

Annual Review

**Bourke Small
Stock Abattoir**

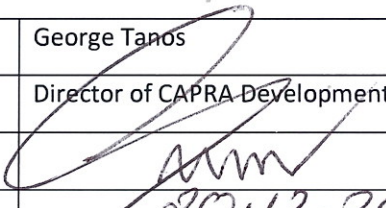
10 January 2020



Prepared for CAPRA Developments Pty Ltd by

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Document Control				
Version	Date	Revision Details	Author	Reviewed
V0.1	4/11/2019	Skeleton report	SJ	
V0.2	20/11/2019	First Draft	SJ	
V0.3	22/11/2019	Second Draft	SJ	JP
V0.4	29/11/2019	Third Draft	SJ	JP
V1.0	11/12/2019	Final Draft	SJ	JP
V1.1	20/12/2019	Updated Final Draft	SJ	JP and GT
V1.2	10/01/2020	Final Report Update	SJ	JP and PH

Name of operation	The Bourke Small Stock Abattoir
Name of operator	CAPRA Developments Pty Ltd
Development consent (DC) #	SSD 7268
Name of holder of development consent/ project approval	CAPRA Developments Pty Ltd
Environment Protection Licence (EPL) #	20918
Name of holder of EPL	Darling River Goat Exports Pty Ltd
Water licence #	NA
Annual Review start date	14 November 2017
Annual Review end date	14 November 2019
I, George Tanos, certify that this audit report is a true and accurate record of the compliance status of the Bourke Small Stock Abattoir for the period 14 November 2017 – 14 November 2019 and that I am authorised to make this statement on behalf of CAPRA Developments Pty Ltd <i>Note.</i> <i>a) The Annual Review is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i> <i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i>	
Name of authorised reporting officer	George Tanos
Title of authorised reporting officer	Director of CAPRA Developments Pty Ltd
Signature of authorised reporting officer	
Date	20.12.2019

1. Statement of Compliance

Table 2. Statement of Compliance

As at the end of the reporting period, the operation was not compliant with its relevant approval conditions as follows:

Were all conditions of the relevant approval(s) complied with?	
DC # SSD 7268	No
EPL # 20918	No

The summary of non-compliance items are identified in the **Table 3** below. Detailed assessment and corrective and/or preventative actions are discussed in relevant Sections below.

Table 3. Non-Compliances

Relevant approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
DC # SSD 7268	C8 and C9	Biodiversity Offset Strategy	Non-compliant	The Biodiversity Offset Strategy and Biobanking Agreement were lodged and approved late by the Office of Environment and Heritage (referred to as OEH hereafter), as explained in detail in the previous Annual Review. No instalment payment has been made to the Biodiversity Stewardship Payments Fund yet (due by 31 January 2019) as agreed in the staged payment plan. Passive management actions have been implemented but not to the fullest extent.	Addressed in Section 6 (pp. 24-26), Section 11 (p.47) and Section 12 (pp.48-49)
DC # SSD 7268	C39	Water Management Plan	Non-compliant	Due to management oversight, the groundwater	Addressed in Section 6 (pp.40-41)

Relevant approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				monitoring test in 2019 was delayed until the last date of the current reporting period (i.e. 14 November 2019), which is more than 12 months after the previous test (completed in March 2018).	and Section 11 (p.47)
DC # SSD 7268	D7	Annual Review	Non-compliant	The Annual Review for period 14 November 2017 – 14 November 2018 was not prepared and lodged to the Department of Planning, Industry and Environment (referred to as the Department hereafter) by early 2019 due to administrative oversight. The Department has agreed to allow the Applicant to lodge one Annual Review for a two-year period (14 November 2017 – 14 November 2019) upon the Applicant's request. Refer to Appendix 25 for the Department's written approval.	Addressed in Section 11 (p.47)
DC # SSD 7268	D11	Independent Environmental Audit	Non-compliant	The Independent Environmental Audit was not commissioned on 14 November 2018 (i.e. within 2 years of the date of the Development Consent) due to administrative oversight.	Addressed in Section 10 (p.46) and Section 11 (p.47)

Relevant approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				The Department has agreed to let the Applicant engage an external auditor to prepare an Independent Environmental Audit for a three-year period (i.e. 14 November 2016 to 14 November 2019). Refer to Appendix 25 for the Department's written approval.	

Compliance status key for Table 3

Risk level	Colour code	Description
High	Non-compliant	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliant	Non-compliance with: - potential for serious environmental consequences, but is unlikely to occur; or - potential for moderate environmental consequences, but is likely to occur
Low	Non-compliant	Non-compliance with: - potential for moderate environmental consequences, but is unlikely to occur; or - potential for low environmental consequences, but is likely to occur
Administrative non-compliance	Non-compliant	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

2. Introduction

The Bourke Small Stock Abattoir project is focused on building and operating a state-of-the-art export abattoir processing facility, designed to process up to 6,000 small stock per day (a mixture of goats and sheep).

The abattoir is located approximately 14 km north of Bourke (see Figure 1 below). The project has been designed to realise a number of opportunities with respect to both goats and sheep markets, particularly in capturing demand in international markets, whilst providing benefits to Bourke and the farming community.

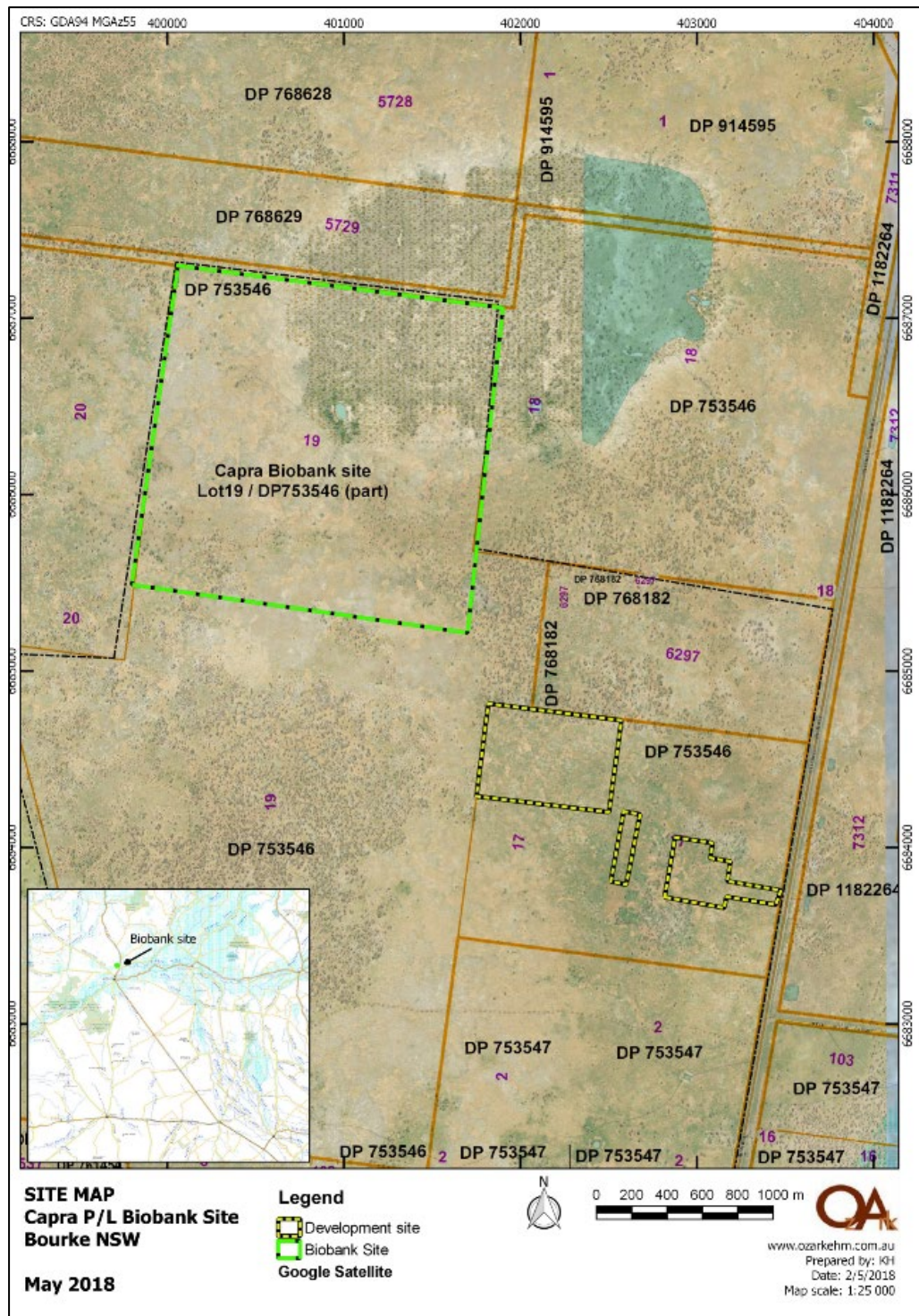
Figure 1 – Regional Context of the Study Area



The "Biodiversity Offset Area" marked in the image above has been approved by OEH.

