

# Annual Environment Management Report 2023

## OPERATIONAL COMPLIANCE REPORT

**1<sup>st</sup> May 2022 – 30<sup>th</sup> April 2023**

APPLICATION NUMBER: MP07\_0121-PA-5

| <b>Revision Number</b> | <b>Prepared by</b>          | <b>Date</b> | <b>Approved by</b> | <b>Date</b> |
|------------------------|-----------------------------|-------------|--------------------|-------------|
| 1.0                    | Luong Nguyen<br>Phil Birkby | 28/04/2023  | Bradley Rea        | 01/05/2023  |

Authorised Reporting Officer: Bradley Rea

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## 1 Executive Summary

The Rosehill Recycled Water Scheme, commissioned in 2011, consists of the Advanced Treatment Plant located at Fairfield and Recycled Water Network conveying the treated water to industrial customers in Smithfield and Rosehill. The scheme is owned by coNEXA via its subsidiaries AquaNet Sydney Pty Ltd and Rosehill Network Pty Ltd and operated and maintained by Veolia Water Operations.

The annual Environmental Audit is carried out to determine the level of compliance with the Minister's Condition of Approval and Environmental Management Plan for the Rosehill Recycled Water Scheme. The compliance report is prepared annually and submitted to the Department of Planning, Industry and Environment in accordance with the Compliance Reporting Post-Approval Requirements.

The 2023 audit for the reporting period from 1/05/22 to 30/04/2023 was conducted on the 24/03/2023 by the internal audit team. Overall, the Fairfield Advanced Water Treatment plant is well run and complies with the requirements of the Minister's Conditions of Approval and Veolia system requirements. The audit team assessed 103 items and identified all within conformance with 7 opportunities for improvement. The opportunities for improvement are mainly for improvement in document management. The auditees have addressed all the 7 opportunities for improvement for this report.

There were no environmental incidents, which led to non-compliance of the Minister's Condition of Approval during the reporting period. The audit team also found no complaints were received via telephone or email.

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## 2 Introduction

### 2.1 Project Background

The Rosehill Recycled Water Scheme includes Fairfield Recycled Water Plant (FRWP) and the Rosehill Recycled Water Network (RRWN). The FRWP produces recycled water and the RRWN delivers to industrial customers. The scheme is a private sector project which was granted the first ever license under the WICA by the NSW government. The scheme was commissioned in October 2011.

Veolia entered into a Design, Build, and Operate (DBO) Contract with AquaNet Sydney for the FRWP. From 1 April 2020, the RRWS is owned by Water Utilities Australia (WUA) subsequently CoNEXA under the company header of AquaNet Sydney. The operations of the FAWTP and RRWN are contracted to Veolia Water Operations through Operation and Maintenance (O&M) Agreements.

The incoming water to FRWP is secondary treated effluent conveyed through Liverpool Ashfield Pipeline (LAP) from Liverpool and Glenfield Sewage treatment Plants, which are operated by Sydney Water Corporation. The processes involved for advanced treatment at FRWP includes strainers, Ultrafiltration, Reverse Osmosis, Ion exchange, Degasser, and Chlorination. The treated water (i.e. Recycled water) is stored in detention tanks on site before it is pumped via Fairfield Pumping station into the RRWN.

The RRWN consists of 20 km of pipeline connecting the two pumping stations, Fairfield and Rosehill pumping station, and two reservoirs at Woodville and Rosehill. The Fairfield pumping station pumps recycled water to the distribution network in the Smithfield area and Rosehill Industrial area. Woodville reservoir is located at the highest point in the network and recycled water from the Woodville reservoir can flow by gravity to Smithfield customers and Rosehill reservoir. The recycled water from Rosehill reservoir is pumped to industrial customers in the Camellia Industrial area by Rosehill pumping station located in the same premises.

### 2.2 Site Address

The site address for the facilities in the Rosehill Recycled Water Scheme is mentioned in the table 1 below.

*Table 1: Site address for RRWS Facilities*

| Facility                              | Site address  |
|---------------------------------------|---|
| Fairfield Recycled Water Plant (FRWP) | Corner of North St and 1 East Parade, Fairfield, NSW 2165 |
| Woodville Reservoir                   | Barbers Road, Chester Hill, NSW 2162                      |
| Rosehill Reservoir & pumping station  | Durham Street, Rosehill, NSW 2142                         |

### 2.3 Site location

The FRWP is located adjacent to Sydney Water Corporation's (SWC) Fairfield Storm Sewage Treatment Plant (SSTP) at the corner of North Street and East Parade, Fairfield. Land uses in the vicinity of the FAWTP include detached residential dwellings on the northern side of North Street, a railway corridor



to the west of the site, and vacant land and the SWC SSTP to the east and south of the site as shown in Figure 1. The site coordinates for the FRWP are provided in Figure 2.

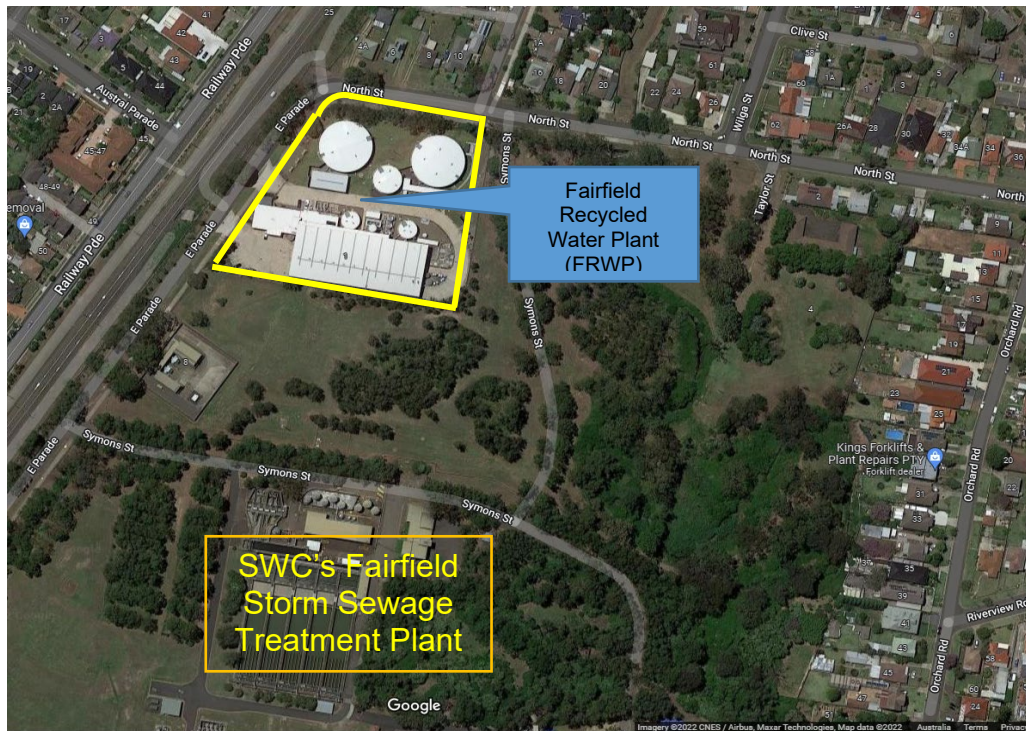


Figure 1: Fairfield Recycled Water Plant

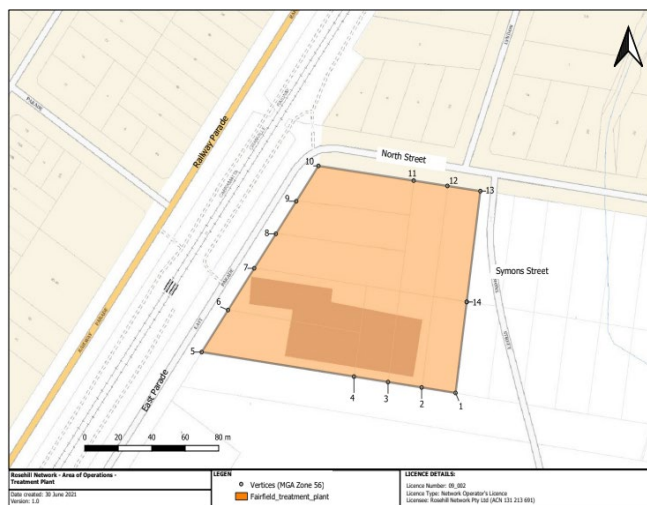


Table D.1 Vertices for area of operations for non-potable water treatment plant

| Vertex | Easting     | Northing    |
|--------|-------------|-------------|
| 0      | 310672.9332 | 6249391.008 |
| 1      | 310666.2595 | 6249341.441 |
| 2      | 310645.989  | 6249344.433 |
| 3      | 310625.9006 | 6249347.36  |
| 4      | 310605.5531 | 6249350.346 |
| 5      | 310514.5482 | 6249363.685 |
| 6      | 310530.3061 | 6249386.579 |
| 7      | 310545.9469 | 6249409.314 |
| 8      | 310558.8966 | 6249428.074 |
| 9      | 310571.0675 | 6249445.824 |
| 10     | 310584.3037 | 6249465.065 |
| 11     | 310641.2294 | 6249457.063 |
| 12     | 310661.3624 | 6249454.16  |
| 13     | 310681.0557 | 6249451.338 |
| 14     | 310672.9332 | 6249391.008 |

Note: Coordinate reference system is MGA 56.

Figure 2: Treatment Plant site coordinates

The overview map of the recycled water network with location of major assets is shown in Figure 5. The Rosehill Reservoir (Figure 4) is located in Camellia industrial area and shares its boundary with Shell Refinery on its Eastern and Southern side. Across the Grand Avenue Road on the Northern side of the reservoir is Boral Industry and across Durham Street on the Eastern side of the Reservoir is a Trailer yard. The Woodville Reservoir (Figure 3) is located on the southern side of the Woodville Golf course and has residential dwellings on the eastern side.



Figure 3: Woodville Reservoir

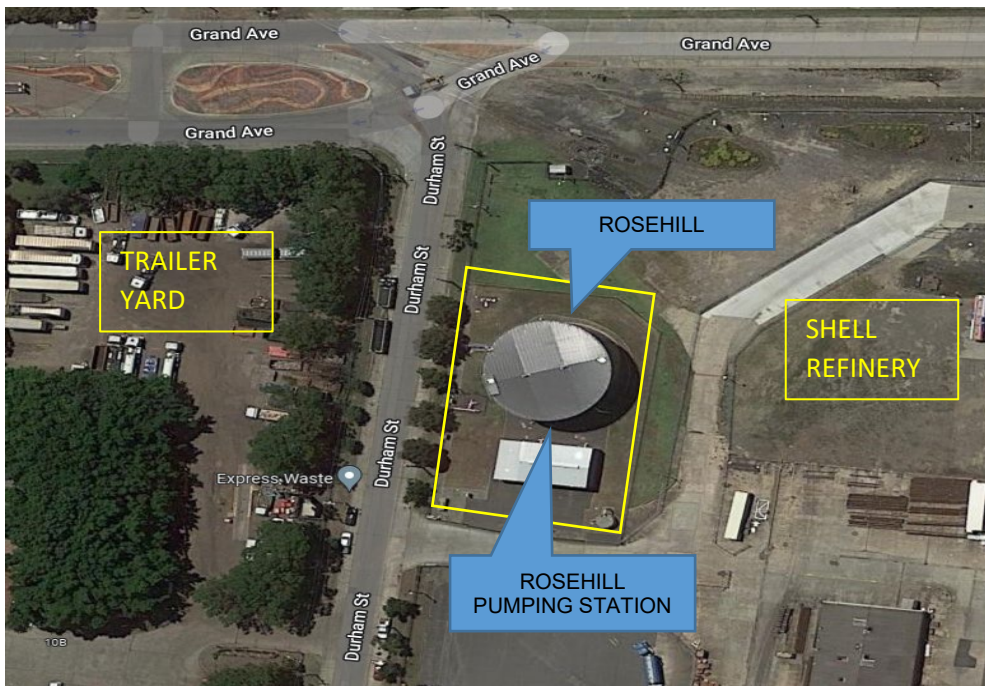


Figure 4: Rosehill Reservoir





## 2.4 Summary of project activities

The project activities at site are associated with operation and maintenance of the FRWP and the RRWN, and no staging projects were carried out during the reporting period which would require approval from the Planning Secretary.

Table 2 listed all the audits conducted in the reporting period.

*Table 2: Audits conducted in reporting period*

| Audit Name                                     | Date Completed | Number of partial compliance | Number of OFI | Number of completed OFI |
|--|----------------|------------------------------|---------------|-------------------------|
| Fairfield Environmental Audit (Internal)       | 24/03/2023     | 0                            | 7             | 7                       |
| Fairfield Environmental Audit (Internal)       | 11/04/2022     | 0                            | 6             | 6                       |
| Network Operators Licence No 09_002 (External) | 05/01/2023     | 0                            | 1             | 1                       |
| Full System audit (Internal)                   | 11/11/2022     | 1                            | 16            | 17                      |

The Audit schedule for 2023 is provided in Table 3 below.

*Table 3: Audit schedule for 2023 and beyond*

| Audit Type       | External compliance audit   | Full Internal Process Audit   | External Laboratory Audit      | Internal Environmental Audit |
|------------------|-----------------------------|---|--------------------------------|------------------------------|
| Duration         | 1 day                       | 3 days  | ½ day                          | 1 day                        |
| Audit            | WICA                        | Full System   | Laboratory                     | EMP/MCOA                     |
| Frequency        | 2 Yearly                    | 3 Yearly  | Annual                         | Annual                       |
| Scheduled Date/s | On IPART request (mid 2024) | 11/25   | On Sydney Water request (2023) | 24/03/23                     |
| Reference        | WQMP and IOP                | General system overview, operational, asset management, safety, Lab | Laboratory documents           | EMP /MCOA                    |
| Lead Auditor     | IPART                       | Veolia  | SWC                            | Veolia                       |

The management plans are placed on Veolia's in-house BMS system and the latest review date for the plans is provided in Table 4 below.

