storage/buildings/open space in the operational area were >50 m from unmanaged vegetation. Verified on-site that hazardous materials storage areas and relevant buildings/open spaces are ≥50 m from unmanaged vegetation	Compliant
B33 Defendable Space	The Applicant must establish and maintain a 30 metre wide Strategic Fire Advantage Zone (SFAZ) around the southern side of Stage 2 and the eastern side of Stage 3, as shown on Figure 3 in Appendix 1	All phases	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis Site Plans/WAE plans Interviews	BFFMP Rev4 dated 29/10/2020 sighted. Section 5.1 outlines requirement for SFAZ "a 30 m wide SFAZ will be provided and maintained along the boundary with the adjoining Rawdon Creek Nature Reserve (eastern side of Stage 3)." seen in figure 2.5 2021 site inspection against the plans provided found that the SFAZ is not yet being landfilled nor are these cells (Stage 2 or Stage 3).	Not Triggered
B34 Bush Fire and Fuel Management Plan	Within 12 months of the date of this consent, the Applicant must update the Bush Fire and Fuel Management Plan (BFFMP) for the Cairncross Waste Management Facility to include the development, to the satisfaction of the Planning Secretary. The BFFMP must: (a) be prepared in consultation with the NSW Rural Fire Service MidCoast District Fire Control Centre	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis Evidence of secretary approval Evidence of consultation with the NSW Rural Fire Service MidCoast District Fire Control Centre Dept Planning letter dated 28/7/25 assessing the 2025 compliance report.	BFFMP Section 1.4/Appendix A Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggered'.	Not Triggered
	(b)be prepared by a suitably qualified and experienced person(s)	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis CV or qualifications of person preparing BFFMP Rev4 dated 29/10/2020, prepared by Arcadis listed within	Suitable qualifications of author listed within report. Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggered'.	Not Triggered

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
	(c)include details of: (i) 24/7 contact details including alternative telephone contact; (ii)maintenance measures for the defensible spaces and SFAZ; (iii)location of hazards (physical, chemical and electrical) that may impact on firefighting operations and procedures to manage identified hazards during firefighting operations;	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis including items outlined in condition	BFFMP: i) Section 3.5. ii) Sections 5.1.1/5.3. iii) Figure 2-5/Section 2.7 Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggerred'.	Not Triggerred
	(d) identify strategies to contain and minimise the effects of any threats to the environment and public health including but not limited to: (i) measures to minimise the risk of fire on site, including in the landfill area/s; actions to extinguish any fires on site promptly; (iii) measures to ensure adequate firefighting capacity on site, including a firefighting tanker	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis including items outlined in condition	BFFMP: i) Section 5.10. ii) Section 5.10. iii) Sections 5.7/5.8. Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggerred'.	Not Triggerred
	(e) include plans of site infrastructure, firefighting water supply, site access and internal roads;	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis including items outlined in condition	BMMFP Figure 2.5 Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggerred'.	Not Triggerred
	(f) detail a communication strategy for notifying the relevant government agencies and potentially affected community in a fire event; and	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis including items outlined in condition	BMMFP Section 6.2.2/Table 6-3 Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggerred'.	Not Triggerred
	(g)any additional matters required by the NSW Rural Fire Service.	Stage 1	BFFMP Rev4 dated 29/10/2020, prepared by Arcadis including items outlined in condition	Note that this condition was non-compliant on the previous Audit Report dated February 2023 as no secretary approval was provided at that time and was outside of the 12 months deadline outlined in this condition. The Department of Planning letter dated 28/07/25 from the Department states the identified non-compliance with Schedule 2, Condition B34(a)-(g) has already been assessed by the NSW Planning, no further action is proposed in relation to this non-compliance. Future Operational Compliance reports should note this condition as 'Not Triggerred'.	Not Triggerred
B35 Bush Fire and Fuel Management Plan	The Applicant implement the most recent version of the BFFMP approved by the Planning Secretary for the duration of the development.	All phases	Evidence of secretary approval Evidence of implementation Verified during site inspection	BFFMP Rev4 dated 29/10/2020 sighted. Section 1.4 discusses consultation with NSW RF5 and MCDFCC. Appendix A contains consultation with NSW Rural Fire Service MidCoast District Fire Control Centre. This was submitted to DPIE on 6 November 2020 secretary approval sighted. No issues observed during site inspection.	Compliant
Traffic and Access					
B36 Operating Conditions	The Applicant must ensure: (a)the development does not result in any vehicles queuing on the public road network;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.4 traffic and transport includes table 6-6 traffic mitigation measures. TT-03 states: "No vehicles will be permitted to queue on the public road network. No queueing observed during site inspection	Compliant
	(b)heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.4 traffic and transport includes table 6-6 traffic mitigation measures. TT-03 states: "No vehicles will be permitted to queue on the public road network. No onsite parking observed during site inspection	Compliant
	(c)all vehicles are wholly contained on site before being required to stop;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.4 traffic and transport includes table 6-6 traffic mitigation measures. TT-03 states: "No vehicles will be permitted to queue on the public road network. Vehicles observed only stopping onsite during site inspection	Compliant
	(d) all loading and unloading of materials is carried out on site; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.4 traffic and transport includes table 6-6 traffic mitigation measures. TT-03 states: "No vehicles will be permitted to queue on the public road network. All loading and unloading only observed onsite during site inspection	Compliant
	(e) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Verified during site inspection	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.4 traffic and transport includes table 6-6 traffic mitigation measures. TT-07 states: "All trucks entering or leaving the site with loads will have their loads covered and will not track dirt onto the public road network. Site inspection found that loads were covered and no dirt tracking observed.	Compliant

Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
Aboriginal and Historic Heritage					
B37 Unexpected finds Protocol	If any item or object of Aboriginal heritage significance is identified on site: (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Unexpected finds Protocol contains measures as per condition Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.3 refers to Aboriginal heritage table 6-5 page 44 includes mitigation measures for unexpected finds including AB-02 "In the event that any identified or suspected Aboriginal objects are detected at any time, all disturbance work shall immediately cease". PMHC advised no Aboriginal heritage items/objects uncovered during the reporting period	Not Triggered
	(b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Unexpected finds Protocol contains measures as per condition Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.3 refers to Aboriginal heritage table 6-5 page 44 includes mitigation measures for unexpected finds including AB-02 "20 m of the find and temporary protective fencing erected around this 'no-go zone' pending further management pre-construction advice from the BCDDES PMHC advised no Aboriginal heritage items/objects uncovered during the reporting period	Not Triggered
	(c) the Biodiversity and Conservation Division of the Department of Environment, Energy and Science (former OEH) must be contacted immediately.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Unexpected finds Protocol contains measures as per condition Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.3 refers to Aboriginal heritage table 6-5 page 44 includes mitigation measures for unexpected finds including AB-02 "If the find consists of or includes human remains, the NSW Police Department and NSW Coroner's office would be contacted. If the burial is identified as being of Aboriginal origin a heritage professional and BCDDES will be contacted to determine the subsequent course of action." PMHC advised no Aboriginal heritage items/objects uncovered during the reporting period	Not Triggered
B38 Unexpected finds Protocol	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Unexpected finds Protocol contains measures as per condition Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.3 refers to Aboriginal heritage table 6-5 page 44 includes mitigation measures for unexpected finds. States recommencement in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974. PMHC advised no Aboriginal heritage items/objects uncovered during the reporting period	Not Triggered
B39 Unexpected finds Protocol	If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded in accordance with the requirements of the Department of Premier and Cabinet Heritage Division.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Unexpected finds Protocol contains measures as per condition Staff interview	LEMP Rev4 dated 15/08/2021 sighted. Section 6.3.3 refers to Aboriginal heritage table 6-5 page 44 includes mitigation measures for unexpected finds. States revaluation and recording of unexpected finds in accordance with the requirements of the Department of Premier and Cabinet Heritage Division. PMHC advised no Aboriginal heritage items/objects uncovered during the reporting period	Not Triggered
B40 Fencing	All fencing must be erected in accordance with the development plans included in the EIS and RTS. <i>Note: This condition does not apply to temporary construction and safety related fencing.</i>	All phases	Details of fencing installed, plans Solid Waste SOP Manual (Jan 2026): SOP39.2 Site Inspection and Audit Checklists – Cairncross (weekly checklist includes: "Perimeter fence line secure and intact including koala fencing" and "Perimeter fence not overgrown with vegetation"). Weekly checklists Verified during site inspection fencing in place	LEMP Rev4 dated 15/08/2021 sighted. Section 2.3.4 states chain wire fencing is currently installed around the Stage E landfill and will be progressively extended as new landfill stages become active. Section 2.3.8 states all litter fences, perimeter fences and gates are inspected daily and cleared of litter as required. SOP39.2 provides controls that perimeter fence integrity and vegetation overgrowth checks are embedded in routine weekly inspections. Weekly checklists allow for verifying whether the fencing is in good condition. in the completed weekly checklist examples within the 6.10.22–24.11.23 PDF, those perimeter fencing items are shown with a "Y" against them (i.e., marked satisfactory), indicating they are being actively checked and recorded (not just listed as a control). All fencing present and intact	Compliant