Figure 2 – The Property

The project site occupies 246 ha of rural land approximately 14 km north of Bourke in the far western region of NSW. The site is positioned off the Mitchell Highway. The land highlighted in Figure 2 comprises of the project site (Lot 17 DP 753546) and Capra Biobank site (Lot 19 DP 753546) as well as Lot 5728 DP 768629, Lot 5729 DP 768628, Lot 1 DP 914595, Lot 18 DP 753546, Lot 6297 DP 768182, Lot 2 DP 753547, Lot 103 DP 753547, Lot 16 DP 753547, Lot 7311 DP 1182264 and Lot 7312 DP 1182264.



The “Capra Biobank site” marked in the image above has been approved by OEH.

The names and contact details for key personnel currently responsible for the environmental management of the operation during the review period are as follows.

Name	Position	Email	Phone
James Turner	Management Darling River Goat Exports Pty Ltd	James@darlingrivermeats.com	0417 239 117
George Tanos	Director CAPRA Developments Pty Ltd	george@blayneyfoods.com.au	0412 799 693

Development Completed During the Reporting Period

As per Condition D7 (a), this section describes the Development that was carried out during the reporting period.

Works completed to date are listed as follows.

- Water, gas and electricity services connected to site;
- Commissioning of the facility and site;
- Initiate operations of the facility;
- Additional concreting on ground floor slabs and footings;
- Tilt panel fabrication;
- Finalisation of sanitary drainage;
- Final pavement works, asphalt toppings and line markings;
- Additional earthworks and preparation for wastewater treatment ponds, mass-burial area etc.;
- Wastewater treatment ponds, mass-burial area and manure stockpiling area;
- Installation of fire hydrant pumps;
- Erect remaining steel for processing facility; and
- Undergoing rehabilitation works post-operation (i.e. sediment and erosion control construction and monitoring).

Development Proposed During the Next Reporting Period

As per Condition D7 (a), this section describes the Development that is proposed to be carried out during the next reporting period.

Works to be carried out and completed during next reporting period are listed as follows.

- Installation of centre pivot irrigation system (contingent on sufficient treated effluent after recommencement of the operation);

- Installation of fencing of the irrigation area;
- Installation and commissioning of remaining operational plant and equipment (i.e. Dehairer machine, Hydraulic Power Pack and Cutters, all offal equipment and Screw Conveyor);
- Completion of hot water ring main downstairs;
- Sewerage to security and stockmen amenities;
- Commissioning Glycol System through the upstairs burners;
- Installation of two Roller Doors and a Workshop;
- Installation of roof access;
- Construction of dustproof Carton Room;
- Swapping out main pumps at the water supply in the machinery shed;
- Adding floor plate cover over the cable trench in the switchboard room;
- Ventilation pipework for grated caps to the floor slab; and
- Passive management actions outlined in the Biobanking Agreement in Section 12 (pp.49-50).

Works to be carried out during next reporting period and completed after next reporting period:

- Augment remaining building and facility and associated structures and bottom floor offices to finish for Occupancy Certification 3.

3. Approvals

The following list of approvals are currently held by the operator and are relevant to the project's development and operation.

- Development Consent – SSD 7268
 - Construction Traffic Management Plan (CTMP)
 - Construction Environmental Management Plan (CEMP)
 - Operational Environmental Management Plan (OEMP), including Aboriginal Cultural Heritage Management Plan (ACHMP), Emergency Disposal and Biosecurity Protocol, Waste Management Plan, Wastewater Management Plan, Irrigation Management Plan and Water Management Plan.
- Environment Protection Licence (EPL) – 20918

4. Construction Summary and Commissioning of Operations

Abattoir operations

The Bourke Small Stock Abattoir (referred to as the abattoir hereafter) was under construction from 14 November 2017 to 1 January 2019 and commenced operations on 2 Jan 2019 under Interim Occupation Certificate. The operation continued for approximately four and a half months until the temporary closure in mid-May 2019 due to commercial reasons. Currently, there are no operational activities (i.e. no livestock onsite), however regular maintenance onsite is performed and ongoing pollution monitoring is recorded as per OEMP requirements.

During the time of operation, the stocking capacity of each holding yard complied with the standards detailed in relevant regulations and AUSVETPLAN manuals at all times, with a maximum processing number of 1,554 livestock in a day (refer to **Appendix 29** for processing activities record).

Daily inspection has taken place to check stock densities, stock hygiene, animal health, and to implement relevant disease control where required. All livestock solid waste generated onsite was disposed to a licenced facility offsite.

See detailed assessment under Section 6 Environmental Performance for Conditions C5-C7 (pp.20-24) of animal welfare and best practice and C17-C21 (pp.30-31) of waste management during operation.

5. Actions Required from the Previous Annual Review

Below is a summary of implementation results of actions required from the previous Annual Review.

Activities	Outcome	Other Comments
Draft and submission of the OEMP (including all required policies and protocols) prior to commencing operations, to the satisfaction of the Department, including: ○ Draft and submission of the Waste Management Plan; ○ Draft and submission of the Wastewater Management Plan;	This activity has been completed.	OEMP including Waste Management Plan, Wastewater Management Plan, Water Management Plan and Irrigation Management Plan, was submitted and approved by the Department on 20 September 2018. See Appendix 12 for OEMP Approval issued by Chris Ritchie as delegate of the Department.

Activities	Outcome	Other Comments
○ Draft and submission of the Water Management Plan; ○ Draft and submission of the Irrigation Management Plan.		
Disease management procedures.	This activity has been completed.	Disease management procedures were incorporated into the Emergency Disposal and Biosecurity Protocol as part of the OEMP. These procedures were approved by the Department on 20 September 2019.
Transfer of EPL to operating entity (Darling River Goat Exports) and compliance with relevant conditions therein.	This activity has been completed.	The EPL was transferred from CAPRA Developments Pty Ltd to the site's operating entity Darling River Goat Exports Pty Ltd on 17 September 2018. Other compliance conditions include weather station installation and advertisement of the contact number for complaints on the Darling River Meats website, prior to commencement of processing activities. These measures have all been completed.
Compliance with Condition C8 (Biodiversity Offset Strategy) on or before 25 February 2018 and implementation of the Biodiversity Offset Strategy and associated Biobanking Agreement.	The obligations under the Biodiversity Offset Strategy have been completed, except for the retirement of 2,068 Ecosystem Credits and implementation of all passive management activities outlined in the Biobanking Agreement.	Both the Biodiversity Offset Strategy and Biobanking Agreement submitted by the Applicant have been approved by OEH and the Applicant has been issued 2,579 Ecosystem Credits. See comments under Conditions C8-C9 for a detailed discussion on implementation of Biobanking Agreement and retirement of the 2,068 Ecosystem Credits.
CAPRA Developments to immediately ensure their complaint register process is being fully documented and actively managed onsite.	This activity has been completed.	A documented complaint register process is included as part of the OEMP and is available on Darling River Meats website, along with a

Activities	Outcome	Other Comments
		telephone line and a complaints form for users to register a new complaint. No complaints have been lodged or recorded during the reporting period (refer to Appendix 31).
Updating and approval of ACHMP (incorporating OEMP commitments).	This activity has been completed.	The updated ACHMP was incorporated into the OEMP and was approved by the Department on 20 September 2018.
Continued dust stabilisation through implementing reasonable and feasible measures to reduce and control dust generated from the Development will continue to be a priority.	This activity has been completed, except for the sealing of the access roads from the back of site.	Access roads at the front of site have been sealed and maintained. Access roads from the back of site are undergoing construction to be fully sealed to minimise wheel generated dust.
Continued establishment/growth of Gurri Trees. Gurri Trees are currently being grown as seedlings as part of Condition C46 (mentioned previously). The successful growth of these will be closely monitored during the next reporting period.	This activity has been completed.	All Gurri Trees have been growing steadily at Gidgee House in Bourke, with continued access provided to the Aboriginal community for educational and cultural usage. Refer to Appendix 22 (p.7) for the photo of growing Gurri Trees.

