



2017 ANNUAL ENVIRONMENTAL REVIEW
INCORPORATING
2015-2017 INDEPENDENT ENVIRONMENTAL AUDIT AND RESPONSE
FOR
GENESIS XERO WASTE RECYCLING & LANDFILL FACILITY

DADI

DIAL A DUMP INDUSTRIES PTY LTD Head Office 84-88 Burrows Road, Alexandria NSW 015



2017 ANNUAL ENVIRONMENTAL PERFORMANCE REVIEW
&
2015 TO 2017 BIENNIAL INDEPENDENT ENVIRONMENTAL AUDIT REVIEW
GENESIS XERO WASTE RECYCLING & LANDFILLING FACILITY

KEY DETAILS

Environment Review and Response prepared by:	Genesis Xero Waste Recycling & Landfill Facility
Head Office Address:	84-88 Burrows Road, St Peters, NSW 2044
Licensee (Proponent):	DADI (EC) Pty Ltd (previously ThaQuarry Pty Ltd & ACN 114 842 453 Pty Ltd)
In respect of:	Project Approval 06_0139 (as modified)
Project site & location:	Genesis Xero Waste Recycling and Landfill Facility (Honeycomb Drive, Eastern Creek).
Lot & DP:	Lot 1 in DP 1145808 and Pt 8 in DP 1200048
EPA licence details	Recycling Licence EPL 20121 Landfill Licence EPL 13426

For and on behalf of DADI (EC) Pty Ltd, the undersigned certifies that the information contained within this report is neither false nor misleading.

Approved: Christopher Biggs, Chief Executive Officer

Signed:

Date: 16 May, 2018

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Appendix A: Summary of 2017 Biennial Audit Findings

REPORT SCOPE

This consolidated Annual Environmental Review (AER) has been prepared to satisfy the Project Approval Condition 3 and Condition 7 of Schedule 5 of MP 06_0139 (as modified) granted by the NSW Minister for Planning on 22 November 2009.

THIS WILL BE THE **FOURTH** ANNUAL ENVIRONMENTAL REVIEW PREPARED FOR THE GENESIS FACILITY AND THE **SECOND** INDEPENDENT ENVIRONMENTAL AUDIT.

Information provided in the AER can relate to the requirements of both Condition 3 and Condition 7 as set out below.

CONDITION 3 OF SCHEDULE 5 -ANNUAL REVIEW

By the end of December 2010, and annually thereafter, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General. This review must:

- a) *Describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year;*
- b) *Include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the:*
 - *the relevant statutory requirements, limits or performance measures/criteria;*
 - *the monitoring results of previous years; and*
 - *the relevant prediction in the EA;*
- c) *Identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;*
- d) *Identify any trends in the monitoring data over the life of the project;*
- e) *Identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and*
- f) *Describe what measure will be implemented over the next year to improve the environmental performance of the project.*
- g)

CONDITION 7 OF SCHEDULE 5 – INDEPENDENT ENVIRONMENTAL AUDIT

Within 6 months of the commencement of operation, and every 2 years thereafter, unless the Secretary directs otherwise, the Proponent Shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) *Be conducted by suitably qualified, experienced and independent team of experts (including odour expert), whose appointment has been endorsed by the Secretary;*
- b) *Include consultation with the relevant agencies*
- c) *Include a full odour audit of the project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit;*
- d) *Assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including assessment, plan or program required under these approvals);*
- e) *Review the adequacy of strategies, plans or programs required under these approvals; if appropriate; and*
- f) *Recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.*

The following Environmental Plans and Strategies are currently addressed and accessible via the Genesis website at www.dadi.com.au.

Aboriginal Heritage Management Plan	Air Quality Odour and Greenhouse Gas Management Plan
Interim Stormwater Management Plan for the pre-sort enclosure	Landscape and Vegetation Management Plan
Conveyor and Chute System maintenance and Management Plan	Spoil Management Plan
The Waste Monitoring Program	Soil, Water and Leachate Management Plan
Emergency Management Manual	Rehabilitation and Closure Plan

This review is conducted by reference to each subject matter and the criteria required by Planning Condition 3 and by an independent auditor against the criteria and agreed scope for Condition 7.

In summary, the following activities were approved under Part 3A of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*:

- capacity to receive up to two million tonnes of waste per annum, including inert and solid wastes from construction and demolition (C&D), commercial and industrial (C&I) waste streams complying with acceptable waste for general solid waste (non-putrescible) facilities, green waste clean ups, and metallurgical furnace slag and ash.
- on-site waste processing including sorting, screening, sieving, crushing, grinding, shredding and/or chipping, and composting of green waste;
- testing and on-site storage/stockpiling of finished recycled products prior to resale predominantly to the building, construction and landscaping sectors and potentially the domestic market;
- quarantine and transfer of unacceptable wastes to an appropriate off-site facility for disposal; By way of example under EPL 20121 this quarantine and transfer would refer to asbestos, hazardous & putrescible wastes etc., received within the recycling facilities (MPC or Crushing) requiring all but asbestos waste to be transferred to an appropriate licenced facility. The asbestos waste could be disposed of in our landfill which is licenced to dispose of asbestos waste.
- Segregated hardfill materials such as rock, sand soil, brick or concrete are also received at the Segregated Materials Area (SMA) within the Facility. These materials are crushed and screened for testing and sale for beneficial re-use;
- construction and operation of associated infrastructure, plant and equipment, including upgrade of the internal road network and reshaping of earthen amenity berms; and
- retention and conservation of a significant area on adjacent land beyond the north-west corner of the site, incorporating a remnant endangered ecological community (EEC) of Cumberland Plain Woodland (CPW).

INDEPENDENT ENVIRONMENTAL AUDIT AND RESPONSE

ERM has been appointed to undertake the Independent Environmental Audit to satisfy Schedule 5, Condition 7 of Project Approval 06_0139 (as modified). The initial audit was carried out on or about 7 December 2013.

The most recent independent environmental audit was initiated on or around June 2017 for the period June 2015 to June to 2017. The findings and recommendations are contained in a report dated 22 February, 2018 (which is provided with this report to the Department and will be available online). The Independent Auditor followed a 6 step review of the Licensee.

THE AUDIT – 6 STAGES OF REVIEW:

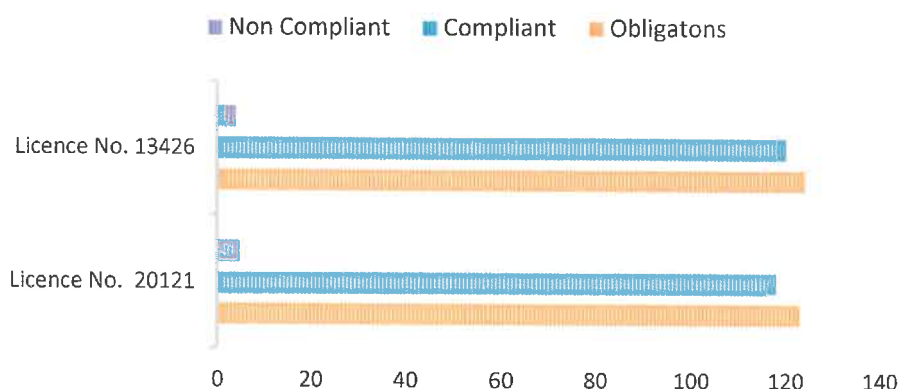


RESULTS OF THE INDEPENDENT ENVIRONMENTAL REVIEW

The Independent Environmental Audit review (IERA) is designed to assess the Licensees compliance with Project Approval 06_0139 (as modified), relating to Environmental Protection Licences (EPL's) 20121 for the recycling operations and 13426 for Landfilling that it held during the audit period.

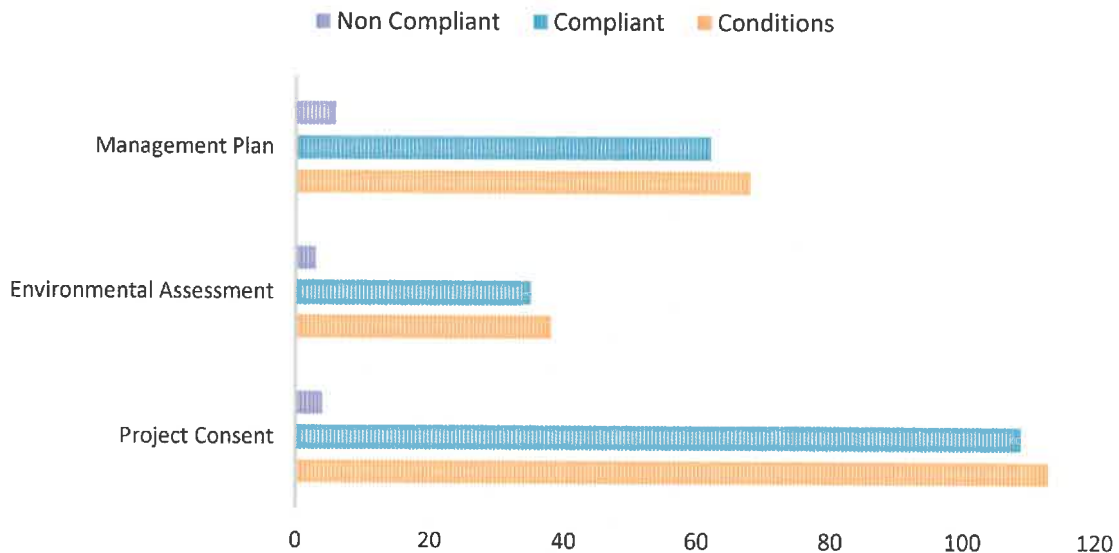
The results of the audit process as shown below in the table, has demonstrated the Licensee was widely held to be compliant and across both EPL's and only yielded 5 nonconformities out of 123 EPL 20121 obligations and only 4 flags out of 124 EPL 13426 obligations.