Table 4: Management Plan Reviews

| Document Number | Document Name                          | Last Review Date | Modifications  |
|-----------------|--|------------------|--|
| MAN-3936        | Water Quality Management Plan          | 21/11/2022       | Updated section 2.2.1 to include reference to TEM-13563 for the Rosehill Recycled Water Schematic and Process Flow Diagram as per Fairfield Internal Audit Tool November 2022 OFI 6.2  |
| MAN-9633        | Asset Management Plan                  | 18/10/2022       | Changed plant definition to include Network, reviewed document changed revision number and issue date. Added in Network coordinator responsibility   |
| MAN-3954        | Operations Management Plan             | 22/11/2022       | Updated section 14.7.10 to include reference to MAN-3981 Laboratory Manual as per "Fairfield Internal Audit Tool November 2022" OFI section 6.6. SPI: made changes as per OFI for Full system Audit conducted on 7.11.22                         |
| MAN-3815        | Environmental Management Plan          | 04/04/2023       | Ver6 04/04/2023 - LN: Removed Waste Management Training MAN3878 at section 10.2 as this training has been incorporated into Environmental Awareness Training. Changed Waste Management Training section 6.7 to Environmental Awareness Training. |
| MAN-3935        | Incident and Emergency Management Plan | 23/01/2023       | Revised emergency contact list to update Site staff and SWC contacts   |

## 2.5 Key personnel responsible for environmental management

The Environmental Management Representative responsible for liaising with the Department of Planning, Industry & Environment is Bradley Rea and the environmental representative for operational EMP is Anae Ressos. The contact details of the representatives are provided in Table 5 below.

Table 5: Key personnel responsible for Environmental Management

| Name        | Organisation              | Email ID               |
|-------------|---------------------------|------------------------|
| Bradley Rea | Water Utilities Australia | BRea@wua.com.au        |
| Anae Ressos | Veolia A&NZ               | anae.ressos@veolia.com |

## 3 Previous action reports

### 3.1 Details of the 2022 audit findings

Internal Environmental Compliance Audit was conducted on 11th April 2022 onsite to determine the level of compliance with the Minister's Conditions of Approval and the Operations Environmental

Management Plan for the RRWS. The audit report was submitted to DPIE as part of AEMR compliance report last year. The summary of the audit is provided in Table 6 below.

*Table 6: Summary of Environmental Compliance Audit 2022*

|   |   |    |                               |    |
|---|---|----|-------------------------------|----|
| <b>Audit Location:</b>                  | FAWTP & RRWN  |    |                               |    |
| <b>Date of Audit Site Visit:</b>        | 11 April 2022   |    |                               |    |
| <b>Date of Audit Report Submission:</b> | 24/05/2022  |    |                               |    |
| <b>Title of Audit:</b>                  | Internal Environmental Compliance Audit   |    |                               |    |
| <b>Lead Auditor name:</b>               | Colin Storey  |    |                               |    |
| <b>Audit team:</b>                      | Cain Taylor, Auditees: Phil Birkby, Sonali Pinge  |    |                               |    |
| <b>Type:</b>                            | Internal  |    |                               |    |
| <b>Audit Findings:</b>                  | Number of Items Assessed:   | 71 | Number of items not assessed: | 28 |
|   | Number of Conforming Items:   | 65 | Findings Statistics           |    |
|   | Number of Conforming Items where OFI has been identified:   | 6  |                               |    |
|   | Total Number of Conforming Items:   | 71 | 100%                          |    |
|   | Number of Partially Conforming Items:   | 0  | 0%                            |    |
|   | Number of Non-conforming Items:   | 0  | 0%                            |    |
| <b>Audit Conclusion:</b>                | <p><b>The audit found that, overall, the Fairfield Advanced Water Treatment Plant is well run and complies with the requirements of the Conditions of Approval and Veolia system requirements. Housekeeping and appearance of the site is very good and exemplifies the standards that Veolia promotes. There were no areas of non-compliance identified, however six Opportunities for Improvement were noted and these mainly related to document management.</b></p> |    |                               |    |

The status of the actions/recommendations proposed in the audit are stated in the Table 7 below.

Table 7: Action Status table for Annual Internal Environmental Compliance Audit, 2022

| Audit finding               | Condition of consent number                                  | Audit observations  | Action proposed  | Proposed Completion Date | Status    |
|-----------------------------|--|---|--|--------------------------|-----------|
| Opportunity For Improvement | COA 1.6 - Administrative Conditions - Statutory Requirements | Update IEMM to remove PRO-4014 and updating of other documents.   | MAN-3935 Incident & Emergency Management Manual has been updated and the hard copies have been replaced at all 5 locations as mentioned in the manual  | 20/04/2022               | Completed |
| Opportunity For Improvement | COA 2.8- Specific Environmental Conditions - Odour           | Recommend including this as a control in Environmental and WHS Risk registers. ROV vacuum would be used to remove sludge from Feed Balance Tank during long Shutdowns   | TEM 3774 updated to include removal of sludge by industrial grade ROV in Reference 2   | 22/04/2022               | Completed |
| Opportunity For Improvement | COA 6.1- Environmental Management - Compliance Tracking      | Change review period of TEM-3921 from one yearly to 6 monthly as per site practices   | Changes made to TEM-3921 document on BMS and process workflow initiated.   | 20/4/2022                | Completed |
| Opportunity For Improvement | EMP 6.5 - Environmental Controls/ Traffic Management         | Minor formatting error on Page 9 (Traffic flows)<br>Include maximum speed to be consistent between TMP and Induction.<br>Include traffic direction indication in Induction as part of General Site Traffic Rules. | Formatting error corrected in Network Traffic Management Plan<br>Maximum speed limit changed to 10 kmph in Plant and Network Traffic Management Plan.<br>The online site induction updated to include max speed limit on site. | 20/4/2022                | Completed |

|                             |   |   |  |           |           |
|-----------------------------|---|---|--|-----------|-----------|
| Opportunity For Improvement | EMP 6.9 - Environmental Controls/ Hazardous Goods | Site to adjust site Citric Acid chemical storage setup to reflect that documented in site manifest. | The Citric Acid IBC are being renewed and stored rearranged to match with site manifest. | 15/6/2022 | Completed |
| Opportunity For Improvement | EMP 10.2- Training, Awareness and Competence      | Incorporate contents of MAN-3878 in Environmental Awareness Training MAN-3838                       | Slides for Waste management added in MAN-3838 in Environmental Issues & Control section  | 22/4/2022 | Completed |



## 4 Incidents

The Health, Safety and Environmental Incidents are logged on in Veolia's in-house system, RIVO. There were no environmental incidents during the reporting period, which led to non-compliance or partial compliance of the Minister's Conditions of Approval.

There was a 20mm underground pipe leak incident at CSR Monier, Grand Avenue, Camelia on 17/08/2022 (RIVO 17552470). This was classified as a minor incident (ref OEMP sec 4.7, 6.8 and MAN -12707 sec 1 Env incidents) with an approximate 1000 L of recycled water discharge on soft ground. Plant manager was informed and pipe break response procedure was followed. Both Linbeck and Jemena were on site with high pressure gas supervision due to the proximity to the gas pipe. A clamp was installed that day to stop the leak. A permanent repair was finished on 27/8/2022 without impact on customers (Figure 6).



Figure 6: Photographs of the pipe leak scene at CSR Monier with gas monitoring (a) and during pipe fixing (b).

## 5 Complaints

All complaints received onsite are logged in RIVO. However, there were no complaints received via telephone or email during the reporting period.

## 6 Compliance tracking audit

### 6.1 Compliance status summary for the 2023 audit

Annual Internal Environmental Compliance Audit was conducted on 24/04/2023 to determine the level of compliance with the CoA and OEMP for the RRWS. The audit report is attached as Appendix

to this report. The summary of the audit is provided in Table 8 below, which shows there were no non-conformances and 6 Opportunity for Improvement identified during the audit.

*Table 8: Summary of Environmental Compliance Audit 2023*

|                           |  |     |                                 |
|---------------------------|--|-----|---------------------------------|
| Audit Location:           | FAWTP & RRWN   |     |                                 |
| Date of Audit Site Visit: | 24/03/2023   |     |                                 |
| Title of Audit:           | Internal Environmental Compliance Audit  |     |                                 |
| Lead Auditor name:        | Aal-e Ali  |     |                                 |
| Audit team:               | Kate Simpson , Auditees: Phil Birkby, Luong Nguyen   |     |                                 |
| Type:                     | Internal Environmental Compliance and CoA Audit  |     |                                 |
| Objective/Criteria:       | To determine the level of compliance with the CoA and the Operations Environmental Management Plan MAN-3815 for the RRWS   |     |                                 |
| Audit Findings:           | Number of Items Assessed:  | 103 | Number of items not assessed: 6 |
|                           | Number of Conforming Items:  | 96  |                                 |
|                           | Number of Conforming Items where OFI has been identified:  | 7   | Findings Statistics             |
|                           | Number of Non-Triggered items  | 37  |                                 |
|                           | Total Number of Conforming Items:  | 103 | 100%                            |
|                           | Number of Partially Conforming Items:  | 0   | 0%                              |
|                           | Number of Non-conforming Items:  | 0   | 0%                              |
| <b>Audit Conclusion:</b>  | <b>The audit found that, overall, the Fairfield Advanced Water Treatment Plant is well run and complies with the requirements of the Conditions of Approval and Veolia system requirements. Housekeeping and appearance of the site is very good and exemplifies the standards that Veolia promotes. There were no areas of non-compliance identified, however seven Opportunities for Improvement were noted and these mainly related to document management.</b> |     |                                 |

## 6.2 Action Status table for the 2023 audit

No 'non-compliant' conditions were observed in the Internal Annual Environmental Compliance Audit 2023. There were 7 'Opportunities for Improvement' (OFIs) recommended in the audit and the action status for the OFIs is mentioned below in Table 9.

Table 9: Action Status table for Annual Internal Environmental Compliance Audit, 2023

| Number of OFI | Audit finding               | Condition of consent number  | Audit observations  | Action proposed   | Proposed Completion Date | Status    |
|---------------|-----------------------------|--|---|---|--------------------------|-----------|
| 1             | Opportunity For Improvement | 1.6 Statutory Requirements   | The 2022 audit required an update to TEM-3886. This was completed, but two versions of the documents have been inadvertently uploaded to BMS. Keep the correct version and remove the incorrect version.  | The latest version is kept.   | 31/03/2023               | Completed |
| 2             | Opportunity For Improvement | The Proponent shall undertake all works affecting a public road or road reserve in consultation with and to meet the requirements of the RMS and relevant Council. | OPPORTUNITY FOR IMPROVEMENT: Review MAN-12615 to include Road Opening Licence. Body of the manual should refer to appendices and how they apply to the operations of the network. MAN-12615 appears to unnecessarily duplicate information from MAN-3910. Consider removing this. | MAN-12615 updated with issue date. Under site actions and procedure section: Input Road Opening Licence. Added under Traffic Controllers section: Licenced traffic controllers should be used on all road works. Network Coordinator will be trained in basic traffic control to enable initial set up of traffic control on emergency works. Appendix has been referred where applicable.<br><br>MAN-3910 is a traffic management plan for the plant. It covers all vehicles and pedestrian travel throughout all sites operated by Veolia. We decided to keep it as is. | 14/04/23                 | Completed |

|   |                             |   |  |  |            |           |
|---|-----------------------------|---|--|--|------------|-----------|
| 3 | Opportunity For Improvement | The Proponent shall ensure that all liquid and/or non-liquid waste generate and/or stored on the site is assessed and classified in accordance with Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (DEC, 2004), or any future guideline that may supersede that document | MAN-3815 refers to Waste Management Training (MAN-3878) but no evidence was provided that this has been carried out.   | MAN-3878 - Waste Management Training has been incorporated in Environmental Awareness Training. All staff have done Environmental Awareness Training. We removed the Waste Management Training from BMS and updated the MAN-3815 Environmental Management Plan.  | 06/04/2023 | Completed |
| 4 | Opportunity For Improvement | 6.1 Compliance Tracking   | TEM-3921 is not due for review for 3 years. Suggest changing review cycle to a shorter period e.g. 6 monthly.  | Review is set for 6 months   | 24/03/2023 | Completed |
| 5 | Opportunity For Improvement | 6.4 Operational Environmental Management Plan   | Audit schedule in MAN-3815 is out of date. It refers to yearly audits, whereas Veolia has moved to a risk-based approach. MAN-3815 to be updated to refer to the Veolia Water LoB audit schedule. Most recent full system audit was in 2022. | Following EMP doc review and annual AEMR changes were made as follows. Sec 1.2 updated to reflect client rebranding, Sec 1.6 and 1.7 updated to reflect policy retrieval and display process at site, sec 11.4 updated to reflect audit against ISO 14001 to Veolia audit schedule and annual audit against AEMR required for annual Conexa submission against MCoA. | 29/03/2023 | Completed |
| 6 | Opportunity For Improvement | LEGAL AND OTHER requirements  | Consider adding planning approvals to the NSW Compliance register.   | Checked TEM-5274 NSW Water Compliance Register. The acknowledgement of Dangerous   | 14/04/2023 | Completed |

|   |                             |                       |   |  |            |           |
|---|-----------------------------|-----------------------|---|--|------------|-----------|
|   |                             |                       |   | goods is listed with the latest issue date and No.   |            |           |
| 7 | Opportunity For Improvement | Objective and targets | Consider adding a monitoring method to Table 5.3 to document how compliance with these objectives and targets are monitored | The target column has been designed to self explain. | 14/04/2023 | Completed |

### 6.3 Annual Performance Reporting as per COA 7.3

This report is prepared in accordance to the Condition 7.3 of the Minister's Condition of Approval and the subclauses under COA 7.3 are stated below:

- **COA 7.3 a) details of compliance with the conditions of this approval-** This report and the Annual Environmental Audit (Rivo No. 7729087) conducted on 24th April 2023 to determine level of compliance with the COA and EMP. The audit shows that the project is in conformance and no non-compliances were observed in the audit
- **COA 7.3 b) a copy of the Complaints Register (refer to condition 5.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were addressed and resolved;-** All Complaints received onsite are logged into RIVO and necessary actions are assigned to relevant personnel. No complaints were registered with the scheme during the reporting period.
- **COA 7.3 c) identification of any circumstances in which the environmental impacts and performance of the project during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under 1.1 of this approval, with details of additional mitigation measures applied to the project to address recurrence of these circumstances.-** MAN 3815-4 Environmental Management Plan provides the mechanisms and procedures for the RRWS to reduce or eliminate environmental impacts during operations predicted in the documents listed under condition 1.1 of this approval. The monitoring of the project impact is conducted as mentioned in section 11 of this EMP and records are maintained as per section 11.3. No unpredictable circumstances leading to environmental incidents have occurred during the reporting period.
- **COA 7.3 d) results of all environmental monitoring required under conditions 3.1 to 3.2 of this approval, including interpretations and discussion by a suitably qualified person; -**As per 3.1 Condition, Veolia had engaged SLR Consulting Pty Ltd to conduct a noise emission performance review in 2011, after commissioning of the plant and pumping station. The Final Operational Noise Compliance report was submitted to Department of Planning and approval letter in compliance with condition 2.5 was received on 19.6.12.  
Noise monitoring is conducted onsite as a part of monthly environmental inspections and records are maintained on Google Drive. Noise monitoring is conducted using professional noise monitoring equipment (Digitech QM1592). As mentioned in the inspection report, if the operators identify any non-compliance of sound levels it is reported to the Process Engineer and Environmental Representative for operational EMP. However, the sound levels are within the prescribed limits and compliant to condition 3.2 of COA in the reporting period.
- **COA 7.3 e) a list of all occasions in the preceding twelve-month period when environmental goals/objectives/impact assessment criteria for the project have not been achieved, indicating the reason for failure to meet the criteria and the action taken to prevent recurrence of that type of failure. -** Nothing to report

## 7 Declaration

### Compliance Report Declaration Form

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Project Name: Camellia & Rosehill Recycled Water Scheme

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Project Application Number: MP07\_0121-PA-5

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Description of Project: Recycled Water Scheme

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Project Address: 1 East Parade, Fairfield NSW

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Proponent: AquaNet Sydney Pty Ltd

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Title of Compliance Report: Annual Environmental Management Report 2023

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Date: 1 May 2023

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I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

- i. The Compliance Report has been prepared in accordance with all relevant conditions of consent;
- ii. The Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;
- iii. The findings of the Compliance Report are reported truthfully, accurately and completely;
- iv. due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- v. The Compliance Report is an accurate summary of the compliance status of the development.

