



Independent Environmental Audit Report

**SSD 07_0161 – Bombala Sawmill, 1 Sandy Lane,
Bombala NSW**

Trigalana Environment Pty Ltd

4 June 2024



Independent Environmental Audit Report

SSD 07_0161 – Bombala Sawmill, 1 Sandy Lane, Bombala NSW

Prepared By:

Richard Peterson

Trigalana Environmental Pty Ltd

ABN: 67 638 805 848

Version Control

Revision	Date	Comment
A	19 May 2024	Initial Draft for Review
0	4 June 2024	Final

Table of Contents

Executive Summary	3
1 Project Overview	4
1.1 Project Background and Approval History	4
1.2 Site Description	4
1.3 Project Approval	7
1.4 Supplementary Approvals and Licences	7
1.5 Auditor	7
1.6 Audit Objectives	7
1.7 Audit Scope and Period	8
1.8 Definitions	9
2 Independent Audit Methodology	10
2.1 Scope Development	10
2.2 Stakeholder Consultation – Key Issues	10
2.3 Summary of Audit Processes	10
2.4 Opening and Closing Meetings	10
2.5 Site Inspection	10
2.6 Document Review	11
2.7 Compliance Descriptors	11
3 Audit Findings	13
3.1 Compliance Performance	13
3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions	13
3.3 Incidents	13
3.4 Community Complaints	13
3.5 Actions from previous Audits	14
3.6 Adequacy of Environmental Management Plans	20
3.7 Stakeholder Consultation Outcomes	20
3.8 Actual Versus Predicted Impacts	24
3.9 Key Strengths	26
3.10 Non-Compliances and Recommendations for Improvement	26
Appendix A DPHI Auditor Approval	33
Appendix B Auditor Declaration	36
Appendix C Audit Table	38
Appendix D Consultation	109
Appendix E Photographs	116

Executive Summary

Trigalana Environmental Pty Ltd has been engaged to undertake the 3rd Independent Environmental Audit (IA3) of the Bombala Sawmill, also known as the Willmott Sawmill Project, located at 1 Sandy Lane, Bombala NSW. The site houses a timber sawmill and processing facility, with products manufactured at the site including structural, landscaping, fencing and decorative timbers. The facility was originally founded in 1977 and redeveloped in 2012.

State Significant Development (SSD) Project Approval (SSD 07_0161 MOD4) covers both the construction and operational phases of the Project. The Project Applicant is Willmott Timbers Pty Ltd. Operators of the facility are DWAU Australia (DWAU).

An Independent Environmental Audit is required by Schedule 4, Conditions 5 of MP07_0161 MOD4 and has been undertaken in accordance with the Department of Planning, Housing and Infrastructure (DPHI) Post Approval Requirements (2020).

The Audit covers operational activities for the period from the last site inspection of the 2nd Independent Environmental Audit (24th March 2021) to the date of the site inspection for IA3, 10th April 2024. The Audit consisted of a site inspection, interview with key project personnel and a review of relevant management plans, project documents and management records.

The site inspection was undertaken by the Auditor on 10th of April 2024, with members of DWAU operational and environmental advisory staff present.

The findings of the Audit are:

- Key environmental risks for noise, air quality and surface and groundwater are being managed effectively.
- Three non-compliances with the conditions of approval (SSD_07061) have been identified.
- Three noncompliance with the Environment Protection Licence 11205 have been identified.
- Five recommendations and two positive observations are made by the audit.

A summary of non-compliances is provided in [Table 1](#) with further detail and recommendation provided in Section 3 and Appendix C.

Table 1: Summary of Non compliances

Condition	Summary of Non – Compliance
SSD_07061	
Schedule 3 – Condition 9	Noise generated by the project exceeds the noise limits in the MCoA and the EPL.
Schedule 3 – Condition 14	Remediation works have not been completed and a validation report to EPA within the timeframes required by this condition.
Schedule 3 Condition 26	Ash from the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler was stored on site temporarily for more than three months.
Environment Protection Licence (# 11205)	
Condition L4.1	The noise criteria was not complied with for the audit period.
Condition M 7.1	As noted in the 2021/2022 Annual Return document, annual noise monitoring did not occur within the Annual Return year.
Condition R 1.5	The 2022 EPL Annual Return was not provided to the EPA within the timeframe required by this condition.