6. Environmental Performance

This section summarises the environmental outcomes intended for the reporting period for The Bourke Small Stock Abattoir, and the Reviews assessment of performance against each outcome.

With the exception of water management and erosion and sediment control (included in Section 7 and Section 8 separately), the following table highlights the environmental performance aspects, their outcomes, and whether these outcomes have been achieved during the review period.

A full comparison of Environmental Impact Statement (EIS) predicted impact and actual impacts have been included separately as **Appendix 11**.

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
Air quality discharges	Development Consent SSD 7268 Condition C1: C1 – The Applicant shall ensure the Development complies with all load limits, air quality criteria and air quality monitoring requirements as specified in the EPL for the site. See EPL Load Limit requirements below.	This condition has been met.	As per the OEMP, fortnightly environmental inspections are conducted to report on environmental impacts of the project. Refer to Appendix 1 for examples of the environmental checklist and Appendix 2 for ongoing climate monitoring data since commissioning of the operation.	Appendix 1 and Appendix 2
<i>Pollution of waters</i>	L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	This condition has been met. All obligations under EPL have also been met.	Review of environmental incident record, Site Audit records in p.6 of Appendix 3, community meeting notes (Appendix 30) and the fact that no water complaints from the annual complaints register (Appendix 31), indicate that no discharges from the development site were observed and no person has been identified to pollute any water.	Appendix 3 and Appendix 30 and Appendix 31
<i>Concentration limits – (Sediment dam).</i>	L2.1 For each monitoring/discharge point or utilisation area specified in the table(s) below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	This condition has been met. There have been no discharges for the sediment dam recorded or evident due to no run-off events having occurred.	As per the EPL, these concentration limits are related to monitoring Point 3 (i.e. Sediment Dam). Evidence of no discharge has been verified through climate monitoring, and that no discharge incidence from site management records and Site Audit reports findings is evident.	Appendix 1 and Appendix 3

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
	L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges. L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the tables. L2.4 Water and/or Land Concentration Limits – Total suspended solids must not exceed 50 milligrams per litre.		See Appendix 1 for monitoring records for the surface water retention pond (i.e. the Sediment Dam) as part of the fortnightly environment checklist, and Appendix 3 for Site Audit remarks on the Sediment Dam and the low likelihood a runoff event could cause discharge overflow.	
Waste (also refer to “Waste” section below and Consent conditions C17-C21)	L3.1 The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal of any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence. This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises under the Protection of the Environment Operations Act 1997.	This condition has been met.	All construction waste (e.g. excess building materials) and operational waste (e.g. livestock solids waste) are recorded and removed to a licenced location offsite. See waste removal records and inedible meat transfer certificate examples in Appendix 10, and waste agreement with Master Butchers Co-Operative Limited (based in South Australia) in Appendix 13.	Appendix 10 and Appendix 13
Noise limits	L4.1 Noise generated at the premises that is measured at each noise monitoring point established under this licence	These conditions have been met.	In the CEMP Section 6.2 Construction Noise Management and Mitigation Measures, it	Appendix 3, Appendix 30

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
	must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2 (<i>refer to EPL noise limits table under section L4.1</i>) L4.2 For the purposes of condition L4.1: - Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays. - Evenings is defined as the period from 6pm to 10pm. - Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.		was determined that due to the distance of the nearest noise-sensitive receptor (nearest residence to the project site is approximately 5.5km), potential noise impacts associated with the construction of the project was predicted to be negligible. Noise monitoring is required in the event a noise complaint or incident. As there have been no complaints recorded in the complaints register or evident during the current reporting period, compliance with this condition has been met. Refer to p.6 of Appendix 3, Appendix 30 and Appendix 31 for evidence of no complaints received.	and Appendix 31
<i>Blasting</i>	L5.1 Blasting at the premises is prohibited.	This condition has been met. Review of complaints/incident records indicate that no blasting activities occurred onsite.	See p.6 of Appendix 3, Appendix 30 and Appendix 31 for comments on no complaints received on site. No blasting will be permitted onsite in accordance with EPL requirement.	Appendix 3, Appendix 30 and Appendix 31

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
<i>Hours of operation</i>	L6.1 Unless otherwise specified by any other condition of this license, all construction activities are: a) restricted to between hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1pm Saturday; and c) not to be undertaken on Sundays or Public Holidays L6.2 Works outside of the hours identified in condition L6.1 may be undertaken in the following circumstances: a) works that are inaudible at the nearest receivers; b) works agreed to in writing by the Department of the NSW Department of Planning and Environment; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; d) Where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm. L6.3 Unless otherwise specified by any other condition of this licence, scheduled activities are	This condition has been met.	No works exceeded regular construction hours or operation hours at any time during the reporting period with the exception of a short period in late November 2017. Concreters started earlier between 2.30 am – 4.00 am to prevent heat risk due to hotter weather in summer. Although these hours were outside the approved hours, they were in accordance with Clause a) of L6.2: <i>a) works that are inaudible at the nearest sensitive receivers;</i> See p.4 of Appendix 3 for Site Audit observation and p.7 for recommendations. No excessive construction or working hours have been recorded after the Site Audit on 23 November 2017. Refer to site attendance register in p.1 of Appendix 7.	Appendix 3 and Appendix 7

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
	permitted to operate 24 hours a day Monday to Sunday.			
<i>Potentially offensive odour</i>	L7.1 The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour emitted in accordance with the conditions of a licence directed at minimising odour. L7.2 No condition of this license identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.	This condition has been met.	No offensive odour was permitted beyond the boundary of the premises and no odour complaints have been received. Refer to p.6 of Appendix 3, Appendix 30 and Appendix 31 for comments on no complaints received on site. One odour leak incident was recorded (with no impact on the environment), which is discussed in more details in Section 11 (p.46). See Appendix 14 (pp.1-3) for the incident record.	Appendix 3, Appendix 14, Appendix 30 and Appendix 31
Odour	Development Consent SSD 7268 Condition C2: C2- The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour, as defined	This condition has been met.	No complaints have been recorded on the complaints register or evident from this assessment of any offensive odour being caused or permitted by the development. Refer to p.6	Appendix 3, Appendix 30 and Appendix 31

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
	in the POEO Act (Development Consent Condition C2).		of Appendix 3, Appendix 30 and Appendix 31 for comments on no complaints received on site. Furthermore, no emission of offensive odour as defined by the POEO Act was caused or permitted by the project during the reported period. An odour leak incident onsite was recorded. Refer to above comments for EPL7.1.	
Dust management	Development Consent SSD 7268 Condition C3 and C4: C3 – The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development. C4 – During construction and operation of the Development, the Applicant shall ensure that: a) all vehicles on-site do not exceed a speed limit of 60 kilometres per hour; b) all loaded vehicles entering or leaving the site have their loads covered; c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking	These conditions have been met. The site complied with the dust management requirements during its construction phase of CTMP, CEMP and EPL.	Refer to Appendix 3 (pp.1-3) for photos of speed limit signs and observations of proper load coverage. See Appendix 4 (pp.2-3) for sealed road and site overview with no dirt or dust evident. Appendix 4 (p.20) also shows continued dust stabilisation implementation using a water tanker (i.e. cleaning of loaded vehicles and site facilities). Further, the Applicant continues to carry out measures to minimise dust through sealing road at the front of site, with remaining sealing work at the back of site to be	Appendix 3 and Appendix 4

AIR QUALITY AND ODOUR				
Environmental aspect	Outcome	Performance (i.e. whether this outcome was achieved)	Other Comments	Appendices
	these materials on public roads; and d)all heavy vehicles do not use engine brakes.		completed in the next reporting period.	