#### Notes:

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

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Name of Authorised  
Reporting Officer: Bradley Rea

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Title: Risk and Compliance Officer

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Signature: 

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Qualification: LLB, GDLP, MBA

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Company: AquaNet Sydney Pty Ltd

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Company Address: Suite 1005, 147 Pirie Street, Adelaide SA 5000



## 8 Appendix A - Environmental Compliance Audit, 2023

|                                  |   |            |   |
|----------------------------------|---|------------|---|
| <b>Audit Location:</b>           | <b>FAWTP &amp; RRWN</b>   |            |   |
| <b>Date of Audit Site Visit:</b> | <b>24 March 2023</b>  |            |   |
| <b>Title of Audit:</b>           | <b>Internal Environmental Compliance Audit</b>  |            |   |
| <b>Lead Auditor name:</b>        | <b>Aal-e Ali</b>  |            |   |
| <b>Audit team:</b>               | <b>Kate Simpson , Auditees: Phil Birkby, Luong Nguyen</b>   |            |   |
| <b>Type:</b>                     | <b>Internal Environmental Compliance and CoA Audit</b>  |            |   |
| <b>Objective/Criteria:</b>       | <b>To determine the level of compliance with the CoA and the Operations Environmental Management Plan MAN-3815</b>  |            |   |
| <b>Audit Findings:</b>           | <b>Number of Items Assessed:</b>  | <b>103</b> | <b>Number of items not assessed:</b> <b>6</b> |
|                                  | <b>Number of Conforming Items:</b>  | <b>96</b>  |   |
|                                  | <b>Number of Conforming Items where OFI has been identified:</b>  | <b>7</b>   |   |
|                                  | <b>Number of Non-Triggered items</b>  | <b>37</b>  | <b>Findings Statistics</b>                    |
|                                  | <b>Total Number of Conforming Items:</b>  | <b>103</b> | <b>100%</b>                                   |
|                                  | <b>Number of Partially Conforming Items:</b>  | <b>0</b>   | <b>0%</b>                                     |
|                                  | <b>Number of Non conforming Items:</b>  | <b>0</b>   | <b>0%</b>                                     |
| <b>Definitions:</b>              | <p><b>Conformance</b> - There is sufficient evidence that the item complies with the defined criteria<br/> <b>Non Conformance</b> - There is no specific evidence that addresses the defined criteria<br/> <b>Partial Compliance</b> - There is some evidence that addresses the defined criteria<br/> <b>Conformance - Opportunity for Improvement (OFI)</b> - There is sufficient evidence that the item complies with the defined criteria but also additional effectiveness or robustness might be possible with some further action.<br/> <b>Non-Triggered:</b> was assessed and found non-triggered<br/> <b>Not Assessed</b> - Was not within the audit scope or was unable to be assessed<br/> <b>Action:</b> An item raised in response to a Non Conformance or Partial Compliance.</p> |            |   |
| <b>Audit Conclusion:</b>         | <p><b>The audit found that, overall, the Fairfield Advanced Water Treatment Plant is well run and complies with the requirements of the Conditions of Approval and Veolia system requirements. Housekeeping and appearance of the site is very good and exemplifies the standards that Veolia promotes. There were no areas of non-compliance identified, however seven Opportunities for Improvement were noted and these mainly related to document management.</b></p>   |            |   |

**Table 1: Compliance in accordance to Minister's Condition of Approval**

| Section                             | Condition Requirements  | Test/Documents and records sighted | Observations  | Audit Finding | Corrective Action | Responsibility | Due Date | Comment/Status per Compliance tracker   |
|-------------------------------------|---|------------------------------------|---|---------------|-------------------|----------------|----------|---|
| 1.1 Terms of Approval               | The Proponent shall carry out the project generally in accordance with the:<br>a) Major Project Application 07_0121;<br>b) Rosehill Recycled Water Scheme, Environmental Assessment, prepared by Parsons Brinckerhoff and dated January 2009;<br>c) Camellia and Rosehill Recycled Water Scheme Preferred Project Report, prepared by Jemena Asset Management and dated 19 March 2009;<br>d) Environmental Assessment of the Modification to the Rosehill Recycled Water Project, prepared by Jemena Asset Management and dated 19 March 2009 and supplementary letter to the Department of Planning from Parsons Brinckerhoff Australia Pty Ltd regarding commitments at Woodville reservoir dated 30 March 2010;<br>e) Environmental Assessment of the modification to the Camellia and Rosehill Recycled Water project, prepared by Parsons Brinckerhoff Australia Pty Ltd and dated May 2010 and supplementary letter to the Department of Planning dated 18 June 2010 from Parsons Brinckerhoff Australia Pty Ltd providing additional information on matters considered inadequately addressed;<br>f) Modification application (MP07_0121 Mod 3) and supplementary information provided by letter dated 7th April 2011 from Veolia Water Australia to the Camellia and Rosehill Recycled Water Project;<br>g) Modification application (MP07_0121 Mod 4) and supplementary information titled Rosehill and Camellia Recycled Water Scheme Due Diligence Report – Proposed discharge of recycled water to land and water during network dewatering dated 13 September 2011; and<br>h) the conditions of this approval. |                                    | Project generally carried out to this requirement<br>No Construction Activities undertaken in the reporting period  | Non-Triggered |                   |                |          | Project generally carried out to this requirement<br>No Construction Activities undertaken in the reporting period  |
| 1.2 Terms of Approval               | In the event of an inconsistency between:<br>a) the conditions of this approval and any document listed from condition 1.1a) to 1.1g) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and<br>b) any document listed from condition 1.1a) to 1.1g) inclusive, and any other document listed from condition 1.1a) to 1.1g) inclusive, the most recent document shall prevail to the extent of the inconsistency.   |                                    | Noted   | Non-Triggered |                   |                |          | No Construction Activities undertaken in the reporting period   |
| 1.2A                                | Notwithstanding anything else in this approval, approval is given for the use of the degasser tower, reverse osmosis permeate collection tank and the filtration (reverse osmosis) building at the heights shown on the Survey Report dated 22 December 2010.   |                                    |   | Non-Triggered |                   |                |          |   |
| 1.3 Terms of Approval               | The Proponent shall comply with any reasonable requirement(s) of the Director-General arising from the Department's assessment of:<br>a) any reports, plans or correspondence that are submitted in accordance with this approval; and<br>b) the implementation of any actions or measures contained in these reports, plans or correspondence.   |                                    | All reasonable requirement(s) of the Director-General have been complied with.  | Non-Triggered |                   |                |          | All reasonable requirement(s) of the Director-General have been complied with.  |
| <b>1. Administrative Conditions</b> |   |                                    |   |               |                   |                |          |   |
| 1.4 Limits of Approval              | This project approval shall lapse five years after the date on which it is granted, unless the works the subject of this approval are physically commenced on or before that time   |                                    | Project commenced on 19 October 2011  | Non-Triggered |                   |                |          | Project commenced on 19 October 2011  |
| 1.5 Limits of Approval              | The peak output operating capacity of the recycled water treatment plant is 25 megalitres per day.  | FAWTP Plant Spreadsheet            | The recycled water treatment plant is designed to achieve an ultimate capacity of 25 ML/day. It will be constructed and commissioned to deliver 20ML/day, this was confirmed during a 10 day trial. Max daily production for the year to 24.3.23 was 6.6 ML. Average daily production for the year to 24.3.23 was 6.6 ML. | Compliant     |                   |                |          | The recycled water treatment plant is designed to achieve an ultimate capacity of 25 ML/day. It will be constructed and commissioned to deliver 20ML/day, this was confirmed during a 10 day trial. |

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| Section                                     | Condition Requirements   | Test/Documents and records sighted  | Observations   | Audit Finding               | Corrective Action   | Responsibility | Due Date  | Comment/Status per Compliance tracker   |
|---|--|---|--|-----------------------------|---|----------------|---|---|
| 1.6 Statutory Requirements                  | The Proponent shall ensure that all applicable licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.   | Sighted Acknowledgement of Dangerous Goods - NDG030738 2/11/2020 No longer on BMS. Located in Manifest. Sighted Trade Waste Permit 35154 - reviewed by SWC in Oct 2019 and risk level was reduced. Due for next review in Oct 2023.<br>WICA Licence - Plant and Network now combined under one licence<br>Check Acts and Regs - NSW Compliance Register<br>Pressure vessels - Renewal application for SafeWork NSW sighted 23/03/2023<br>Sighted Apparatus Licence - two way radios - renewed in 2022 expires 14/12/2023 AMCA Licence number 1944489/1 Land Mobile System | Licences sighted and in date. Confirmed that recommended changes from 2022 audit have been applied with regards to updated notification process due to transfer of licence to WUA. .   | Opportunity For Improvement | OPPORTUNITY FOR IMPROVEMENT: 2022 audit required an update to TEM-3886. This was completed, but two version of the document have been inadvertently uploaded to BMS. Keep the correct version and remove the incorrect version. | LN             | Completed 31/03/23 (RIVO Action ID: 5710754). The latest version is kept. | <u>Recycled Water Treatment Plant</u><br>Network Operators Licence (IPART) 09_001.<br><u>Network</u><br>Network Operators Licence (IPART) 09_002.<br><u>Scheme</u><br>DoP Planning approval 07_0121 (AquaNet Sydney P/L).<br>Retail Suppliers Licence (IPART) 10_01R. |
| <b>2. Specific Environmental Conditions</b> |  |   |  |                             |   |                |   |   |
| 2.1 Noise Impacts / Vibration Impacts       | The Proponent shall meet the requirements of <i>Assessing Vibration: A Technical Guideline</i> (DECC, February 2006) during the construction and operation of the project  | Section 4.2 of EMP<br>3 monthly PM Schedule for to monitor vibration on the plant and equipment at the plant ROS-R-0165- Sighted 24 March 2023<br>3 monthly PM Schedule for plant and equipment within the network ROS-SPI-R-1013 Sighted 24 March 2023   | <u>Recycled Water Plant &amp; Network</u><br>During normal operations, the scheme does not produce vibrations. Pump vibration analysis is covered in Section 4.2 of Environmental Management Plan - MAN-3815.<br>3 monthly vibration monitoring on equipment is conducted. An Operational Environmental Vibration Check will be commissioned upon receipt of any | Compliant                   |   |                |   |   |
| 2.2 Construction Noise                      | The Proponent shall only undertake construction activities associated with the project that would generate an audible noise at the nearest sensitive receiver and at any residential premises during the following hours:<br>a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive;<br>b) 7:00 am to 1:00 pm on Saturdays; and<br>c) at no time on Sundays or public holidays.<br>This condition does not apply in the event of a direction from police or other relevant authority for safety reasons, to prevent environmental harm or risk to life.  |   | The plant and Network were in operation during the reporting period.<br>No Construction Activities undertaken in the reporting period. Should construction occur, the requirements as detailed in Section 7 of the Environmental Management Plan- MAN-3815 would be implemented.   | Non-Triggere d              |   |                |   |   |
| 2.3 Construction Noise                      | Notwithstanding condition 2.2 of this approval, the Proponent may undertake construction activities during the following additional periods, provided that those activities are detailed in an approved Construction Noise and Vibration Management Plan (refer to condition 6.3c):<br>a) evening work: 6:00 pm to 10:00 pm, Mondays to Fridays; and<br>b) night-time work: 10:00 pm to 7:00 am, Mondays to Fridays.   |   | No Construction Activities undertaken in the reporting period  | Non-Triggere d              |   |                |   |   |
| 2.4 Construction Noise                      | Notwithstanding conditions 2.2 and 2.3 of this approval, the construction hours specified under those conditions may be varied with the prior written approval of the Director-General. Any request to alter specified construction hours shall be:<br>a) considered on a case-by-case basis;<br>b) accompanied by details of the nature and need for activities to be conducted during the varied construction hours; and<br>c) accompanied by any information necessary for the Director-General to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of receivers in the vicinity of the relevant construction site. |   | No Construction Activities undertaken in the reporting period  | Non-Triggere d              |   |                |   |   |