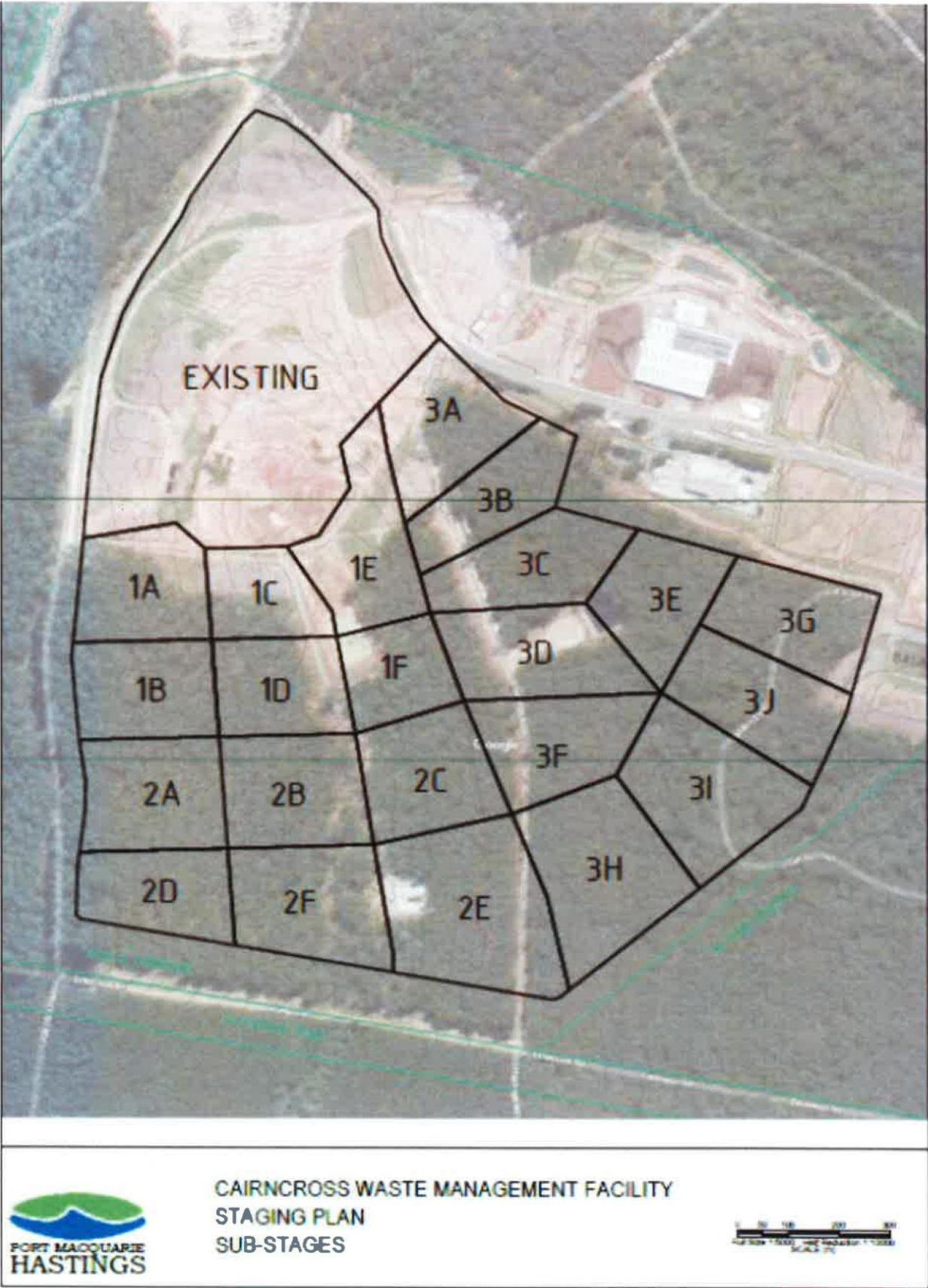
Condition Number	Requirement	Development phase	Evidence Used	Findings and Recommendations	Compliance Status
Rehabilitation, Final Landform And Closure					
B41 Rehabilitation	The Applicant must progressively rehabilitate the completed landfill cells to achieve the final landform shown in Appendix 4. The vegetation types, maintenance, monitoring and performance criteria for the rehabilitation works must be detailed in the LEMP required by condition C2	Stage 3	LEMP Rev4 dated 15/08/2021, prepared by Arcadis	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
B42 Final Landform	The Applicant must rehabilitate the site to achieve the final landform shown in Appendix 4, and in accordance with the criteria in the EPA's Environmental Guidelines: Solid Waste Landfills 2016, or its latest version.	Stage 3	Expect this is not triggered?	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
B43 Landfill Closure Plan	The Applicant must prepare and implementa Landfill Closure Plan (LCP) to the satisfaction of the Planning Secretary. The LCP must: (a)be prepared in accordance with section 76 of the POEO Act;	Stage 3	Evidence of Secretary's satisfaction LCP in line with condition Site insepction	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(b)be prepared by a suitably qualified and experienced expert(s);	Stage 3	Cv/qualifications of person preparing	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(c)be submitted to the EPA and the Planning Secretary twelve (12) months prior to the planned closure of the landfill (Stage 3);	Stage 3	Evidence of submission to Planning secretary 12 months prior to closure (if applicable)	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(d)be approved by the EPA and the Planning Secretary prior to the final closure of Stage 3;	Stage 3	Evidence of Planning secretary and EPA approval 12 months prior to closure (if applicable)	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(e) detail the requirements for ongoing management of the capped waste mass;	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(f)detail the maintenance procedures for the final capping, in accordance with the requirements of the EPA's Environmental Guidelines: Solid Waste Landfills 2016, or its latest version;	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(g)describe monitoring and management measures to ensure the integrity of the cap;	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(h)describe ongoing surface water and leachate management, odour and dust control;	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(i) detail landfill gas monitoring and maintenance; and	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered
	(j) identify future land use/s on the site.	Stage 3	LCP containing details in condition	The facility is landfilling Stage 1 and Council advises it is not anywhere near close to requiring rehabilitation.	Not Triggered

