



2014

ANNUAL ENVIRONMENT REVIEW

**Genesis Xero Waste Recycling & Landfilling Facility
(Off Honeycomb Drive, Eastern Creek)**

Annual Environment Review prepared by:

Genesis Xero Waste Recycling & Landfill Facility

Head Office Address:

32 Burrows Road, St Peters, NSW 2044

Proponent:

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 (off Honeycomb Drive, Eastern Creek).

Lot & DP:

Lots 1 and 4 in DP 1145808

For and on behalf of ThaQuarry Pty Ltd and ACN 114 842 453 Pty Ltd, the undersigned certifies that the information contained within this report is neither false nor misleading.

First Draft

Revised Draft

[Addressing issues raised by NSW Planning and Environment by letter dated 7th May 2015]

Approved:

Signed:

Date:

Report Scope

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

This will be the first Annual Environment Return prepared for the Genesis Facility.

Condition 3 of Schedule 5 states:

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.*

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

Fencing and Gates- Site security & Signage.
Amenity Berms
Operating Hours & Noise
Air Quality
Odour & Leachate Management Collection Treatment and Discharge
Stormwater Management
Landfill & Chute
Waste Management Procedures
Complaints
Compliance with Licence Conditions EPA

This review is conducted by reference to each subject matter and the criteria required by Planning Condition 3.

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 and green waste clean ups;
- on-site waste processing including sorting, screening, sieving, crushing, grinding, shredding and/or chipping, and composting of green waste;
- recycling of an estimated 65-80% of incoming waste (1.3 to 1.6 million tonnes per annum (mtpa), based on maximum capacity intake) e.g. to produce road base, aggregate, landscaping soil, bedding sand, mulch, wood chip, green waste compost and asphalt derived products for land application;
- testing and on-site storage/stockpiling of finished products prior to resale from stockpiles, predominantly to the building, construction and landscaping sectors and potentially the domestic market;
- transport of an estimated 20-35% of incoming waste (0.4 to 0.7 mtpa, based on a maximum capacity intake) to the landfill proposed within the quarry void, comprising incoming materials which are unsuitable or uneconomical for recovery and recycling (for example contaminated soils, asbestos waste, metal gas cylinders, fire extinguishers and loads that cannot physically be sorted);
- quarantine and transfer of unacceptable wastes to an appropriate off-site facility for disposal;
- 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

Condition 7 of the Planning Approval Conditions is extracted below:

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:

- a) be conducted by a suitably qualified, experienced and independent team of experts (including an odour expert), whose appointment has been endorsed by the Director-General;*
- 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 any assessment, plan or program required under these approvals);*
 - e) *review the adequacy of strategies, plans or programs required under these approvals; and, 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.*
- Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.*

The initial independent environmental audit was carried out by Kester Boardman and Tim Gunns of Cardno and was initiated on or about December 7th 2012 to satisfy Schedule 5, Condition 7 of Project Approval 06_0139 (as modified).

Prior to undertaking this audit Cardno has never been engaged by Dial a Dump Industries in any capacity.

The Environmental Audit was designed to assess compliance with Project Approval 06_0139 (as modified), Environmental Protection Licence (EPL) 20121 and 13426.

The audit included:

- ☐ Consultation with relevant agencies;
- ☐ Desktop review of appropriate supporting documentation;
- ☐ A site inspection incorporating an audit of compliance with the relevant project approval and Environmental Protection Licence documentation;
- ☐ Follow up review of supplementary documentation;
- ☐ Follow up meeting to discuss draft audit findings and corrective actions taken with DADI; and
- ☐ Revision and issue of the audit.

Audit Participants

The following people actively participated in the audit:

- ☐ Kester Boardman (Cardno, Lead Auditor);
- ☐ Tim Gunns (Cardno, Auditor);
- ☐ Kim Glassborow (DADI, Legal Counsel);
- ☐ Christopher Biggs (DADI, General Counsel);
- ☐ Bob Crotty (DADI, Landfill Manager);
- ☐ Paul Ryan (DADI, MPC Manager);
- ☐ Paul Wilcockson (DADI, Workshop Manager); and
- ☐ Cherie Duncan (DADI, Weighbridge Manager).

By written agreement between DADI Legal and the Department, the audit excluded an odour audit until such time as the greenwaste operations were fully operational. Cardno did not undertake an odour assessment as part of that audit exercise.