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| Section               | Condition Requirements  | Test/Documents and records sighted  | Observations   | Audit Finding | Corrective Action | Responsibility | Due Date              | Comment/Status per Compliance tracker   |
|-----------------------|---|---|--|---------------|-------------------|----------------|-----------------------|---|
| 2.5 Operational Noise | The Proponent shall design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed 40 dB(A) (Measured as L Aeq(15min) ) at the most affected residential receiver. This maximum allowable noise contribution applies under wind speeds up to 3 ms-1 (measured at 10 meters above ground level), and under temperature inversion conditions of up to 3 C/100 meters.   | TEM-3883 Environmental Inspection Checklist sighted on BMS and completed forms (records) for Dec 2022 and Jan 2023 also sighted. ROS-R-0164 PM Schedule sighted which triggers inspection monthly.  | Site has an onsite sound monitor and Digitech. Monthly Environmental Inspection includes noise monitoring using Checklist (TEM-3882) at 6 locations on site. No monitoring done at residences as results on site comply. TEM-3882 is current and due for review in 2024.   | Compliant     |                   |                |                       |   |
| 2.6 Dust Generation   | The Proponent shall construct and operate the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site, including the following:<br>a) staged construction work to expose only one area at a time, where practical;<br>b) stabilisation of exposed areas as soon as possible following completion of construction works;<br>c) scheduling of work to avoid generation of dust during unfavourable meteorological conditions. | Section 8.7 of EMP sighted  | No dust produced during operations. Mainly this conditions refers to construction period and extension of the network or work on site is not planned in the near future. Section 8.7 of EMP sets out requirements for dust suppression should it be necessary (water suppression, covering spoils or immediate removal from site)  | Compliant     |                   |                |                       |   |
| 2.7 Dust Generation   | Should visible dust emissions occur at any time, the Proponent shall identify and implement all practical dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.   | Recycled Water Plant<br>No dust is produced during operations<br>Network<br>Negligible dust is produced during operations<br>Should dust be produced as part of operations, it is managed in accordance with Section 8.7 of Environmental Management Plan MAN-3815  | Refer above comment.   | Compliant     |                   |                |                       |   |
| 2.8 Odour             | The Proponent shall not cause or permit the emission of offensive odours from the site in accordance with the provisions of Section 129 of the <i>Protection of the Environment Operations Act 1997</i>   | Contingency plan in 8.6 of EMP lists actions to be taken in case of an odour event.<br>Proactive management of Odour<br>Section 8.4 of OEMP<br>Identification of possible source of Odour<br>Section 8.3 of OEMP<br>WIS-3879 Shutdown/Restart manages shutdowns in a way that would minimise opportunity for odour<br>Environmental risk register | OFI action from 2022 to add controls to Environmental Risk Register confirmed to have been completed (Ref 1 and ref 2 in lines 16 adn 17 of risk register)<br>EMP section 8.3 lists potential odour problems. Previously Feed Balance Tank may get sludge build up which would form odours. ROV is used for annual checks, now doing every 2 years. If sufficient build up is observed, an ROV vacuum would be used to remove sludge. Recommend including this as a control in Environmental and WHS Risk registers. | Compliant     |                   | LN             | Completed 31/03/2023. | Added "In the event of odour occurrence, ROV vacuum would be used to remove deposited sludge from the tank." in section 8.3 Feed storage tank |

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| Section                            | Condition Requirements  | Test/Documents and records sighted  | Observations   | Audit Finding               | Corrective Action  | Responsibility | Due Date             | Comment/Statuses per Compliance tracker   |
|------------------------------------|---|---|--|-----------------------------|--|----------------|----------------------|---|
| 2.9 Traffic and Transport Impacts  | Upon determining the haulage route(s) for the construction, the Proponent shall:<br>a) Commission a qualified person to undertake a Road Dilapidation Report of all roads proposed to be used for construction activities in consultation with relevant road authorities. The Report shall assess the current condition of the relevant roads.<br>b) Following completion of construction a subsequent Road Dilapidation Report shall be prepared to assess any damage that may have resulted due to traffic and transport related to the construction and ongoing operation of the project.<br>The Proponent shall commit to restore the relevant roads to a state described in the original Road Dilapidation report. The cost of any restorative work described in the subsequent Report or recommended by the relevant road authorities after review of the subsequent Report, shall be funded by the Proponent. Such work shall be undertaken at a time as agreed upon between the Proponent and the relevant road authorities. In the event of a dispute between the parties with respect to the extent of restorative work that may be required under this condition, any party may refer the matter to the Director-General for resolution. The Director-General's determination of any such dispute shall be final and binding on the parties. |   | Not Applicable to Operations for Plant and Network   | Non-Triggered               |  |                |                      |   |
| 2.10 Traffic and Transport Impacts | The Proponent shall undertake all works affecting a public road or road reserve in consultation with and to meet the requirements of the RMS and relevant Council   | MAN-12615 TMP for the Network.<br>Record - February 2022 - Road Occupy Licence number 1755412<br>Record - January 2023 - Road Occupy Licence number 1972012 | In the event of a pipe leak/break on the network that involves work on public roads, this activity will be managed in accordance with the Network Traffic Management Plan - MAN-12615 as well as Leak Detection of RRWN Assets Procedure - WIS-14357<br>Road occupy licences for relevant work were sighted. | Opportunity For Improvement | OPPORTUNITY FOR IMPROVEMENT: Review MAN-12615 to include Road Opening Licence. Body of manual should refer to appendices and how they apply to the operations of the network. MAN-12615 appears to unnecessarily | PB + LN        | Completed 14/04/2023 | <u>Recycled Water Plant</u><br>Not applicable to operations<br><u>Network</u><br>In the event of a pipe leak/break on the network that involves work on public roads, this activity will be managed in accordance with the <b>Network Traffic Management Plan - MAN-12615</b> as well as Leak Detection of RRWN Assets Procedure - WIS-14357<br><br>14/04/23: MAN-12615 updated with issue date. Under site actions and procedure section: Input Road Opening Licence. Added under Traffic Controllers section: |
| 2.11 Traffic and Transport Impacts | The Proponent shall ensure that all pipeline crossings of roads are constructed using construction methods and depth covered determined in consultation with the relevant road authority.   |   | No construction activity for new road crossings carried out in the reporting period  | Non-Triggered               |  |                |                      |   |
| 2.12 Traffic and Transport Impacts | All works associated with the project are to be at no cost to the RTA or relevant road authority. The Proponent shall, prior to construction, liaise with the RTA to determine whether a Works Authorisation Deed is required.  |   | Noted and referred as required, but not triggered in this reporting period   | Non-Triggered               |  |                |                      |   |
| 2.13 Traffic and Transport Impacts | Where directional drilling/boring is proposed under roads or where trenching is proposed within road reserves, prior to the commencement of construction of pipelines, the Proponent shall consult with the relevant road authority and prepare a report to their reasonable satisfaction, the following matters:<br>a) detailed plans of the pipeline including vertical and horizontal alignment;<br>b) plant and equipment proposed to be used and construction compound locations;<br>c) construction schedule and hours of construction<br>d) proposed lane closures of the road network prior to commencement of work;<br>e) specific plans required prior to submission of road occupancy licence applications;<br>f) mitigation measures proposed to reduce impacts to traffic and pedestrian safety; and<br>g) indicative maintenance arrangements during operations.  | Not currently used as part of normal operations.  | Recycled Water Plant<br>Not applicable to operations<br>Network<br>Not relevant to current operations but could be applicable if additional customers are bought on and new pipelines need to be included. No such work planned.   | Non-Triggered               |  |                |                      |   |
| 2.14 Contamination and Remediation | The Proponent shall ensure that contaminated areas of the recycled water treatment plant site and other work areas are appropriately remediated, if necessary, prior to the commencement of construction works associated with the project in those areas. All remediation work shall be conducted in accordance with the requirements of the Contaminated Land Management Act 1997 and Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (1997).  |   | Land has been previously remediated as outlined in Section 4.5 of Environmental Management Plan - MAN3815. No further remediation occurred in reporting period   | Non-Triggered               |  |                |                      | Land has been previously remediated as outlined in Section 4.5 of Environmental Management Plan - MAN3815. No further remediation occurred in reporting period  |
| 2.15 Contamination and Remediation | Prior to any construction or excavation works adjacent to Norris Street, Loftus Road, Dursley Road, Fairfield Road and Pine Road, in the Holroyd City Council area, the Proponent shall conduct a preliminary contamination assessment to identify any areas affected by contamination.   |   | Minor works not requiring new excavation, removal of hydrant on Dursley Road was carried out in reporting period. No contamination assessment required for these works.  | Non-Triggered               |  |                |                      | Not Applicable to Operations  |

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|--|--|--|---|----------------|-------------------|----------------|----------|---------------------------------------|
| 2.16 Contamination and Remediation     | Prior to the commencement of site preparation and construction works associated with the project that may directly disturb known contaminated areas of the site, the Proponent shall submit to the Director-General a Site Audit Statement(s) – Construction prepared by an accredited Site Auditor under the Contaminated Land Management Act 1997, verifying that the contaminated areas have been remediated to a standard consistent with the intended land use.   |  | No major excavation works undertaken in reporting period. Asbestos Management Plan is referred if excavation exceeds 0.5 m on site  | Non-Triggere d |                   |                |          | Not Applicable to Operations          |
| 2.17 Hazards, Risk and Land Use Safety | All demolition work shall be carried out in accordance with AS 2601-2001 The Demolition of Structures.   |  | No demolition works conducted in reporting period   | Non-Triggere d |                   |                |          | Not Applicable to Operations          |
| 2.18 Hazards, Risk and Land Use Safety | The Proponent shall store and handle all Dangerous Goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with:<br>a) all relevant Australian Standards;<br>b) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and<br>c) DECC guidelines entitled: Storing and Handling Liquids: Environmental Protection Participants Manual and Environmental Compliance Report: Liquid Chemical Storage Handling & Spill Management.<br>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.   | Section 4.9 of the EMP describes these requirements.<br><br>WIS-3839 - Chemical Deliveries Work Instruction<br><br>TEM-126 - Chemical spill response quick guide<br>PRO-4025 - Chemical spills clean up and disposal procedure<br><br>Drain covers in spill kits | Recycled Water Treatment Plant<br>All chemicals kept on Fairfield site are managed in accordance with the Veolia High Risk Management Standard (HRMS) - Hazardous Materials, Chemicals Delivery, Storage and Handling STA-119. The risks relating to handling, storage, packaging and delivery of material are identified as far as practicable in the OHS Risk Register. Mitigation of risk is built in to standard operating processes via various means:<br>- All chemicals are labelled<br>- For all chemicals, MSDS are kept at point of use and available on 'ChemAlert'<br>- All Bulk Chemical Delivery Drivers must complete a online Chemical Delivery Induction prior to uploading any chemicals.<br>- Chemicals are uploaded in accordance with the Veolia Unloading and Recording Bulk Chemical Deliveries Work Instruction WIS-3839.<br>- For each bulk chemical stored on site a 'spill emergency response procedure' has been developed.<br>Network<br>Minimal dangerous goods storage is associated with operations. Should <del>Dangerous Goods storage be required, the</del><br>Not applicable to Operations | Compliant      |                   |                |          |                                       |
| 2.19 Hazards, Risk and Land Use Safety | The Proponent shall implement all the mitigation and control measures listed in section 3.5 of the Preliminary Hazard Assessment (PHA) of the EA. The Proponent shall submit an update on the implementation status of these measures to the Director-General prior to the commencement of construction, and again prior to the commencement of commissioning of the project.  |  |   | Non-Triggere d |                   |                |          | Not Applicable to Operations          |
| 2.20 Pre-commissioning Hazards Studies | Prior to the commencement of commissioning of the project the Proponent shall prepare and submit for the approval of the Director-General the following studies:<br>a) an Emergency Plan for the project. The Plan shall be prepared in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the project; and<br>b) a Safety Management System, covering all operations at the project and any associated transport activities involving hazardous materials. The System shall clearly specify all safety-related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to safety procedures. The System shall be developed in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations          |
| 2.21 Flooding Impacts                  | Prior to the commencement of construction, the Proponent shall prepare engineering drawings in consultation with Fairfield Council for relocation of St Elmo's Drain to account for potential flooding impacts at the site of the recycled water treatment plant. The engineering drawings shall be submitted for the approval of the Director-General prior to the commencement of construction.  |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations          |

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|-------------------------------------|--|--|---|----------------|-------------------|----------------|----------|--|
| 2.22 Flooding Impacts               | The Proponent shall include specific design features for bulk chemicals tanks and chemical container storage areas at the recycled water treatment plant to prevent impacts beyond the boundary of the site in the case of a flood event. The chemical storage and handling area shall be designed to meet the requirements of AS 3780-1994.   |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.23 Flooding Impacts               | Prior to finalising the design of the recycled water treatment plant and the commencement of construction works, an overland flood risk analysis for the site, including modelling of overland flows during the 100 year ARI overland flow design flood, shall be undertaken. A copy of the overland flow modelling results shall be provided to Fairfield City Council and to the Department upon completion.   |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.24 Ecological Impacts             | The Proponent shall define predicted minor impact by the project on River-flat Eucalypt Forest, Cumberland Plain Woodland, Shale Gravel Transition Forest and Castlereagh Swamp Woodland in accordance with the documents referred to in condition 1.1 and prepare a strategy to offset such vegetation losses or impact, to the satisfaction of the Director-General. Details of the offset strategy shall be submitted for the approval of the Director-General prior to the commencement of construction. |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.25 Ecological Impacts             | The Proponent shall ensure prompt restoration of drainage channels, which may provide Green and Golden Bell Frog habitat and movement corridors along creek lines, during construction works to minimise potential ecological impacts.   |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.26 Ecological Impacts             | All work, including waterway crossings, undertaken within 40 metres of waterways shall be conducted in accordance with the Department of Water and Energy Guidelines for Controlled Activities.  |  | No new works affecting waterways conducted in reporting period  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.27 Heritage Impacts               | Prior to the commencement of construction, all project personnel shall undergo project induction, covering education in protocols and offences relating to knowingly disturbing or destroying non-Aboriginal heritage items or Aboriginal relics, and including the potential for uncovering non-Aboriginal and/or Aboriginal relics in the project work areas.  |  | Not applicable to Operations  | Non-Triggere d |                   |                |          | Not Applicable to Operations   |
| 2.28 Heritage Impacts               | In the event of uncovering any previously unidentified Aboriginal objects or relics, work shall cease immediately in the vicinity of the site and the event shall be reported immediately to the DECC. This requirement shall be included in the project induction and the Construction Environmental Management Plan.   | Sited the section 4.10.1 Environmental Management Plan MAN-3815  | Recycled Water Plant & Network Should previously unidentified Aboriginal objects or relics be found, the requirements of Section 4.10.1 of Environmental Management Plan MAN-3815 should be implemented. No excavation works conducted and no relics found in reporting | Non-Triggere d |                   |                |          | Recycled Water Plant & Network Should previously unidentified Aboriginal objects or relics be found, the requirements of Section 4.10.1 of Environmental Management Plan MAN-3815 should be implemented.   |
| 2.29 Soil and Water Quality Impacts | The Proponent shall comply with section 120 of the <i>Protection of the Environmental Operations Act 1997</i> which prohibits the pollution of waters.   | Plant carries out surface water quality monitoring, and follows manual 12707. Daily SCADA check sheet TEM-3778-6 has additional prompts to record surface water monitoring test results. Sighted Surface water monitoring records. Latest record 10/04/2022 Hard copies stored in Environment folder | Locally filed document - Surface Monitoring results - records rainfall and test results. TEM-3778 -6 Documents and prompts checking of valve status and reminds that sampling to be carried out.  | Compliant      |                   |                |          | Recycled Water Plant & Network Compliant The requirements are identified in Section 4.7 & 6.8 of the Environmental Management Plan MAN-3815. If discharges from the Network are required, the requirements detailed within Recycled Water Release Plan - MAN-12707 shall be implemented. |
| 2.30 Soil and Water Quality Impacts | The Proponent shall install and maintain for the duration of construction works associated with the Project, erosion and sedimentation control measures consistent with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004)   |  | Not applicable to Operations. Should future excavation works be required, the requirements details within Section 4.10.2 of the Environmental Management Plan MAN-3815 shall be implemented   | Non-Triggere d |                   |                |          | Recycled Water Plant & Network Compliant Should future excavation works be required, the requirements details within Section 4.10.2 of the Environmental   |