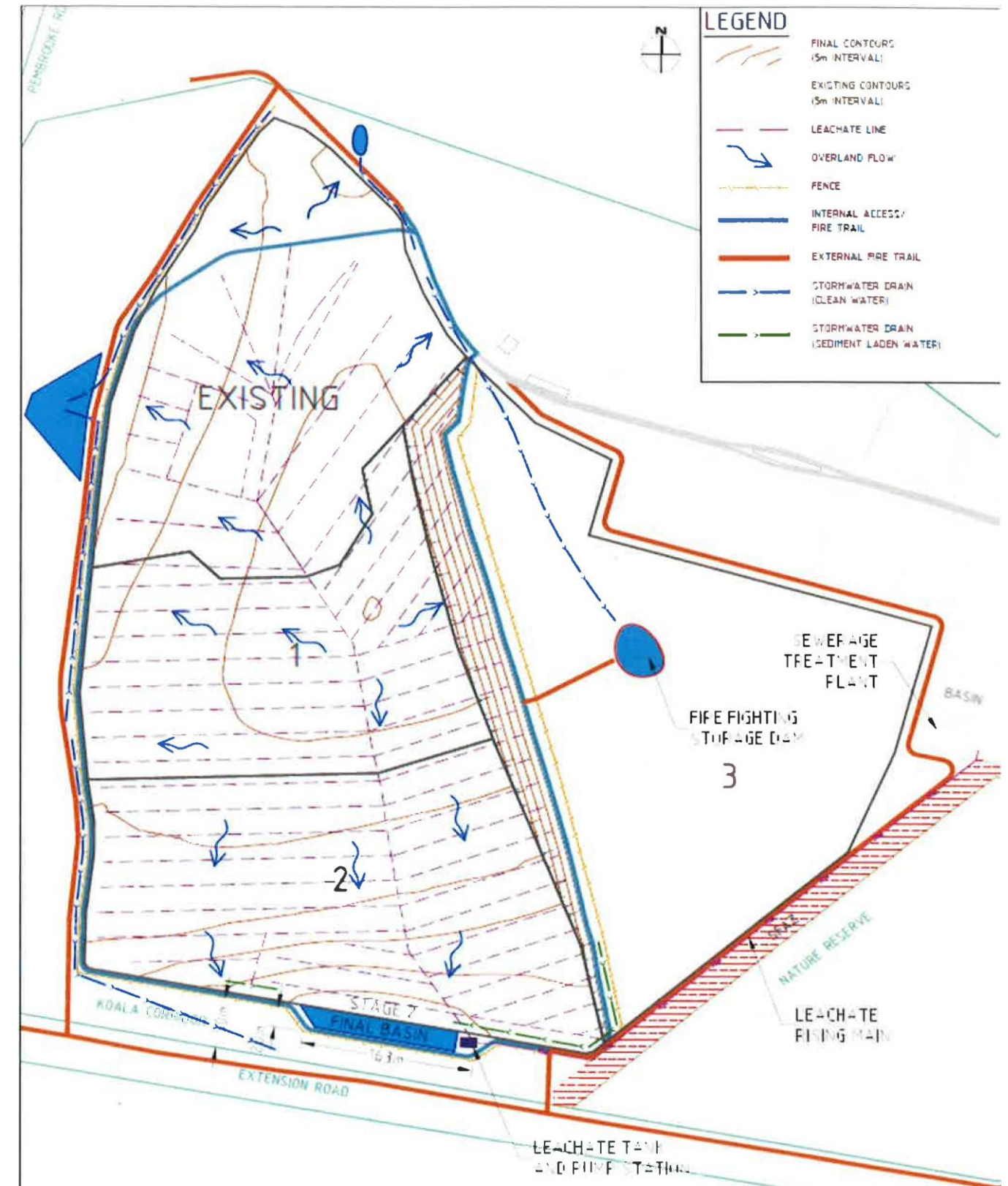
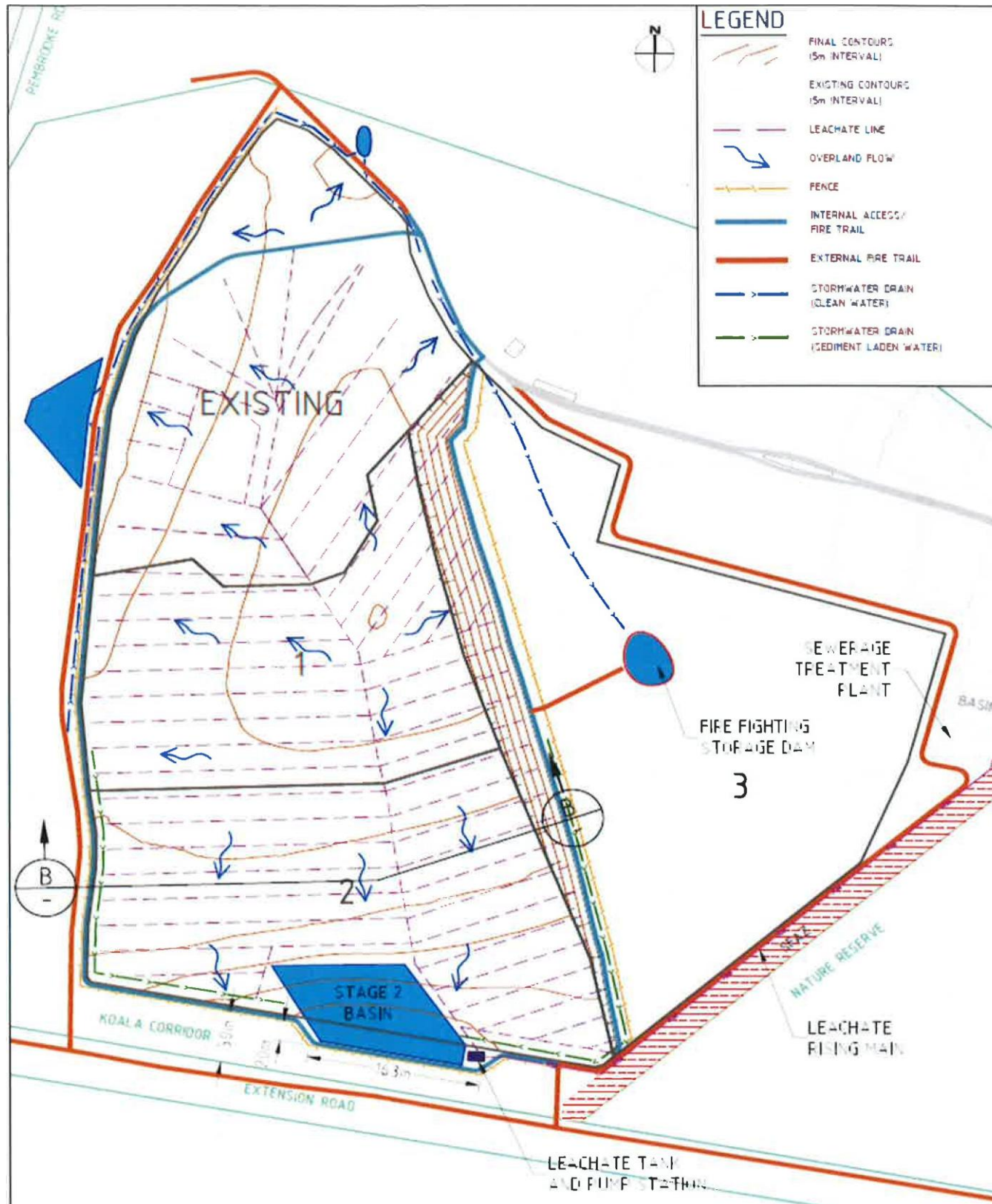
Condition Number	Requirement	Development Phase	Evidence Used	Findings and Recommendations	Compliance Status
Environmental Management					
C1 Management Plan Requirements	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data;	All phases	LEMP Rev4 dated 15/08/2024, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - Section 2.1 discusses the existing environment and vegetation LMP - Section 4 discusses the existing environment and historic leachate WMP - Section 4.1 contains baseline data VMP - Section 4 discusses the existing environment	Compliant
	(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - i) section 4 discusses statutory requirements. ii) Section 6.3 covers relevant limits or performance measures and criteria. iii) Section 7 covers the performance indicators for management measures LMP - i) section 3 discusses statutory requirements. ii) Sections 4.3/6.2 cover relevant limits or performance measures and criteria. iii) Section 6.2.3 covers the performance indicators for management measures WMP - i) section 3 discusses statutory requirements. ii) Sections 4.4/5.4 cover relevant limits or performance measures and criteria. iii) Sections 4.3/5.4.4 cover the performance indicators for management measures VMP - i) section 3 discusses statutory requirements. ii) Appendix B covers relevant limits or performance measures and criteria. iii) Sections 5.1.3/5.2.6/5.4.5/5.6.6 cover the performance indicators for management measures	Compliant
	(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - Section 6 contains mitigation measures LMP - Section 6 contains mitigation measures WMP - Sections 4.4/5.4 contain mitigation measures VMP - Section 5.8 contains mitigation measures	Compliant
	(d) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - i) Summary of reporting, inspections and monitoring found in Appendix A1. Impacts and environmental performance covered in section 6.2/6.3. ii) Section 7.3 addresses the effectiveness of management measures LMP - i) Impacts and environmental performance covered in section 6.2. ii) Sections 6.3/7 address the effectiveness of management measures WMP - i) Sections 4.2/5.2 discuss impacts and environmental performance. ii) Sections 4.4/5.4 address the effectiveness of management measures VMP - i) Section 4.7 discusses impacts and environmental performance. ii) Section 7.1 addresses the effectiveness of management measures	Compliant
	(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - Section 7.6.2 contains a contingency plan LMP - Sections 5.5/7.4 detail the contingency plan WMP - Sections 4.4.8/5.5.4 detail the contingency plan VMP - This report	Compliant
	(f) a program to investigate and implement ways to improve the environmental performance of the development over time;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - Section 7.6 discusses the review process and continuous improvement LMP - Section 7.3 discusses the review process and continuous improvement WMP - Section 6 discusses the review process and continuous improvement VMP - Section 7.3 discusses the review process and continuous improvement	Compliant
	(g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - i) Section 7.4 addresses non-compliances. Section 5.5.1 addresses incidents. ii) Section 5.3 contains complaints handling procedures. iii) Section 7.5.3 addresses failure to comply with statutory requirements. LMP - i) Sections 7.4/7.6 address non-compliances and incidents. ii) Section 7.5 contains complaints handling procedures. iii) Section 7.6 addresses failure to comply with statutory requirements. WMP - i) Sections 6.3/6.4 address non-compliances and incidents. ii) Section 6.4 contains complaints handling procedures. iii) Section 6.5 addresses failure to comply with statutory requirements. VMP - i) Sections 7.2/7.4 address non-compliances and incidents. ii) Section 7.5 contains complaints handling procedures. iii) Section 7.6 addresses failure to comply with statutory requirements.	Compliant
	(h) a protocol for periodic review of the plan. <i>Note: the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i>	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis LMP Rev5 dated 14/12/2020, prepared by Arcadis WMP Rev7 dated 04/06/2021, prepared by Arcadis VMP Rev5 dated 27/08/2021, prepared by Arcadis	LEMP - Section 7.6.1 discusses the review process LMP - Section 7.3 discusses the review process WMP - Section 6 discusses the review process VMP - Section 7.2.2 discusses the review process	Compliant
Landfill Environmental Management Plan					
C2 Landfill Environmental Management Plan	The Applicant must prepare a Landfill Environmental Management Plan (LEMP), in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis Evidence of Secretary's satisfaction	LEMP document	Compliant
C3 Landfill Environmental Management Plan	As part of the LEMP required under Condition C2 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis including role, responsibility, authority and accountability of all key personnel	LEMP Section 5.1	Compliant
	(b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis containing all aspects of condition	LEMP: i) Section 5.3.5. ii) Section 5.3. iii) Section 5.3. iv) Section 7.4. v) Section 5.4 .	Compliant
	(c) include: (i) Leachate Management Plan (see Condition B11); (ii) Water Management Plan (see Condition B17); (iii) measures to control dust and odour from all emission sources on site; (iv) a Landfill Gas Monitoring Plan (LGMP) developed in accordance with the requirements of the EPA's Environmental Guidelines: Solid Waste Landfills 2016 or its latest version; (v) management measures for the control of feral animals, including foxes and wild dogs; (vi) measures to control litter and prevent illegal dumping, with reference to the Memorandum of Understanding between NSW National Parks and Wildlife Service, Forestry Corporation of NSW and Port Macquarie-Hastings Council; (vii) details of vegetation types, maintenance, monitoring and performance criteria for progressive rehabilitation works and a weed management plan.	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis containing all aspects of condition	i) Appendix A - LMP. ii) Appendix C - WMP. iii) Section 6.3.6.1. iv) Appendix E. v) Section 2.3.9. vi) Section 2.3.5. vii) VMP.	Compliant
C4 Landfill Environmental Management Plan	The Applicant must: (a) not commence landfilling until the LEMP is approved by the Planning Secretary; and	Stage 1	Secretary approval dated prior to landfilling commencement	Sighted approval from Chris Ritchie (DPE) dated 23 December 2020 which approved the Landfill Environmental Management Plan (LEMP), Revision 3, dated 2 December 2020, prepared by Arcadis Pty Ltd. No landfilling has commenced onsite. Construction work was set to commence in January 2021 according to a letter to DPE from Michael Magalhaes (Council) dated 27 November 2020. As such this date is subsequent to the approved LEMP and is in line with C4 (a). The Applicant must: (b) operate the development in accordance with the LEMP approved by the Planning	Compliant
	The Applicant must: (b) operate the development in accordance with the LEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time)	All phases	LEMP Rev4 dated 15/08/2021, prepared by Arcadis informing site operations Revisions history reflective of condition requirements Site inspection to verify	Table 5-2 Program A of the LEMP was updated to address the findings of the independent audit on 14 July 2021; subplans also updated.	Compliant