LICENCE OBLIGATIONS



The Compliance Summary table below sets out the overall results of this IEAR regarding Project Consent conditions where the audit found only 4 instances of non compliance from 113 project consent conditions. The Licensee also accepts that its Environmental Assessment report and its Management Plan when audited during this period found 3 out of 38 and 6 out of 68 non compliances respectively, for the audit period

COMPLIANCE SUMMARY



The Licensee acknowledges these conclusions as set out in the IEAR but is also encouraged that only one noncompliance across all the audit criteria was rated at high (Audit criteria #395). The Licensee has already commenced a review of this recommendation including arranging for an updated geotechnical report to be prepared.

Further, another aspect that the Licensee wishes to be noted is that a number of the audit criteria are repeated across each of the licences, Environmental Assessment and Management Plans. In addition to the repeated audit criteria, the audit has highlighted a number of criteria which the Licensee will seek to be amended or removed prior to the next audit period.

The next Biennial Independent Environmental Audit will commence in 2019 for the period June 2017 through to June 2018.

RESPONSE TO AUDIT RECOMMENDATIONS

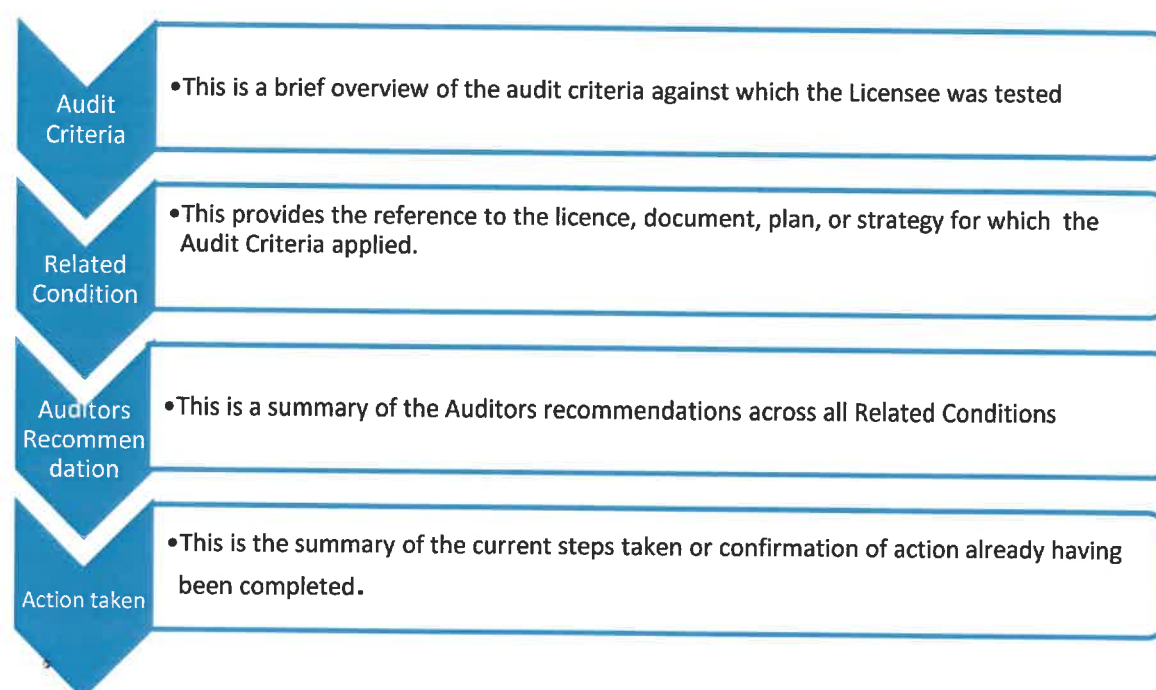
As can be quickly ascertained from the tables above Licensee was overwhelming compliant with all of its Environmental Protection Licences, Management Plans, Environmental Assessments, Statement of Commitments and Agency Consultation Requirements and conditions with non compliance being less than 5% across all audit criteria.

The Licensee is pleased to confirm that it has already taken steps to further improve or has otherwise actioned the recommendations made in the most recent audit report to ensure that it and the Genesis facility maintains a continued high level of Environmental Performance and accountability, including that any works required are undertaken in accordance with the recommendations which we have summarised in the table below.

Further, as the Licensee has now had the benefit of undergoing a second IEAR the Licensee has identified a number of inconsistencies and/or multiplication of audit criteria across the audit scope. The Licensee considers that this has led to a disparity in the reporting of the conclusions and findings as a result. Nonetheless the Licensee will seek to work with the Department with a view to evaluate the adequacy and applicability of a number of the conditions, obligations and plans for the future scope of the IEAR and assessment requirements to find an amicable and reasonable approach to consolidating or reducing the number of audit criteria.

INDEPENDENT ENVIRONMENTAL AUDIT REVIEW RECOMMENDATIONS AND ACTIONS

The table below is the Licensees response and actions already taken in response to the IEAR recommendations where the Licensee was found not to have meet the necessary thresholds to secure a 'compliant' outcome. Given the repetition of a number of the audit criteria across the entire scope of the IEAR we have grouped this together in the table and summarised the Auditors recommendations to the audit criteria.



Additional information regarding the approach, documents consulted, and the auditor's observations and notes can be found in the following tables attached to the Independent Environmental Audit at **Appendix A**:

-  Table 1 – Environmental Protection Licence 20121
-  Table 2 – Environmental Protection Licence 13126
-  Table 3 – Project Approval 06_0139 (Mod 5)
-  Table 4 – Environmental Assessment (Light Horse Business Centre volume 1: Environmental Assessment Report).
-  Table 5 – EA Assessments and Reports
-  Table 6 – Management Plans and Procedures
-  Table 7 – Agency and Stakeholder Consultation
-  Table 8 – Criteria Derived from the Findings of Previous Audit

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#11 - Table 1 #12 - Table 1	For each monitoring/discharge point or utilisation area the concentration of a pollutant must not exceed the concentration limits specified for that pollutant	Surface Water Quality Monitoring for EPL 13426 (L3.1) and 20121 (M2.1)	The auditor has not included any recommendations.	The Licensee will be seeking to clarify with the NSW EPA the overflow on the descriptors that requires amending. There was a nominated increase/exceedance for TSS and PH levels noted but the Licensee notes that the TSS exceedance was as a result of heavy rainfall that disturbed sediment.
#43 – Table 1 #157 – Table 2 #284 - Table 3 #429 - Table 6 #523 & #561 Table 8	The licensee must: a) Implement suitable measures to manage pests, vermin and declared noxious weeds on site;	- EPL20212 05.2a - EPL13426 04.2 06_0139-3/4 Project approval (Mod 5) - Management Plans and Procedures weed management reporting. - Landscape and Vegetation Management Plan	Control measures for vermin should extend to foxes and feral cats.	Feral Animals The Licensee notes that evidence of foxes was outside the operational area identified in the Planning approval. There was no evidence of feral cats. However the Licensee also notes - It has engaged the services of Bettersafe Pest and Weed Management Pty Ltd to undertake routine feral animal control. They have set traps which are baited monthly and checked weekly. - The perimeter fence is installed in accordance with Approved fencing place which was approved by Blacktown Council. - It is a member of FoxScan (https://www.feralscan.org.au/foxscan) which records and map sightings of foxes, fox damage and control activities in the local area. - It has approached the Local Land Services of Greater Sydney with regard to running their fox campaign workshop again in 2018 with the primary objective of forming a landscape approach to manage foxes. Weed Control The Licensee has a Landscape and Vegetation Management Plan of June 2017 which sets out the Licensee's weed monitoring strategy. This is available on the website. In addition to this, the Licensee has - Engaged the services of Bettersafe Pest and Weed Management Pty Ltd who have developed and commenced a weed control and bush regeneration plan and - updated the current policy in accordance with the Local Land Services Greater Sydney Regional Strategic Weed Management Plan 2017-2022.
			Weed Monitoring and reporting is to be carried out in accordance with the Vegetation Management Plan in the areas and at the points specified using the forms and checklists in "Guidelines for Monitoring a Bushcare Project".	