1 Project Overview

1.1 Project Background and Approval History

The redevelopment and commencement of the upgrade of operations to the Bombala Sawmill (also known as the Willmott Sawmill Project), was approved by the then Minister for Planning under the former Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 7th September 2010 (07_0161). The project approval permitted construction of a new green mill and timber treatment plant and associated infrastructure including four boilers, ten drying kilns, two seamers, a new wastewater management system, a new site access and a new office and carpark.

The project was transitioned to State Significant Development (SSD) by order, which took effect by publication in the NSW Government Gazette on 7th September 2018.

Since 2010, the project approval has been modified four times as summarised below:

- **MOD1, approved 10th February 2012:** Administrative changes allowed the project to be more accurately defined and developed in site 'zones' rather than sequential stages; and minor changes to the design and layout of the sawmill.
- **MOD2, approved 15th July 2015:** Allowed for the replacement of four approved boilers (including three gas-fired boilers and one wood-fired boiler) with a single 18-megawatt (MW) woodfired boiler.
- **MOD3, approved 19th February 2019:** Allowed for the installation of a new 15 MW wood-fired boiler to be installed in place of the 18 MW wood-fired boiler approved under MOD 2 and to replace the 10 MW gas-fired boiler.
- **MOD4, approved 24th April 2020:** The installation of a linear spray system to allow for the treatment of finished timber framing material with a preservative chemical known as Determite, a non-dangerous good which provides protection from termite and borer attack. Minor upgrades to the existing production line to facilitate the installation of the spray system.

The current Applicant is Dongwha Australia Pty Ltd, with the project handed over from the former Applicant, Willmott Timbers Pty Ltd.

Schedule 4, Condition 5 of SSD 07_0161 requires Independent Environmental Audits to be conducted within 2 years of the planning approval, and every 3 years thereafter, unless the Secretary directs otherwise.

There have been two previous Independent Environmental Audits conducted for the project. Independent Audit 1 (IA1) was conducted in 2018, and Independent Audit 2 (IA2) was conducted in March 2021. This Audit Report describes the findings from the 3rd Independent Environmental Audit for the project (IA3).

1.2 Site Description

The Bombala Sawmill and timber processing facility is located at 1 Sandy Lane, Bombala, in the Snowy Monaro Local Government Area (LGA). The site is described as Lot 2 DP 1016573 and Lot 27 DP 1061792 and is located approximately 2 km south-west of the township of Bombala, between Sandy Lane, Delegate Road, and Wedmore Road (see [Figure 1](#)). The site and land surrounding the site is zoned RU1-Primary Production. The site is surrounded by farmland and the nearest residential receiver, known as Trevanion, is located approximately 150 m south-west of the site boundary. There is also a commercial receiver located on the western boundary of the site.

Timber milling operations commenced on the site in 1979 and the facility has previously been the subject of more than 20 development consents issued by the former Bombala Council (now Snowy Monaro Regional Council) for various upgrades and expansions. Products manufactured at the site

include structural, landscaping, fencing and decorative timbers. The facility comprises the following main components including:

- Green Mill
- Dry Mill
- Satellite Building
- Treatment Plant
- Despatch Building
- Kilns, Boiler, Weighbridge, Workshop
- 4 ponds-Pond 1, Pond 2 Northern Road and Southern Road
- Self-bunded above ground fuel tank
- Internal roads, carparking and
- Administration buildings and amenities.

The Site Layout Plan is presented in [Figure 2](#).