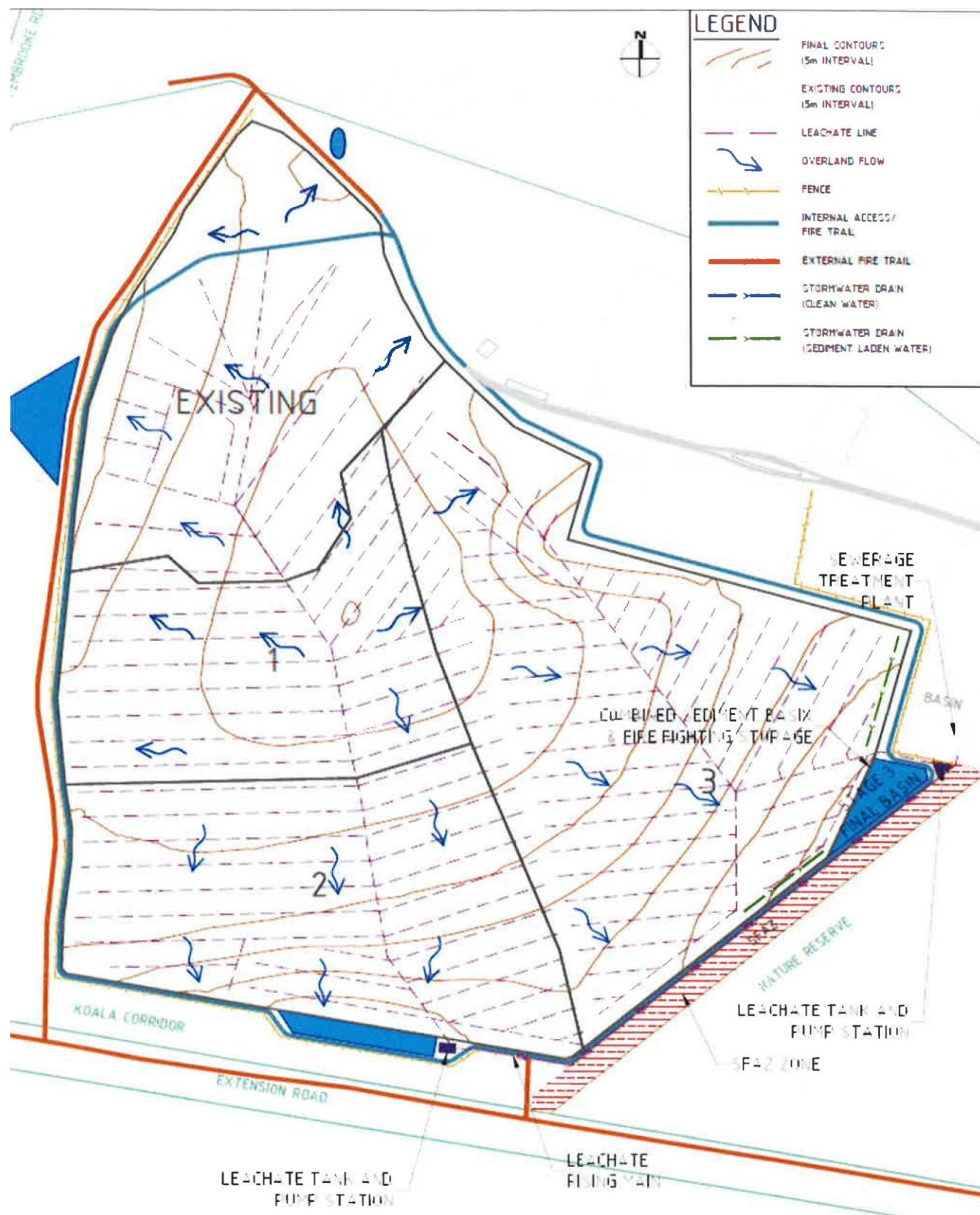
Condition Number	Requirement	Development Phase	Evidence Used	Findings and Recommendations	Compliance Status
Revision Of Strategies, Plans And Programs					
C5 Revision Of Strategies, Plans And Programs	Within three months of: (a) the submission of a Compliance Report under condition C12;	All phases	PMHC letter 27/06/2025 Letter to DPHI re Operational Compliance Report upload and timing (dated 22 April 2025). Email to compliance@planning re Operational Compliance Report (dated 7 May 2025). Letter to DPHI "Revision of Strategies, Plans and Programs" (dated 27 June 2025).	Compliance report submitted 22 Apr 2025; Department notified of review 27 Jun 2025 (within 3 months). Review concluded no revisions required at that time, with interim leachate plan flagged as pending completion of works. Sighted letter from PMHC to DPHI stating: Council would like to notify the Department that per condition C5 (a) of the consolidated consent, we have conducted a review of the development's strategies, plans and programs after the submission of the annual compliance report. This review was completed within three months of the submission of the compliance report. Following the review, no revisions to the strategies, plans and programs were considered necessary to improve the environmental performance of the development based on the compliance report findings.	Compliant
	(b) the submission of an incident report under condition C7;	All phases	Evidence of and details of revision 2024 Annual Return Staff interview	PMHC advised not triggered: 2024 spill does not meet definition of an Incident as an occurrence that causes or threatens to cause material harm (not trivial harm to environment/health/safety, or >\$10,000 loss).	Not Triggered
	(c) the submission of an Independent Audit under condition C15;	All phases	Evidence of and details of revision PMHC email 20/11/2025 DPE letter 18/7/2023 PMHC letter 19/7/2023 Signed Independent Audit Response to Audit Recommendations (dated 19 July 2023, referencing audit dated 17 Feb 2023). IEA report upload to DPE portal 21/2/2023 (email dated 21/2/23)	Sighted evidence of IEA report submission date 21/2/2023. Sighted inter PMHC email with a screenshot of the backend of Council's website. 2023 audit uploaded 11/09/2023. 2023 audit response uploaded 25/07/2023. PMHC "Response to Audit Recommendations for the Independent Audit dated 17 February 2023" were included in the 2023 audit report. On 19/7/2023, PMHC sent correspondence "Independent Audit Report February 2023 - Response to Audit Recommendations". No evidence of revision of plans prior to 21/5/2023.	Non-Compliant
	(d) the approval of any modification of the conditions of this consent;	All phases	DPHI Notice of Determination (Mod 1) confirming approval date 31 August 2023 (letter dated 7 September 2023). Mod1 Consolidated Consent Conditions 2025 compliance report Staff interview Council letter 27 Jun 2025 (C5(a) review after compliance report submission) referencing "previous correspondence" about an updated interim leachate management plan to be provided once works completed	SSD 5792 Mod 1 approved by DPE on 31/08/2023 proposed to modify the leachate- barrier and collection system to increase the leachate storage capacity of the landfill in order to manage the risk of significant leachate generated from the landfill cells in Stage 1. No document in the Mod-1 portal tranche evidences that Council notified DPE within the 3-month window that a C5(d) review was being carried out, and this was reported as non-compliant in the 2025 compliance report. Council response was that PMHC believes this condition is compliant: 'The application for Mod 1 included an Interim Leachate Management Plan. That plan and the works it contemplated was approved in the Mod. There is no need to update the Leachate Management Plan as the Interim Leachate Management Plan sits over that document. Condition A2 requires the development to be carried out in accordance with the modification and the Modification Assessment. The Interim Leachate Management Plan has been developed based on the approval of Mod 1'. This audit agrees with this assessment, given the ILMP was submitted as part of the Mod 1 package, and it will be updated once interim works are complete. The full LMP will be updated once the final design is proposed - underway. Council letter 27 Jun 2025 (C5(a) review after compliance report submission) referencing "previous correspondence" about an updated interim leachate management plan to be provided once works completed	Compliant
	(e)or the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	All phases	Staff interview	PMHC advised no directions received	Not Triggered
C6 Revision Of Strategies, Plans And Programs	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	All phases	Mod1 Consolidated Consent Conditions Staff interview Council letter "SSD-5792-Mod 1 - Works not commencing" dated 15/10/2024	SSD 5792 Mod 1 approved by DPE on 31/08/2023 proposed to modify the leachate- barrier and collection system to increase the leachate storage capacity of the landfill in order to manage the risk of significant leachate generated from the landfill cells in Stage 1. In PMHC email to auditor, advised implementation of the ILMP has commenced, and the ILMP will be updated once the associated works are complete and final LMP developed occur once final system is designed. No update to plans required after Mod 1 submission as ILMP was lodged with Mod 1 for DoPI review/approval. C5(c) not yet demonstrated, however revisions undertaken subsequent to the IEA. No other C5 triggers required.	Not Triggered
Reporting and Auditing					
C7 Incident Notification, Reporting and Response	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	All phases	Evidence of and details of revision 2024 Annual Return Staff interview	The 2024 Annual Return details an incident with leachate: <i>following a significant weather event, the leachate collection system in the waste cell was overtopped by leachate resulting in some leachate moving outside the cell. No leachate moved outside the boundary of the premises as a result of this incident.</i> The action taken is listed as: <i>Council is awaiting advice from its technical consultant on leachate management options. In the interim, leachate levels are being managed by the removal of leachate by trucking it offsite to an appropriate licensed facility. Council is awaiting on technical advice from its consultant on the options for the management of leachate including installing additional storage capacity.</i> PMHC advised not triggered: 2024 spill does not meet definition of an Incident as an occurrence that causes or threatens to cause material harm (not trivial harm to environment/health/safety, or >\$10,000 loss).	Not Triggered
C8 Non-compliance Notification	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	All phases	TE25002 Compliance Audit Report 2025; Operational Compliance Report (27 Feb 2024); PMHC letter to DPHI dated 22/04/2025.	*No evidence was sighted (by prior auditors) demonstrating written notification to the Department within 7 days for non-compliances identified during the reporting period (including Feb 2023 report outcomes and the Water Technology 2024 compliance reporting period). *PMHC letter dated 22/04/2025 states the Department was notified of non-compliances for the 12/11/2023–11/11/2024. This period is compliant. *No data available re 2025 compliance reporting period. Action: PMHC to notify Department within 7 days of any non-compliance	Non-Compliant
C9 Non-compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	All phases	TE25002 Compliance Audit Report 2025; Operational Compliance Report (27 Feb 2024); PMHC letter to DPHI dated 22/04/2025.	As per above, there were a number of instances where notification not provided. For the 2025 Operational compliance report, notification was provided and all detail was within the letter/report.	Compliant
C10 Non-compliance Notification					
C11 Compliance reporting	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance. No later than 6 weeks before the date notified for the commencement of operation, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department	All phases Stage 1	Noted Evidence of Compliance Monitoring and Reporting Program submission to secretary	As per the previous Compliance Report dated Feb 2023, Council emailed DPE on 24 November 2020 regarding the submission of programs for compliance reporting and independent auditing. A letter from DPE dated 9 December 2020 informed Council that the department is satisfied that the Compliance Reporting Program and the Independent Audit Program for the development are consistent with Post Approval Requirements (2020). DPE states in letter dated 9 December 2020 that: "Based on your notification for commencement being January 2021, the first Independent Audit for the construction of Stage 1 of the landfill is due on 29 March 2021 and the first Operation Compliance Report is due on 3 January 2022"	Compliant
C12 Compliance reporting	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	All phases	2023-2025 compliance reports	Previous compliance reports sighted and found consistent with Department requirements	Compliant