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| Section                              | Condition Requirements   | Test/Documents and records sighted  | Observations  | Audit Finding               | Corrective Action  | Responsibility | Due Date                       | Comment/Status per Compliance tracker   |
|--------------------------------------|--|---|---|-----------------------------|--|----------------|--------------------------------|---|
| 2.31 Soil and Water Quality Impacts  | The Proponent shall investigate options for the collection, storage and reuse of stormwater which may include the installation of rainwater tanks to capture stormwater from the roof of station buildings or the construction site buildings and use of this water for preparing concrete, dust suppression and establishing and maintaining revegetated areas and landscaping. Such options shall be incorporated into the Construction Environmental Management Plan required under condition 6.2 of this approval. |   | Rain water is captured from the roof of main process building at the Recycled Water Treatment Plant and is used for irrigation and site hose down during operations.  | Compliant                   |  |                |                                | <u>Recycled Water Plant</u><br>Rain water is captured from the roof of main process building at the Recycled Water Treatment Plant and is used for irrigation and site hose down during operations.   |
| 2.32 Waste Generation and Management | All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials.  | Plant & Network Section 4.6 & 6.7 of the Environmental Management Plan Surface Water Monitoring results for liquid waste  | Waste management requirements are detailed within Section 4.6 & 6.7 of the Environmental Management Plan MAN-3815 and complied with.<br>Process waste stream is disposed of to Trade Waste via a trade waste licence with Sydney Water.<br>During the audit period there has been no waste removed from site other than process waste stream (trade waste), general domestic waste, recycling and scrap metal. Scrap metal receipt from BluesStar scrap metal provided as evidence.                           | Compliant                   |  |                |                                | <u>Recycled Water Plant &amp; Network</u><br>Compliant<br>Waste management requirements are detailed within Section 4.6 & 6.7 of the Environmental Management Plan MAN-3815   |
| 2.33 Waste Generation and Management | The Proponent shall maximise the treatment, reuse and/or recycling on the site of any excavated solids, slurries, dusts and sludges associated with the project, to minimise the need for treatment or disposal of those materials outside the site due to the risk of asbestos contamination.   | Plant & Network Section 4.6 & 6.7 of the Environmental Management Plan  | Network - material excavated goes to engaged contractors recycling centre (Linbeck). Ballast is graded and sold to other customers. Liquids are all disposed of via trade waste. Soil excavated on site from below 500 mm is disposed of via licenced   | Compliant                   |  |                |                                | <u>Recycled Water Plant &amp; Network</u><br>Compliant<br>Waste management requirements are detailed within Section 4.6 & 6.7 of the Environmental Management Plan MAN-3815   |
| 2.34 Waste Generation and Management | The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.   |   | Other than secondary treated effluent from Sydney Water LAP which is feed to this recycled water treatment plant, no other waste is received onsite. A Water Industry Competition Act (WICA) license is held by project proponent for operation of the Recycled Water Scheme.   | Compliant                   |  |                |                                | Not Applicable to Operations  |
| 2.35 Waste Generation and Management | The Proponent shall ensure that all liquid and/or non-liquid waste generate and/or stored on the site is assessed and classified in accordance with Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (DEC, 2004), or any future guideline that may supersede that document  | Trade waste licence sighted<br>Dangerous goods transport form (Startrack) for return of lab waste to Merck sighted.   | <u>Recycled Water Plant</u><br>Plant waste is subject to a Trade Waste Agreement (Consent No. 35154) with Sydney Water. All other waste management requirements are outlined in Section 4.5 (Asbestos) as per DEC guidelines and 4.6 (general waste) as per NSW EPA (2014) Waste Classification Guideline of Environmental Management Plan MAN-3815<br><u>Network</u><br>If water is to be discharged from within the Network, it is subject to the requirements outlined in the Recycled Water Release Plan- | Opportunity For Improvement | MAN-3815 refers to Waste Management Training (MAN-3878) but no evidence was provided that this has been carried out. | LN             | Completed (Action ID: 5710761) | <u>Recycled Water Plant</u><br>Plant waste is subject to a Trade Waste Agreement (Consent no 35154) with Sydney Water. All other waste management requirements are outlined in Section 4.5 (Asbestos) and 4.6 (general waste) of Environmental Management Plan MAN-3815<br><u>Network</u><br>If water is to be discharged from within the Network, it is subject to the requirements outlined in the Recycled Water Release Plan- MAN12707. |
| 2.36 Waste Generation and Management | The Proponent shall manage any asbestos or asbestos-contaminated materials that may be uncovered during the remediation or construction works strictly in accordance with the requirements of Protection of the Environmental Operations (Waste) Regulations 2005 and any guidelines or requirements issued by DECC in relation to these materials   | Sighted - Environmental Management Plan (EXT-3948 - construction) in place. Prepared by JBS environmental - Oct 2009.<br>Sighted - Section 6.2 of EMP MAN-3815 and reference to PRO-4020 Unintentional Disturbance to Potentially Impacted Fill | Section 6.2 EMP refers to Asbestos-PRO-4020 Unintentional disturbance to the Potentially Impacted fill response. For intentional excavations, EXT-3948 will be followed. No disturbance of asbestos or asbestos-contaminated materials took place in the audit period.  | Compliant                   |  |                |                                | <u>Recycled Water Plant &amp; Network</u><br>Not applicable to normal operations. IF asbestos contaminated materials are found, the requirements outlines in PRO4020 - Unintentional Disturbance to the Potentially Impacted Fill Response & Section 6.2 of Environmental Management Plan MAN-3815 shall be implemented.  |

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| Section                                  | Condition Requirements  | Test/Documents and records sighted  | Observations  | Audit Finding   | Corrective Action           | Responsibility | Due Date | Comment/Status per Compliance tracker  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
|--|---|---|---|---|-----------------------------|----------------|----------|--|------|------|----------------|------|------|---------------------------------------|------|------|----------|------|------|-------------------|------|------|----------------------|------|------|--|--------|------|--|------------------------------|---------------|--|--|--|--|
| 2.37 Visual Amenity and Urban Design     | <p>The Proponent is permitted to construct surface facilities and associated infrastructure at the recycled water treatment plant generally located and configured consistent with the preliminary designs presented in the documents referred to in condition 1.1 of this approval and in particular, Figure 2.1 of the document referred to under condition 1.1c). Heights of surface facilities will be limited as specified in Table 1.</p> <p>Table 1 – Maximum Height of Surface Facilities</p> <table border="1"> <thead> <tr> <th>Item</th> <th>Height Limit (m AHD)</th> <th>Height Limit (including any access ladders, safety rails, roof ventilation apparatus)</th> </tr> </thead> <tbody> <tr> <td>Recycled Water Storage Tank</td> <td>15.1</td> <td>16.3</td> </tr> <tr> <td>Feed Balance Tank</td> <td>14.7</td> <td>16.0</td> </tr> <tr> <td>Detention Tank</td> <td>14.9</td> <td>16.2</td> </tr> <tr> <td>Filtration (Reverse Osmosis) Building</td> <td>18.3</td> <td>19.8</td> </tr> <tr> <td>Degasser</td> <td>16.3</td> <td>17.2</td> </tr> <tr> <td>Flocculation Tank</td> <td>13.5</td> <td>14.7</td> </tr> <tr> <td>Reverse Osmosis Tank</td> <td>13.6</td> <td>14.9</td> </tr> <tr> <td>Reverse Osmosis Permeate Collection Tank</td> <td>12.175</td> <td>13.2</td> </tr> </tbody> </table> | Item  | Height Limit (m AHD)  | Height Limit (including any access ladders, safety rails, roof ventilation apparatus) | Recycled Water Storage Tank | 15.1           | 16.3     | Feed Balance Tank  | 14.7 | 16.0 | Detention Tank | 14.9 | 16.2 | Filtration (Reverse Osmosis) Building | 18.3 | 19.8 | Degasser | 16.3 | 17.2 | Flocculation Tank | 13.5 | 14.7 | Reverse Osmosis Tank | 13.6 | 14.9 | Reverse Osmosis Permeate Collection Tank | 12.175 | 13.2 |  | Not applicable to operations | Non-Triggered |  |  |  |  |
| Item                                     | Height Limit (m AHD)  | Height Limit (including any access ladders, safety rails, roof ventilation apparatus)   |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Recycled Water Storage Tank              | 15.1  | 16.3  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Feed Balance Tank                        | 14.7  | 16.0  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Detention Tank                           | 14.9  | 16.2  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Filtration (Reverse Osmosis) Building    | 18.3  | 19.8  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Degasser                                 | 16.3  | 17.2  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Flocculation Tank                        | 13.5  | 14.7  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Reverse Osmosis Tank                     | 13.6  | 14.9  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| Reverse Osmosis Permeate Collection Tank | 12.175  | 13.2  |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| 2.38 Visual Amenity and Urban Design     | Deleted   |   |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| 3.1 Noise Monitoring                     | <p>Within 90 days of the commencement of operation of the pumping station at the recycled water treatment plant and the Rosehill pumping station, or as may be otherwise agreed by the Director-General, and during a period in which the pumping station and the recycled water treatment plant are operating under design loads and normal operating conditions, the Proponent shall review the noise emission performance of the pumping station and the recycled water treatment plant site. The review shall include, but not necessarily be limited to:</p> <p>a) methodologies for noise monitoring;<br/>                     b) location of noise monitoring;<br/>                     c) frequency of noise monitoring;<br/>                     d) identification of monitoring sites at which pre-operational and operational noise levels can be ascertained; and<br/>                     e) details of any entries in the Complaints Register (condition 5.3 of this approval) relating to noise impacts.</p> <p>A report providing the results of the program shall be submitted to the Director-General within 28 days of completion of the testing required under this condition.</p>  | <p><u>Recycled Water Plant</u><br/>                     Report 61010660R1 approved by the department</p> <p><u>Network</u><br/>                     Report 20C-12-0205-trp-266717-0-Acoustic Impact Assessment submitted to the Department on 12/09/2012.</p> | As per 3.1 Condition, Veolia had engaged SLR Consulting Pty Ltd to conduct a noise emission performance review in 2011-2012 after commissioning of the plant and pumping station. The Final Operational Noise Compliance report was submitted to Department of Planning and approval letter in compliance with condition 2.5 was received on 19/6/2012. | Non-Triggered   |                             |                |          | <p><u>Recycled Water Plant</u><br/>                     Report 61010660R1 approved by the department</p> <p><u>Network</u><br/>                     Report 20C-12-0205-trp-266717-0-Acoustic Impact Assessment submitted to the Department on 12/09/2012.</p>  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| 3.2 Noise Monitoring                     | <p>In the event that the program undertaken to satisfy condition 3.1 of the approval indicates that the operation of the pumping stations and the recycled water treatment plant site, under design loads and normal operating conditions, will lead to greater noise impacts than permitted under conditions 2.5 of this approval, then the Proponent shall provide details of remedial measures to be implemented to reduce noise impacts to levels required by that condition. Details of the remedial measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require.</p>   | <p>Approval letter in compliance with condition 2.5 received on 19/6/2012</p> <p>Environmental monitoring Checklist including noise monitoring (TEM-3882)</p>   | Remedial measures following construction were undertaken as mentioned in the SLR report and approval letter by Department of Planning & Infrastructure NSW was provided (Ref no 10/21092-1). Monthly noise monitoring in Operations Phase is carried out to ensure that the sound levels don't exceed prescribed limits                                 | Non-Triggered   |                             |                |          | <p><u>Recycled Water Plant</u><br/>                     Only Applicable if there is a noise complaint or results of noise monitoring indicate greater than allowable noise impact</p> <p><u>Network</u><br/>                     Only Applicable if there is a noise complaint or results of noise monitoring indicate greater than allowable noise impact</p> |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| <b>4. Compliance Tracking</b>            |   |   |   |   |                             |                |          |  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |
| 4.1 Compliance Tracking                  | <p>Prior to each of the events listed below, the Proponent shall certify in writing to the satisfaction of the Director-General that it has complied with all conditions of this approval applicable prior to that event:</p> <p>a. commencement of any construction works on the land subject of this approval; and<br/>                     b. commencement of operation of the project.</p>  |   | Not relevant to current operations but could be relevant if additional construction work is to be carried out.  | Non-Triggered   |                             |                |          | <p>Not relevant to current operations but could be relevant if additional construction work is to be carried out</p> <p>Previous reports submitted include 091112 Compliance Tracking Report &amp; 110803 DoP Guidelines CoA Matrix Rev4.</p>  |      |      |                |      |      |                                       |      |      |          |      |      |                   |      |      |                      |      |      |  |        |      |  |                              |               |  |  |  |  |