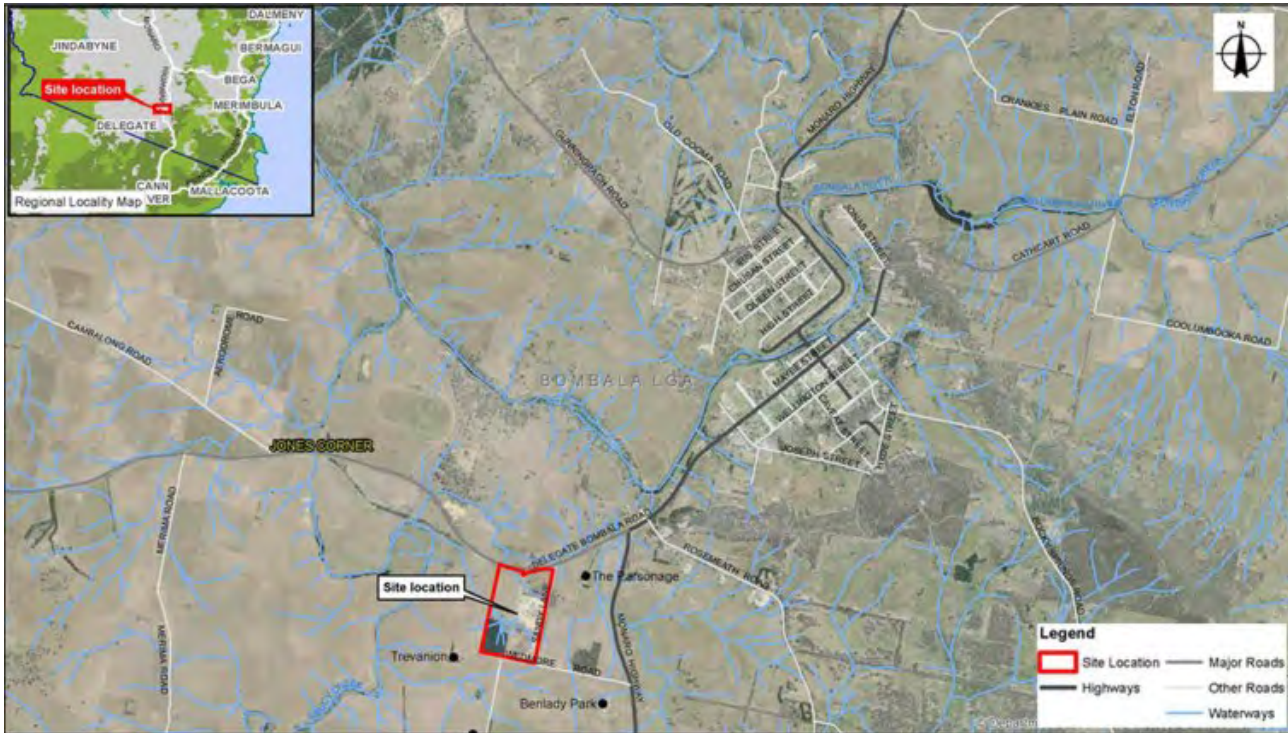


Figure 1: Site location and Regional Context Map (Source: DWAU Sawmill, Bombala Modification 4 Assessment Report, April 2020).