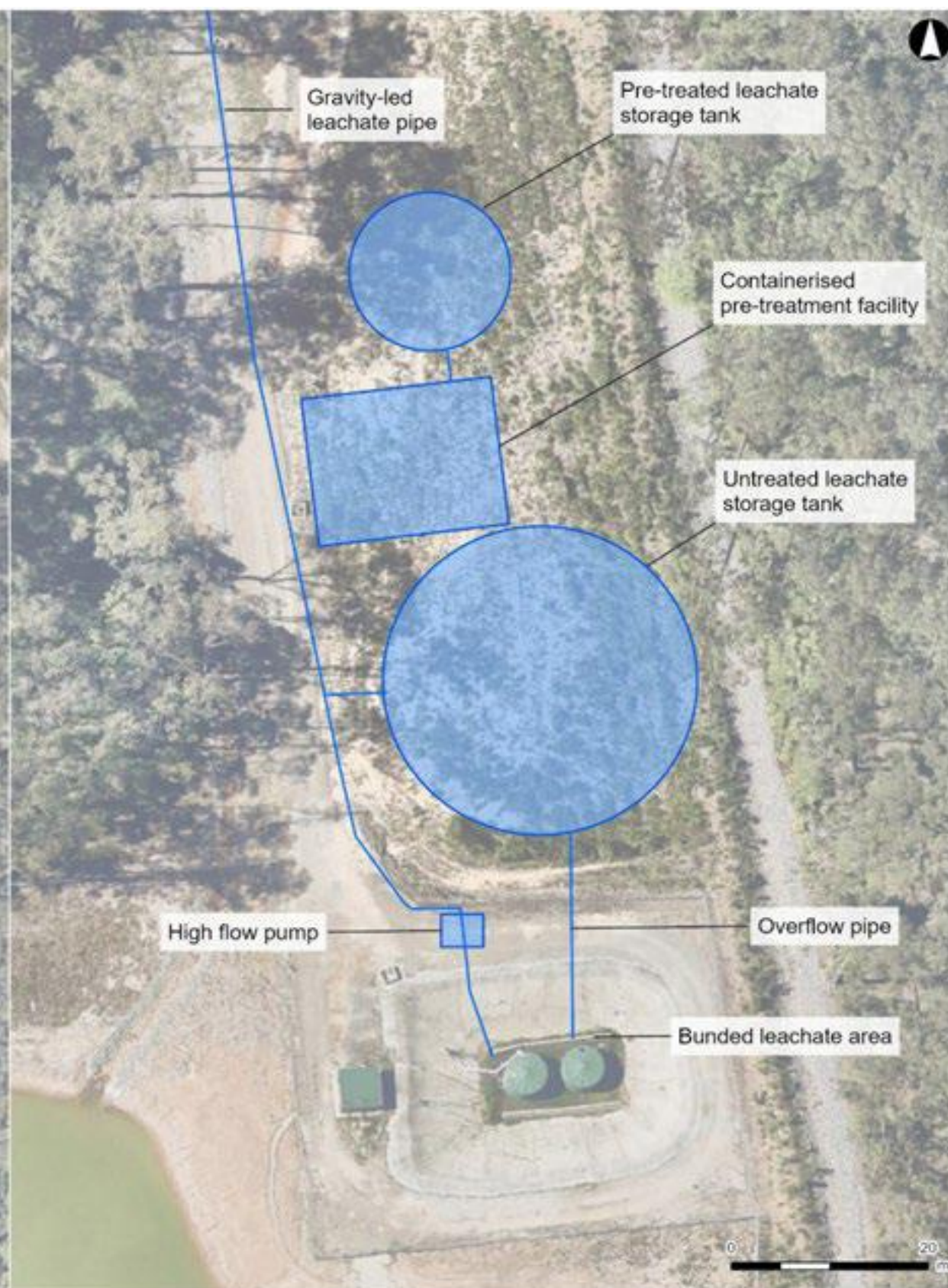
Condition Number	Requirement	Development Phase	Evidence Used	Findings and Recommendations	Compliance Status
C13 Compliance reporting	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Department and notify the Department in writing at least 7 days before this is done. Independent Audit	All phases	PMHC letter 28/02/2024 Screenshot 7/05/25 PMHC email 7/5/2025	Sighted email 7/5/2025 from PMHC to DPE with the following evidence: 1. Letter from PMHC to DPE stating that to advise that the Compliance Report dated 27 February will be uploaded to Council's website by 31 March 2024. 2. screenshot from Council's website software showing that the document was uploaded to Council's website on 4 March 2024. Sighted email 7/5/2025 from PMHC to DPE stating that Council submitted 2025 compliance report to the department on 22/04/2025.	Compliant
C14 Independent Audit	No later than 4 weeks before the date notified for the commencement of operation, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department.	Stage 1	First operational IEA findings. PMHC letter 31/01/2024 Independent Audit Program 31/01/2024	Email dated 24 November 2020 from PMHC to DPIE Portal sighted which states: "submission of our programs for compliance reporting and independent auditing" Letter dated 8 December 2020 to DPIE from Michael Magalhães (Port Macquarie-Hastings Council) "Amendment of compliance reporting and independent audit program" sighted letter dated 9 December 2020 from DPIE to Sean McKinnon (Port Macquarie-Hastings Council) stating that: The Department has reviewed the revised document and is satisfied that the Compliance Reporting Program and the Independent Audit Program for the development are consistent with the Post Approval Requirements (2020). Operation has not commenced yet. DPIE states in letter dated 9 December 2020 that: "Based on your notification for commencement being January 2021, the first Independent Audit for the construction of Stage 1 of the landfill is due on 29 March 2021 and the first Operation Compliance Report is due on 3 January 2022" The initial audit program is outside the audit period. Sighted PMHC letter 31/01/2024 with an updated audit program to be used until 2055	Compliant
C15 Independent Audit	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department under condition C14 of this consent; and	All phases	Independent Audit Program 2023 IEA report 2024 compliance report	The last independent audit report was dated February 2023. Stage 1 Construction for the development has been completed and the Initial Independent Audit (Construction) was completed by Molino Stewart. Landfilling operations commenced on 20 July 2022 and condition C15 requires an Independent Audit to be carried out within 26 weeks of the commencement of operation (landfilling), i.e. by no later than 18 January 2023. An extension to this date until close of business 28 February 2023 was granted by DPE, ref. letter by Heidi Watters, DPE to Louise Hoade, PMHC dated 25 November 2022. The 2024 compliance report reported the audit was verified to be in accordance with the Independent Audit Post Approval Requirements Guideline (2020) which is in line with the independent audit program.	Compliant
	(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	All phases	Independent Audit Program 2023 IEA report 2024 compliance report	Molino Stewart undertook the Initial Independent Audit (Operations) in line with the Independent Audit Post Approval Requirements (2020) as approved by DPIE. The 2024 compliance report reported the audit was verified to be in accordance with the Independent Audit Post Approval Requirements Guideline (2020) which is in line with the independent audit program.	Compliant
C16 Independent Audit	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: (a) review and respond to each independent Audit Report prepared under condition C15 of this consent;	All phases	PMHC response to previous IEA dated 19/07/2023	Sighted PMHC response to previous IEA dated 19/07/2023	Compliant
	(b) submit the response to the Department; and	All phases	Independent Audit RAR 19.07.23 signed letter fr PMHC to DPE IEA report upload to DPE portal 21/2/2023	Sighted evidence of IEA report submission date 21/2/2023. In addition to the IEA with response being submitted in February 2023, sighted PMHC letter extracting the response and submitting it to the department.	Compliant
	(c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least 7 days before this is done.	All phases	PMHC email 20/11/2025 Evidence of upload (OpenCities publication screenshots and email commentary) PMHC letter to Planning Secretary's nominee dated 21/02/2023 notifying intended upload of IEA and Compliance Report by 28/02/2023	PMHC provided written notification to the Department on 21/02/2023 that the February 2023 Independent Environmental Audit and Compliance Report would be uploaded to Council's website by 28/02/2023, satisfying the 27-day prior notice requirement for the intended publication date. Sighted PMHC email to DPHI 20/11/2023 with a screenshot of Council's website. 2023 audit uploaded 11/09/2023. 2023 audit response uploaded 25/07/2023. Audit report upload is outside of time period. The 2023 audit report was sighted on PMHC's website: https://www.pmhc.nsw.gov.au/Your-Council/Policies-plans-and-strategies/Plans/Cairncross-Waste-FacilityManagement-Plans .	Non-Compliant
C17 Monitoring and Environmental Audits	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	All phases	Noted		
C18 Access to Information	At least 48 hours before the commencement of operation until the completion of all works under this consent, including rehabilitation, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) the proposed staging plans for the development if the development is to be staged; (v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vii) a summary of the current stage and progress of the development; (viii) contact details to enquire about the development or to make a complaint; (ix) a complaints register, updated monthly; (x) the Compliance Report of the development; (xi) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; (xii) any other matter required by the Planning Secretary; and	Stage 1	Link to project website	Email from Emma Torain dated 19/1/2026 with link to documents on Council's website https://www.pmhc.nsw.gov.au/Your-Council/Policies-plans-and-strategies/Plans/Cairncross-Waste-Facility-Landfill-Expansion i) Documents present; ii) EIS, response to EIS, signed consent, modification 1 consolidated consent, EPL all available iii) Documents present iv) Detailed design stage 1A, 1C and 1E plans available v) 2012-2025 landfill reports found in a link to a different part of the website https://www.pmhc.nsw.gov.au/Your-Council/Council-reports/Environment-reports/Landfill-reports vi) summary of monitoring results present vii) summary paragraphs listed above links/reports viii) details about where to contact to make a submission available ix) complaints register available. Last complaint was in 2024 so not updated since x) 2021-2024 compliance reports available xi) audit reports available and response to 2023 audit recommendations xii) N/A	Compliant
	(b) keep such information up to date, to the satisfaction of the Planning Secretary.	All phases	Link to project website	Documents mentioned in C18(a) are all current	Compliant