A copy of the Audit Report is at Appendix I

Senior management conduct regular environmental inspections of the Facility.

These 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 EMS. Any non-conformances are recorded on inspection forms and the cause of any non-conformances are investigated by the site operations manager.

Maintenance works – Operational Environmental Review

In April 2013, minor maintenance works were carried out by the Licensee's engaged sub-consultants to blast two rock outcrops located on the northern side of the quarry. JK Geotechnics were engaged to monitor the rock outcrop and slip since 2008.

The removal of the two rock outcrops by way of controlled blasting carried out by David Lees of GFW was carried out from 25 April 2013 to 28 April 2013.

Notification of the proposed controlled blasts were given to both WorkCover and the Department of Planning & Infrastructure.

The controlled blasting were successful and on-going monitoring of the outcrops is observed and recorded by senior management on a daily basis.

For the purposes of the 2014 environmental review the relevant information has been broken down and tabulated by issue as follows:

Site Security & Signage

Salient Matters	Nil
works that were carried out in the past year	Maintenance and Repair.
the works that are proposed to be carried out over the next year,	Maintenance and Repair.
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 Monitoring Applicable Approval given for the emplacement on the exterior of buildings of genesis Brand name signs, workplace safety signs and a direction sign at the end of the public road and the entry drive to the premises
any non-compliance over the last year	An alleged non-compliance identified- Roof top sign visible from aircraft www.dadi.com.au a breach of DCP applicable to public space advertising. At the request of the Department of Planning in or about 26 March 2013 sign has been amended to say "DADI". The following photo evidencing the amendment was captured using neamaps on 13 May 2015.

	
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

Amenity Berms

Salient Matters	Nil
works that were carried out in the past year	Maintenance at minimum Height levels and Repair.
the works that are proposed to be carried out over the next year,	Maintenance at minimum Height levels Maintenance and Repair.
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 Monitoring Applicable
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspections, 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	Not Applicable

potential cause of any significant discrepancies;	
describe what measure will be implemented over the next year to improve the environmental performance of the project.	Not Applicable

Odour Leachate Management and Discharge

Salient Matters	In January 2013 the Leachate Collection riser was incomplete so as to be able house the electric pump. In or about February 2013 Ex Tropical Cyclone Oswald produced excessive quantities of stormwater over the site. A Stormwater collection dam within the quarry was accidentally breached. The landfill having opened only in December 2012 there was only a small quantity of waste. Nevertheless the water which was released was treated as leachate. Upon subsequent discharge of leachate pursuant to the Sydney Water Trade Waste agreement Sydney Water experienced complaints from Minchinbury residents about odour from the sewers. No odour was detected on site or directly from the site.
works that were carried out in the past year	The riser and pump were put into position. Accumulated surface leachate was removed to a newly created holding dam where it was chemically treated before discharge of it to the sewer by agreement with Sydney Water. The incident was reported to the NSW EPA on 28 February 2013. It was also reported to the NSW Department of Planning on 1 March 2013 The site Trade Waste Agreement was temporarily suspended by Sydney Water until independent laboratory testing confirmed that that the leachate met the chemical parameters specified by Sydney Water Treatment of the leachate now takes place pursuant to arrangements entered into by the site operator with Sydney water to ensure that the leachate achieves chemical parameters acceptable to Sydney Water before discharge. Sydney Water reinstated the original probationary trade waste agreement and subsequently on or about 2 April 2014 entered into a renewed agreement. Leachate quality is a function of the materials landfilled and can be highly variable. No useful predictions were made within the Environmental assessment for the project as to the expected quality of the leachate. A HDPE lined dam was created as a future emergency facility in the event that there are one in one hundred year rain events which create a quantity of leachate unable to be absorbed by the landfilled waste mass. This ensures that such