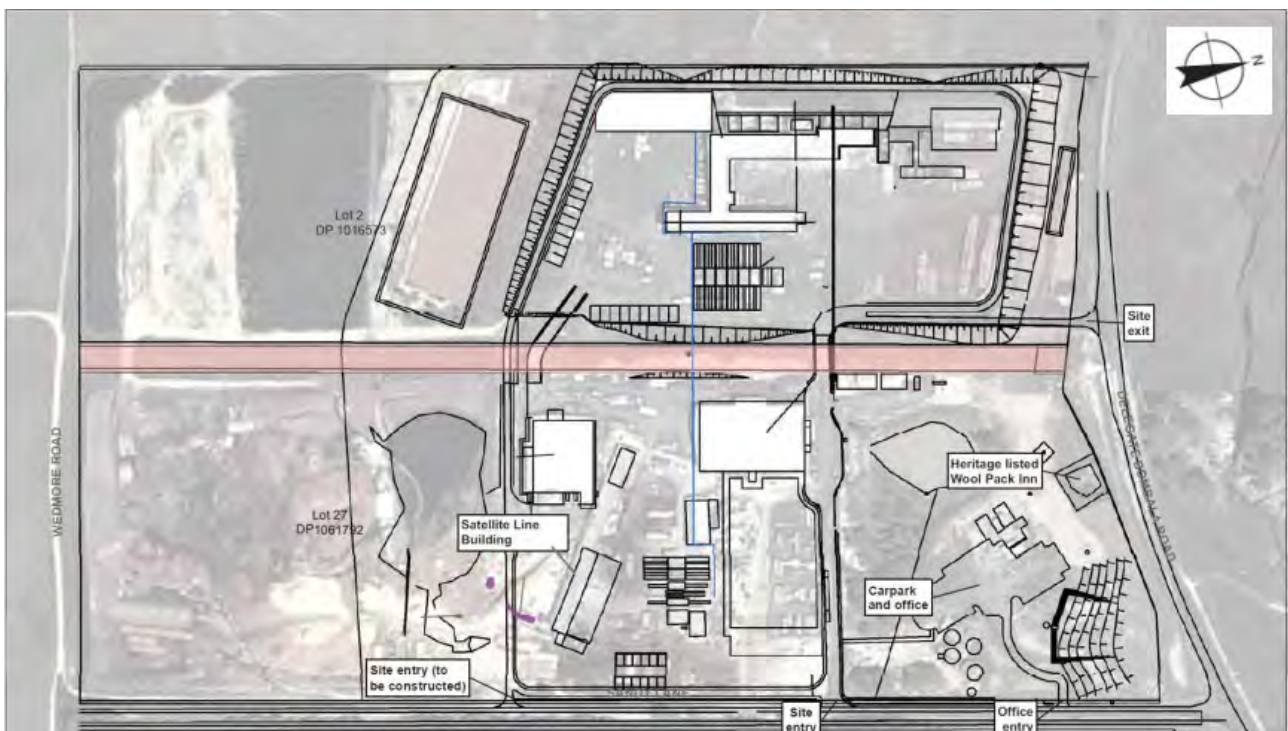


Figure 2: Site Layout (Source: DWAU Sawmill, Bombala Modification 4 Assessment Report, April 2020).

1.3 Project Approval

The project was originally approved under the former section 75J of the EP&A Act and was a transitional Part 3A project under Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (EP&A (ST&OP) Regulation).

On 5 September 2018 the Director, Industry Assessments (as delegate of the then Minister for Planning), made an order under clause 6 of Schedule 2 to the EP&A (ST&OP) Regulation declaring the development the subject of project approval to be SSD. The order was published in the NSW Government Gazette on 7 September 2018 and took effect from that date.

The effect of this order is that the project approval is taken to be a development consent under Part 4 of the EP&A Act for the carrying out of the development.

1.4 Supplementary Approvals and Licences

In addition to the Planning Approval (SSD_07_0161), the site also operates under an Environment Protection Licence (EPL No. 11205):

- Scheduled Activities: Wood or timber milling or processing (>200,000m³ annual processing capacity) & Wood preservation (30,000m³ annual processing capacity).

1.5 Auditor

Trigalana Environmental Pty Ltd has been appointed to undertake this IA3. The Auditor was approved by DPHI in accordance with SSD 07_0161 Schedule 4, Condition 5. Details of the Auditor are provided in [Table 2: Auditor Details](#).

Table 2: Auditor Details

Name	Qualifications	Key Experience
Richard Peterson	B. E Civil M. Environmental Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Lead Auditor	25 years of environmental management experience in the infrastructure sector. Have undertaken over 100 Audits including independent DPHI Audits for major infrastructure Projects including: • Upper South Creek Advanced Water Recycling Centre. • EnergyConnect. • Crudine Ridge Windfarm. • Sapphire Windfarm. • Rye Park Windfarm. • Albion Park Bypass. • Walla Walla Solar Farm. • Warrell Creek to Nambucca Heads. • Northern Road upgrade. • Tweed Valley Hospital. • Windsor Bridge.

The DPHI Letter of approval for the Auditor is provided in **Appendix A**.

1.6 Audit Objectives

The key objectives of the Independent Environmental Audit are to assess compliance of the Project with the Conditions of Approval (CoA) and the implementation of management plans and other requirements as outlined in the CoA. The Audit is to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the lifetime of the project.