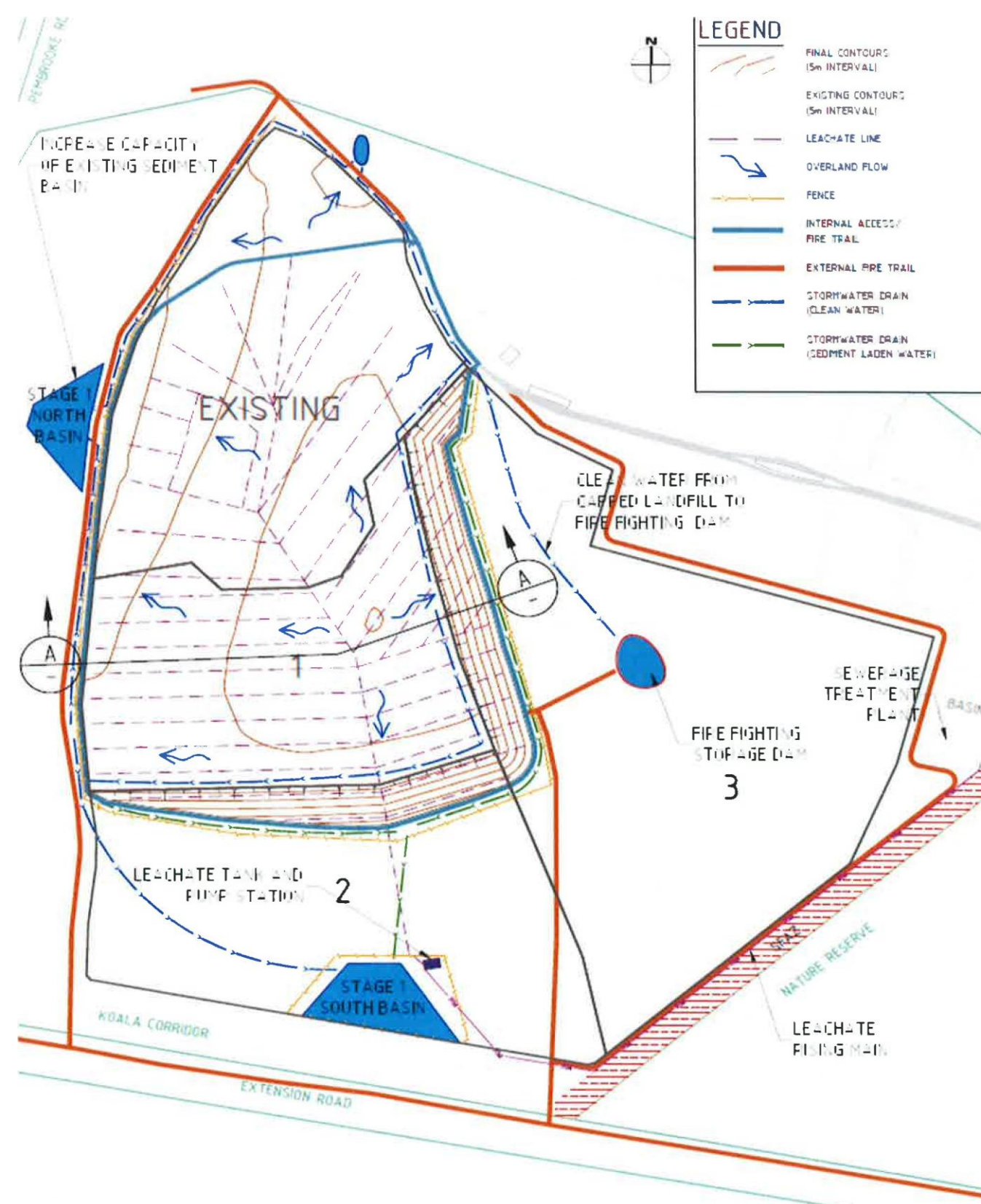
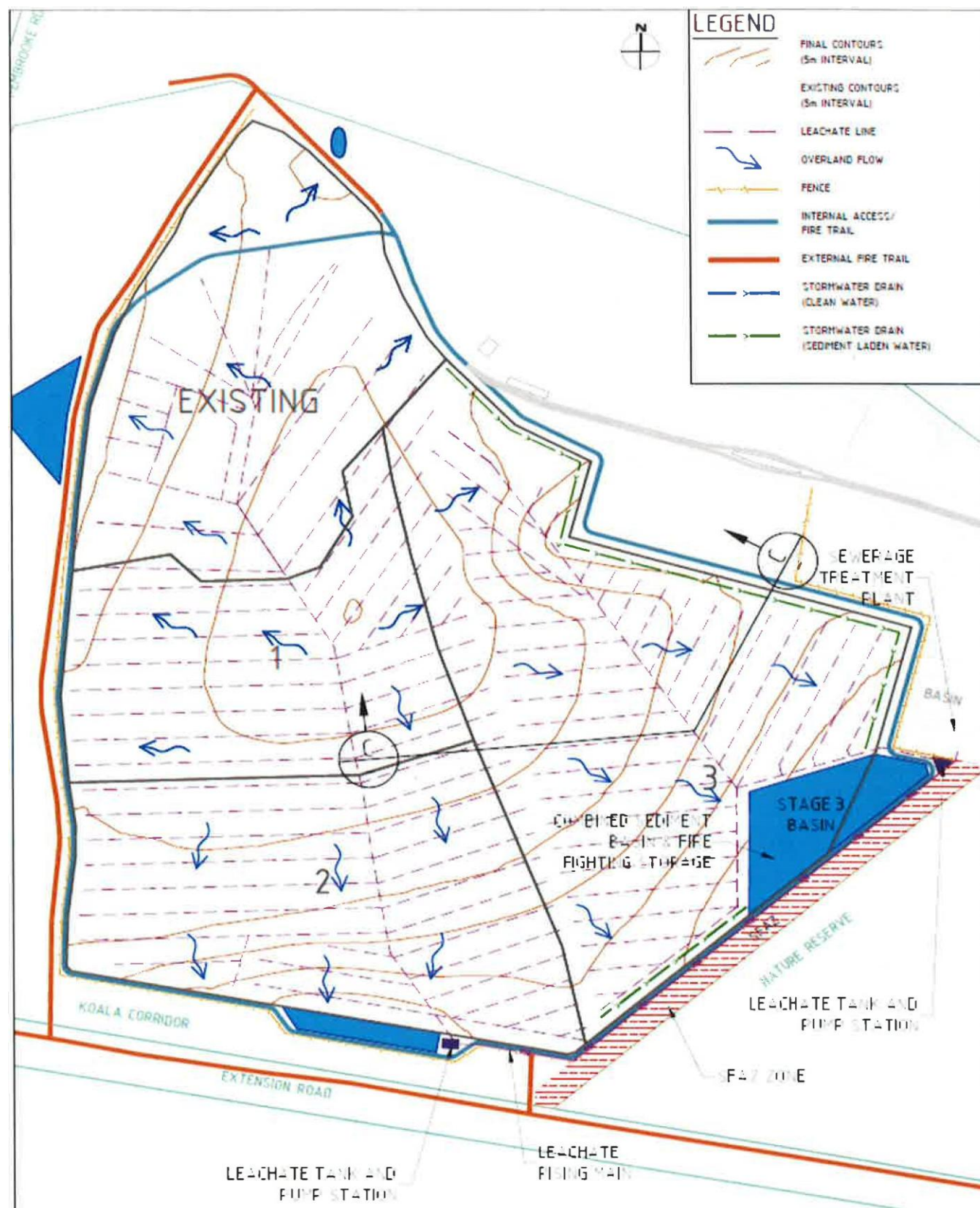
Development Layout Plans