	water can be quickly removed from contact with waste for treatment without the risk of odour.
the works that are proposed to be carried out over the next year,	A new HDPE stormwater dam was also created within the landfill area with a capacity in conformity with the requirements set out in the EA and is shortly to be replaced with another HDPE lined dam to accommodate an increased capacity.
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;	One telephone complaint was received in or about February 18th 2013 in relation to odour detectable from sewers in Minchinbury. On 20 February 2013 EPA officers attended and inspected the site after general public complaints about evening airborne odour. No action was required. All other complaints have been investigated and found not to be related to the site. Complaints can be made by calling the complaints line 9832 3333 or 9519 9999 which is listed on the website at: http://www.dadi.com.au/landfills-and-recycling-centres.html. A detailed register of complaints and subsequent investigation and action taken is maintained on the website. This information is publically available by clicking on "Genesis Complaints Register" at: http://www.dadi.com.au/landfills-and-recycling-centres.html
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Automated monitoring and dosing of treatment chemicals have been implemented with remote alarm and telephone warning systems in the case of an exceedance of any parameters. Continuation of active inspection maintenance and upkeep of the leachate sequence batch reactor and nitrifying bacterial.
identify any trends in the monitoring data over the life of the project;	Chemical testing results at the time of the incident indicated various mitigating measures to be taken to alter the chemical characteristics of the leachate water before discharge. Reports to the EPA and Sydney Water are attached in this regard. There have been no long term changes in leachate quality. Trade waste conditions are generally satisfactorily met.
any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	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. However, in case of a leachate treatment pump outage, there are supplies of ammonia sulphate on site available to provide sufficient material for the nitrifying bacteria to operate.

describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems
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Operating hours & Noise

Salient Matters	
works that were carried out in the past year	In or about November 2013 an application was submitted to the NSW Department of Planning seeking approval to extend the operating hours of the MPC. That extension of operating hours did not apply to Landfilling activities or crushing or separating activities in the SMA. A copy of the current Approval is at Appendix II.
the works that are proposed to be carried out over the next year,	A change to work hours for the MPC is proposed though no change is proposed for other site work practices or hours.
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;	Unattended Noise Monitoring was carried out by Pacific Environmental at the nearest sensitive receivers being located at residences in Minchinbury. A Noise Monitoring Plan setting out the monitoring protocol for evaluation compliance was approved by DOP&I on 5 December 2011. All noise monitoring, as stipulated in the Facility's operating EPLs, are uploaded on the Facility's website (www.dadi.com.au/genesis-xero-waste-facility). The noise monitoring as undertaken by our acoustic consultants as demonstrated full compliance with the dB(A) limit for the Facility. There have been no complaints about noise from the surrounding neighbours since (partial) operations commenced in June 2012. 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. On 14 December 2013 the NSW Department of Planning approved the extended operating hours enabling the MPC Plant to be operated for an extra hour in the morning (from 6am) to an extra 4 hours in the evening (from 6pm to 10pm), and an extra two hours in the morning (from 6am to 4pm) on a Saturday, Sunday and Public Holiday.
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Continuation of existing work practices within the site and within the MPC.
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	Not Applicable

potential cause of any significant discrepancies;	
describe what measure will be implemented over the next year to improve the environmental performance of the project.	An application is being lodged for a further extension of operating hours within the MPC . If approved this extension of operating hours will lengthen the turnaround time available as waste is delivery before it is process by the Plant. This in turn will enhance the sorting and checking procedures before crushing and processing ensuring that retrieval and recover of re-usable materials is maximised.

Air Quality

Salient Matters	
works that were carried out in the past year	Dust deposition monitoring gauges continue to be located at the positions shown in the Air Quality Management Plan. A Dustrak live realtime monitor is located at 93 Minchin Drive, Minchinbury. Both of these systems are monitored by Pacific Environmental with remote warning systems in the case of exceedance recorded by the Dustrak monitor. Continuous enhancement of water sprays and sprinklers in the SMA and on facility paved roads to minimise airborne particulates. Continues improvement maintenance and repair to paved roads to ensure good quality surfaces which minimise airborne particulates.
the works that are proposed to be carried out over the next year,	Continuous review of Dustrak monitoring technology to ensure optimum monitoring.
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 complaints have been received from members of the public.
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Maintenance of stockpile height within the SMA to remain below the height of the amenity berms. Continuous enhancement of water sprays and sprinklers in the SMA and on facility paved roads to minimise airborne particulates. Continues improvement maintenance and repair to paved roads to ensure good quality surfaces which minimise airborne particulates.