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|----------------------------------|---|---|---|---------------|-------------------|----------------|----------|---|
| 4.2 Compliance Tracking          | The Proponent shall develop and implement a Compliance Tracking Program for the project, prior to commencing operations, to track compliance with the requirements of this approval and shall include, but not necessarily limited to:<br>a) provisions for periodic review of the compliance status of the project against the requirements of this approval and the Statement of Commitments detailed in the document referred to in condition 1.1 of this approval;<br>b) provisions for periodic reporting of the compliance status to the Director-General;<br>c) a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing;<br>d) procedures for rectifying any non-compliance identified during environmental auditing or review of compliance;<br>e) mechanisms for recording environmental incidents and actions taken in response to those incidents;<br>f) provisions for reporting environmental incidents to the Director-General during construction and operation; and<br>g) provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.<br>The Compliance Tracking Program shall be implemented prior to operation of the project with a copy submitted to the Director-General for approval within four weeks of commencement of the project, unless otherwise agreed by the Director-General. | 2022 Internal Environmental Audit report<br>TEM-14502 document<br>WO1006658361 trigger for conducting audit<br>WO1007102618 for recent incident response scenario | a) Compliance tool (TEM - 14502) in place and being updated annually following the Environmental Audit. VAMS W/O set up as prompt.<br>b) AEMR submitted annually to DPIE for approval reporting environmental incidents, remedial measures, non-compliances if any.<br>c) Internal Environmental Audit carried out annually with respect to MCoA and EMP requirements<br>d) Procedures identified and mentioned in OEMP<br>e&f) Incident & Emergency Management Manual (IEMM) satisfies these requirements<br>g) Training provided to Veolia employees, mock scenarios carried out on 4 monthly basis in accordance to IEMM. Contractors & subcontractors are required to undertake a mandatory site induction and required induction based on nature of work being carried out to meet this requirement. Inductions are conducted online through Alturo software and records of all inductions maintained. | Compliant     |                   |                |          | <a href="#">Recycled Water Plant &amp; Network Compliance Tracking Spreadsheet</a><br>Maintained in BMS - TEM-14502 and reviewed annually.<br>Previous reports submitted 110803 DoP Guidelines CoA Matrix Rev 4.doc |
| 4.3 Compliance Tracking          | Nothing in this approval restricts the Proponent from utilising any existing compliance tracking programs administered by the Proponent to satisfy the requirements of condition 4.2. In doing so, the Proponent must demonstrate to the Director-General how these systems address the requirements and/or have been amended to comply with the requirements of the condition.   |   | Refer above comment   | Compliant     |                   |                |          | Not applicable because 4.2 is in place  |
| 4.4 Compliance Tracking          | The Proponent shall meet the requirements of the Director-General in respect of the implementation of any measure necessary to ensure compliance with the conditions of this approval, and general consistency with the documents listed under condition 1.1 this approval.   | Captured via this document currently in use.<br>WO# 1006658361 Work Order<br>TEM-14502-1 DoP Guidelines Tracking Template   | See above - Compliance tracking tool in place.  | Compliant     |                   |                |          | <a href="#">Recycled Water Plant &amp; Network Compliance Tracking Spreadsheet</a><br>Maintained in BMS - TEM-14502   |
| <b>5. Community Consultation</b> |   |   |   |               |                   |                |          |   |
| 5.1 Community Consultation       | Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.   | Not stated in documentation but if request is made documents can be made available.   |   | Compliant     |                   |                |          | <a href="#">Recycled Water Plant &amp; Network</a><br>Compliant - No requests for any documentation   |
| 5.2 Compliants Procedure         | Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation):<br>a) a telephone number on which complaints about construction and operational activities at the site may be registered;<br>b) a postal address to which written complaints may be sent; and<br>c) an email address to which electronic complaints may be transmitted.<br>The telephone number, the postal address and the email address shall be published in a local newspaper circulating in the local areas prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the Proponent's website.   | Signage on site   | Signage at plant and pump stations provides phone number<br>Pump station signs also list WUA website<br>WUA website contains email address and postal addresses for contact   | Compliant     |                   |                |          | <a href="#">Recycled Water Plant &amp; Network</a><br>Compliant - Signage around network directing any public complaints. And signage directing people to WUA website.  |

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|------------------------------------|--|--|---|-----------------------------|---|----------------|-----------|--|
| 5.3 Complaints Register            | <p>The Proponent shall record details of all complaints received through the means listed under condition 5.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p> <p>a) the date and time, where relevant, of the complaint;</p> <p>b) the means by which the complaint was made (telephone, mail or email);</p> <p>c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</p> <p>d) the nature of the complaint;</p> <p>e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</p> <p>The Complaints Register shall be made available for inspection by the Director-General upon request.</p>  | <p>No separate register available - all complaints recorded in Rivo. Complaints managed in accordance with Complaint Handling procedure - PRO-3916 -sighted. Refers to recording in RIVO as a Quality event.</p> | <p>No complaints were received during the audit period</p> <p>Signs on local network sites which comes to site and is recorded on answerphone if site not manned.</p>   | Compliant                   |   |                |           | <p><u>Recycled Water Plant &amp; Network</u></p> <p>Complaints are stored in Rivo. No compliants recorded in the reporting period. Requirements outlines in Section 10.3 in Environmental Management Plan MAN-3815</p> |
| <b>6. Environmental Management</b> |  |  |   |                             |   |                |           |  |
| 6.1 Compliance Tracking            | <p>Prior to the commencement of any construction or operational activities, or as otherwise agreed by the Director-General, the Proponent shall nominate for the approval of the Director-General a suitably qualified and experienced Environmental Representative(s) independent of the design, construction and operation personnel. The Proponent shall engage the Environmental Representative(s) during any construction activities, and throughout the life of the project, or as otherwise agreed by the Director-General. The Environmental Representative(s) shall:</p> <p>a) oversee the implementation of all environmental management plans and monitoring programs required under this approval, and advise the Proponent upon the achievement of these plans/programs;</p> <p>b) have responsibility for considering and advising the Proponent on matters specified in the conditions of this approval and the Statement of Commitments as referred to under condition 1.1c) of this approval;</p> <p>c) oversee the implementation of the environmental auditing of the project in accordance with the requirements of condition 4.2 of this approval and all relevant project Environmental Management System(s); and</p> <p>d) be given the authority and independence to recommend to the Proponent reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts, and, failing the effectiveness of such steps, to recommend to the Proponent that relevant activities are to be ceased as soon as reasonably practicable if there is a significant risk that an adverse impact on the environment will be likely to occur.</p> | <p>Nicole Boukarim is state adviser. Ramona Bachu is National Rep Emergency Contact List TEM-3921 inclusive of these contacts</p>  | <p>The Environmental Management Representative responsible for liaising with the Department of Planning, Industry &amp; Environment is Bradley Rea and the environmental representative for operational EMP is Nicole Boukarim. The contact numbers for both are mentioned in Emergency list in IEMM. Evidence provided of regular updates to the incident contact list over the past years. Nicole Boukarim is the subject matter expert for MAN-3815 (EMP) and is included in the workflow for any reviews of this document</p> | Opportunity For Improvement | <p><b>Opportunity for Improvement -</b> TEM-3921 is not due for review for 3 years. Suggest changing review cycle to a shorter period e.g. 6 monthly.</p> | LN             | Completed | <p>AquaNet are the proponent. Bradley Rea has been approved as the Environmental Representative for the scheme</p>   |

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| 6.2 Construction Environmental Management Plan | <p>The Proponent shall prepare and implement a Construction Environmental Management Plan (CEMP) to outline environmental management practices and procedures to be followed during construction of the project. The CEMP shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004) and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) a description of all relevant activities to be undertaken on the site during construction;</li> <li>b) statutory and other obligations that the Proponent is required to fulfil during construction including all relevant approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</li> <li>c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan:                             <ul style="list-style-type: none"> <li>i) measures to manage dust emissions;</li> <li>ii) measures to monitor and minimise soil erosion and the discharge of sediment and other pollutants to lands and/ or waters during construction activities;</li> <li>iii) measures to monitor and control noise emissions during construction works;</li> <li>iv) measures to minimise the impact of construction on local flora and fauna and threatened species;</li> <li>v) Measures to implement in the case of uncovering previously unidentified soil and groundwater contamination during project excavations, including management of uncovered asbestos-contaminated sheeting and/or Acid Sulphate Soils.</li> </ul> </li> <li>d) a description of the roles and responsibilities for all relevant employees involved in the construction of the project;</li> <li>e) the additional studies listed under condition 6.3 of this approval; and</li> <li>f) Complaints handling procedures during construction.</li> </ul> <p>A separate CEMP may be prepared for each stage of the project. The relevant CEMP shall be submitted for the approval of the Director-General no later than one month prior to the commencement of any relevant construction works associated with the project, or within such period otherwise agreed by the Director-General. Construction works shall not commence until written approval has been received from the Director-General.</p> |                                    | Not applicable to Operations Phase | Non-Triggere<br>d |                   |                |          | Not Applicable to Operations  |
| 6.3 Construction Environmental Management Plan | <p>As part of the Construction Environmental Management Plan required under condition 6.2 of this approval, the Proponent shall prepare and implement the following in consultation with the relevant Councils and for approval by the Director-General:</p> <ul style="list-style-type: none"> <li>a) an Acid Sulphate Soil Management Plan, if the mottled-clay soils at a depth of 1.0 m – 2.5 m below ground level along Berry Street (Granville) to Thackeray Street (Camellia) are to be disturbed during pipeline construction activities. The Plan shall be prepared in accordance with Acid Sulfate Soil Manual (Acid Sulfate Soil Management Advisory Committee, 1998);</li> </ul>   |                                    | Not applicable to Operations Phase | Non-Triggere<br>d |                   |                |          | Not Applicable to Operations<br>No Construction Activities undertaken in the reporting period |
| 6.3 Construction Environmental Management Plan | <ul style="list-style-type: none"> <li>b) a Flora and Fauna Management Plan to manage flora and fauna impacts during construction and include appropriate revegetation of impacted area. The Plan shall be prepared in consultation with DECC and the Councils and shall include, but not necessarily be limited to:                             <ul style="list-style-type: none"> <li>i) details of all potentially affected threatened flora and fauna species and specific management procedures for the Green and Golden Bell Frog habitat;</li> <li>ii) weed control mechanisms and controls for the spread of disease and animal injury;</li> <li>iii) general management procedures for the construction of pipelines within vegetated corridors, and the rehabilitation of any disturbed vegetation.</li> </ul> </li> </ul>   |                                    | Not applicable to Operations Phase | Non-Triggere<br>d |                   |                |          | Not Applicable to Operations<br>No Construction Activities undertaken in the reporting period |

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| Section  | Condition Requirements   | Test/Documents and records sighted | Observations  | Audit Finding  | Corrective Action | Responsibility | Due Date | Comment/Status per Compliance tracker   |
|--|--|------------------------------------|---|----------------|-------------------|----------------|----------|---|
| 6.3 Construction Environmental Management Plan | <p>c) a Construction Noise and Vibration Management Plan to manage noise and vibration impacts during construction of the pipeline, recycled water treatment plant, Woodville reservoir and Rosehill pumping station and to identify all feasible and reasonable noise and vibration mitigation measures. The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) details of all potentially affected sensitive receivers;</li> <li>ii) the construction noise and vibration goals identified in the EA for construction periods greater than 26 weeks;</li> <li>iii) specific activities to be conducted during the first hour of construction on Saturdays (7am to 8am) and measures to be incorporated to reduce noisy work during this specific time;</li> <li>iv) where the objectives are predicted to be exceeded, an analysis of feasible and reasonable noise and vibration mitigation measures that will be implemented to reduce construction noise and vibration impacts; and</li> <li>v) procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity.</li> <li>vi) Procedures for consulting with Yennora &amp; Old Guildford Public Schools, Alaadin Child Care Centre and Guildford Arabic Baptist Church to ensure that formal examination periods (ie end-of-year or State-wide examinations), centre rest periods or church services times are taken into account when scheduling construction activities</li> </ul>  |                                    | Not applicable to Operations Phase  | Non-Triggere d |                   |                |          | Not Applicable to Operations<br>No Construction Activities undertaken in the reporting period |
| 6.3 d) Traffic Management Plan                 | <p>d) a <b>Traffic Management Plan</b> for all works to be carried out within public areas, or where construction activity impacts on traffic flow and bicycles or pedestrian access, in compliance with the requirements of AS 1742.3 Traffic Control Devices for Works on Roads. The Plan shall be prepared in consultation with the Councils, the relevant road authority, bus companies and private property owners to address potential impacts which shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>i) details of how construction of the project will be managed in proximity to local and regional roads;</li> <li>ii) details of traffic routes for heavy vehicles, including any necessary route or timing restriction for oversized loads;</li> <li>iii) provision for pedestrian access in the vicinity of construction areas, including disabled and pram access, cyclists, and provision for access to private properties;</li> <li>iv) provision of vehicle parking in areas where existing parking spaces will be lost;</li> <li>v) provisions to minimise impact on school traffic zones, including limited hours of work during school hours, compliance with speed limits by construction vehicles in school zones and where possible scheduling of construction work during school holiday periods;</li> <li>vi) details of bus routes in the vicinity of construction areas, including proposed changes to existing routes; and</li> <li>vii) demonstration that all statutory responsibilities with regard to road traffic impacts have been complied with.</li> </ul> |                                    | <p>No major construction works conducted during reporting period.</p> <p>For maintenance activities traffic plans are submitted to local councils prior to receipt of Council permit</p> <p>Traffic Management Plan for Network MAN-12615 and MAN-3910 for plant is referred to for any activities affecting traffic.</p> | Non-Triggere d |                   |                |          |   |