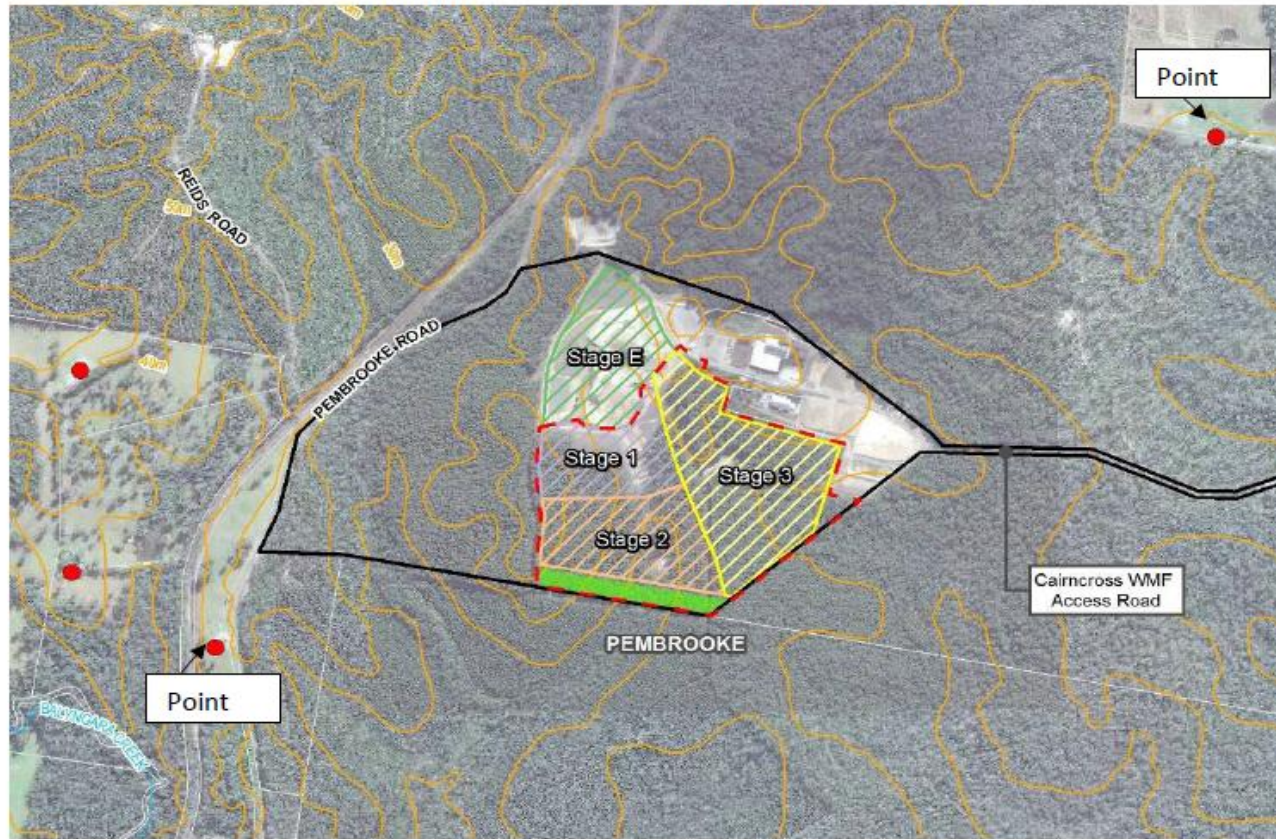




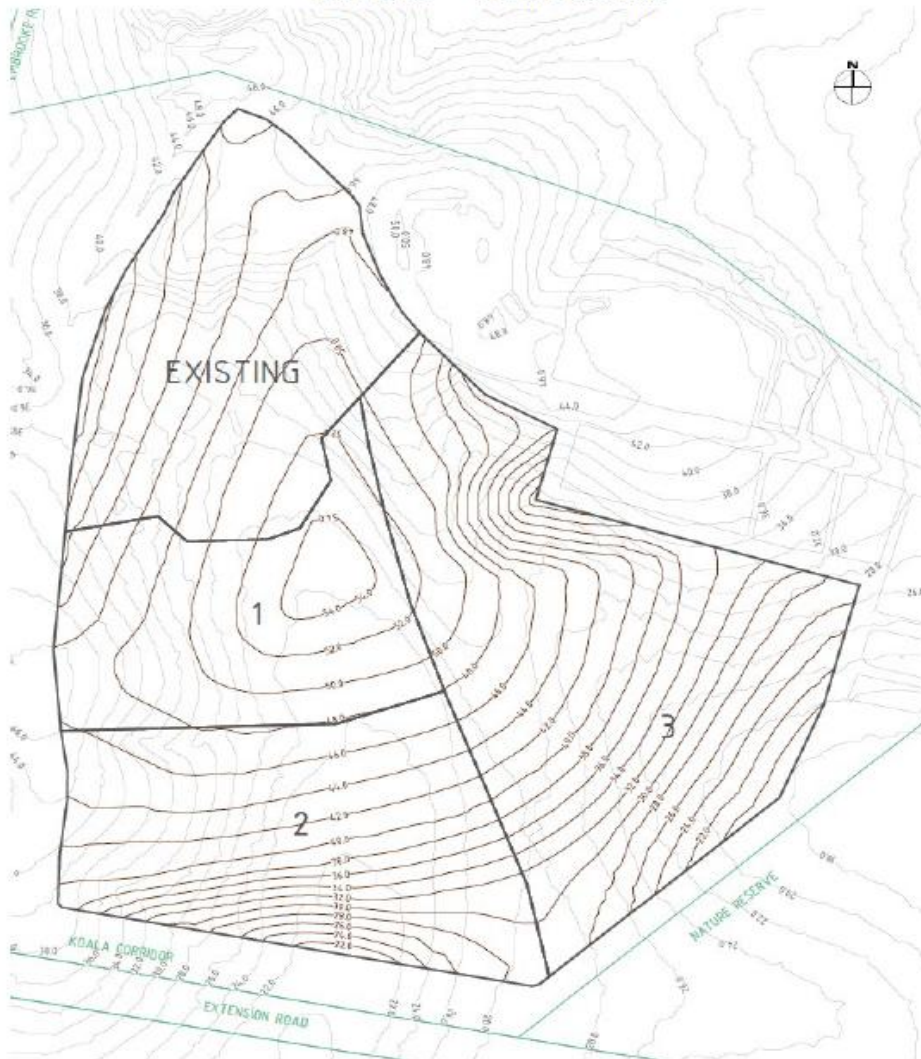




APPENDIX 3 NOISE MONITORING LOCATIONS



APPENDIX 4 FINAL LANDFORM



WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

1. A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C7 or, having given such notification, subsequently forms the view that an incident has not occurred.