	Within the MPC there has been a continuous improvement program to improve 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 particulates become unmanageable within the building.
identify any trends in the monitoring data over the life of the project;	Monitoring data seems to indicate acceptable and continuing compliance. Quarterly reports from Pacific Environment indicate "that the site is currently complying with ambient air quality impact assessment criteria". There were no occasions where the 24-hour average PM₁₀ concentration was above the impact assessment criteria of 50 µg/m³. Further, Pacific Environment report that "average dust deposition levels recorded at each monitoring location are well below the impact assessment criterion of 4g/m²/month. These amounts do not exceed the levels specified in the relevant DEC criteria. The Facility continues to engage the services of Pacific Environment to undertake compliance monitoring as required.
any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	As above.
describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems

Landfill and Chute

Salient Matters Northern Slip stability works Fill rate Leachate Collection Stormwater collection Chute Maintenance and reduction	
works that were carried out in the past year	In 2013 a fault in the northern rock face of the quarry previously identified was reviewed in terms of workplace safety and the safety of third parties entering onto the site. Expert opinions were obtained from Jeffrey and Katauskas Geotechnical Engineers. Traffic control measures were immediately implemented within the Quarry to ensure protection of persons and property Works were then carried out by independent and appropriately qualified contractors to stabilise the rock face and those works were notified to the WorkCover Authority and to the NSW Department

	of Planning [by letter dated 26 April 2013] at the time they were carried out. As a result of the works the rock face in that area has stabilised.
the works that are proposed to be carried out over the next year,	Since the stabilisation works regular inspections and measurements have been recorded to identify the potential for any further slippages. Inspections are carried out daily.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, 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 further slippages have so far been identified.
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	N/A
identify any trends in the monitoring data over the life of the project;	N/A
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.	Continuation and continuous review of all existing Monitoring systems and amendment where necessary. A new firm of environmental consultants has been engaged to undertake ongoing internal audit and review of all environmental policies.

Salient Matters Northern Slip stability works Fill rate & Stormwater collection Leachate Collection Chute Maintenance and reduction	
works that were carried out in the past year	During 2013/2014 a HDPE lined stormwater collection dam was installed. It was expected that at the filling rate which had been forecast the usefulness of the dam would be expected to be 12-18 months and would require replacement as the filled waste level rose. 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 greater and greater 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. Landfilling is continuing to take place in accordance with the Landfill Environment management Plan.
the works that are proposed to be carried out over the next year,	Replacement HDPE lines stormwater collection pond stage 2
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;	Stormwater collected in the HDPE lined pond within the quarry is water which has fallen into the access roadway and has therefore not come into contact with landfilled waste. Such water, being collected in a lined pond, is deemed clean and is either re-used within the pit and on the pit roads in dust suppression activities if required. Alternatively the water from this pond may be pumped to surface level and thence via the vegetated swales to OSD (south) for future re-use.
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	N/A
identify any trends in the monitoring data over the life of the project;	N/A
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.	Continuation of all existing stormwater monitoring systems

Salient Matters Northern Slip stability works Fill rate & Stormwater collection Leachate Collection Chute Maintenance and reduction	
works that were carried out in the past year	In 2013/2014 by agreement with the NSW EPA a second small bore monitoring sump was emplaced within the pit at the southern end complying generally with the construction requirements of the main riser. The main riser is located at the northern end of the base of the pit which is deeper than the southern end. The purpose of the secondary sump is to enable routine measurements of the leachate levels and comparison of them as between the primary and secondary sumps for compliance with Licence P1 and M1 to M7 inclusive.
the works that are proposed to be carried out over the next year,	The leachate sump risers will continue to be emplaced and increased in height as and when the level of filled waste requires.
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;	Since the stormwater dam breach which occurred in February - March 2013 and was reported upon no further incidences have occurred. The subsequent construction of the additional HDPE lined reservoir provides additional capacity

• the relevant predictions in the EA;	in the event of a generation of leachate in excess of the field capacity of the landfilled waste.
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Upkeep and maintenance of all systems including replacement rapid changeover electrically driven pump for leachate extraction.
identify any trends in the monitoring data over the life of the project;	N/A
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.	Continuation of all existing Monitoring systems

Salient Matters Northern Slip stability works Fill rate & Stormwater collection Leachate Collection Chute Maintenance and reduction	
works that were carried out in the past year	Reduction in length of the Chute.
the works that are proposed to be carried out over the next year,	Reduction in chute length when required. As the Filled level of waste rises the chute length will be reduced. The chute is constructed in sections and is designed for the progressive reduction in its length. For a given quantity of waste to be landfilled in any year as the surface area increased the landfilled depth decreases. It is expected therefore that the periods between chute reductions will be extended.
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;	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. There are no observations to suggest the occurrence of any adverse developments. Chute was inspected by Mark Molloy, Jones Nicholson Consulting Engineers on 23 April 2014 to validate the integrity of the structure remained in accordance with the design and installation requirements A copy of the Plan is at Appendix III
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Upkeep and maintenance of all systems including replacement rapid changeover electrically driven pump for leachate extraction.
identify any trends in the monitoring data over the life of the project;	N/A
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.	Continuation of all existing Monitoring and safety systems

Waste management procedures.