ANIMAL WELFARE AND BEST PRACTICE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Animal welfare and best practice	Development Consent SSD 7268 Condition C5: C5 - The Applicant shall ensure the Development complies with the relevant requirements for the welfare of livestock, particularly health, housing, watering, feeding, handling and transport, including but not limited to those listed in: a) National Animal Welfare Standards for Livestock Processing Establishment; b) Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock; c) Australian Industry Welfare Standards and Guidelines for Goats; d) Australian Industry Welfare Standards and Guidelines for sheep; e) Model Code of Practice for the Welfare of Animals: The Goat;	This condition has been met. External livestock suppliers and/(or) truck drivers that have been selected by the business, handle livestock health prior to transferring to the Development site. Livestock management onsite has been in accordance with the OEMP requirements.	External livestock suppliers and/or truck drivers check livestock fitness, and are responsible for livestock welfare during transport in accordance with Livestock Transport Requirements prepared by the site administrator. Refer to p.8 and p.39 of Appendix 6 for transport procedure and an example of the signed form kept in the security office. There have been no records of injured or stressed livestock after transfer. National Vendor Declaration (NVD) forms are provided to Management for all livestock transferred to the site. Then, an On-Plant Vet (OPV) checks the health status of the livestock prior to slaughter. See Appendix 6 pp. 6-7 for examples of NVD and goat checklist,	Appendix 4 and Appendix 6

ANIMAL WELFARE AND BEST PRACTICE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	f) Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments; and g) any other relevant document that supersedes the above.		and pp.17-19 for Ante-Mortem process carried out by the OPV. During operation, the Livestock Manager inspects stock yards every day and ensures adequate feed and water supply is provided. All stock holding yards are washed regularly to minimise stress and the risk of injuries of livestock. Any livestock identified as weak, ill or injured are promptly treated. See Appendix 6 pp.9-15 for stockyards procedures, and pp. 1-5 for an example of daily livestock handling monitoring and recording and evidence of no dead stock. Also refer to Appendix 4 (pp.4-8) for photos of clean stock holding and chilling areas. Specific tasks are designed for the slaughter floor to ensure all restraint, stunning and slaughter procedures are carried out humanely and effectively. See Appendix 6 pp.16-31 for examples of procedures and pp.40-55 for examples of signed records. Also refer to pp.32-38 for statement of attainment to show staff competency on handling livestock.	

ANIMAL WELFARE AND BEST PRACTICE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Emergency disposal and biosecurity	Development Consent SSD 7268 Condition C6: C6 - Prior to the commencement of operation, the Applicant shall prepare an Emergency Disposal and Bio-Security Protocol, detailing the procedures for a biosecurity emergency including a mass mortality event, to the satisfaction of the Department. The protocol shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5.	This condition has been met. The Emergency Disposal and Biosecurity Protocol was prepared, and approved by the Department, as part of the OEMP.	No mortality event has been identified or reported through reviewing site records and Site Audit reports. See Appendix 7 for staff induction and training record on the Emergency Disposal and Biosecurity Protocol (included as part of OEMP training).	Appendix 7
Disease management	Development Consent SSD 7268 Condition C7: The Applicant shall ensure the following key Q-Fever controls are in place during the operation of the Development a) ensuring livestock is rested prior to transport to the Development site; b) a driver protocol is in place to ensure drivers transporting livestock to the Development site do not stop in built up areas when carrying livestock; c) the Meat Livestock Australia's guide 'Is it Fit to Load?' is considered before livestock is transported to the Development site;	This condition has been met. The disease management protocols, and drivers' protocols, procedures and controls are included in the Emergency Disposal and Biosecurity Protocol (approved as part of the OEMP). These measures have been implemented.	External livestock suppliers and/or truck drivers check the livestock fitness and ensure they are well rested prior to transport to the Development site. This is supported by no evident observation of livestock stress from Management upon their arrival. Livestock transport cars only stop at the designated area (i.e. livestock unloading ramp, refer to p.5 of Appendix 4) after a brief stop at front gate for a security check. Stock holding yards are maintained and cleaned regularly. See Appendix 4 (pp.5-8) for clean ramps, upstairs and downstairs, holding yards to rest	Appendix 4, Appendix 6, Appendix 7, Appendix 8, Appendix 13 and Appendix 32

ANIMAL WELFARE AND BEST PRACTICE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	d) implementation of an immunisation program for all abattoir workers; e) ensuring animal waste is removed from the Development in enclosed containers; f) ensuring the design (i.e. irrigation, ventilation, dust suppression, fencing) of the Development meets industry best practice for the control of disease; and g) details of measures for continuous improvement in disease management to be reported in the annual review required under Condition D7.		livestock and fencing to prevent livestock from running away. Refer to Appendix 8 for examples of Q Fever pre-screening and vaccination form for abattoir workers. Animal wastes are disposed to a licenced location offsite in enclosed containers (i.e. wasters are safely covered on top of the trailer). An extra blood tank will be used where necessary. See p.4 of Appendix 13 for relevant clauses in the goat renderable material supply agreement. The site design (i.e. irrigation, ventilation, dust management and fencing) are in place to serve as effective disease intervention. Refer to Appendix 4 pp. 20-21 for the water tanker used to suppress dust and silt, and the fencing installed on site. Refer to pp.9-10 for aerators and fencing in wastewater treatment ponds to prevent water overflow, and pp.31-34 for various ventilation fans installed on site. See Appendix 7 for site induction checklist, staff training records on disease	

ANIMAL WELFARE AND BEST PRACTICE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
			management and vehicle management (included as part of OEMP training). The livestock health check process has been implemented to improve disease management, starting with reviewing NVD received, visual examination and records of the livestock fitness, and obtaining OPV's sign-off after Ante-Mortem process prior to any slaughtering activities (see Appendix 6 for procedures and records). In addition, a mass disposal pit has been constructed to improve waste management (see p.12 of Appendix 4). Refer to Appendix 32 for the sanitation procedures approved by the Department of Agriculture and Water Resources.	

BIODIVERSITY				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Biodiversity offset strategy	Development Consent SSD 7268 Condition C8 and C9: C8 - Within 12 months of the operation of this development consent, the Applicant shall	These conditions have not been met. Records reviewed indicates that registration of Biobank site and	The timeframe for the staged payment plan to retire Ecosystem Credits and management plans and actions for the Biobank site were agreed upon finalising the	Appendix 9, Appendix 11 and Appendix 22

BIODIVERSITY				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	purchase and retire 2,068 Ecosystem Credits to offset the removal of 55.3 hectares of native vegetation as calculated in the Biodiversity Assessment Report, prepared by EMM (EIS, Appendix I) C9 – Any proposed management activities shall be in addition to other obligations for conservation that are attached to the land such as actions being carried out under a Property Vegetation Plans.	purchase of 2,579 Ecosystem Credits have been completed. However, the retirement of Ecosystem Credits has not been progressed, and the first instalment of \$89,741.40 (1/3 of Total Fund Deposit required, due on 31 January 2019) has not been paid to OEH yet. Only passive management activities are required until at least 80% of the Total Fund Deposit has been received for the first time (i.e. \$215,171.26, refer to p.14 of Appendix 9) and some of these activities have been completed. Completed passive management activities include the establishment of outside boundary fencing	Biobanking Agreement on 31 May 2019 (see Appendix 9 for approved Biobanking Agreement, approved payment arrangement plan, Biodiversity Site Land Registration, Biodiversity Credit Ownership, and Credit Retirement Reports and email communication from OEH). However, the first instalment payment to retire Ecosystem Credits, and the full implementation of passive management activities have been postponed due to exceptionally difficult seasonal and economic conditions adversely impacting the Applicant. These factors have resulted in a temporary closure. Refer to Appendix 22 (pp. 1-6) for works completed so far in the Biobank site. See Section 12 (pp. 48-49) for the Applicant's action on resuming credit retirement progress and a detailed timeframe for implementation of remaining passive management actions.	

BIODIVERSITY				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
		and fire trail, prohibition of grazing, prohibition of waste storage/disposal and retention of dead timbers and rocks on the Biobank site. Fire for conservation management, nutrition control, vegetation retention and management of human disturbance requirements have not been implemented yet.	Biodiversity mitigation measures outlined in EIS are discussed in detail in Appendix 11 (pp.6-7).	