2. Written notification of an incident must:
- a. identify the development and application number;
 - b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - c. identify how the incident was detected;
 - d. identify when the applicant became aware of the incident;
 - e. identify any actual or potential non-compliance with conditions of consent;
 - f. describe what immediate steps were taken in relation to the incident;
 - g. identify further action(s) that will be taken in relation to the incident; and
 - h. identify a project contact for further communication regarding the incident.

INCIDENT REPORT REQUIREMENTS

3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

4. The Incident Report must include:
- a. a summary of the incident;
 - b. outcomes of an incident investigation, including identification of the cause of the incident;
 - c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
 - d. details of any communication with other stakeholders regarding the incident.



APPENDIX D DPHI CONSULTATION



Bethany Carlyon

From: Astrid Christensen <astrid.christensen@planning.nsw.gov.au>
Sent: Friday, 16 January 2026 11:17 AM
To: Shireen Baguley
Cc: Bethany Carlyon
Subject: RE: Independent Audit: Cairncross Waste Management Facility Expansion (SSD-5792) [Filed 16 Jan 2026 11:33]

Categories: Filed by Mail Manager

Caution: External Email.

Hi Shireen,

My mistake, I can see now those elements were included.

I am very sorry for the confusion.

Kind regards,

Astrid Christensen (she/her)
Senior Compliance Officer – Far North Region
Planning Compliance | Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

P (02) 9274 6170 | **E** Astrid.Christensen@planning.nsw.gov.au
PO Box 72, Murwillumbah NSW 2484 | Level 1, 135 Murwillumbah Street, Murwillumbah NSW 2484
www.dphi.nsw.gov.au



If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au. Please submit all post approval documents online, via the Major Projects website. To do this, please refer to the instructions available [here](#).

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Shireen Baguley <shireen.baguley@watertech.com.au>
Sent: Friday, 16 January 2026 11:08 AM
To: Astrid Christensen <astrid.christensen@planning.nsw.gov.au>
Cc: Bethany Carlyon <bethany.carlyon@watertech.com.au>
Subject: RE: Independent Audit: Cairncross Waste Management Facility Expansion (SSD-5792)

Good morning Astrid

Thank you very much for the prompt response to our correspondence, appreciated.

I've attached a copy of the previous IEA report, prepared for the first operational audit in 2023. I was the auditor for this one as well, and in line with the 2020 IAPAR, I did include:

- an assessment of the physical extent of the development in comparison with the approved boundary,
- identify key strengths of the development's environmental management and performance

These were addressed in section 4.3

Is in line with what you are seeking to have covered?

Thanks
Shireen

Shireen Baguley
Principal Scientist
(My working days are Tuesday, Thursday, Friday)

WATER TECHNOLOGY • 02 9354 0300 | 0417 804 900 • www.watertech.com.au • 

This email, and any attachments, may contain confidential or legally privileged information. If you think it was sent to you by mistake, please delete all copies of the email and advise the sender.

From: Astrid Christensen <astrid.christensen@planning.nsw.gov.au>

Sent: Friday, 16 January 2026 10:48 AM

To: Shireen Baguley <shireen.baguley@watertech.com.au>

Cc: Bethany Carlyon <bethany.carlyon@watertech.com.au>

Subject: RE: Independent Audit: Cairncross Waste Management Facility Expansion (SSD-5792)

Caution: External Email.

Hi Shireen,

Thanks for your email.

I do not have any additional requests beyond the requirements of the 2020 Independent Audit Post Approval Requirements (IAPAR).

In line with the 2020 IAPAR, please ensure you also include an assessment of the physical extent of the development in comparison with the approved boundary, and identify any key strengths of the development's environmental management and performance identified by the auditor. I note this information was not included in the previous independent audit prepared by Water Technology.

Please reach out if you have any questions.

Kind regards,

Astrid Christensen (she/her)
Senior Compliance Officer – Far North Region
Planning Compliance | Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

[E Astrid.Christensen@planning.nsw.gov.au](mailto:E.Astrid.Christensen@planning.nsw.gov.au)

PO Box 72, Murwillumbah NSW 2484 | Level 1, 135 Murwillumbah Street, Murwillumbah NSW 2484

www.dphi.nsw.gov.au



If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au. Please submit all post approval documents online, via the Major Projects website. To do this, please refer to the instructions available [here](#).

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Shireen Baguley <shireen.baguley@watertech.com.au>

Sent: Friday, 16 January 2026 10:20 AM

To: Astrid Christensen <astrid.christensen@planning.nsw.gov.au>

Cc: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; Bethany Carlyon <bethany.carlyon@watertech.com.au>

Subject: Independent Audit: Cairncross Waste Management Facility Expansion (SSD-5792)

Dear Astrid,

Please find attached correspondence regarding the consultation with DPHI for the Cairncross Waste Management Facility.

Please let us know if DPHI has any input into the scope of the Independent Audit that you would like us to consider in addition to the assessment against the SSD-5792 conditions of consent (our audit schedules are attached for your reference). To meet the timeframe set out for the next Independent Audit, we are aiming to complete the site inspection on or before 29th January, 2026. We ask that you provide any requirements in advance of this date.

Kind regards
Shireen



APPENDIX E SITE INSPECTION PHOTOGRAPHS





Front gate.



Front entry signage.



Entry road.



Weighbridge with inspection facilities.



Unacceptable waste types signage.



Active tip face.



Tipping at active face.



Daily cover (LHS).



Disposal of asbestos.



Waste separation – steel and white goods.



Waste separation – green waste.



Waste separation – concrete, bricks, tiles & pavers.



Litter collection around site.



Construction for interim leachate collection tank pad as per Interim Leachate Management Plan.



APPENDIX F AUDIT ACTION PLAN



Condition Number	Item Number	CC1 IEA Findings and Recommendations	Action to be Taken	Details of Action Taken	By Who	By When
Actions required to correct non-compliances						
C8	NC-1	3 non-compliances (C5, C8 and C16 were found)	PMHC to notify Department within 7 days of any non-compliance.			
C5(c)	NC-2	No evidence that plans were revised within 3 months of independent audit report submission (i.e. by 21/5/2023)	Future documents to follow timelines outlined.			
C16(c)		Audit report upload is outside of time period.				

Condition Number	Item Number	CC1 IEA Findings and Recommendations	Action to be Taken	Details of Action Taken	By Who	By When
Opportunities for Improvement						
C18(vi)	OI-2	Summary of monitoring is not comprehensive. Just pages of tables.	Provide an explanation about the results, if any were exceeding the limit and why.			

Melbourne

15 Business Park Drive
Notting Hill VIC 3168

Brisbane

Level 5, 43 Peel Street
South Brisbane QLD 4101

Sydney

Suite 3, Level 1, 20 Wentworth Street
Parramatta NSW 2150

Adelaide

2/39-40 Greenhill Road
Wayville SA 5034

New Zealand

4 Williamson Avenue
Ponsonby New Zealand 1021

Geelong

1/5 Bridge Street
Newtown VIC 3220

Gold Coast

Suite 37, Level 4, 194 Varsity Parade
Varsity Lakes QLD 4227

Sunshine Coast

4C 'Regatta Corporate', 2 Innovation Parkway
Birtinya QLD 4575

Melbourne – CBD

Suite 904, Carlow House, 289 Flinders Lane
Melbourne VIC 3000

Brisbane – Camp Hill

2a/4 Newman Avenue
Camp Hill QLD 4152

Ballina

Unit 1b/1 Hogan Street
Ballina NSW 2478

Perth

Level 1, 21 Adelaide Street
Fremantle WA 6160

Wangaratta

First Floor, 40 Rowan Street
Wangaratta VIC 3677

Wimmera

597 Joel South Road
Stawell VIC 3380

Darwin

Unit 40/29 Woods Street
Darwin City NT 0800

1300 198 413



watertech.com.au