Salient Matters Material types Accepted at the premises. Rejection of Loads Potential Asbestos Contaminated Loads	
works that were carried out in the past year	Segregated Greenwaste and garden Waste is not generally received at the premises and pricing mechanisms discourage its production. Greenwaste and garden Waste co-mingled with other wastes is often received though the quantities tend to be relatively small. It is separated within the MPC and processed through a slow speed shredder. The greenwaste is then transported offsite to a third party organisation that uses this material in their process to manufacture beneficial re-use products. Woodwaste - Through the MPC processing facility the woodwaste is separated from the other materials using mechanical and hand picking techniques. Through this process CCA treated timber along with painted timber that may contain lead are removed and disposed of in the landfill. The timber passes through two independent work stations to ensure quality targets are achieved. Woodwaste is then shredded and screened into different size grading and tested to the EPA Raw Mulch exemption. Once testing is certified clean, material then is sent off site. Potentially Asbestos Contaminated Materials. (PACM) The presence of Asbestos Materials is a workplace Health and safety Hazard. The presence of Asbestos bearing materials if they enter into the recycled products are a danger to consumers. In such case the commercial damage to the dial A Dump Dial A Product and Genesis brands is immeasurable. Rather than train staff to recognise asbestos the Licence Holder adopts the work practice that any material which potentially <i>could be</i> asbestos is to be treated <i>as if it were</i> asbestos and removed from the recycling flow in an approved manner and thereafter for landfilling. Abolishing the technical distinction between Asbestos and compressed fibre cement products in this way is an adoption of the precautionary principle. It enhances workplace safety and protects the commercial brand. A copy of the current Asbestos Management Plan is at Appendix IV.
the works that are proposed to be carried out over the next year,	Continuation and enhancement of existing systems.

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;	N/A
any non-compliance over the last year	No non compliances identified
describe what actions were (or are being) taken to ensure compliance;	Continuation and enhancement of existing systems.
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

Surface Water Management

Surface water management on the site involves the following:

- Installation and regular maintenance of erosion and sediment controls including sediment fences and sediment basins;
- Delineation of areas required to be disturbed, ensuring that any disturbance is limited to those areas required and minimization of vegetation disturbance;
- Active management of sediment dam levels via water transfers between dams and drawing water for use as dust suppression on unsealed surfaces, or irrigation of re-vegetated areas.

Water that falls into the landfill area that comes into contact with waste is not treated as surface water. Instead, it is treated as leachate and dealt with pursuant to EPL 13426 and the Trade Waste Agreement with Sydney Water. It is drained towards the main sump and extracted for treatment and discharge to sewer

Water Supply

Water for site amenities is sourced from labelled rainwater tanks installed in the site compound area (behind the back of the timber stockpile areas of the MPC).

Stormwater Management

The Licence holder and the EPA by agreement implemented additional monitoring of stormwater discharge points identified as Onsite Detention basin [OSD] North and OSD south.

The monitoring requirements are as set out in EPL 20121 conditions P1 and M1 to M7 inclusive and in EPL 13426 P1 and M1 to M7.

Monitoring is carried out by IGGC Pty Ltd and the monitoring records published on the website. (Please note that the link on the Genesis website that takes viewers to the Pollution Monitoring data is currently unavailable. This has been a software issue. The Proponent is seeking to have this problem rectified as soon as possible.

Describe what actions were (or are being) taken to ensure compliance: During normal rain events all stormwater run off collected from hardstand areas within the facility flow via GPT (n) and (s) through vegetated swales to OSD(n) and (s). Both Osds are equipped with bio remediation reed beds and are interconnected via an HDPE pipe.

OSD (s) overflows predominantly to OSD north.

OSD north is the reservoir from which water is pumped for beneficial re use around the site in dust suppression in roads and on stockpiles and during external processing.

Identify any trends in the monitoring data over the life of the project: In extra ordinary rain events whilst the suspended solid rate of stormwater discharge ends to increase the volume of water relative to the SS rate is generally considered acceptable.

Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies: 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.

Describe what measure will be implemented over the next year to improve the environmental performance of the project: Continuation of all existing systems.

Stormwater collected in the pond within the quarry is water which has fallen into the access roadway and has therefore not come into contact with landfilled waste. Such water is either re-used within the pit and on the pit roads in dust suppression activities if required. Alternatively the water from this pond may be pumped to surface level and thence via the vegetated swales to OSD (south) for future re-use.

Chute

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.

There are no observations to suggest the occurrence of any adverse developments.

A copy of the Plan is at Appendix III

Operational Noise - monitoring

Unattended Noise Monitoring was carried out by Pacific Environmental at the nearest sensitive receivers being located at residences in Minchinbury.

A Noise Monitoring Plan setting out the monitoring protocol for evaluation compliance was approved by DOP&I on 5 December 2011.

All noise monitoring, as stipulated in the Facility's operating EPLs, are uploaded on the Facility's website (www.dadi.com.au/genesis-xero-waste-facility). The noise monitoring as undertaken by our acoustic consultants as demonstrated full compliance with the dB(A) limit for the Facility.

There have been no complaints about noise from the surrounding neighbours since (partial) operations commenced in June 2012.

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."

On 16 December 2013 the NSW Department of Planning approved the extended operating hours enabling the MPC Plant to be operated for an extra hour in the morning (from 6am) to an extra 4 hours in the evening (from 6pm to 10pm), and an extra two hours in the morning (from 6am to 4pm) on a Saturday, Sunday and Public Holiday.

Reportable incidents

Since commencement of operations, there was one incident that was reported to authorities (DOP&I, EPA and Sydney Water Corporation). This was done in accordance with condition 5 of schedule 5 of the Project Approval (as modified).

Information about how to make a complaint is available on the Genesis website at: <http://www.dadi.com.au/landfills-and-recycling-centres.html>. Details about previous complaints are also available for the public viewing at: <http://www.dadi.com.au/assets/Genesis%20Complaints%20Register%20Published.pdf>

Odour emissions from large volume of leachate (January to February 2013):

On 29 January 2013, severe rain occurred, (due to ex Tropical Cyclone Oswald), and the largest of the clean surface stormwater dams in the quarry rapidly filled. The pump which empties the dam to the surface OSDs suffered a mechanical failure.

An attempt was made to retrieve the damaged pump. During this process the dam wall was breached. This resulted in a quantity of clean water held by the dam to pass into the landfill zone thereby immediately categorising the water as 'leachate'. The duration of the event was limited to that evening. The dam wall and the pump were repaired and replaced the following morning.

As a result of the rain event the stormwater crossing the landfill zone was classified as 'leachate'. The approximate volume of this 'deemed leachate' was unknown. No pollutant was directly discharged off site as a result of the event.

The concentration of pollutants discharged, pursuant to the facility's Industrial Trade Waste Agreement with Sydney Water Corporation, were in compliance with the maximum concentrations permitted.

On 18 February 2013, the Facility, received a complaint regarding odour from Sydney Water's sewer vent pipes that had been complained of to Sydney Water. Sydney Water had investigated it but had been unable to determine a cause. On 19 February 2013, representatives on behalf of the Facility attended Minchinbury and interviewed a number of local residents in an attempt to ascertain potential sources of the odour.

On 19 February 2013, leachate discharge was temporarily suspended at the request of Sydney Water as a precautionary measure. A proposal was submitted on behalf of the Facility in relation to enhancements to the SBRs remote monitoring and control mechanisms.

On 20 February EPA officers attended and inspected the site after general public complaints about evening airborne odour. No action was required.

Remedial action taken:

Since the incident, the Facility has undertaken the following actions:

- continual testing of the SBR nitrifying bacteria for viability;
- replacement of the nitrifying bacteria where necessary;
- implementation of an automatic dosing system with pH probe for pH adjustment of treated leachate before discharge under the Trade Waste Agreement, as a protective measure against sulphide generated odours;
- appointment of Ian Grey of Ian Grey Groundwater Consulting Pty Ltd as external consultant manager of the leachate treatment system;
- an additional reserve capacity for surface stormwater dam (with an estimated capacity of 1,000,000 litres) was constructed (within the landfill boundary) in the event that there should be a future occurrence of a similar kind. This back up dam is intended not to carry or hold leachate but only surface stormwater which is deemed to be leachate on account of where the water has pooled (the dam was constructed

in accordance with the Leachate Collection System & Management Plan by Douglas Partners); and

- full upgrade of the leachate treatment plant to automation (with alarm systems, improvements to the automation systems, monitoring of process conditions & effluent water quality) in October - November 2013.