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#69 – Table 1 #292- Table 3 #371 – Table 5	The licensee shall store all chemicals, fuels and oils used on site in an appropriately designed impervious bunded area that contains 110 percent of the largest container contained within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian standards, and/or EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management.	■ EPL20121 07.2 ■ 06_0139-3,20 Project approval (Mod 5) ■ 5.1.5 - Environmental Assessment	Store all chemicals, fuels and oils used on site in an appropriately designed impervious bunded area that contains 110 %of the largest container. It is recommended the Licensee consider AS1940 during the design of any bunded areas, and in particular the following note: "NOTE: Portable bunding units, e.g. bunded pallets, or flexible bunding units are not suitable for permanent storage as there are no uniform performance criteria for chemical resistance or fire resistance and they can be easily moved to an unsuitable location. <i>They may be suitable for the short-term holding of damaged packages, or where goods are in transit or in manufacturing and handling areas."</i>	The Licensee has checked all bunds and replaced only 1 damaged bund that was identified by the Audit. In relation to the damaged bund identified the Licensee states that at the time of the audit the bund was not operational as the container was empty. Note that the bund was of sufficient size (110%) of the container. The Licensee does not have a need for a designated/permanent storage area at this time for fuels, chemicals and oils, so does not need to consider the AS1940 requirements at this time. Should this change in the future, the Licensee will ensure it meets all relevant standards required.

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#92 – Table 1 #204 – Table 2	The proponent must provide an annual audit of the design, operation and odour management practices of the operation with the primary aim of identifying improvements that lead to attainment of best practice in regard to minimising odour emitted from the premises. The proponent must implement all reasonable audit recommendations. The scope of such an audit to be regularly reviewed in consultation with the EPA.	▪ EPL20121 M7.2 ▪ EPL13426 M7.1	Commission a suitably qualified consultant to undertake an annual audit of the design, operation and odour management practices of the operation with the primary aim of identifying improvements that lead to attainment of best practice in regard to minimising odour emitted from the premises. Ensure the scope of such an audit to be regularly reviewed in consultation with the EPA. Note: in the event EPL condition M7.2 is removed from any future variation of the licence, this recommendation shall be considered redundant.	The Licensee engaged suitably qualified consultants including a Senior Engineer and Project Manager and a Senior Principal Environmental Scientist who carried out and reviewed the Report. The qualifications and names have been provided to the Auditor. The Licensee has not consulted specifically with the EPA regarding the 'design' of the odour management practices but nonetheless provides the EPA with an annual audit from which no issues have been raised by the EPA. The Licensee will be seeking a review of this requirement with the EPA prior to the next audit period.
#169 - Table 2	The licensee must submit and maintain a filling plan for the disposal of waste sequentially in each landfill cell(s). This Filling plan must be updated at intervals of no greater than 12 months.	▪ EPL13426 05.10	Submit a copy of the revised filling plan to the EPA for comment annually.	The Licensee has complied with this required action following extended discussions between the Licensee and the DPE. The filling Plan is a part of the LEMP which was approved by the DoP. There have been no variations to this.

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#286 – Table 3	The Proponent shall: - Prepare an Emergency & Fire Response Plan for the site to the satisfaction of NSW Fire Brigade, which should include but not be limited to mitigation measures, and include the number of days material can be stored on site, prior to construction commencing and the plan being implemented; - implement suitable measures to minimise the risk of fire on site; - extinguish any fires on site promptly; - maintain adequate fire-fighting capacity on site: and - detail emergency evacuation procedures	06_0139-3.16 Project Approval (Mod 5)	Ensure the Emergency & Fire Response Plan is endorsed by the NSW Fire Brigade.	The Licensee believes that it has previously taken all necessary steps and received approval from the NSW Fire Brigade of its Emergency & Fire Response Plan via a letter dated 28 June, 2011 which has been provided to the Auditor. The Licensee will be seeking a review with the DoP to remove the requirement for NSW Fire department approval.

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#355 – Table 3	Rehabilitation / Closure Plan Upon cessation of landfilling, the Proponent shall decommission the landfill and rehabilitate the site. The Proponent shall prepare and implement a Rehabilitation and Closure Plan. This plan must: a) Be prepared in consultation with DECCW, and Council b) Be prepared by a suitably qualified and experienced expert; c) Be submitted to the Director-General for approval within 3 years of commencement of operations; d) Define the objectives and criteria for rehabilitation and closure; e) Investigate options for the future use of the site; f) Describe the measures that would be implemented to achieve the specified objectives and criteria for the rehabilitation and closure; g) Calculate the cost of implementing these measures; and h) Describe how the performance of these measures would be monitored over time.	▪ 06_0139-4,2 Project Approval (Mod 5)	Update the Landfill Rehabilitation and Closure Plan consistent with the requirements of project consent 06_0139-4,2	Confirmation of the Landfill Rehabilitation and Closure plan having been supplied to the EPA and DPE in March 2017. No response or objection has been received by the Licensee to the plan submitted.

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#369 – Table 4 #442 – Table 6 #529 & #533 – Table 8	An OSD basin and Gross Pollutant Trap Cleaning Program to be implemented to provide more frequent monitoring as site settles from development. A maintenance and monitoring check-sheet shall be developed that allows for the data entry, location of stormwater management devices on-site (e.g. based on a map with numbered locations), type of monitoring (visual, water sampling, etc), outcome (e.g. all clear, device needs cleaning), actions taken, and any follow up required.	■ 5.1.3 – Environmental Assessment ■ Management Plans and Procedures – ■ Soil Water and Leachate Management Plan	It is recommended that the "Fortnightly OSD Pit Inspection" visual inspection program (or other suitable inspection program) be extended to cover the sediment basins. The level of water in the basins should be recorded, as well as the turbidity. On the basis of these parameters the basins should be flocculated and dewatered as required to reduce the likelihood of overflow. The frequency of monitoring and dewatering may be increased in response to forecast high rainfall events.	The Licensee notes that the auditor refers to the recommendation at #51, however #51 is only an observation. The Licensee maintains that it has complied with this criteria. The licensee refers the reader to the Consolidated Stormwater Management Plan by Martens and Associates, which the Auditor has been provided with and which has received approval by the DPE. In particular the Licensee refers to the current OSD Pit inspection reports which include the sediment basin but are mis described as OSD.
#395 – Table 4	Geotechnical inspections of the pit shall be undertaken every 6 months and any identified stability issues rectified as required. All geotechnical inspections shall be documented and reported as part of a management plan of the pit integrity.	■ 5.8.4 Environmental Assessment	Ensure geotechnical inspections of the pit are undertaken at the required intervals (6 monthly). It is recommended that all geotechnical advice provided on the project is provided by a suitably qualified and experienced geotechnical engineer.	The Licensee notes that the auditor assigned a high risk level to this non compliance. The Licensee states that the geotechnical inspections of the pit are carried out monthly, which is more regularly than the 6 monthly requirement. The Licensee acknowledges that there have been geotechnical reports obtained since 2008, particularly in 2014, 2015, 2017. The Licensee agrees to update this report and to ensure the scope of the slip reports are extended to include the pit generally.

Audit Criteria & Table Ref #	Audit Criteria	Related Licence Condition	Auditor Recommendation	Action Taken by Licensee
#425 and #426 Table 6	Landscaping will be carried out to reduce the visual impacts of the Site, with all plantings referencing the Site's topography and using local species for rehabilitation / revegetation works, where possible. Exotic species will not be used. All visual bunds or vegetation screens will utilise native species and weed control will be undertaken as necessary, in accordance with Abel.	▪ Landscape and Vegetation Management Plan	Given the age of the conifer plantings and removal and replacement of these trees is unlikely to provide any net environmental benefit. Consider revising the management plan such that it does not directly conflict with the existing landscaping. Ensure all future plantings are limited to native species.	The Licensee will be seeking to amend the existing Landscape and Vegetation Management plan to ensure that the conifer plantings are incorporated to resolve any future non compliance and in accordance with the requirements of the project approval in which we are to revise the plans to the satisfaction of the secretary (being the secretary of the DoP) within 3 months of the submission of an IEA, Incident Report or, Annual review.
#461 and #467 Table	Vehicles attempting to leave unacceptable or excluded wastes at the MPC will be identified and directed to return to the weighbridge. The licensee (operator) will record details of the waste and carrier and communicate this information to the gatehouse and thence to the DECCW under the provisions of the POEO Act.	▪ Spoil Management Plan	The Licensee has been unable to provide any evidence of loads that have been reported to the EPA despite records of such loads being rejected on the 'rejected loads register'. Nevertheless the auditor notes that this is not currently a legal requirement, and the inclusion of this requirement in the management plan reflects a failure to update the plan.	Note this is a double up in criteria and should be part of request to reduce criteria