1.7 Audit Scope and Period

This Audit has been undertaken in accordance with the Minister's CoA (SSD 07_0161). These conditions are outlined in [Table 3](#) below.

Table 3: Independent Environmental Audit – Requirements SSD 07_0161

Condition Reference	Condition	Comment
Schedule 4 Condition 5	Within 2 years of this approval, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:	The previous Independent Environmental Audit (IA2) was conducted in March 2021. This is the 3 rd Independent Environmental Audit (IA3), undertaken in April 2024, in accordance with the 3-yearly timeframe.
	(a) be conducted by suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary.	The Auditor has been approved by DPHI. Refer Appendix A .
	(b) include consultation with the relevant agencies.	Consultation has been undertaken as required with details provided in Section 3.7 of this Audit Report.
	(c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);	The environmental performance of the project was assessed during the site inspection and is described in Section 3 of this Audit Report.
	(d) review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate,	The adequacy of strategies and programs is described in Section 3.6 of this Audit Report.
	(e) recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals. <i>Note: This audit team must be led by a suitably qualified Auditor and include experts in any fields specified by the Secretary.</i>	Recommended measures or actions to improve the environmental performance of the project, are provided in Section 3.10 of this Audit Report.
Schedule 4 Condition 6	Within 6 weeks of the completing of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	DWAU are to submit a copy of this Audit Report and Proponent's Response to the audit recommendations within the required timeframe.

In addition to the above conditions, this audit has been conducted and carried out in general accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).

1.8 Definitions

Commonly used acronyms in this Audit Report are as described in Table 4.

Table 4: Common acronyms

Acronym	Description
AEMP	Air Emissions Management Plan, Bombala Sawmill Project September 2021
CCA	Copper Chrome Arsenate
Council	Snowy Monaro Regional Council (formerly Bombala Council)
CoA	Conditions of Approval stated in Project Approval Application MP 07_0161
DPE	Department of Planning and Environment (now the Department of Planning Housing and Infrastructure)
DPIE	Department of Planning, Industry and Environment (now the Department of Planning Housing and Infrastructure)
DPHI	Department of Planning Housing and Infrastructure (formerly the Department of Planning and Environment)
DWAU	DWAU Australia Pty Ltd
DWRMMP	Dust and Wood Residue Monitoring and Management Plan
EA	Environmental Assessment titled "Expansion of Bombala Integrated Sawmilling and Value Adding Facility Volumes"
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	NSW Environment Protection Authority
EPL	Environmental Protection Licence
Incident	A set of circumstances that causes or threatens to cause material harm to the environment and/or breaches or exceeds the limits of performance measures/criteria in the approval
EMS	Environmental Management Strategy
EWMS	Environmental Work Method Statement
IEA	Independent Environmental Audit
ICNG	EPA Interim Construction Noise Guideline
IPAR	DPHI Independent Audit Post Approval Requirements, May 2020)
Planning Secretary	The Planning Secretary of the Department of Planning, Housing, and Infrastructure.
PIRMP	Pollution Incident Response Management Plan
PMP	Product Management Plan Bombala Sawmill Project, September 2021
(the) Project	Bombala Sawmill
RAP	Remedial Action Plan
SWMP	Soil and Water Management Plan
VOC	Volatile Organic Compounds

2 Independent Audit Methodology

2.1 Scope Development

The Audit scope was developed in consideration of:

- The NSW DPHI Independent Audit Post Approval Requirements (IPAR) (May 2020).
- Project Conditions of Approval (SSD 07_0161) as modified (24 April 2020).
- Stakeholder feedback from relevant government stakeholders including:
 - o Department of Planning, Housing, and Infrastructure (DPHI)
 - o NSW Environment Protection Authority (EPA)
 - o Snowy Monaro Council (Council).

2.2 Stakeholder Consultation – Key Issues

In undertaking the Audit, key issues raised by the government agencies groups that are relevant to the Audit are summarised in Section 3.7 with the Auditors response to the issues raised.