In light of the proposed future expansion, of the facility and the separate application in respect of the proposed Energy from waste facility the licence holders have commissioned appropriately qualified engineers to prepare an integrated site stormwater management plan in the near future.

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:

- 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).

Polystyrene Recycling Equipment Grant

In June 2012, the Licence-holder received an EPA grant for the 'Expanded Polystyrene Recycling Grant Program'.

Polystyrene is a very bulky waste that may be recovered and recycled and turned into new products preventing the need for disposal to landfill. The Facility purchased and installed a polystyrene 'Hungry Giant EPS 300' compactor and hopper to implement a polystyrene recycling initiative. The Facility has received and extracted polystyrene from the waste streams and recycles and has compacted the polystyrene for on-sale.

The specifications of the Hungry Giant EPS 300 compactor are as follows;

Height	221 cm
Width	546.5 cm
Depth	75 cm
Weight	2000 KG
Power Supply	380 V – 3 phases
Motor	16.65 KW
Capacity	200kg/hour
Ratio	50:1
Noise Level	110 db

The waste streams with which the facility deals tends to produce polystyrene which is either too comingled with other wastes or too dirty to be successfully re-used. Also the compacter has proven to be too small and too slow to be efficient.

This program has been decommissioned and the Hungry Giant has been advertised for sale.

It is intended that if the proposed Pre Sort Enclosure modification is approved and constructed then the facility will have a much enhanced capacity to separate C & I waste streams (including polystyrene) within a cleaner environment and process it on a more commercial scale.

Reported non-compliances

Under EPL 13426 (Quarry) the following minor non-compliances were reported in the Annual Return for the EPA in 2013:

1. *Licence condition L2.4 (limits for stormwater quality)*: non-compliance was reported due to the impractical condition requirements imposed on the licence-holder. The condition was subsequently modified by the EPA to remove monitoring points 2 and 3 from the then referred to condition L2.4 (version of EPL 13426 dated 24 December 2012), to enable compliance.
2. *Licence condition M2.1 (stormwater, groundwater and leachate monitoring)*: minor non-compliance due to discrepancies between the licence condition and the monitoring program agreed between the EPA and licence-holder regarding the scope of analytes. The non-compliance has been resolved with the parties agreeing and revising the scope of analytes in a variation to condition M2.1.
3. *Licence condition M7.4 (other monitoring and recording conditions)*: minor non-compliance with condition M7.4. Until late January 2013, no leachate was present, however post storm event (of ex-Tropical Cyclone Oswald), the volume of leachate was not accessible for routine monitoring under this condition. Routine monitoring commenced once access was arranged at the leachate sump.
4. *Licence condition P1.2 (location of monitoring/discharge points and areas)*: non-compliance due to blockage of groundwater bores BH10d and BH12d installed in 2009 (as reported to the EPA by Ian Grey nominated consultant from Ian Grey Groundwater Consultants Pty Ltd on 26 March 2013). EPA approved replacement and relocation of groundwater bores BH10d and BH12d.

Under EPL 13426 (Quarry) the following minor non-compliances were reported in the Annual Return for the EPA in 2014:

1. Licence condition M2. There was an insufficient number of samples collected for various monitoring points due to a simple oversight. Additional samples were collected in the following monitoring period to compensate, as reported to the EPA by Ian Grey nominated consultant from Ian Grey Groundwater Consultants Pty Ltd on 13 May 2014.
2. Licence condition M7.4. Insufficient number of leachate level readings for EPA monitoring points, due to limited access to monitoring points however all access problems were rectified as reported to the EPA by Ian Grey nominated consultant from Ian Grey Groundwater Consultants Pty Ltd on 13 May 2014.

Under EPL 20121 (Recycling operations for MPC) the following minor non-compliances were reported in the Annual Return for the EPA for 2013:

Licence condition L2.1 (acceptance of Flock Waste): non-compliance with condition L2.1, EPA during a site inspection (September 2012) observed a stockpile of Flock Waste at the western boundary of the MPC. The material identified was removed from the facility.

Flockwaste GSW is only accepted for landfilling.