PREVIOUS AUDITS RECOMMENDATION – UPDATE

Audit Criteria Ref #	Criteria	Auditors position/further details	Licensees Response
#519 – Table 8	It is recommended that a procedure be established and documented for the immediate review of results and communication of the results to management followed by reporting to the EPA (if required).	The Licensee was unable to produce a procedure prepared in response to this recommendation, however they indicated the Pollution Incident Response Plan performed this function. The auditor has reviewed the PIRP and notes that the PIRP defines pollution very narrowly and hence is not suitable for informing responses to sub-optimal monitoring results and the like.	The Licensee has an adequate system of reporting incidents as they occur as set out in its Pollution Incident Response Plan as previously identified. The Licensee is working on a further amended policy and procedure on the Notification, Management and Communication of Environmental incident to meet this audit control.
#521 – Table 8	It is recommended that DADI keep records of all pre-emptive housekeeping activities that are undertaken in preparation for inclement weather events.	The Licensee was unable to produce evidence of any activities undertaken in preparation for inclement weather events to minimise the likelihood of impacts upon the environment (noting that no actual impact is believed to have occurred). In particular elevated turbidity results for the onsite sediment basins and review of weather data suggest a high rainfall event occurred in Q3 2015 (although water did not overflow the sediment basins). Records of actions taken (if any) in preparation for or in response to this rainfall event (e.g. flocculation and dewatering of the basins) were not able to be produced.	Noted
#523 – Table 8 #561 - Table 8	Initiate a pests, vermin and feral animal control program. Implement a robust monitoring program to (a) characterise the populations of weeds and vermin / feral animals on the site (and adjacent sites) and (b) verify that the control measures implemented are being successful in controlling these populations.	The auditor has not observed any evidence that a robust and effective weed and feral animal monitoring and control programme has been prepared and implemented on the site.	The Licensee has maintained that a weed monitoring and control program has been prepared and implemented on the site. Further the Licensee does not believe that it has a pest, vermin or feral animal control problem within the auditable area.
#529 – Table 8	Engage suitably qualified and competent persons to undertake erosion monitoring across the site on a regular basis. Rectify any incidences of erosion promptly.	The auditor has not observed any evidence that a erosion monitoring program has been undertaken on the site. Implement an erosion monitoring program until it can be demonstrated that site surfaces are stabilised, stable and non polluting. In particular monitoring should be undertaken in the Mod 5 earthworks area where erosion has been observed.	The Licensee will undertake a program of erosion monitoring across the auditable area on a 6 monthly basis. The Licensee will look to engage an appropriate consultant. If erosion is noted that creates or is likely to destabilise or pollute the site or area, then the Licensee will take remedial action.

Audit Criteria Ref #	Criteria	Auditors position/further details	Licensee Response
#533 – Table 8	Prepare a surface water management infrastructure / pollution control infrastructure maintenance checklist to ensure all sumps, drains and bunds on site are checked and maintained regularly.	Stormwater inlets are checked as part of the 'Fortnightly OSD Pit Inspection' programme however it appears the actual sumps/basins and drains are not captured by these regular checks.	The current OSD Pit Inspection reports also include the sediment basin report. These reports have been provided and approved by the EPA previously.
#543 – Table 8	Ensure all sediment control measures or devices are actively maintained	The auditor has reviewed a number of 'PSE reports' associated with the Mod 5 earthworks, and a number of 'OSD Pit Inlet' inspection reports. These reports indicate erosion and sediment control devices the subject of these inspections have been maintained appropriately. The auditor observed a tattered and destroyed sediment fence on the western side of the amenity berm in a portion of the Mod 5 earthworks area (an area of unconsolidated soil), and on this basis cannot conclude that sediment control measures are adequately maintained on the site.	The area referenced by the auditor is outside the auditable area. The Licensee will investigate and review the sediment fence referred to ascertain whether it is still maintaining adequate sediment controls that impact the auditable areas.
#556 – Table 8	Submit LEMP to EPA and Council for comment.	The Licensee has not been able to provide evidence that the LEMP was submitted to the EPA and Council for comment.	The Licensee has submit all plans and procedures to Council and / or the EPA for review as required, including the LEMP
#562 – Table 8	Suggest including more detail of the changes made in the pollution incident response plan (PIRP)	A record of changes is not contained within the version of the Pollution Incident Response Management Plan provided for review (version 5).	The Licensee does already apply version control to this document (in fact all of its documents) but has begun a review of whether the suggested audit recommendation is required in more detail or not.

ENVIRONMENTAL PERFORMANCE – 2017 ANNUAL REVIEW

Senior management conduct regular environmental inspections of the Facility. On an annual basis in accordance with Schedule 5 Section 3, management reviews the prior 12 months environmental performance of site to prepare this annual review. This annual review is to be read in conjunction with online 2017 annual return submitted 24 April 2018.

These regular inspections are needed to determine, in conjunction with the routine environmental monitoring and incident/complaint reporting procedures, whether there is on-site compliance with the approved Environmental Management System (EMS). Any non-conformances are recorded on inspection forms and the cause of any non-conformances are investigated by the site operations manager.

SITE SECURITY & SIGNAGE

Salient Matters	Nil
Works that were carried out in the past year	Continued maintenance and repair of the site's fencing and lockable security gates for security and public safety. A new access road was built with access now from Kangaroo Avenue.
Works that are proposed to be carried out over the next year	The new portion of Precinct road is expected to open in March 2018. Along with the new road, there is a continual maintenance and repair of the site's fencing for security and public safety.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	No Monitoring Applicable. Complaints Records: Nil
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspection, maintenance and upkeep.
Identify any trends in the monitoring data over the life of the project;	Not Applicable
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Not Applicable
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Not Applicable

ODOUR MANAGEMENT

Salient Matters	Leachate Management. Green Waste Management.
Works that were carried out in the past year	Ongoing maintenance and repair (as required) of the leachate tanks, to minimise odour generation. Implementation and update of the landfill gas management plan.
Works that are proposed to be carried out over the next year,	Continued maintenance and repair of the leachate tanks to minimise odour generation.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; - the relevant predictions in the EA;	Monitoring Results KMH conducted a boundary field odour assessment Survey at the Genesis Facility on 17 February 2017, KMH concluded that based on the results of the odour assessment, the site was compliant with the EPA NSW Impact Assessment Criteria for boundary odour. The report confirmed that it is unlikely that odour levels measured at the boundary of the site would be detectable outside the perimeter of the facility, in particular, in the nearest residential developments. The aerial photograph below shows various monitoring locations for the odour assessment conducted by SEMA  Key: - Location of boundary FAOA monitoring - Weighbridge - Green and timber - Product pickup - Leachate Tanks - Landfill Complaints A telephone complaint was received by EPA on 24 August 2017 alleging that at approximately 10:30am there was a sewer like odour in Minchinbury. The Licence-holder investigated practices at the site and confirmed (to the EPA) that the offensive odour in the area did not originate from the Genesis facility. Enquiries were also made at a neighbouring site whether any odour had been detected, however the staff on site at the neighbouring property confirmed that there was no odour emanating from the Genesis site. A detailed register of complaints and subsequent investigation and action taken is maintained on the website.
Any non-compliance over the last year	Nil

Describe what actions were (or are being) taken to ensure compliance;	Continuation of existing work practices within the site, including daily covering of the active tipping face, ensuring all green waste received at the MPC is unloaded and separated inside the building and promptly transported from site. Optimal operation of the leachate management system is also maintained, to minimise odour generation.
Identify any trends in the monitoring data over the life of the project;	The review of the Odour Assessment, odour monitoring results and complaint records over the life of the project show that the Genesis Facility is complying with statutory requirements.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The actual odour impact of the project has been less than predicted as Genesis does not stockpile green waste (only wood waste). Approval was originally granted for this activity and it was predicted that this would cause significant odour, however as yet the proponent has decided not to undertake this activity onsite. All green waste is transported off site before degradation begins.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems.

AMENITY BERMS

Salient Matters	Nil
Works that were carried out in the past year	Ongoing, inspections, maintenance of the amenity berms as required ensure stability of the berms and prevent damage from erosion.  <i>Aerial photo identifying amenity berms</i>
Works that are proposed to be carried out over the next year,	Continuing maintenance of amenity berms, with particular emphasis on reducing weeds and allowing native grasses and plants to grow, reducing erosion and increasing the stability of the berms, in line with the Landscape and Vegetation Management Plan.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	No Monitoring Applicable.
- the monitoring results of previous years; - the relevant predictions in the EA;	Complaints Records- Nil.
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspection maintenance and upkeep of the berms ensuring height, shape and appropriate vegetation.
Identify any trends in the monitoring data over the life of the project;	Amenity berms continue to be effective in providing a visual screen around the site, noise attenuation and a shield against airborne particulate generation.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Nil.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	To improve the environmental performance of the project, particular emphasis will be placed on increasing weeding activities and where applicable planting on amenity berms, in line with Landscaping and Vegetation and Amenity Berms Management Plans.