2.3 Summary of Audit Processes

- Opening meeting.
- Site inspection, noting environmental practices and controls.
- Audit Interviews.
- Review of documents and records.
- Closing meeting.

2.4 Opening and Closing Meetings

An opening meeting was held on 3rd April 2024 where the Auditor provided an overview of the Audit process and confirmed the agenda for the Audit. Details of attendees are provided in Table 5.

Table 5: Opening and Closing meeting attendance.

Opening and Closing Meeting Attendees		
Name	Position	Organisation
Kyong Seok, Min	Manager, DWAU	DWAU
Glen Hampshire*	Head of Production	DWAU
Will Fleming*	WHS Officer	DWAU
Susannah Price*	Compliance Officer	DWAU
Toby Hobbs	Compliance Supervisor	DWAU
Richard Peterson	Environmental Auditor	Trigalana Environmental

Note * opening meeting only.

The closing meeting was held on 3rd of June 2024 where the summary of the Audit findings was provided, noting areas of good practice, non-compliances, and recommendations for improvement.

2.5 Site Inspection

A site inspection was undertaken on the morning of 10th of April 2024. The Auditor was escorted by representatives of DWAU operational and environmental staff. Observations made by the Auditor in relation to the management of specific conditions of approval and the EPL are documented in **Appendix C**. Photographs taken during the site inspection are provided in **Appendix E**.

2.6 Document Review

In undertaking the Audit, a broad range of documents were reviewed or referred to, including:

- Project conditions of approval (SSD 07_0161) as modified.
- Project Environmental Impact Statement Expansion of Bombala Integrated Sawmilling Facility (November 2009).
- Environmental Management Plans, developed in accordance with the Project Conditions including:
 - o Air Emissions Management Plan, Bombala Sawmill Project
 - o Product Management Plan Bombala Sawmill Project
 - o Dust and Wood Residue Monitoring and Management Plan
 - o Energy Efficiency Plan, Bombala Sawmill Project
 - o Environmental Management Strategy
- DWAU Sawmill, Bombala Modification 4 Assessment Report, NSW DPIE, April 2020.
- 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, 1 Sandy Lane, Bombala NSW, Benbow Environmental, May 2021.
- Bombala Sawmill (MP 07_0161) Annual Review 01 November 2020 to 01 November 2021,
- Bombala Sawmill (MP 07_0161) Annual Review 01 November 2021 to 31 October 2022, DWAU Australia Pty Ltd, 26 April 2023.
- Bombala Sawmill (MP 07_0161) Annual Review 01 November 2022 to 31 October 2023, DWAU Australia Pty Ltd, 7 December 2023.
- Correspondence with relevant authorities.
- Consultation records.
- Specialist reports.
- Records of implementation of the environmental management plans including checklists, inspection reports, etc.

A detailed list of the documents reviewed in undertaking the Audit is provided in **Appendix C - Audit Table**.

2.7 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in and as described in the DPHI 2020 Auditing Post Approval Requirement and summarised in [Table 6](#).

Table 6 - Compliance Descriptors

Status	Description
Compliant (C)	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed.
Non- Compliant (NC)	One or more specific elements of the conditions or requirements have not been complied with within the scope of the Audit.
Not Triggered (NT)	A requirement has an activation or timing trigger that has not been met at the time when the Audit was undertaken.
Noted	A statement or fact, where no assessment of compliance is required.

Following determination of the compliance status of each condition, the risk levels for each noncompliance were assessed in accordance with [Table 7](#).

Table 7 – Risk Assessment Matrix

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

3 Audit Findings

3.1 Compliance Performance

A summary of compliance performance is provided in Table 8.

Table 8: Compliance summary

Schedule	Number of Conditions	Compliant	Non-Compliant	Not Triggered	Noted
SSD 07_0161 MOD4					
1	Not used				
2	13	6	-	13	-
3	55	32	3	20	-
4	6	5	-	1	-
Total	74	43	3	23	-
Environment Protection Licence (# 11205)					
1	3	3	-	-	-
2	1	1	-	-	-
3	14	9	1	-	3
4	6	6	-	-	-
5	19	18	1	-	-
6	16	13	1	2	-
7	2	2	-	-	-
Total	63	52	3	2	3

3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions

No agency notices, warning letters, orders, penalty notices or prosecutions have been issued to the project during the audit period.