1. Under EPL 20121 (Recycling operations for MPC) the following minor non-compliances were reported in the Annual Return for the EPA for 2014:

1. Licence condition L7.1 Height of stockpile exceeded stipulated limits in licence condition. The material on the stockpile was processed thereby reducing the height of the stockpile and markers put in place to confirm height restrictions observed in future.

The Planning approval for the project was granted in November 2009

Construction for the project commenced in October 2010

The EPL enabling recycling within the MPC was granted in June 2012

The EPL enabling landfilling was granted in December 2012.

Full commercial operation of the facility therefore was not operational until December 2012

By email b dated 16 October 2012 The Department of Planning approved that the first Independently conducted Environmental audit would be carried out in 2013 and approved Cardno as the auditor.

Initiatives for the next 12 months

The Facility has a number of performance initiatives planned for the next 12 months including rolling out a detailed induction / training on-line program (with video footage and narration) to train all employees on key aspects of environmental compliance and work performance for the Genesis Facility.

Such modules for this program will include (to name a few), training in workplace policies, asbestos awareness & PPE, and tailored modules for the safe use of specialised equipment and tasks around the Facility.

The Genesis induction training program is proposed to be rolled out in the first half of 2015, with preliminary preparation for the program already commenced.

Environmental initiatives for the Facility also include the continued implementation (and/or revision) of the requirements and commitments from the Genesis Recycling & Landfill Environmental Monitoring Plan and Programs.

Appointment of replacement environmental consultants is a priority.

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 include the phenomenon [now addressed by the NSW EPA] of the transportation of waste for landfilling interstate [notably Queensland] in order to advantage the lower levy.

The development and adoption by the NSW EPA of a Policy relating to the derivation of energy from waste.

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		
1.	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The Strategy must:	Complies
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: Rodney Johnson (Site Manager) – 0408 919 562 Ronan Dunlea (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
	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.	Required.
Management Plan Requirements		
2.	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:	Complies
	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; - 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; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and	Complies
h)	a protocol for periodic review of the plan.	Complies
Annual Review		
3.	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. This coincided with the commencement of the Independent Environmental Audit required by Condition 7.
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 - the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; and - 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		
4.	Within 3 months of the submission of an:	
a)	audit under condition 7 of schedule 5;	The results of the Audit and the incident Report submitted to the Department in April 2013 were reviewed. It was considered at that stage that no further modification was required at that time of the Projects Strategies Plans and Programs.
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		
5.	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.	An incident was reported to the Department of Planning on or about February 2013 accompanied by a report to the NSW EPA detailing further information. Consequential effects of that incident involved amendments to the requirements for the continuation of the Trade Waste Agreement with Sydney Water. Ongoing leachate treatment and management measures have ensured continuing compliance with the Trade Waste Agreement and with Sydney water requirements for the discharge of leachate.
Regular		
6.	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	Partial Non compliance. Water quality, Leachate quality, stormwater quality and Groundwater quality monitoring is carried out on behalf of the Facility by IGGC Pty Ltd.

this approval, and to the satisfaction of the Director-General.	The Principal senior hydro geologist has been unwell during the course of 2014 and some reporting results have not been provided in a timely fashion. Whilst the health of the Principal senior hydro geologist appears to have improved somewhat, to ensure ongoing compliance, a new consultant is being commissioned.
INDEPENDENT ENVIRONMENTAL AUDIT	
7. 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 by Cardno. Please refer to Appendix I of this Annual Review for a copy of the letter detailing the findings of the Environmental Audit.
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;	The NSW Department of Planning agreed that since, no green waste was processed and no composting activities occurred at the premises and no complaints had been made against the facility in respect of odour emanating from the premises that a full odour assessment would not be required at least for the initial Audit. (ref: letter from Christine Chapman}
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 WEED AND PEST MANAGEMENT DADI received a non-complaint result for weed management measures. DADI have continuously engaged a weed contractor every 6 months in accordance with the VMP. A schedule of works for 2015 has also been implemented and will be complied with. An environment officer has also been engaged who will be responsible for undertaking requirements in the VMP relating to weeds and ensuring the 2015 schedule of works is adhered to.
Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.	

8.	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.	It was submitted to the Department of Planning on 21 March 2013. A copy of the covering letter is provided at appendix 1.
ACCESS TO INFORMATION		
9.	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;	Partially 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);	To be updated
f)	a copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and	Complies
g)	any other matter required by the Director-General.	Noted