Table 1: Compliance in accordance to Minister's Condition of Approval

| Section                                       | Condition Requirements   | Test/Documents and records sighted   | Observations   | Audit Finding               | Corrective Action  | Responsibility | Due Date   | Comment/Status per Compliance tracker   |
|---|--|--|--|-----------------------------|--|----------------|------------|---|
| 6.4 Operational Environmental Management Plan | <p>The Proponent shall prepare and implement an <b>Operation Environmental Management Plan</b> to detail an environmental management framework, practices and procedures to be followed during operation of the project. The OEMP shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to:</p> <p>a) identification of all relevant statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all relevant approvals, licences, approvals and consultations;</p> <p>b) a description of the roles and responsibilities for all relevant employees involved in the operation of the project;</p> <p>c) overall environmental policies and principles to be applied to the operation of the project;</p> <p>d) relevant standards and performance measures to be applied to the project, and a means by which environmental performance can be periodically reviewed and improved, where appropriate;</p> <p>e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; and</p> <p>f) the additional plans listed under condition 6.5 of this approval.</p> <p>A separate Operation Environmental Management Plan (OEMP) may be prepared for each stage of the project. The relevant OEMP shall be submitted for the approval of the Director-General no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Director-General. Operation shall not commence until written approval has been received from the Director-General</p> | <p>MAN-3815 Revision 4 Environmental Management Plan (Veolia)</p> <p>EXT-3948 JBS Environmental Management Plan (Oct 2009)</p> <p>Approval letter (Ref no 07_125) in compliance with condition 6.4 &amp; 6.5 received in June 2011</p> | <p>Current document (MAN-3815 Rev 4) satisfies all requirements listed.</p> <p>Document originally prepared in 2010 and approval letter from Director of Infrastructure Projects (delegate to Director-General) was sighted (June 2011)</p>  | Opportunity For Improvement | <p>OPPORTUNITY FOR IMPROVEMENT: Audit schedule in MAN-3815 is out of date. It refers to yearly audits, whereas Veolia has moved to a risk-based approach. MAN-3815 to be updated to refer to Veolia Water LoB audit schedule. Most recent full system audit was in 2022.</p> | PB             | 29/03/2023 | <p><u>Recycled Water Plant</u><br/>OEMP submitted and approved by the department (30 June 2011)</p> <p><u>Network</u><br/>OEMP submitted and approved by the department (27 June 2011) (Modified 26 April 2012)</p> <p>Environmental Management Plan MAN-3815, Version 4 (17 May 2021) is the current version of the plan</p> <p>29/03/23: Following EMP doc review and annual AEMR changes were made as follows. Sec 1.2 updated to reflect client rebranding, Sec 1.6 and 1.7 updated to reflect policy retrieval and display process at site, sec 11.4 updated to reflect audit against ISO 14001 to Veolia audit schedule and annual audit against AEMR required for annual Conexa submission against MCoA.</p> |
| 6.5 Operational Environmental Management Plan | <p>As part of the Operation Environmental Management Plan required under condition 6.4 of this approval, the Proponent shall prepare and implement the following:</p> <p>a) a <b>Landscape Management Plan</b> including but not limited to:</p> <p>i) measures to minimise and manage the use of herbicides for weed control;</p> <p>ii) a plan for the replacement of plants in accordance with Fairfield Council's Urban Creeks Master Plan in riparian areas affected by the project. This may include any need for establishment of access paths within the creek corridor area for maintenance or other works;</p> <p>iii) procedures for the removal of trees from Woodville Golf Course and rehabilitation plans for the visual impact of Woodville Reservoir;</p> <p>iv) planting of additional screening plants in the area of North Street to provide visual screening for local residents, using native shrubs</p>   | <p>Section 9 of the EMP (MAN-3815) satisfies these requirements.</p>   | <p>Only part a (i) is relevant for Operational Activities.<br/>Landscape Management Plan - Section 9 EMP</p>   | Compliant                   |  |                |            | <p>Part a ii) only relevant for Operational Activities.<br/>Landscape Management Plan - Section 9 Environmental Management Plan MAN-3815<br/>Plans submitted and approved by the department</p>   |
| 6.5 Operational Environmental Management Plan | <p>b) an <b>Air Quality and Odour Management Plan</b> to outline measures to minimise impacts from the project on local and regional air quality. The Plan shall include, but not necessarily be limited to:</p> <p>i) identification of all major sources of odour that may be emitted from the project;</p> <p>ii) pro-active management and response mechanisms for odour emissions, with specific reference to measures to be implemented and actions to be taken to minimise and (where practicable) prevent potential odour impacts on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project;</p> <p>iii) provision for review of air quality monitoring data, with comparison of monitoring data with that assumed and predicted in the documents listed under condition 1.1 of this approval, including verification of air quality modelling and predictions, as may be relevant;</p> <p>iv) plans for regular maintenance of process equipment to minimise the potential for odour emissions; and</p> <p>v) a contingency plan should an incident, process upset or other initiating factor lead to elevated odour impacts, whether above normal operating conditions or environmental performance goals/ limits.</p>  | <p>Section 8 of the EMP (MAN-3815) satisfies these requirements<br/>Approval letter (Ref no 07_125) in compliance with condition 6.4 &amp; 6.5 received in June 2011</p>   | <p>No air quality monitoring required as per Section 8 of EMP. Plant inspections carried out on daily basis and any abnormal odour levels are notified to Process Engineer or Operations Manager. TEM-3882 (Environmental Inspection Checklist) is conducted monthly and includes odour inspections. No odour compliants received by residents in neighbourhood in the audit period.</p> | Compliant                   |  |                |            | <p>Section 8 of Environmental Management Plan MAN-3815<br/>Plans submitted and approved by the department</p>   |

**Table 1: Compliance in accordance to Minister's Condition of Approval**

| Section                                       | Condition Requirements  | Test/Documents and records sighted   | Observations   | Audit Finding  | Corrective Action | Responsibility | Due Date | Comment/Statuses per Compliance tracker   |
|---|---|--|--|----------------|-------------------|----------------|----------|---|
| 6.5 Operational Environmental Management Plan | <p>c) a <b>Noise Management Plan</b> to detail measures to mitigate and manage noise during operation of the recycled water treatment plant site, and Rosehill pumping station. The Plan shall include, but not necessarily be limited to:</p> <p>i) identification of noise-generating activities and/or sources in relation to the Rosehill pumping station and the recycled water treatment plant site;</p> <p>ii) identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits referred to in condition 2.4 of this approval;</p> <p>iii) procedures to ensure that all reasonable and feasible noise mitigation measures are applied during operation of the Rosehill pumping station and the recycled water treatment plant site; and</p> <p>iv) procedures to generate suitable documentation for environmental auditing, that demonstrates that best practice noise control operations are being implemented.</p>   | Section 7 of the EMP (MAN-3815) Approval letter (Ref no 07_125) in compliance with condition 6.4 & 6.5 received in June 2011 | Section 7 of the EMP (MAN-3815) satisfies these requirements. Monthly noise monitoring at pre-identified locations at the plant is conducted by site staff and recorded in TEM-3882 Environmental Inspection Checklist. There are no residents near Rosehill pumping station and pumps are enclosed. Woodville reservoir has no pumps to generate noise. | Compliant      |                   |                |          | Section 7 of Environmental Management Plan MAN-3815 Plans submitted and approved by the department  |
| 6.5 Operational Environmental Management Plan | <p>d) a <b>Recycled Water Release Plan</b> to detail measures to be implemented during pipeline dewatering. The Plan shall be prepared in consultation with relevant Councils, prior to the release of recycled water and include, but not be limited to:</p> <p>i) the identification of water volumes and quality parameters to be released, including no release of water that is 'out of specification', the dechlorination of large volumes of water (&gt; 1ML), and no release of water to land where chlorine levels are greater than 2mg/L;</p> <p>ii) release methodology, including no release of water directly to waterways, or which results in scour and erosion, or has the potential for local flooding;</p> <p>iii) notification and reporting procedures to Councils prior to, during and following each release event, and in the AEMR required by condition 7.3;</p> <p>iv) water quality recording and contingency measures for water which does not meet reuse standards;</p> <p>v) traffic management measures; and</p> <p>vi) post-release inspection and cleanup measures.</p> | Recycled Water Release Plan (MAN-12707) sighted  | Recycled Water Release Plan (MAN-12707) satisfies all conditions stated and is referred to for pipe dewatering. There have been no releases in the audit period.   | Compliant      |                   |                |          |   |
| 6.6 Operational Environmental Management Plan | <p>6.6 Within 3 months of:</p> <ul style="list-style-type: none"> <li>the submission of an incident report under condition 7.1 above;</li> <li>the submission of an annual review under condition 7.3 above; or</li> <li>any modification to the conditions of this approval, (unless the conditions require otherwise),</li> </ul> <p>the Proponent shall review, and if necessary revise, the OEMP required under condition 6.4 and the management plans required under condition 6.5 of this approval, to the satisfaction of the Director-General.</p> <p>Note: This is to ensure these documents are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>   |  | OEMP (MAN 3815) is reviewed every 3 years according to the schedule in the BMS or if the audit or annual review triggers any modifications. No new revision of MAN-3815 was created in 2022 following the annual review as none were triggered by its findings. Revisions of sub-documents were triggered and updates were carried out in 2022.          | Compliant      |                   |                |          |   |
| <b>7. Environmental Reporting</b>             |   |  |  |                |                   |                |          |   |
| 7.1 Environmental Incident Reporting          | The Proponent shall notify the Director-General of any environmental incident within 12 hours of becoming aware of the incident. The Proponent shall provide full written details of the incident to the Director-General within seven days of the date on which the incident occurred.   | TEM-3886 - Fairfield Incident Notification Process   | No relevant incidents have occurred in audit period. Responsibility for notification is by Brad Rea from Connexa. Veolia procedure TEM-3886 requires notification to Connexa as soon as possible to allow them to notify the D-G within the  | Compliant      |                   |                |          | No incidents to report. AquaNet are the Proponent. Should an incident occur, the requirements to report are detailed in the Environmental Management Plan MAN-3815. |
| 7.2 Environmental Incident Reporting          | The Proponent shall meet the requirements of the Director-General to address the cause or impact of any environmental incident, as it relates to this approval, reported in accordance with condition 7.1 of this approval, within such period as the Director-General may require.   |  | Not applicable as no incidents in reporting period. Environmental Management Plan MAN-3815 outlines that communication protocol for reporting  | Non-Triggere d |                   |                |          |   |



Table 1: Compliance in accordance to Minister's Condition of Approval

| Section                          | Condition Requirements   | Test/Documents and records sighted | Observations  | Audit Finding | Corrective Action | Responsibility | Due Date | Comment/Statuses per Compliance tracker  |
|----------------------------------|--|------------------------------------|---|---------------|-------------------|----------------|----------|--|
| 7.3 Annual Performance Reporting | <p>The Proponent shall, throughout the life of the project, prepare and submit for the approval of the Director-General, an <b>Annual Environmental Management Report (AEMR)</b>. The AEMR shall review the performance of the project against the Operation Environmental Management Plan (refer to condition 6.6 of this approval) and the conditions of this approval. The AEMR shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) details of compliance with the conditions of this approval;</li> <li>b) a copy of the Complaints Register (refer to condition 5.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were addressed and resolved;</li> <li>c) identification of any circumstances in which the environmental impacts and performance of the project during the year have not been generally consistent with the environmental impacts and performance predicted in the documents listed under 1.1 of this approval, with details of additional mitigation measures applied to the project to address recurrence of these circumstances;</li> <li>d) results of all environmental monitoring required under conditions 3.1 to 3.2 of this approval, including interpretations and discussion by a suitably qualified person; and</li> <li>e) a list of all occasions in the preceding twelve-month period when environmental goals/objectives/impact assessment criteria for the project have not been achieved, indicating the reason for failure to meet the criteria and the action taken to prevent recurrence of that type of failure.</li> </ul> <p>The Proponent shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than twelve months after the commencement of operation of the project. The Director-General may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Proponent shall make copies of each AEMR available for public inspection on request.</p> | 2022 Audit report and this report  | <ul style="list-style-type: none"> <li>a. This report and the Annual Environmental Audit (Rivo No.7729087)</li> <li>b. Compliant register - No compliants were registered with the scheme during the reporting period</li> <li>c. Nothing to report</li> <li>d. Plant noise report(Report Number 610.10660-R1) submitted 6 January 2012, Rosehill Pump Station report 12 September 2012. Continuous monthly noise monitoring checks are carried out and recorded using TEM-3882.</li> <li>e. Nothing to report</li> </ul> | Compliant     |                   |                |          | <ul style="list-style-type: none"> <li>a. This report and the Annual Environmental Audit (No. 5180180)</li> <li>b. Compliant register - No compliants were registered with the scheme during the reporting period</li> <li>c. Nothing to report</li> <li>d. Plant noise report submitted 6 January 2012, Rosehill Pump Station report 12 September 2012</li> <li>e. Nothing to report</li> </ul> |

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**Table 2: Compliance in accordance to EMP conditions**

| CoA Section &                | EMP (MAN-3815) Section  | Criteria   | Test/Documents and records  | Observations  | Audit Finding               | Corrective Action   | Responsibility  | Due Date                                      |
|------------------------------|---|--|---|---|-----------------------------|---|---|---|
| LEGAL AND OTHER requirements | The Proponent shall carry out the project generally in accordance with the:<br>a) Major Project Application 07_0121;<br>b) Rosehill Recycled Water Scheme, Environmental Assessment, prepared by Parsons Brinckerhoff and dated January 2009;<br>c) Camellia and Rosehill Recycled Water Scheme Preferred Project Report, prepared by Jemena Asset Management and dated 19 March 2009;<br>d) Environmental Assessment of the Modification to the Rosehill Recycled Water Project, prepared by Jemena Asset Management and dated 19 March 2009 and supplementary letter to the Department of Planning from Parsons Brinckerhoff Australia Pty Ltd regarding commitments at Woodville reservoir dated 30 March 2010;<br>e) Environmental Assessment of the modification to the Camellia and Rosehill Recycled Water project, prepared by Parsons Brinckerhoff Australia Pty Ltd and dated May 2010 and supplementary letter to the Department of Planning dated 18 June 2010 from Parsons Brinckerhoff Australia Pty Ltd providing additional information on matters considered inadequately addressed;<br>f) Modification application (MP07_0121 Mod 3) and supplementary information provided by letter dated 7th April 2011 from Veolia Water Australia to the Camellia and Rosehill Recycled Water Project;<br>g) Modification application (MP07_0121 Mod 4) and supplementary information titled Rosehill and Camellia Recycled Water Scheme Due Diligence Report – Proposed discharge of recycled water to land and water during network dewatering dated 13 September 2011; and<br>h) the conditions of this approval. | Are the legislations, licences & approvals relevant to the RRWS listed on the NSW Compliance Register?         | Acknowledgement of Dangerous Goods - NDG030738 9/10/2019<br>Trade Waste Permit 35154<br>WICA Licence<br>Check Acts and Regs   |   | Opportunity for Improvement | OPPORTUNITY FOR IMPROVEMENT: Consider adding planning approvals to the NSW Compliance register. | PB + LN<br>14/04/2023:<br>Checked TEM-5274 NSW Water Compliance Register. The acknowledgement of Dangerous goods is listed with the latest issue date and No. | Completed<br>14/04/23 (RIVO action ID 5710744 |
| LEGAL AND OTHER requirements | 3.3   | Is the information on the NSW Compliance Register relevant to the RRWS up to date?                             | Appears generally satisfactory  | Links to CoA 1.6<br>Licences included: Radio licence, pressures vessels , Trade Waste and   | Conforming                  |   |   |   |
| RISK MANAGEMENT              | 4   | Are those aspects that have a significant impact on the environment been determined and addressed in the OEMP? | 4.1 Traffic and Transport<br>4.2 Noise and Vibration<br>4.3 Air Quality - Monitoring<br>4.4 Flora and Fauna                   | Yes. Section 4 of EMP satisfies the requirements  | Conforming                  |   |   |   |
| RISK MANAGEMENT              | 4.2   | What vibration monitoring is taking place on site.   | 3 monthly PM - Sighted. 2 recent reports sighted. Traffic light system on report indicating status and when refurb is needed. | Links to CoA 2.1<br>3 Monthly vibration monitoring continues to be carried out as previously. A VAMS PM (# ROS-SPI-R-1013) is reasied to ensure this is carried | Conforming                  |   |   |   |
| <b>RISK MANAGEMENT</b>       |   |  |   |   |                             |   |   |   |
|                              | 4.6   | Waste management   |   | Links to CoA 2.35   | Not                         |   |   |   |