OPERATING HOURS & NOISE

Salient Matters	Nil
Works that were carried out in the past year	Continued implementation of the Noise Monitoring Program, repair and maintenance of plant and equipment and amenity berms onsite to minimise noise generation.
Works that are proposed to be carried out over the next year,	Continued implementation of the Noise Monitoring Program and maintenance and report of plant and equipment and amenity berms. A proposed MOD 6 has been submitted to the DOP to extend operating hours as follows: SEARs have been issued for this proposed modification and the proponent has engaged Consulting Earth Scientists Pty Ltd to undertake the requisite environmental testing/modelling.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; - the relevant predictions in the EA; Any non-compliance over the last year	Monitoring Results Consulting Earth Scientists Pty Ltd (CES) conducted noise compliance assessments for the Genesis Facility in September 2017 the results of the noise monitoring investigation at monitoring locations A1 and A2 indicated that background noise environment in the vicinity of the facility was dominated by road traffic noise from the M4, with no audible noise being generated from the Genesis Landfill and Recycling Centre.
Describe what actions were (or are being) taken to ensure compliance;	Complaints Records - Nil. Nil
Identify any trends in the monitoring data over the life of the project;	Continuation of existing work practices including Noise Monitoring Programs carried out by a qualified Environmental Consultant. All on-site operating plant machinery is well maintained and noise muffled; no rock breaking to occur except at lower levels on the site or behind earthen bunds to act as noise baffles, monitoring and mitigating noisy behaviours of trucks entering the premises.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The continued review of noise monitoring results over the life of the project, and the lack of noise complaints since construction of the project concluded and partial operations commenced in 2012, show that the Genesis Facility continues to comply with statutory requirements and EPL noise limits. The predicted noise modelling undertaken in the Environmental Assessment by ERM showed that the cumulative industrial noise impacts were predicted to be negligible, with noise levels remaining below the amenity noise goals during all modelled weather conditions.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	The NSW Department of Planning approved extended operating hours for the MPC in December 2013 and there have been no identified additional noise impacts from this change. Continuation of all existing systems.

AIR QUALITY

Salient Matters	Dust Deposition Landfill gas
Works that were carried out in the past year	Dust Deposition ■ Dust deposition monitoring gauges maintained at the positions shown in the Air Quality Management Plan. A Dustrak live real time monitor is located at 93 Minchin Drive, Minchinbury. Both of these systems are monitored by qualified, independent environmental consultants with remote warning systems in the case of exceedance recorded by the Dustrak monitor. ■ Ongoing maintenance and repair to paved and asphalt roads to ensure good quality surfaces which minimise airborne particulates, along with use, maintenance and repair of water sprays and sprinklers throughout the facility and on facility paved roads to minimise airborne particulates. Landfill Gas Update and continued operation of the landfill gas monitoring program with monthly monitoring of surface and accumulated gas and quarterly sub-surface landfill gas monitoring undertaken by qualified consultants. Regularly update the relevant greenhouse gas emission inventory for the site.
Works that are proposed to be carried out over the next year	Continuous review of Dustrak monitoring technology to ensure optimum monitoring and compliance with relevant standards of air quality. Continued implementation of the Landfill Gas Monitoring program and regular updating of gas emissions data.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	Dust Deposition ■ Dust monitoring was undertaken monthly by Thomson Environmental Systems. Despite Genesis recording high deposited dust levels for one month in 2017 (February) the EPL annual average limit of 4 g/m²/month was not exceeded, as mitigation measures were put in place and have continued to be effective. ■ There were no occasions where the 24-hour average PM₁₀ concentration was above the impact assessment criteria of 50 µg/m³. 2015-2017 results were below the EPL average limit of 4g/m²/month. Landfill Gas Continued engagement of environmental monitoring experts to conduct regular landfill gas monitoring. In 2015/2017 it was found that all landfill gas concentrations were below the target thresholds described in the Landfill Gas Management Plan for the surface, and accumulation LFG monitoring. During the Quarterly subsurface gas monitoring performed in September 2017, borehole BH19s reported anomalous concentrations of methane greater than the threshold specified in the landfill gas monitoring plan. Genesis informed the EPA of the exceedance and EPA requested a 7 day monitoring period of the concentrations of methane within the borehole. The Licensee complied with this directions and provided the EPA with the required data. Further to the monitoring requested by the EPA, and in accordance with the landfill gas management plan, the Licensee, voluntarily and in conjunction with as advice from Consulting Earth Sciences (CES), increased the monitoring periods for BH19s in order to collect data to perform a preliminary risk assessment.

	Fortnightly readings of BH19s were taken and collected for a period of 3 months. The investigation and preliminary risk assessment found that the risk presented by the anomalous methane concentration within BH19s was classified as “characteristic gas situation” in the Wilson and Card model, as such the gas risk at BH19s was classified as being low risk. Complaint Records. Nil. See reference above to Landfill Gas
Any non-compliance over the last year	
Describe what actions were (or are being) taken to ensure compliance;	▪ Maintenance of stockpile heights within the SMA to remain below the height of the amenity berms. ▪ Continuous enhancement of automated water sprays and sprinklers in the SMA and on facility paved roads to minimise airborne particulates. ▪ Continuation of dust suppression measures including wetting down stock piles, ensuring trucks cover their loads, limiting the speed of vehicles on site and requiring all trucks leaving the site to pass through a truck wheel wash before returning to sealed roads within the Facility. ▪ Within the MPC there has been a continuous improvement program to enhance air quality within the building. This is a necessary requirement for optimum workplace health and safety. It has involved the identification of individual and specific dust generating points from the recycling plant with enclosure of same and extraction points before the airborne particulars become unmanageable within the building. ▪ Continued compliance with all air quality monitoring requirements.
Identify any trends in the monitoring data over the life of the project;	Dust Deposition 24-hour averaging and annual averaging PM10 deposition monitored at a nearby residential receptor generally decreased in 2014 and have consistently remained under the threshold during the following years. Dust deposition monitored at the gauges along the site boundary have also been relatively stable below the 4 g/m2/month limit across the life of the project, with the two spikes in 2015 and one spike in 2017 not having a significant impact on the annual average. Landfill Gas Other than the anomalous spike noted above, landfill gas monitoring completed in 2017 found that methane concentration was below the target thresholds described in the Landfill Management Plan, for surface gas and gas accumulation. The December 2017 quarterly subsurface gas monitoring reported concentrations of methane below the threshold at all monitoring locations including BH19s which returned to normal concentrations of methane. The use of a chute from the MPC to the landfill has reduced the number of trucks using the partially unpaved road down to and up from the landfill, and continues to reduce predicted dust generation levels on site.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems on site and air quality monitoring.

STORMWATER QUALITY

Salient Matters	Landfill fill rate
Works that were carried out in the past year	Inspection, maintenance and repair of draining system, hardstand areas, GPT's roads and detention dams, to ensure continued segregation of 'clean' and 'dirty' water, sediment control and water quality. Landfilling is continuing to take place in accordance with the Landfill Environment Management Plan. Because of the inverted conical shape of the quarry, progressively the same incoming quantity of landfill material could be expected to spread and filled over a larger and larger surface area. The result is that the fill rate per year slows for the same given quantity of waste. In turn this prolongs the useable life of the stormwater collection pond and the time required before each replacement becomes longer. A site water balance was carried out by Consulting Earth Scientists Pty Ltd, this is discussed in the leachate section below. Continued inspection, maintenance and repair of drainage system, hardstand areas, roads and detention dams. A proposed MOD 7 is being prepared which will include a revised Stormwater Management Plan which will be developed in conjunction with Blacktown City Council.
Works that are proposed to be carried out over the next year	
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	Monitoring Results Water quality monitoring at the two stormwater retention dams on site (EPA monitoring points 2 & 3) was conducted quarterly by EnvironConsulting Services in 2017. A review of the monitoring results found that: • Ammonia levels have increased slightly during the third quarter of 2017, however on the last monitoring round conducted in November 2017 the concentrations of ammonia have returned to their background levels from previous years. • pH levels have remained stable in comparison to previous years during 2017. • Total suspended solids results have presented a spike during the last quarter of 2017, this spike has been attributed to the low levels of water within the OSDs. • Heavy metal concentrations have remained with low concentrations in 2017. The northwest dam discharged over 3 consecutive days due to overflow in March 2017 The discharged event are attributed to torrential rain in those months. Laboratory analysis of contaminants of potential concern as set out by the EPA on license 13426 returned concentrations below the threshold criteria for the set contaminants Complaints records - Nil
Any non-compliance over the last year	Northwestern OSD reported a concentration of total suspended solids above the criteria set up by EPA during the November 2017 monitoring event, the exceedance was attributed to low levels of water (nearly dry) on the dam, also it is noted that the dam did not discharged any water to the environment before or after the monitoring event was conducted. Otherwise the Licensee remains compliant with its existing licence conditions.
Describe what actions were (or are being) taken to ensure compliance;	Site area separation and gradation to separate 'clean' and 'dirty' water. Regular inspection and maintenance of site drainage gross pollutant sumps and traps to reduce sediment levels and pollution of stormwater. Maintenance of roads to reduce erosion and sedimentation and protection of stormwater drains along with daily litter collection and sweeping of paved roads. Regular inspect of surface water infrastructure, including before and after storm events (if known).