TRAFFIC AND TRANSPORT				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Road works and site access	Development Consent SSD 7268 Condition(s) C10 and C11 C10 - Prior to the commencement of operation of the Development, the Applicant shall complete the private vehicular road access road connection to the Mitchell Highway to the satisfaction of the roads' authority	These conditions have been met.	Construction of private vehicular road access and road connection to the Mitchell Highway had been completed, and was to the satisfaction of the roads' authority during the final stage of construction and operation of the Development in 2017. Refer to Appendix 15 for construction completed	Appendix 4 and Appendix 15

TRAFFIC AND TRANSPORT				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	C11 - Prior to the commencement of operation of the Development, the private vehicular access road connection to the Mitchell Highway is to be constructed to the satisfaction of the RMS and is to include the following a) a Basic Right-Turn Treatment (BAR) as shown in Figure 7.5 Part 4a of the Austroads Guide to Road Design on the Mitchell Highway at its intersection with the vehicular access servicing the site; b) a Rural Auxiliary Left Turn Treatment – Short Turn Lane on the Mitchell Highway generally in accordance with Figure 8.3 Part 4A of the Austroads Guide to Road Design and relevant RMS Supplements; c) the private vehicle access road at the approaching connection to the Mitchell Highway is to be wide enough to accommodate the simultaneous passing of turning road train vehicles. The access road is to be sealed a minimum of 60 m from the edge of the hold line; and d) Safe Intersection Site Distance (SISD) requirements outlined in the Austroads Guide to Road Design part 4A and relevant RMS Supplements shall be provided and maintained at		and written approval issued by Chris Ritchie as the Department's nominee. Also see pp.22-23 of Appendix 4 for the Auxiliary Left Turn Lane and wide access that allows simultaneous passing of turning road train vehicles.	

TRAFFIC AND TRANSPORT				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	the site access to the Mitchell Highway.			
Signage	Development Consent SSD 7268 Condition C12: C12 - Size C Gateway Truck (crossing and entering) Signs (W5-22) with 300 metre distance plates are to be provided 300 metres either side of the site access. The signs are to be erected and visible during construction and operation of the Development.	This condition has been met.	Required signage had been erected as per the CTMP (refer to various signage photos taken from the two Site Audit reports in Appendix 3).	Appendix 3
Works Authorisation Deed	Development Consent SSD 7268 Condition C13: C13 - Prior to the commencement of construction works on the Mitchell Highway, a Works Authorisation Deed (WAD) shall be executed between the Applicant and the RMS to enable the Applicant to undertake "private financing and construction" works on the Mitchell Highway	This condition has been met.	A Works Authorisation Deed (WAD) had been executed between the Applicant and the RMS prior to the commencement of construction works. See RMS approval notice in Appendix 17.	Appendix 17
Road Occupancy Licence	Development Consent SSD 7268 Condition C14: C14 ...The Applicant shall contact the RMS Traffic Operations Coordinator to determine if a Road Occupancy Licence (ROL) is required.	This condition has been met.	A ROL had been obtained from the RMS prior to the commencement of construction works on the Mitchell Highway. See Appendix 18 for licence details issued by RMS.	Appendix 18

TRAFFIC AND TRANSPORT				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Construction Traffic Management Plan	Development Consent SSD 7268 Condition C15: C15 - ...The Applicant shall prepare a Construction Traffic Management Plan (CTMP) for the Development. Th plan shall form part of the CEMP required under Condition D1.	This condition has been met.	A CTMP had been approved prior to the commencement of construction. See Appendix 15 for approval letter from RMS.	Appendix 15
Operating Conditions	Development Consent SSD 7268 Condition C16: C16 – The Applicant shall ensure: a) internal roads, driveways and parking (including grade, turn paths, site distance requirements, aisle widths, aisle lengths, and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2; b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design; c) the Development does not result in any vehicles queuing on the public road networks; d) heavy vehicles and bins associated with the Development do not park or stand on local roads or	These conditions have been met. All internal roads, drive ways and parking have been constructed and maintained in accordance with AS2890.1, AS2890.2, CTMP, CEMP, EPL and SSD7268.	The ‘as built’ plans for the Mitchell Highway intersection was inspected and approved by RMS. The Development achieved practical completion on 17 May 2018. See Appendix 16 for approval letter issued by RMS. All vehicle movements are properly managed in the designated area with visible signs in accordance with AUSTROADS Guide to Road Design. Heavy vehicles and bins associated with the Development are kept in the designated area at all times. See Appendix 3 (pp.1-4) for signages and audit remarks on traffic and transport management. Refer to Appendix 7 (pp.6-7) for records of external vehicles as per Biosecurity Protocol, prior to loading	Appendix 3, Appendix 4, Appendix 7, Appendix 16 and Appendix 27

TRAFFIC AND TRANSPORT				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	footpaths in the vicinity of the site; e) all vehicles are wholly contained on site before being required to stop; f) all loading and unloading of materials is carried out on site; and g) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.		and unloading of materials on site. The car park is regularly cleaned and clear of any obstacles at all times. See p.3 of Appendix 4 for car park photo with no dust evident, and p.4 of Appendix 27 for the Department's comment on the overall tidiness of the site.	

WASTE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Waste management	Development Consent SSD 7268 Condition C17, C18 and C19: C17 – The Applicant shall ensure any liquid and non-liquid wastes generated on the site is classified in accordance with the <i>Waste Classification Guidelines Part 1: Classifying Waste</i>, (EPA, 2014), or its latest revision. C18 – Prior to the commencement of operation, the Applicant shall provide the Department and the EPA with documentary evidence, including a copy of any executed Waste Agreement(s), confirming it has secured a	This condition has been met.	Both construction waste and operation waste have been correctly classified. All waste has been removed offsite to a licenced facility as required. See Appendix 13 for the goat renderable material supply agreement with Master Butchers Co-Operative Limited based in South Australia.	Appendix 13

WASTE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	suitably licensed waste collection facility capable of lawfully receiving the relevant waste from the site with consideration to the POEO Act, <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the relevant development consents of receiver facilities. C19 – All waste removed from the site shall only be directed to a waste management facility or premises lawfully permitted to accept the waste.			
Waste management plan	Development Consent SSD 7268 Condition C20 and C21: C20 - Prior to the commencement of operation, the Applicant shall prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Department. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. C21 – Waste generate outside the site shall not be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the POEO Act	These conditions have been met. The Waste Management Plan was approved by the Department as part of the OEMP, and has been implemented.	All waste generated onsite are directed to an external rendering facility that is appropriately licenced as required. See Appendix 10 for waste removal record. All stockyards and onsite facilities are regularly cleaned and inspected. A waste accumulation incident and a spillage incident were recorded with no evident environmental harm. This is discussed in more details in Section 11 (p.47). See Appendix 14 (pp. 4-7) for incident records.	Appendix 10 and Appendix 14

HAZARD AND RISK				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Dangerous goods	Development Consent SSD 7268 Condition C22 and C23: C22 - Dangerous goods, as defined by the <i>Australian Dangerous Goods Code</i>, shall be stored and handled strictly in accordance with: a) all relevant Australian Standards; b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (EPA, 1997) In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency C23 – The quantities of dangerous goods stored and handled at the site shall be below the threshold quantities listed in the Department of Planning's <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> (Applying SEPP 33) at all times.	These conditions have been met.	Review of site records and communication with the Management indicate that no Dangerous Goods, as defined by the Australian Dangerous Goods Code has ever been stored on site.	N/A

NOISE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Hours of work	Development Consent SSD 7268 Conditions C24 and C25: C24 - The Applicant shall comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Department. Table 1 hours: Earthworks and Construction Mon to Fri – 7am to 6pm Saturday – 8am to 1pm Sunday – Nil Operation Mon to Sun – 24 hours C25 – Works outside of the hours identified in Condition C24 may be undertaken in the following circumstances: a) works that are inaudible at the nearest sensitive receivers; b) works agreed to in writing by the Department; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or d) where it is required in an emergency to avoid the loss of	These conditions have been met.	In relation to earthworks and construction activities, work was completed within the designated hours, however as the hotter months approached, work was conducted outside of the approved hours, starting between 2.30am and 4.00am in late 2017. A visual sighting of the Site Attendance Register confirmed this slight change in hours of work. This was done to limit the associated safety risk (e.g. dehydration, heatstroke) Although these hours were outside the approved hours, they were in accordance with Clause a) of Condition C25: <i>a) works that are inaudible at the nearest sensitive receivers;</i> See Appendix 3 for hour inspection comment (p.4) and improvement suggestion (p.7). This improvement has been implemented, and there have been no excessive working hours recorded outside of the approved timeframe for the remaining reporting period (refer to site attendance	Appendix 3 and Appendix 7