|   |     |   |  |  |                             |   |   |   |
|---|-----|---|--|--|-----------------------------|---|---|---|
| RISK MANAGEMENT                             | 5.1 | Have all the significant risks identified in the OEMP been listed in the Environmental Risk Register TEM-3774?<br>Are any other relevant risks listed in the register?  | Risk register - last reviewed 8/12/22. Sighted.  | Risk register was sighted and includes the significant risks from the OEMP. Some items in Section 4 of the OMP (Description of Significant Environmental Risks) are not included in the risk assessment. if the OEMP does not identify significant risks associated with these areas.  | Conforming                  |   |   |   |
| RISK MANAGEMENT                             | 5.1 | Is the register reviewed annually?<br>Is the register used to monitor and evaluate the effectiveness of the controls in place?  | Risk register - last reviewed 8/12/22. Sighted.  | Risk Register last reviewed in 8/12/22   | Conforming                  |   |   |   |
| <b>Objective and targets</b>                |     |   |  |  |                             |   |   |   |
| Objective and targets                       | 5.3 | Are the Objectives and Targets monitored regularly?   | MAN-3815 Section 5.2 and 5.3   | Items listed in the objectives table are monitored regularly as per site inspections and generated work orders for contractors (Lawncare/Grounds maintenance etc.)<br>Work orders are tracked and reported on a monthly basis via managers report to client and Veolia GM. Asset team will report overall work order status every 3 months to track any deferred or delayed works.<br>If limits from monitoring results are exceeded then subsequent actions are generated via RIVO until close out. | Opportunity for Improvement | OPPORTUNITY FOR IMPROVEMENT:<br>Consider adding a monitoring method to Table 5.3 to document how compliance with these objectives and targets are monitored | LN - The target column has been designed to self explain. | Completed 13/04/23 (RIVO action ID 5710752) |
| Environmental Controls / Asbestos           | 6.2 | Has there been an instance of asbestos find or disturbance to the capping layer on the FARWP in the auditing period? If yes, was it handled in accordance with EMP (Asbestos) EXT-3948 and/or Unintentional Disturbance to the Potentially Impacted Fill response |  | Links to CoA 2.36. Not triggered   | Not Applicable              |   |   |   |
| Environmental Controls / Traffic Management | 6.5 | Is there an appropriate signage to ensure safe movement into and within the FAWTP site?   | Signage - arrows, speed limit - 10 kph - shared zone   | Observed during site visit.  | Conforming                  |   |   |   |
| Environmental Controls/ Traffic Management  | 6.5 | Is there a provision for loading and delivery areas?  | Sighted bulk chemical unloading area, parking areas, bins stored and secured against wind.   | Sighted<br>Liquid contained in IBC in use sighted on walk around had a visual difference to one sighted elsewhere. It was confirmed following site walk around the colour difference was due to material degradation of IBC. Chemical inside was confirmed to Citric. IBC will be decanted and replaced.   | Conforming                  |   |   |   |
| Environmental Controls/ Traffic Management  | 6.5 | Are there appropriate speed limits for safe and orderly movement into, out of, and within the site?   | Site walk  | 10 km/h limit. Signage observed during site walk.  | Conforming                  |   |   |   |
| Environmental Controls/ Traffic Management  | 6.5 | Is the Traffic Management Plan MAN-12615 for the RRWN implemented and being adhered to?   | TEM-12615 sighted<br>Traffic management signs at the Fairfield site have been observed<br><br>Training records for network coordinator to be provided. | Links to CoA 2.10<br>Traffic Management Plan - MAN-12615. Current document was issued April 2022 due for review in October 2023.   | Conforming                  |   |   |   |

|   |             |  |   |   |            |  |  |  |
|---|-------------|--|---|---|------------|--|--|--|
| Environmental Controls/ Waste                 | 6.7         | Have there been any breaches of the Trade Waste Consent?   | No breaches. Trade Waste Sample Report sighted for period 2022 October to December  | Links to CoA 2.32 & 2.33<br>Samples collected by Autosampler every quarter and sent to SWC lab for analysis. Changed to quarterly on 20/1/2020. Checked standards from licence against TEM-3892 and also include original SWC results to Trade Waste. Results available in Google Drive Trade Waste/Trade Waste Reports to SWC - Checked October-December 2022. | Conforming |  |  |  |
| Environmental Controls/ Waste                 | 6.7         | Is there a recycling program in place?   | Yes. Cardboard, mixed recyclables, collected by Veolia. Recycling bins observed during site walk.   | Links to CoA 2.32 & 2.33  | Conforming |  |  |  |
| Environmental Controls/ Surface Water         | 6.8         | Is Surface Water monitored on regular basis and in accordance with the WIS-3876 Monitoring work instruction.   | Surface water monitoring records sighted for audit period (Google sheet)  | Links to Coa 2.29<br>Locally filed document - Surface Monitoring results - records rainfall and test results. TEM-3778 -6 Documents and prompts checking of valve status and reminds that sampling to be carried out.   | Conforming |  |  |  |
| Environmental Controls/ Hazardous Goods       | 6.9         | Are hazardous goods stored in compliance with the site Dangerous Goods Licence?  | Sighted Acknowledgement of Dangerous Goods - NDG030738 2/11/2020. Located in Manifest. Site inspection indicated compliance with Acknowledgement of Dangerous Goods   | Links to CoA 2.18<br>Details of hazardous chemicals also recorded in site manifest.   | Conforming |  |  |  |
| Environmental Controls/ Hazardous Goods       | 6.9         | Are site staff trained in chemical handling and spill management?  | Training records sighted<br>Cloud Assess for chemical handling<br>Training attendance form for Spill management<br>(Internal training including spill management is not yet migrated to Cloud Assess)   | Training records showed all operators have chemical handling training.  | Conforming |  |  |  |
| Environmental Controls/ Hazardous Goods       | 6.9         | Are copies of the site manifest and chemical SDS's kept in a cabinet at the entry to site and at the chemical storage areas (SDS only)?<br>Are all SDS's up to date? | Hard copies at the designated locations confirmed during site walk. ChemAlert records sighted.  | Site manifest and SDS cabinet at chemical storage area were inspected. All SDS up to date and signage appropriate.  | Conforming |  |  |  |
| Environmental Controls/ Energy Optimisation   | 6.10        | Have cost-effective energy conservation measures been implemented on site?   |   | Solar hot water onsite. Automatic lights via sensors. Centralised lighting control for site RO building and surrounding area. During audit period VSD-  | Conforming |  |  |  |
| Environmental                                 | 7.7         | Have there been any noise  | No noise complaints recorded - RIVO   | Links to CoA 2.5 & 6.5  | Conforming |  |  |  |
| Environmental Controls/ Noise                 | 7.7         | Have all the noise mitigation measures described in the OEMP section 7.7 been implemented?   | All engineering controls are in place. Environmental Awareness training slide pack sighted MAN-3838 review up to date. Training records sighted   | Links to CoA 2.5 & 6.5<br>Environmental Awareness training carried out on 01 March 2023.  | Conforming |  |  |  |
| Environmental Controls/ Noise                 | 7.8         | Is noise monitoring taking place on an annual basis or after a complaint has been received?  | Site has an onsite sound monitor and Digitech. Monthly Environmental Inspection includes noise monitoring using Checklist (TEM-3882) at 6 locations on site. No monitoring done at residences as results on site comply. Results have been scanned into Google Drive. Sighted monitoring results from December 2022 to February 2023. | Links to CoA 2.5<br>Monitoring performed monthly  | Conforming |  |  |  |
| Environmental Controls/ Air Quality and Odour | 8.4 and 8.5 | Have there been any odour complaints?  | None recorded in Rivo.  | Links to CoA 2.8 & 6.5  | Conforming |  |  |  |

|  |         |      |  |  |  |                |  |  |  |
|--|---------|------|--|--|--|----------------|--|--|--|
| Environmental Controls/ Air Quality and Odour        |         | 8.4  | If yes, have adequate controls been implemented and monitoring activities instigated?  |  | Links to CoA 2.8 & 6.5   | Not Applicable |  |  |  |
| Environmental Controls/ Air Quality and Odour        |         | 8.4  | Shutdown - what control measures were be implemented during last shutdown if any in order to eliminate the potential for odour formation. Were they adequate?  | WIS-3789 Shutdown/Restart Instructions.  | Links to CoA 2.8 & 6.5<br>No shutdown longer than 4 hours during audit period.   | Conforming     |  |  |  |
| Environmental Controls/ Air Quality and Odour        | 8.4 EMP |      | What data is recorded by weather station? Is the station maintain and data reviewed periodically to ensure it is available when needed? Manual says "will be installed" however it is in current use.  | Windspeed, rainfall, temp are measured live and displayed in control room, but are not recorded beyond 24 hours. Data used for surface water monitoring rainfall. Windspeed used for chemical spills. Solar powered and no maintenance required. Located next to SCADA so is routinely monitored informally. | Sighted section 8.4 in EMP - "Weather station is installed".   | Conforming     |  |  |  |
| Environmental Controls/ Air Quality and Odour        |         | 8.6  | In the auditing period, has there been a period of high odour levels and if yes has the contingency plan described in the OEMP (MAN-3815) been implemented.  | Contingency plan in MAN-3815 sighted.  | Links to CoA 2.8 & 6.5<br>Odours produced by adjacent SWC stormwater plant can be detected on site; however there have been no periods of high odour from the site during the audit period.        | Not Applicable |  |  |  |
| Environmental Controls/ Air Quality and Odour        |         | 8.7  | In the auditing period, has there been an event where big quantities of dust have been generated and what control measures were implemented. Were they adequate?   | No dust generations expected during normal operations  | Links to CoA 2.6 & 2.7   | Not Applicable |  |  |  |
| Environmental Controls/ Landscape and Rehabilitation |         | 9.4  | Is adequate screening of FAWTP and RRWN buildings and/or structures from external view points in place?  | Section 4.8 of MAN-3815 Visual Amenity   | Links to CoA 6.5<br>Screening is in accordance Section 4.8 of MAN-3815. Screening is 'adequate' in the view of the auditors  | Conforming     |  |  |  |
| Environmental Controls/ Landscape and Rehabilitation |         | 9.4  | Has the landscaping ensured invasive noxious weeds do not spread?  | Site Walk  | No signs of invasive noxious weeds on site.  | Conforming     |  |  |  |
| Environmental Controls/ Landscape and Rehabilitation |         | 9.5  | Is contract arrangement in place for landscaping at the FAWTP and on the RRWN? If yes does it include:<br>Grass cutting<br>Weed management<br>Watering and maintenance of garden bed drop watering system<br>Repairs to garden beds and turfed areas<br>Tree pruning<br>New planting as instructed | WO#1007173448 Most recent monthly grounds maintenance WO for Rosehill network<br>1 monthly<br>Section 9 of MAN-3815  | Links to CoA 6.5   | Conforming     |  |  |  |
| Environmental Controls/ Landscape and Rehabilitation |         | 9.5  | Is the effectiveness of the landscape maintenance reviewed?  | Section 9.5 of MAN-3815  | Reviewed as required if grounds become unkept. For example, landscaper is currently quoting to replace mulching in garden beds.  | Conforming     |  |  |  |
| Training, Awareness and Competence                   |         | 10.2 | Is environmental induction given to new employees/contractors? (review training records)   | Site induction and site Environmental Awareness Training Package sighted.  | Environmental Awareness Training package now delivered (MAN-3838)  | Conforming     |  |  |  |
| Training, Awareness and Competence                   |         | 10.2 | Have all employees been trained in the following:<br>Environmental Awareness Training<br>MAN-3838 Is this still used as the manual says it is incorporated in Site Induction?  | Induction<br>MAN-3838<br>Training records  | Specific training package for Waste Management but no training conducted. Elements of Waste Management training is incorporated in MAN-3838 Environmental Awareness. Man 3838 is current and being | Conforming     |  |  |  |

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| Training, Awareness and Competence                  | 10.2 | Does the induction/training awareness cover comprehensively the requirements of the EMP and the CoA for both Network and Plant.   | Induction sighted   | Site induction covers all key elements of OEMP   | Conforming     |  |  |  |
| Communication                                       | 10.3 | Has any community and/or regulator complaints/inquiries been received in the auditing period? If yes, have they been adequately   |   | Links to CoA 5.3<br>Nil complaints in the audit period   | Not Applicable |  |  |  |
| CHECKING AND CORRECTIVE ACTION - Monitoring         | 11.1 | Are monthly plant inspections undertaken and do they confirm that the environmental controls described in the EMP have been implemented, meet specification and are being maintained? Is the Environmental Inspection Checklist (TEM-3882) used? Are results of inspections reported in monthly SHE meetings? | Work order for monthly inspections sighted<br>Checklist sighted (TEM-3882)  | The Environmental Inspection checklist is used on a monthly basis under WO from VAMS<br>Monthly meeting minutes now include section to discuss result from site inspections                      | Conforming     |  |  |  |
| CHECKING AND CORRECTIVE ACTION - Non-conformance    | 11.2 | Are all non-conformances recorded in RIVO?  | Rivo  | No non-conformances occurred in past year; however OFIs from audits are in Rivo and were sighted.  | Conforming     |  |  |  |
| CHECKING AND CORRECTIVE ACTION - Audits and Reviews | 11.4 | Have environmental system audits been conducted on a yearly basis?  | Audit records from audit 2022   | This audit against CoA and EMP is conducted yearly. Systems audit against ISO14001 is conducted in accordance with the Veolia Water LoB audit schedule. Most recent audit was conducted in 2022. | Conforming     |  |  |  |
| CHECKING AND CORRECTIVE ACTION - Monitoring         | 11.4 | Is the Compliance Tracking program TEM-14502 in place and has it been used to review compliance with DA?  | Compliance Tracking Tool in place. Separated tabs - Operations and Not Relevant to Operations. Review is conducted annually in accordance | Links to CoA 4.2<br>TEM-14502 has been uploaded to BMS   | Conforming     |  |  |  |
| CHECKING AND CORRECTIVE ACTION - Monitoring         | 11.5 | Have management reviews been conducted and records maintained?  | Management review meeting report (20/4/22)  | 2022 Management Review meeting conducted 20/4/22.  | Conforming     |  |  |  |