Identify any trends in the monitoring data over the life of the project;	Water quality of stormwater in the retention dams has remained at a high enough level over the life of the project to be reused onsite. It has been noted that during the month of November and December 2017 the water stored on the dams was insufficient to supply the demand for the site needs, therefore town water was used.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Increasing levels of water reuse onsite for dust suppression and other activities has reduced dam overflow events to 2 in 2017, minimising any potential impact on surrounding waterways.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing monitoring and safety systems.

LANDFILL AND CHUTE

Salient Matters:

 Northern Slip stability works
  Groundwater monitoring
  Leachate Collection
  Chute Maintenance and reduction

Salient Matter	Northern Slip stability works
Works that were carried out in the past year	Nil, regular inspections undertaken to ensure no further works are required.
Works that are proposed to be carried out over the next year,	Continuation of daily inspections to identify the potential for any slippages. No further works are anticipated at this stage, but it will be subject to the outcomes of the daily monitoring.
Review of the monitoring results and complaints records of the project over the past year, includes a comparison against the relevant statutory requirements, limits or performance measures/criteria;	No further slippages have so far been identified.
Any non-compliance over the last year	Complaints Register - Nil
Describe what actions were (or are being) taken to ensure compliance;	Nil.
Identify any trends in the monitoring data over the life of the project;	Continuation of daily inspections and training of quarry staff to ensure safety awareness of potential slip area.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	No further slippages have so far been identified since stabilisation works were completed in 2013.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Not Applicable.
	Continuation of all existing monitoring systems.

Salient Matter	Groundwater monitoring
Works that were carried out in the past year	Continuous groundwater monitoring using the existing monitoring well network, regular maintenance to the dedicated pumps installed on a number of wells.
Works that are proposed to be carried out over the next year,	Nil.
review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; • the relevant predictions in the EA; Any non-compliance over the last year	Monitoring Results Groundwater quality monitoring was conducted quarterly by EnvironConsulting Services in 2017 at EPA monitoring points 7-25. Groundwater quality has been maintained in 2017, when comparing monitoring results to previous years. Complaints Records - Nil
Describe what actions were (or are being) taken to ensure compliance;	Nil
Identify any trends in the monitoring data over the life of the project;	Stage 2 Groundwater monitoring network comprising of 7 new monitoring wells were installed early 2017 and are continuously monitored to assess if leachate is leaving the site regardless of the inwards flow of groundwater towards the quarry. Ammonia concentration is the primary leachate indicating parameter and for the purposes of assessment of leachate contamination of groundwater wells on site. The concentration of ammonia measured in the monitoring wells during 2017 monitoring period are within the range encountered in the monitoring well network before landfilling activities commenced and indicate that groundwater on the site is not being impacted by leachate.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Measured levels of contaminants of concern suggest that the leachate is not impacting the groundwater quality of the site.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing monitoring systems.

Salient Matter	Leachate Collection
Works that were carried out in the past year	▪ Bunding and Waterproofing works on the Leachate tanks ▪ The polyethylene tanks on the green waste area have been equipped with high and low level float switches to control their discharge to the leachate treatment plant and protect the pumps used to transfer the liquid, this process is controlled by a Programmable Logic Controller (PLC) which has been programmed to maintain the polyethylene tanks at the lowest possible level at all times to prevent pressurised leaks in the unlikely event of tank failure. ▪ Installation of a 1.5m height colour bond panels on the top of the bund wall acting as a secondary measure to stop pressure leaks in the unlikely event that the tanks fail during a rain event. ▪ The Water Balance Report found that the amount of leachate generated at the site indicated a net positive volume of water and/or available leachate within the landfill pit. The Licensee continues treating leachate and discharging effluent to the sewer under trade waste agreement with Sydney Water.
Works that are proposed to be carried out over the next year	Works will continue to regularly increase the height of the main leachate sump riser (Monitoring Point 26) as the level of filled waste rises.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; • the relevant predictions in the EA; Any non-compliance over the last year Describe what actions were (or are being) taken to ensure compliance; identify any trends in the monitoring data over the life of the project;	Monitoring Results ▪ Leachate quality monitoring was conducted quarterly by EnvironConsulting Services at EPA monitoring point 26. Leachate levels were also monitored by EnvironConsulting Services at Monitoring Point 27. ▪ Chemicals monitored as part of the leachate quality monitoring program, have reported concentrations similar to those found on previous years with the exception of ammonia, which has increased its concentration levels. The concentrations of ammonia are expected to continue increasing as the landfill ages and the degradation process takes part within the waste mass. ▪ The leachate treatment plant operated by the licensee, has successfully managed the increased concentrations of ammonia during the year 2017 to levels below the trade waste agreement criteria that the licensee currently holds with Sydney Water. Complaints Records - Nil
Any non-compliance over the last year Describe what actions were (or are being) taken to ensure compliance; identify any trends in the monitoring data over the life of the project;	Nil Continuation of active inspection maintenance and upkeep of the leachate sequence batch reactor and nitrifying bacterial.
any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; describe what measure will be implemented over the next year to improve the environmental performance of the project.	There have been no long term changes in leachate quality with the exception of ammonia concentrations which have increased during 2017. The concentrations of ammonia are expected to continue increasing as the landfill ages and the degradation process takes part within the waste mass. Trade waste conditions continue to be satisfactorily met. ▪ It had been speculated that in the initial stages of landfilling there may be insufficient material upon which the nitrifying bacteria of the SBR could operate. ▪ Currently, there is always enough suitable material present in the waste mass which is evidenced in the ammonia content of the leachate for the nitrifying bacteria of the SBR to operate. Leachate piping system will be maintained to ensure leachate tanks are filled at an optimum rate.

Salient Matter	Chute Maintenance and Reduction
Works that were carried out in the past year	Reduction in chute length when required as the filled level of waste rises. No further chute reduction was required in 2017. The footings and structural integrity of the chute are inspected and monitored in the manner set out in the Chute Management and Maintenance Plan approved by the Department.
Works that are proposed to be carried out over the next year,	Continued reduction in chute length as required. Continued inspection, maintenance and repair of the chute and conveyor system.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; • the relevant predictions in the EA;	No observations to suggest the occurrence of any adverse developments in the footing and structural integrity of the chute. Complaints Records - Nil
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Regular maintenance of chute and the internal misting system. Visual inspections by appropriately trained staff.
Identify any trends in the monitoring data over the life of the project;	There have been no occurrences of any adverse developments in the footing and structural integrity of the chute since its construction.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies.	Nil.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continued maintenance and inspection of chute.

WASTE MANAGEMENT PROCEDURES.

Salient Matters	Material types accepted at the premises. Rejection of Loads Potential Asbestos Contaminated Loads General operations.
Works that were carried out in the past year	
Works that are proposed to be carried out over the next year,	A modification to the Project Approval (Mod 5) has been approved and as such a licence variation will be sought to increase tonnes and variety of waste streams acceptable at the premises. The development will allow for a "pre-sort enclosure" installed on the premises which will increase the optimum recycling output of the Project.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	No Monitoring Applicable
Any non-compliance over the last year	Complaints Records - Nil
	■ The EPA completed an inspection on Tuesday 18 October 2016 and subsequently issued an invitation to show cause. ■ During the inspection of the landfill an "unexpected find" of suspected ACM occurred in a load of material that had been previously tipped. DADI instigated a voluntary closure of the area of the landfill. VENM cover was applied to the relative area of the landfill. An independent hygienist was engaged to inspect the area and certified it as free from asbestos. The EPA and were notified upon completion of the works and the areas reopened. ■ During the same inspection a piece of suspected ACM was identified in the SMA. This area was segregated, the piece of suspected ACM was sent to an external laboratory and an external hygienist engaged to inspect the area. The external laboratory identified that the material was not ACM and the hygienist certified the area as free from asbestos. The EPA and were notified upon completion of the works and the areas reopened. ■ The EPA has since notified the Licensee that the sample it took from this area was ACM and the Licensee is preparing a response.
Describe what actions were (or are being) taken to ensure compliance;	■ Initial weighing and visual screening of waste entering site. ■ MPC spotters employed and trained to ensure recyclable waste is sorted correctly and no waste that is not permitted is allowed onsite. ■ 3 x MicroPhazer.asbestos analyser devices were purchased, which allows on the spot testing of suspect material for asbestos content. ■ Tipping Face Spotter employed on site to ensure that vehicles are directed to the correct location to tip their waste and no waste that is not permitted is allowed on site. ■ Rejected loads register is being continuously maintained by DADI.
Identify any trends in the monitoring data over the life of the project;	Not Applicable
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Nil
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Modification to the Project Approval will see proposed changes to opening hours, location of the PSE, location and number of weighbridges, increased tonnages and ability to accept C&I waste which will increase the optimum recycling output of the Project.