3.3 Incidents

The Auditor reviewed the incident register and noted there were no incidents that occurred that would require notification to DPHI or EPA. DWAU confirmed that no incidents were reported to EPA or DPHI during the audit period.

3.4 Community Complaints

The Auditor reviewed the complaints register and noted there were no community complaints have been received for the project during the audit period.

3.5 Actions from previous Audits

The status of implementation of the recommendations from the previous Independent Environmental Audit (IA2) Report, May 2021 has been included in Table 9 below.

Table 9: Actions from the previous IEA

Reference	Summary of Non-Compliance	Previous Recommendation	Evidence of implementation / Status
Noise			
NC-004	Condition 9 of Schedule 3 of MP 07_0161 requires that noise not exceed specified limits. Noise compliance reports prepared in the audit period found noise exceeded noise limits in this condition	A full noise impact assessment with noise modelling is recommended to address these non-compliances for noise.	A noise impact assessment was undertaken which confirmed noncompliance with the approved noise limits. An assessment of opportunities to mitigate noise against “reasonable and feasible criteria” was also undertaken by the acoustic consultant. The assessment concluded that reasonable and feasible measures had been implemented on site with discussions and negotiations for “at property treatments” at the nearest sensitive receivers have been undertaken.
NC-005	Condition 11 of Schedule 3 of MP 07_0161 required Noise Validation Reports that demonstrate compliance with noise limits in this consent. The reports show noise levels associated with specific aspects of the processes being undertaken exceed the noise limits.		
NC-012	EPL Condition L4.1 sets noise limits. Noise reports undertaken within the audit period show noise exceeds EPL limits.		
NC-013	EPL Condition L4.6 sets requirements to determine compliance with noise limits. It is noted that the sleep disturbance LAMAX criteria, location and level do not represent requirements of contemporary noise guidelines (Noise Policy for Industry 2017) and needs to be revised in a new full noise impact assessment for the site.		
NC-017	EPL Condition U1.3 requires a noise validation assessment to be undertaken. The assessment was undertaken, however each noise generating source and the contribution to the sensitive receivers was not undertaken. This was outside the scope of the validation report due to the difficulties establishing this detail from measurements alone.		

Reference	Summary of Non-Compliance	Previous Recommendation	Evidence of implementation / Status
Annual Review			
NC-001	Condition 4 of Schedule 2 of MP 07_0161 requires DWAU to comply with requirements of the Planning Secretary arising from the Department's assessment of strategies, plans, programs, reviews, audits or correspondence, and implementation of any actions or measures in these documents. The Department sent a letter following the previous 2018 audit requesting further actions including a report on actions taken to address each non-compliance in the audit and an Annual Review. No evidence of these further actions being done was provided to the Auditors.	No specific recommendation made by the previous audit.	The Auditor notes that this finding was related to the previous audit period and has not been considered further by this audit.
NC-009	Condition 2 of Schedule 4 of MP 07_0161 requires an Annual Review to be undertaken. This has not been done. It is noted that there appears to be some confusion with regard to the annual return required under the EPL and the Annual Review required as part of the project approval. These are separate reports.	No specific recommendation made by the previous audit.	Annual Reviews are now being undertaken. The following Annual Reviews were provided to the Auditor: • 2020-2021 • 2021-2022 • 2022-2023. Annual Returns are also prepared and submitted to the EPA in accordance with the EPL.
Waste Classification			
NC-006	Condition 26 of MP 07_0161 requires ash from the 2.5 MW and 15 MW wood-fired boilers that cannot be re-used or recycled in accordance with the NSW EPA Waste Classification Guidelines. It is noted ash has been tested with reference to the ash from burning biomass order (2014) with results indicating this therefore the ash cannot be applied to land does not apply. A waste classification has not been sighted during the audit and needs to be shown to allow the waste to be disposed of correctly.	No specific recommendation made	Options to recycle ash were investigated however none were deemed to be viable due to the elevated metals content within the ash. Cleanaway Environmental Services were engaged to remove the ash and dispose of it at an NSW EPA licenced landfill. Removal and disposal of ash recommenced on a regular basis in August 2023 and therefore this non-compliance will not be ongoing.
NC-008	Condition 29B of MP 07_0161 requires DWAU to classify all liquid and non-liquid wastes taken offsite in accordance with the Waste Classification Guidelines.	No specific recommendation made	The Auditor reviewed the waste tracking register for the period between 03/1/23 – 27/2/24 in addition to examples of waste records provided by the Waste