NOISE				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	lives, property and/or to prevent environmental harm.		register on p.1 of Appendix 7).	
Construction noise limits	Development Consent SSD 7268 Conditions C26 and C27: C26 – The Development shall be constructed with the aim of achieving the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures shall be implemented and activities that could exceed the construction noise management levels shall be identified and managed in accordance with the CEMP. C27 – Where feasible and reasonable, operation noise mitigation measures shall be implemented at the start of construction (or at other times during construction) to minimises construction noise impacts.	These conditions have been met. Refer EPL condition L4.1 comment earlier.	Construction noises are within the required limits and there have been no noise complaints regarding construction works as evident from sighting site records, the complaints register and community meeting notes. Hence, no further noise mitigation measures or monitoring are required.	N/A
Operational noise limits	Development Consent SSD 7268 Conditions C28: C28 – The Applicant shall ensure the noise generated by the operation of the Development does not exceed the noise limits in Table 2 (refer Table 2, Clause C28 of Development Consent SSD 7268).	These conditions have been met. Refer EPL condition L4.1 comment earlier.	Operational noises are within limits, and there have been no noise complaints as evident from site records, the complaints register and community meeting notes.	N/A

SOIL AND WATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Construction soil and water management	Development Consent SSD 7268 Conditions C29: C29 – Soil and water management measures consistent with <i>Managing Urban Stormwater – Soils and Construction Vol. 1</i> (Landcom, 2004) (the Blue Book) shall be employed during the construction of the Development to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	This condition has been met. Construction soil and water management measures are consistent with Blue Book requirements. The Erosion and Sediment control plan has been implemented.	Visual inspection and multiple RMS inspections of works have been conducted to ensure compliance of this condition. RMS final inspection was completed, and the ‘as built’ plans for the road intersection were approved. The Practical Completion of the Development was issued by RMS on 17 May 2018 (See Appendix 16). Refer to Section 8 (pp.45-46) for a detailed implementation assessment.	Appendix 16
Surface water discharge limits	Development Consent SSD 7268 Conditions C30: C30 – The Applicant shall ensure that all licensed surface water discharges from the site comply with discharge limits (volume and quality) set for the Development in any EPL or relevant provisions of the POEO Act.	This condition has been met. There have been no discharges recorded during the reporting period or evident from this assessment.	Refer to comments in L2.1 above (p.14) for the detailed assessment. The Applicant will continue closely monitoring the discharge and will take daily samples should discharges become visible during a run-off event.	N/A
Stormwater	Development Consent SSD 7268 Conditions C31: C31 – The Applicant shall design, construct, operate and maintain all stormwater and	This condition has been met.	See p.5 of Appendix 3 for photo of the empty Sediment Control pond during drought, and the natural rocks in place which serve as erosion control.	Appendix 3 and Appendix 4

SOIL AND WATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	water storage facilities on site with the internal surfaces equivalent to, or better than, a clay liner of permeability $1 \times 10^{-9} \text{ ms}^{-1}$ or less and a thickness of no less than 900mm, or equivalent alternative.		As per comments from the Site Audit reports, the rocks may be deemed as outside license conditions as they do not fully cover the Sediment Control pond, however the likelihood of any occurrence of runoff is considered very low (as the site would need to be completely under water for this to happen). Review of site records indicates that no incidents at the Sediment Dam have been reported, hence the rocks can be considered as the equivalent alternative to satisfy the condition. See Appendix 4 p.19 for Sediment Dam storing stormwater after the rain in November 2019, with the water height well below the rocks.	
Bunding	Development Consent SSD 7268 Conditions C32: C32 – The irrigation area, four process wastewater treatment ponds, mass-burial area and the manure stockpiling area shall be bunded to prevent clean stormwater run-off from entering these areas.	This condition has been met. All required areas have been properly bunded.	See Appendix 4 p.2 for overview of bunded irrigation area and wastewater treatment ponds, and pp.9-18 for up-close photos of bunded treatment ponds, mass-burial area and manure stockpiling area.	Appendix 4
Groundwater	Development Consent SSD 7268 Conditions C33:	This condition has been met.	Test bores had been constructed in accordance with <i>Minimum Construction Requirements</i>	Appendix 21

SOIL AND WATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	The groundwater bores for the Development shall be constructed in accordance with the <i>Minimum Construction Requirements for Bores in Australia, Third Edition, February 2012</i> (National Uniform Drillers Licensing Committee, 2012) to a minimum depth of 20 metres below ground level.		<i>for Bores in Australia</i> . Both were completed in the previous reporting period. See Appendix 21 for construction reports and test results for the nine-month baseline data.	

WASTEWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Irrigation area	Development Consent SSD 7268 Conditions C34: C34 – The Applicant shall ensure the quantity of wastewater applied to the irrigation area shall not exceed the capacity of that area to effectively utilise wastewater. This includes the use of the wastewater for pasture or crop production, and the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material from the wastewater.	This condition is not applicable in the current reporting period.	The Applicant has completed the wastewater treatment ponds construction and required lining, however utilisation of wastewater or crop production is not applicable due to insufficient effluent to necessitate the use of the irrigation system as a result of the temporary closure.	N/A
Design	Development Consent SSD 7268 Conditions C35: C35 – Prior to the commencement of operation, the Applicant shall prepare and implement a Wastewater Management Plan (WWMP) for	This condition has been met. The Wastewater Management Plan was approved by the Department as part of the OEMP and has	Silt and sediments run-off control fencing have been installed and reconstructed around the wastewater treatment ponds (refer to Appendix 3 for reconstruction requirement as a result of initial damages observed).	Appendix 3 and Appendix 4

WASTEWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	the development to the satisfaction of the Department.	been implemented.	See Appendix 4 pp.9-11 and p.21 for photos of bunded waste water treatment ponds and surrounding silt and sediments run-off control fencing after the reconstruction. Further dust suppression measures have been implemented during the reconstruction through using the water tanker (p.20 of Appendix 4) to clean the exposed surfaces.	
Monitoring	Development Consent SSD 7268 Conditions C36 and 37: C36 – The Applicant shall undertake a commissioning stage monitoring program in consultation with the EPA for the wastewater treatment system, including details on the effluent volume and quantity. C37 – The Applicant shall undertake a soil and water monitoring program during operation of the Development, in consultation with the EPA and as may be included in the EPL for the Development, for irrigation water (volume and quality), soils, groundwater and crops based on risk factors that aim to detect when specific water quality, soil or crop	These conditions are not applicable as there has been no irrigation to necessitate the use of irrigation system yet. Water samples from the test point on the kill floor and from the two wastewater treatment ponds (the anerobic pond and the aeration pond) were collected once during operation.	Refer to email correspondence in Appendix 27, as per OEMP, the irrigation system will not be required until there is treated effluent available, which is likely to happen after a ramp up period upon recommencement of operation. The Applicant will closely monitor the daily flows to the treatment system and will ensure the irrigation system is in place and operational well in advance of the practical availability of sufficient treated effluent. See Appendix 5 pp. 1-7 for wastewater test results after commissioning.	Appendix 5 and Appendix 27

WASTEWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	sustainability trigger values are nearing or have exceeded, trigger figure values.	No ongoing soil or water monitoring program has been commissioned due to no irrigation.	Refer to Section 12 (p.48) for actions and timeframe to complete irrigation system installation and implementation of soil and water monitoring program.	
Irrigation management	Development Consent SSD 7268 Conditions C38: C38 – Prior to the commencement of operation, the Applicant shall update the Irrigation Management Plan (IMP) (refer to Appendix K of the EIS) to the satisfaction of the Department.	This condition is not applicable to the current reporting period. The Irrigation Management Plan was approved by the Department as part of the OEMP, however it has not been implemented as of yet. The irrigation area has been completed, excluding the installation of the irrigation system (as discussed in Conditions C36-C37 above). As a result, no effluent monitoring, soil monitoring or crop monitoring has been	No effluent, soil or crop samples are available due to the short operation period, and a temporary closure that resulted in no available treated effluent for irrigation at this time. Refer to Section 12 (p.49) for actions and timeframe to implement the Irrigation Management Plan.	N/A

WASTEWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
		implemented due to no available samples		

SURFACE AND GROUNDWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Water Management Plan	Development Consent SSD 7268 Conditions C39: C39 – Prior to the commencement of operation, the Applicant shall prepare a Water Management Plan (WMP) to the satisfaction of the Department. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5.	The Water Management Plan was approved by the Department as part of the OEMP and has been implemented, with the exception of a delay in the 2019 annual water test requirements at the two groundwater monitoring test bores. Records inspected show that all parameters for potable water and groundwater are within maximum limits/historical data range.	Water inspection is included as part of the fortnightly environmental checklist. See Appendix 1 for flow meter records (currently only have readings for potable meter and raw water meter as irrigation meters are not in use yet) and observations on pond water and pollution. All testing results for potable water and treatment pond water can be found in Appendix 5. Due to management oversight, the 2019 groundwater monitoring was conducted on 14 November 2019 (i.e. the last date of the current reporting period), which was more than 12 months after the last test in March 2018. Review of the latest monitoring results and comparison with previous records (p.2 of Appendix	Appendix 1, Appendix 5 and Appendix 20

SURFACE AND GROUNDWATER				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
		Surface water samples are not required as there has been no discharge occurring at the monitoring point.	20) suggest that no parameters exceed the maximum historical results, and some parameters are below the minimum historical results due to no on-site irrigation. Hence, environmental risks of non-compliance are negligible. See Appendix 20 for full groundwater monitoring results from 2017-2019. Refer to Section 11 (p.47) on management action on reinforcement of annual groundwater monitoring.	