CULTURAL HERITAGE

Salient Matters	Salvage of Aboriginal Cultural Material Integrity of archeologically sensitive areas
Works that were carried out in the past year	Inspection, maintenance and repair of fencing around the Conservation area to control access to classified archaeological sensitive land (Zone 1)
Works that are proposed to be carried out over the next year,	Continued monitoring of Conservation Area.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; - the relevant predictions in the EA; Any non-compliance over the last year	Continued maintenance of fencing around the Conservation area. Since construction there has been no further discovery of any Aboriginal cultural materials. Cultural monitoring results are consistent with previous years and this is predicted to continue. Complaints records - Nil
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Fencing and regular surveillance of site to control access to sensitive areas.
Identify any trends in the monitoring data over the life of the project;	There has been little change to site since initial construction, as such the project approval requirements which apply to these issues should be removed.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	N/A
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	N/A

OTHER COMPLIANCE MATTERS – CONDITION 7 OF SCHEDULE 5 (JUNE 2015-JUNE 2017)

RELEVANT STATUTORY MONITORING REQUIREMENTS

The monitoring requirements for dust and surface water are as set out in EPL 20121 conditions P1 and M1 to M7 inclusive. The monitoring requirements for groundwater, surface water and leachate are set out in EPL 13426 P1 and M1 to M7. These reports and results can be found by following the attached link: <http://www.dadi.com.au/policies-reports/genesis-reporting>.

Additionally, odour, landfill gas and noise assessments are regularly completed in line with the site's Air Quality, Odour and Greenhouse Gas Management Plan and Landfill Gas and Noise Monitoring Programs. The noise limits are set out in EPL 20121 condition L4 and EPL 13426 condition L4.

ENVIRONMENTAL PROTECTION LICENCE - POTENTIAL NON-COMPLIANCES RAISED BY EPA

Under Recycling Facility EPL 20121 the following compliance issues have been raised by the EPA in 2017:

1. asbestos sheeting and fragments being sited in the unprocessed stockpile within the material processing centre (MPC) and within one 20mm aggregate stockpile.
2. Dust emanating from within the MPC building, and dust migrating offsite from vehicle movements on internal driveways and excavator use. Along with sediment and mud be tracked onto Honeycomb Drive by trucks leaving the premises turning into dust.
3. Observations of painted and engineered wood in processed stockpiles in the timber section of facility.

The Licensee has actioned or provided responses to all EPA correspondence relating to their concerns. In particular the Licensee has

- Ensured that it has adequate water carts on regular basis wet down all internal roads to reduce any dust, along with sprinklers in the MPC to assist with dust suppression.
- Ensured that it has adequate trained spotters to view loads as they both enter the MPC over the weighbridge (via a viewing platform, with each load under video surveillance) and when tipping in the MPC. The Facility uses microphazers and trained spotters if there is an 'unexpected find' within a load. Any load found to contain asbestos is entered into the rejected load register. The Licensee has expressed to the EPA, and the EPA has acknowledged the difficulty in determining what is and isn't asbestos that may be brought into the MPC incorrectly, or as an unexpected find. The Licensee also regularly reviews its methodology and plans in relation to asbestos.
- Acted upon the issued Clean up Notice 1549945 relating to the unexpected asbestos finds in MPC stockpile and 20mm aggregate stockpile.

Under EPL 13426 (Landfill Operations) the following compliance concerns have been raised by the EPA specifically in relation to the Licensee's landfill operations. Again, the Licensee has promptly replied to any request or invitation to provide additional information.

- Method and manner of disposal of asbestos soils within the landfill, specifically in relation to application of cover and compaction.
- Use of water cart with asbestos

- 'Unexpected finds' of asbestos in GSW
- Exhumation of waste and removal off site
- Odour
- Sediment and mud tracking and related dust
- Concerns whether end of day Daily Cover has been applied or appropriately applied.
- Suspected application to land of wood waste not meeting mulch exemptions

The EPA has only issued Penalty notices regarding 2 unexpected finds of asbestos in the landfill. The Licensee does not admit to any breach of the POEO Act and these matters are now before the Court.

The Licensee takes very seriously all investigations and suggestions of potential breaches of either the Act, the waste regulations or the applicable licence conditions. The Licensee is constantly reviewing its methods and practices in relation to the activities that it carries out under both its licences to ensure that it maintains one of the highest standards of any similar facility in New South Wales. The Licensee also acknowledges that all notices issued to it by the EPA are available to the public by following the attached link <http://www.epa.nsw.gov.au/licensing-and-regulation/public-registers>

INCIDENTS AND COMPLAINTS

COMPLAINTS RECORDS

Four complaints were made during the audit period June 2015 and June 2017 concerning the project.

A detailed register of complaints and subsequent investigation and action taken is maintained on the website and available for the public viewing at: <http://www.dadi.com.au/policies-reports/genesis-reporting>.

Information about how to make a complaint is available on the Genesis website at: <http://www.dadi.com.au/landfills-and-recycling-centres.html>.

REPORTABLE INCIDENTS

There were no reportable incidents during the audit period of June 2015 and Jun 2017. For completeness the Licensee does note that it notified the EPA of an anomalous exceedance of methane gas in September, 2017 and provided regular reports. This exceedance has now resolved itself.

ADDITIONAL COMMITMENTS

PUBLIC SAFETY

Since the Facility opened in mid-2012 a number of measures have been implemented to minimise the risks to the public and to ensure public safety. These measures are regularly reviewed for applicability and customers are regularly reminded of their need to consider the safety of others on site with flyers regarding driving behaviour whilst on site.

- the site is fenced;
- speed signs and speed bumps erected at the end of DADI Drive entrance (approaching the Workshop);
- access points to the site are gated and locked after hours (with security patrols after hours);
- access points to the site have security and warning signs;
- all visitors (including consultants) must sign in & out of the visitors register located at the Administration Office;
- the site is under video surveillance; and
- restricted general access to potentially hazardous zones (e.g. inside the chute).

MOD 5

MOD 5 was approved by the Department of Planning in March 2016. Mod 5 consistent of the following development approvals:

- Proposal to construct a pre-sort enclosure adjoining the existing materials processing centre to improve the efficiency of the on-site operations of the existing Genesis Waste Management Facility including traffic flow;
- Construction of Pre-sort enclosure not yet constructed but expected to start shortly. This new pre-sort enclosure will adjoin the existing materials processing centre to and will improve on site operations

MOD 6

Mod 6 relates to the modification to the conditions for MP06_139. No approval has yet been received. In particular the following conditions of consent are sought to be amended:

- o Condition 39, Table 5 that sets out the hours of operation; and
- o Schedule 3; Condition 1(a) the limits landfill capacity to 700,000 tonnes per annum.
- The modification seeks to extend the hours of operation and remove the annual landfill cap to promote flexibility in the site operations.
- This MOD is still with the Department after further submissions were made on the landfill cap. We understand that the DoP are waiting on comment from the EPA.

MOD 7

- The proposal involves modification to the entry point and layout of the site operations area to facilitate the delivery of the Precinct Road required by the conditions of MP06_139 and generally improve the operation of the site.
- The modification does not seek to alter or extend the operations already approved on the site. Accordingly, the conditions as imposed should generally not be affected by the modification with the minor exception of plan reference conditions.

INITIATIVES FOR THE NEXT 12 MONTHS - 2018

The following initiatives have either been carried over from 2017 or are new endeavours for 2018.

- Modification (MOD 5) of the Genesis Facility conditions of approval enabling it to process and remove part of the existing earthen berm. The purpose of this activity was to clear an area for the construction of the pre-sort enclosure (PSE).
 - o The PSE will separately house an automated mechanical sorting plant similar to the existing plant in the main MPC.
 - o The PSE will optimise recycling on the facility and potentially increase the waste streams able to be recycled on the premises by increasing recyclable recovery rates through front end segregation (pre shredding).
 - o It will also reduce WHS risks relating to personnel, trucks & machinery operating within the same workspace as the sorting plant.
- In 2017 DADI worked with neighbouring landowners and Blacktown City Council to construct the new section of Precinct Road to meet its obligations under the Development Consent.
 - o Construction of the new road required a change in access from Honeycomb Drive, to Kangaroo Avenue
 - o The Licensee will be looking to make this alternative access to Precinct Road (DADI Drive) more permanent with additional weighbridge facilities to ensure compliance with all record keeping and waste levy obligations (Mod 7).
 - o Expected completion of the new section of Precinct Road is March 2018 (now due for completion early May 2018). Once this Precinct Road is complete it is intended to be handed back to Blacktown City Council.

- In early 2018, the Licensee met with the team from Blacktown City Council to discuss the various elements it was proposing for Mod 7. One of these elements was around the completion of a site wide stormwater management plan. The Licensee and Blacktown City Councils are currently reviewing recommendations to improve stormwater management on site. The Council has formed the view that stormwater detention basin should reside wholly within the boundary of the Genesis Facility. As such the Licensee will seek to expand the land title of the facility by boundary re-alignment.
- Environmental initiatives for the Facility in 2018 will also include a review of all strategies, plans and programs relating to the project approval and to the requirements and commitments from the Genesis Recycling & Landfill Environmental Monitoring Plan and Programs in order to bring them in to line with the current operations as it moves from the construction phase. In particular, DADI will be looking to engage both Independent consultants, as well as take advantage of its current inhouse experience to ensure that all revisions are best in class, and the Licensee will seek all necessary approvals during this process.
- Following on from this audit review period, incorporating both the 2017 annual review and the 2015 -2017 Biennial environmental review, the Licensee will be looking to implement a new compliance software across its business and in particular the Facility and transfer stations to improve the environmental performance and facilitate improved compliance and reporting.
- Enclosing the timber yard, which will
 - Reduce risks associated with dust generation, resulting from the shredding of timber products, as this process will then be conducted in a controlled environment, unaffected by weather conditions.
 - Increase the shelf life of the finished product resulting from non-exposure to UV and inclement weather.
 - Reduce volumes of leachate being generated, treated and discharged through the trade waste / sewer system.
- Construction of a Commercial and Industrial (C&I) Recycling Plant, which will
 - Improve recovery rates of paper / plastic / cardboards, through a dedicated automated separation and recovery system.
 - Improve the performance of the Construction and Demolition recycling plant by diverting the C&I waste streams away from the plant, allowing it to become finer tuned to the recovery of fines, timbers, metals, rubble and aggregates.

STRATEGIC AND COMMERCIAL REVIEW

In concert with this operational environmental review the Corporate Group of the Licence holders has carried out a review against the commercial and policy imperatives which have occurred during the past twelve month period.

These included

- the ongoing phenomenon of the transportation of waste for landfilling interstate [notably Queensland] in order to advantage the lower levy and
- the imminent cessation of that phenomenon consequent upon the announcement by the Qld state government of a reintroduction of landfill levy; and
- the announcement of the National Sword Policy by the PRC under which recyclable materials [principally plastic glass and paper] which had been accepted into PRC for recycling have now been excluded; and
- Recommendations issued by the NSW Upper House Parliamentary Inquiry into the waste industry;
- Addressing the community need for increased domestic resource recovery and recycling capacity by the implementation of the additional C & I Plant

An initiative by the EPA in the form of a campaign to ensure that asbestos is appropriately managed and covered at landfills, has highlighted the shortfalls of using VENM as cover in compliance with Clause 80 of the Regulation. It is the Licensee's

view that GSW should be used cover for asbestos materials and the Proponent has made submissions to the EPA on this point, in the hope that the cover requirements will be amended to allow for more substantial cover of asbestos.

The ongoing requirement to ensure that recycled products meet appropriate guidelines for safety and quality.

The Company has decided as a matter of policy to make these elements its core directives for the next following twelve month period.

These involve the following,

1. Seeking an extension of operating hours for delivery to and within the MPC in order to facilitate ongoing maintenance and repairs to the Genesis Plant, prolonged hours for its use and extended pre-sort procedures to accommodate enhanced procedures for removal of potential asbestos (or asbestos appearing) materials.
2. Enhancing the timber sorting processes in order to maximise opportunities for beneficial re-use and thereby lowering the volumes of timber required to be stored on site.
3. Seeking construction approval for the construction on site of an additional under cover facility to allow for redirection of and enhancing retrieval procedures for the Commercial and Industrial Waste streams.
4. The progression of "The Next Generation" [TNG] Energy from waste planning application.

SUMMARY

SCHEDULE 5 TO CONSENT (06_0139 MOD 4)		
ENVIRONMENTAL MANAGEMENT, REPORTING & AUDITING		
ENVIRONMENTAL MANAGEMENT		
Environmental Management Strategy		
The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The Strategy must:		
a)	be submitted to the Director-General for approval prior to the commencement of construction;	Complies
b)	provide the strategic framework for environmental management of the project;	Complies
c)	identify the statutory approvals that apply to the project;	Complies
d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Complies – Key Contact Personnel: ▪ CEO – Executive Management ▪ Group Operations Manager – Executive Management, responsible for the oversight of all Sites, ▪ Site Managers – Management – responsible for the day to day operations on site. ▪ Simon Sherwood (Site Manager) - 0429 293 909
e)	describe the procedures that would be implemented to:	
	keep the local community and relevant agencies informed about the operation and environmental performance of the project;	Complies DADIs website contains links to up to date environmental performance of the project with monitoring results.
	receive, handle, respond to, and record complaints;	Complies
	resolve any disputes that may arise during the course of the project;	Complies
	respond to any non-compliance; and	Complies
	respond to emergencies;	Complies
f)	include	
	copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and	Complies
	a clear plan depicting all the monitoring currently being carried out within the project area.	Complies
Management Plan Requirements		
The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:		
a)	detailed baseline data	Complies
b)	a description of:	
	the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Complies
	any relevant limits or performance measures/criteria;	Complies
	the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	Complies

c)	a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Complies
d)	a program to monitor and report on the:	
	impacts and environmental performance of the project;	Complies
	effectiveness of any management measures (see c above);	Complies
e)	a contingency plan to manage any unpredicted impacts and their consequences	Complies
f)	a program to investigate and implement ways to improve the environmental performance of the project over time;	Noted
g)	protocol for managing and reporting any:	
	incidents;	Complies
	complaints;	Complies
	non-compliances with statutory requirements;	Complies
	exceedances of the impact assessment criteria and/or performance criteria; and	Complies
h)	a protocol for periodic review of the plan.	Complies
Annual Review		
By the end of December 2010, and annually thereafter, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General. This review must:		According to the definitions of the Project Consent, the "project" is the development described in the EA. The EA describes the project as a resource recovery facility and landfill facility. The Recycling Environment Protection Licence commenced in June 2012 and the Landfill Environment Protection Licence commenced in December 2012. As such, the first annual review of the environmental performance of the project was undertaken in December 2013, being the anniversary of when the landfill operations commenced in accordance with the Environmental Protection Licences. The Licensee is current with all required Annual Reviews This 2017 Annual review coincides with the biennial requirement of the Independent Environmental Audit required by Condition 7. For completeness the Licensee, as it has done in prior years, has lodged this review with the response to the IEA.
a)	describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year;	Noted
b)	include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	Noted
	the monitoring results of previous years; and	Noted
	the relevant predictions in the EA;	Noted
c)	identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	Noted
d)	identify any trends in the monitoring data over the life of the project;	Noted
e)	identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and	Noted

f)	describe what measure will be implemented over the next year to improve the environmental performance of the project.	Noted
Revision of Strategies, Plans & Programs		
Within 3 months of the submission of an:		
a)	audit under condition 7 of schedule 5;	The latest audit was initiated in or around April 2015. The initial report was with an addendum addressing additional licence conditions was completed by the end of March 2017. The next audit will take place in 2017 as per the project approval. Any revisions of the Project's Strategies Plans and Programs will be completed based on the results of the reaudit.
b)	incident report under condition 5 of schedule 5; and	Noted
c)	annual review under condition 3 of schedule 5, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General	Noted
<i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i>		
REPORTING		
Incident		
The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the proponent shall provide the Director General and any relevant agencies with a detailed report on the incident.		Noted
Regular		
The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Director-General.		Complies
INDEPENDENT ENVIRONMENTAL AUDIT		
Within 6 months of the commencement of operation, and every 2 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:		The Initial Environmental Audit was carried out in 2013 by Cardno. The second Environmental Audit was commenced in April 2015 and the supplementary audit requested by DOP was finalised on 12 April 2017. The Audit for the period 2015 to 2017 was completed with final audit report being provided on 28 February 2018.
a)	be conducted by suitably qualified, experienced and independent team of experts (including an odour expert), whose appointment has been endorsed by the Director General;	Noted
b)	include consultation with the relevant agencies;	Noted
c)	include a full odour audit of the project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit;	A full odour audit of the project was completed by Cardno in 2015.
d)	assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);	Noted

e)	review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate; and	Noted
f)	recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.	Noted
<i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.</i>		
Within 6 weeks of the completing of this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.		The Audit response and Audit report will be provided by not later than 16 May, 2018 as agreed.
ACCESS TO INFORMATION		
From the end of 2009, the Proponent shall make the following information publicly available on its website:		
a)	a copy of all current statutory approvals;	Complies
b)	a copy of the current environmental management strategy and associated plans and programs;	Complies
c)	a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;	Complies
d)	complaints register, which is to be updated on a monthly basis	Complies
e)	a copy of any Annual Reviews (over the last 5 years);	Complies
f)	a copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and	Complies
e)	any other matter required by the Director-General.	Noted