VISUAL AMENITY				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
External lighting	Development Consent SSD 7268 Conditions C40: C40 – The Applicant shall ensure the lighting associated with the Development: a) complies with the latest version of AS 4282 (INT) – <i>Control of Obtrusive Effects of Outdoor Lighting</i>; and b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	This condition has been met.	No obtrusive effects of outdoor lighting have been observed or reported during the operation. Refer to Appendix 30 and Appendix 31 on evidence of no complaints recorded.	Appendix 30 and Appendix 31

HERITAGE (ABORIGINAL AND NON-ABORIGINAL)				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
Aboriginal site cards	Development Consent SSD 7268 Conditions C41: C41 – Prior to the commencement of construction, the Applicant shall prepare Aboriginal site cards to be registered with the OEH for all Aboriginal sites discovered during the site surveys	This condition has been met.	All Aboriginal heritage site cards (42 in total) can be found in online cloud storage at https://spaces.hightail.com/receive/t3OIm1g11C. See Appendix 19 for ten site card examples.	Appendix 19
Protection of Aboriginal Heritage Items	Development Consent SSD 7268 Conditions C42: C42 – Prior to the commencement of construction and prior to any ground works within the irrigation area, the Applicant shall undertake Aboriginal heritage pre-clearance surveys within the irrigation area in accordance with the survey methodology outline in the EIS.	This condition has been met.	Pre-clearance surveys had been conducted prior to the construction phase. Aboriginal site cards following irrigation survey/salvage were lodged to OEH (see Condition C41 for site cards location). See Appendix 24 for extracted sections of ACHMP on salvage methods and findings during irrigation survey.	Appendix 24
Unexpected finds protocol	Development Consent SSD 7268 Conditions C43 and C44: C43 – If any archaeological relics are uncovered during the course of construction of the Development, then all works shall stop immediately in that area and the OEH Heritage Branch contacted. C44 – If any Aboriginal objects are uncovered during work,	These conditions have been met.	No unanticipated or unexpected archaeological relics or Aboriginal objects have been found during the reporting period, other than those that are evident from our assessment.	N/A

HERITAGE (ABORIGINAL AND NON-ABORIGINAL)				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	excavation or disturbance of the work area, work must stop immediately and the Regional Operations Group of the OEH, Council and the RAPs are to be consulted.			
Aboriginal cultural heritage management plan	Development Consent SSD 7268 Conditions C45: C45 – Prior to the commencement of operation, Applicant shall prepare an Aboriginal Cultural Heritage Management Plan (ACHMP) to the satisfaction of the Department.	This condition has been met. The ACHMP was approved by the Department and formed as part of the OEMP. Refer to OEMP Approval letter in Appendix 12. The ACHMP has been implemented.	Artefacts discovered during the construction were temporarily housed by EMM Consulting prior to being transferred to Mr Phillip Sullivan (Bourke Aboriginal Health Services Officer). Communication with Phillip between 27-28 November 2019 finds that these artefacts are still possessed by him and he is willing to hold them until the display room at the Abattoir is constructed for permanent storage. As the Abattoir does not possess artefacts onsite, a Care Agreement (discussed in the previous Annual Review) is no longer required to lodge. Refer to Appendix 28 for email correspondence regarding Artefact storage.	Appendix 28
Gurri tree removal and compensatory planting	Development Consent SSD 7268 Conditions C46: C46 – Prior to the commencement of operation, the Applicant shall compensate	This condition has been met.	12 Gurri Trees (also known as the wild orange tree or Capparis Mitchellii) were planted and are correctly growing at Gidgee House in Bourke, with continued access granted to the	Appendix 22

HERITAGE (ABORIGINAL AND NON-ABORIGINAL)				
Environmental aspect	Outcome	Performance	Other Comments	Appendices
	for the removal of one Gurri tree through: a) the purchase of 12 Gurri trees and funding of the necessary resources for planting the trees, soil and fertiliser, drip line irrigation and maintenance; and b) ensuring the trees are planted in location that enable continued access to the Aboriginal community for educational and cultural usage, following consultation with the Registered Aboriginal Parties (RAPs) identified in the EIS.		Aboriginal community for education and cultural usage. An updated photo of the growing Gurri Trees can be found in p.7 of Appendix 22. <i>Note: The Development Consent stated that the Applicant is not responsible for the trees after the actions required by Condition C46 have been completed in the current reporting period.</i>	

7. Water Management

The Annual Review shall report on the water taken by the operation in the previous water year (1 July – 30 June). As the commissioning period for the Abattoir is from 2 Jan 2019 to mid-May 2019, the observed water consumption below only applies to these four and a half months.

Depending on production levels, 200,000 to 500,000 litres of potable water are consumed on a daily basis from the onsite water tanks for dust stabilisation and drinking water purposes, as indicated by Management.

A further 40,000 litres of water over the last six-month of construction period were transported onsite via an external water tanker for additional dust stabilisation purposes. No external water is required to be transported onsite now and all potable water is directly sourced from permanent water tanks installed and connected on site.

8. Erosion and Sediment Control

Soil and water management measures had been designed and implemented for the construction phase in accordance with the Blue Book to achieve the key objective of minimising soil erosion and the discharge of sediment and other pollutants to land and/or waters (also mentioned in Section 6 above). Refer to **Appendix 23** for a detailed Erosion and Sediment Control Plan and the measures implemented during Phase 3 of the construction work.

See **Appendix 3** for inspections and assessment of implemented sediment control structures during Site Audits. Maintenance and restructuring (if required) have also been conducted on all erosion and sediment control structures (i.e. silt fencing) installed to prevent soil loss and sediment-laden runoff from leaving the site (see p.21 of **Appendix 4** for photos of reinforced silt fencing).

9. Community

During the reporting period of the Annual Review there have been a number of escorted meetings and engagements at the development site, including but not limited to local Council representatives, local indigenous community representatives, Bourke Aboriginal economic prosperity framework representatives, police and community services representatives, labour hire companies, suppliers in the local community and Darling River Meat board members.

The purposes of these meetings were for meet-and-greet and/or providing updates on construction work progress. No environmental complaints were received during any of these meetings. See **Appendix 30** for a summary of meeting notes.

Review of site records and Site Audit reports find that practices for site sign-in and induction procedures were activated for site briefings, safety briefings and related induction process. We also note that all safety compliances were followed, except the wearing of hard hats. We suggested to reinforce this to minimise safety concern, as recommended in **Appendix 3**.

Appendix 7 summarises examples of site records, showing the following items:

- Site Attendance Register (p.1) – detailing the date, name, company, nature of the visit (i.e. visitor or worker) and starting time and finishing time of the individual;
- Site Induction Form (pp.2-5) - an example of what is required to be filled in upon visitor arrival (more than 70 of these forms are on record and have been visually inspected upon drafting this Annual Review); and
- BSSA Biosecurity Risk Assessment for Visitors (pp.6-8) – two examples of visitor biosecurity risk assessment records that prevent diseases from being passed onto livestock onsite.

No complaints have been received during the Annual Review period, as recorded in **Appendix 31**. The Applicant continues to ensure the complaints register process is actively managed onsite.

10. Independent Audit

A total of two Site Audits were conducted by JPAbusiness Pty Ltd. The results of these and key actions required from Site Audit #1 and #2 are detailed below.

Site Audit # 1

This audit was conducted on 23 November 2019. The site was given an overall compliance score of A minus (i.e. compliant with small areas of improvement suggested).

Audit results indicated construction site access was compliant with CTMP, CEMP, EPL and SSD7268. The site was clean and no environmental complaints were received, although silt fencing required some corrections.

There were out of hours work identified, requiring risk assessment on work hours and controls. No other significant actions were proposed as the site was rated as compliant.

Site Audit #2

This audit was conducted on 02 July 2018. No compliance score was given in the audit report.

Audit results indicated that all signage and safety controls on site were compliant with CTMP, CEMP, EPL and SSD726, except wearing of hard hats, which Management would need to reinforce to each person on site.

Silt and sediments run-off control fencing required reconstruction work and dust suppression measures to further reduce risk of dust pollution.

Next Site Audit

Future Independent Site Audits will be conducted on a random basis.

Independent Environmental Audit

Molino Stewart (endorsed by the Department on 27 November 2019) has been appointed as the external auditor to conduct an Independent Environmental Audit on site, commissioning 29 November 2019. The final audit report for period 14 November 2016 – 14 November 2019 is expected to be submitted to the Department by 28 February 2020.

Refer to **Appendix 26** for the endorsement letter from the Department and official acceptance of the audit proposal by Director George Tanos.

11. Incidences and Non-Compliances during the Reporting Period

Incidences

Three incidents were recorded during the reporting period, with no material or evident impacts on the environment. The Applicant has implemented the Pollution Incident Response Management Plan to address any potential adverse impacts on the surrounding environment. These incidents are summarised as follows.

- An odour leak recorded on 14 April 2019 due to skin and offal products being left for too long without turning on the refrigeration. No evident impact on the environment was

observed. A preventative measure has been implemented through ensuring refrigeration is in place before production.

- Construction waste accumulation at the back corner of building on 8 May 2019 due to no suitable bins in place. No environmental harm was observed. Preventative measures have been implemented through engaging contractors to clean up the construction area within three days and adding more bins on site.
- Solid waste spillage recorded on 14 May 2019 at the first corner to the unloading and loading ramp. No evident pollution risk was observed to the stormwater retention pond (i.e. the Sediment Dam). A reinforced cleaning measure has been implemented through using extra water to clean the truck prior to loading.

Detailed records of each of the above can be found in **Appendix 14**.

Non-Compliances

As a result of this Annual Review, our assessment is that the proponent was non-compliant with the Development Consent SSD 7268, Environment Protection Licence # 20918 and associated management plans CTMP, CEMP and ACHMP as at the end of the reporting period. Further action(s) regarding each non-compliance item is discussed as below.

1. Biodiversity Offset Strategy

Details of non-compliance events and reasons can be found in Section 6 (pp.24-26). The credit retirement process has been included as an action point in Section 12. Refer to Section 12 (pp.48-49) for detailed list of passive management actions to be carried out.

2. Groundwater Monitoring

Groundwater monitoring in 2019 was delayed due to management oversight (more than 12 months from the previous test in March 2019). Going forward, the annual groundwater monitoring program at the two test bores will be scheduled and reinforced as per OEMP requirements. The next sampling at the two test bores is to be scheduled in early October 2020.

3. Annual Review

The Applicant did not prepare and lodge an Annual Review for period 14 November 2017 – 14 November 2018 by early 2019. Instead, the current Annual Review will cover period 14 November 2017 – 14 November 2019 as discussed in Section 1 (p.5). These Annual Reviews will be formally scheduled going forward.

4. Independent Environmental Audit

Due to administrative oversight, the commissioning of the original Independent Environmental Audit did not take place as per Condition D11. The Applicant has appointed Molino Stewart as the external auditor and the Independent Environmental Audit has been commissioned on 29 November 2019. A final audit report will be submitted to the Department by 28 February 2020. The IEA will be formally scheduled going forward.

Other Comments

- Our review of records indicates there have been one warning letter (issued by Heidi Watters as the Nominee of the Department) received during the reporting period in relation to non-compliance with Condition D7 and D11 (see **Appendix 25**).
- There has been no complaint of any form received in the current reporting period through sighting annual complaints register (see **Appendix 31**).
- All required environmental performance review and pollution monitoring data have been uploaded to the Darling River Meats website in accordance with Condition D9 under the Development Consent SSD 7268 and condition R1 under EPL 20918. The quarterly effluent quality monitoring, annual soil monitoring and annual crop monitoring will commence after the complete installation of the pivot irrigation system (contingent on sufficient effluent to be treated), and commencement of the irrigation management plan. Relevant monitoring data will be published on Darling River Meats website within 14 working days.

12. Activities to be Completed in the Next Reporting Period

While not limited to these items, the following activities will be implemented during the next reporting period at the project site relating to the environmental performance of the operation, and to comply with the conditions of the Development Consent SSD 7268, Environment Protection Licence # 20918 and associated management plans.

- Complete installation of centre pivot irrigation system (contingent on sufficient treated effluent after recommencement of the operation). The Department will be notified within one week of the installation;
- Implement soil and water monitoring program and irrigation management program after the effluent treatment system commissioning period (contingent on installation of centre pivot irrigation system);
- Review OEMP and all associated management plans within three months of submitting this Annual Review and update processes where necessary to improve environmental performance and/or heritage preservation;
- Progress retiring partial Ecosystem Credits and deposit corresponding money to the Biodiversity Stewardship Payments Fund; and
- Implement remaining passive management actions and keep relevant monitoring records on the Biobank site, as summarised in the following table.

Item	Timeframe*
Retention of regrowth and remnant native vegetation, dead timber and rocks.	To be implemented by 31 May 2020.
No human activities (other than permissible management actions) that may have a negative impact on biodiversity values are permitted.	To be implemented by 31 May 2020.

Item	Timeframe*
Fire for conservation management plan.	To be implemented by 31 May 2020.
Nutrient control through prohibition of applying fertilisers, pesticides and herbicides on the Biobank site except where required to undertake the management actions.	To be implemented by 31 May 2020.
An Annual Report for period 31 May 2019 to 31 May 2020 submitted to OEH to summarise implementation of passive management on the Biobank site.	To be submitted by 30 June 2020.

(*Timing target, subject to adverse seasonal conditions.)

In addition, as per Schedule D Condition D7 (f), the environmental performance improvement proposed to be implemented over the next reporting period will include continued dust stabilisation through completion of sealing access roads at the back of the premises, to minimise wheel generated dust.

13. Management and Mitigation Measures

Review of actions and records provided by the Applicant suggests that the Applicant is compliant with the EIS and Response to Submissions (RTS) commitments outlined in Appendix A of the Development Consent SSD 7268. Some weaknesses have been identified regarding the evidence of a few committed items and/or actions, which is likely to be flagged for auditor recommendations during the upcoming Independent Environmental Audit.

Appendices

Below is the list of Appendices referenced throughout the Annual Review document.

1. Appendix 1 – Environmental Checklists
2. Appendix 2 – Climate Monitoring
3. Appendix 3 – Site Audits
4. Appendix 4 – Site Photos
5. Appendix 5 – Water Testing
6. Appendix 6 – Livestock Procedures and Records
7. Appendix 7 – Site Records
8. Appendix 8 – Vaccination Forms
9. Appendix 9 – Biodiversity Offset Strategy
10. Appendix 10 – Waste Removal Records
11. Appendix 11 – EIS Predictions Versus Actual Impacts
12. Appendix 12 – OEMP Approval
13. Appendix 13 – Waste Agreement
14. Appendix 14 – Environmental Incident Records
15. Appendix 15 – Road Works Approval
16. Appendix 16 – Practical Completion Approval
17. Appendix 17 – Approval Letter of WAD
18. Appendix 18 – Road Occupancy Licence
19. Appendix 19 – Site Card Examples
20. Appendix 20 – Groundwater Monitoring
21. Appendix 21 – Test Bores Construction
22. Appendix 22 – Biobank Site and Gurri Trees
23. Appendix 23 – Soil Erosion and Sediment Control
24. Appendix 24 – ACHMP Irrigation Survey and Findings
25. Appendix 25 – DPIE Letter
26. Appendix 26 – IEA Endorsement and Appointment
27. Appendix 27 – Email Correspondence
28. Appendix 28 – Aboriginal Heritage Information
29. Appendix 29 – Processing Record
30. Appendix 30 – Community Meeting Notes Summary

31. Appendix 31 – Annual Complaints Register

32. Appendix 32 – Sanitation Procedures

33. Appendix 33 – Greenhouse Gas Emission

34. Appendix 34 – Local Employment Records