Reference	Summary of Non-Compliance	Previous Recommendation	Evidence of implementation / Status
	Evidence of this having been undertaken was not available during the audit.		Contractor (Cleanaway). The tracking register includes the following information: • Date of waste generated. • Waste classification. • Quantity. • Transporter. • Disposal location. • Docket and invoice number. The Waste Contractor is Cleanaway and most of the waste generated is classified as general solid waste (non-putrescible). The disposal location is Bega Central Waste Facility. The Bega Waste Facility holds an Environment Protection Licence to accept general solid waste (putrescible and non-putrescible).
NC-014	EPL Condition O5.1 requires any liquid and/or non-liquid waste generated or stored at the premises be assessed and classified in accordance with the Waste Classification Guidelines. Not all waste has been classified.	No specific recommendation made	The Auditor reviewed the waste tracking register for the period between 03/1/23 – 27/2/24 in addition to examples of waste records provided by the Waste Contractor (Cleanaway). The tracking register includes the following information: • Date of waste generated. • Waste classification. • Quantity. • Transporter. • Disposal location. • Docket and invoice number. The Waste Contractor is Cleanaway and most of the waste generated is classified as general solid waste (non-putrescible). The disposal location is Bega Central Waste Facility. The Waste Facility holds an Environment Protection Licence to accept general solid waste (putrescible and non-putrescible).
Air Monitoring Requirements			
NC-003	Condition 5 of Schedule 3 of MP 07_0161 requires air emissions not exceed emission limits specified in the EPL. Limits were exceeded during the audit period on one occasion for POINT 23–Redry Boiler for Volatile	No specific recommendation made	The results of air quality monitoring undertaken during the audit period are compliant with the EPL and CoA.

Reference	Summary of Non-Compliance	Previous Recommendation	Evidence of implementation / Status
	Organic Compounds and on one occasion for POINT 23–Redry Boiler for Nitrogen Oxide concentration.		
NC-011	EPL Condition L2.2 specifies air concentration limits that must not be exceeded. These were exceeded as noted in NC-003.	No specific recommendation made	The results of air quality monitoring undertaken during the audit period are compliant with the EPL and CoA.
NC-015	EPL Condition M2.2 requires monitoring to be undertaken at specific points at the site. During the audit period, the second round of air emission testing in 2020 was not undertaken due to COVID and POINT 38 was not monitored. It is noted that DWAU are in consultation with the EPA to have POINT 38 removed from the EPL.	No specific recommendation made	Point 38 is not referenced in Condition L2.2 of the EPL).
Revision of Plans			
NC-002	Condition 4 of Schedule 3 of MP 07_0161 requires the Dust and Wood Residue Monitoring Plan to be revised prior to commencement of operation of the 15 MW wood-fired boiler. No evidence was provided that this plan has been revised.	No specific recommendation made by the previous audit.	The Dust and Wood Residue Management and Monitoring Plan was updated on 15/9/21 to accommodate the additional 15MW boilers.
NC-007	Condition 27 of Schedule 3 of MP 07_0161 requires a Product Management Plan (PMP) to be prepared. The PMP does not contain all elements listed in this condition and needs to be revised.	No specific recommendation made by the previous audit.	The Product Management Plan has been periodically updated throughout the operational phase and since 2012 has been revised six times in response to EPA and DPHI feedback and to address modifications to the conditions of consent. The latest revision (Rev F) was approved by DPHI on the 18/11/21.
NC-010	Condition 3 of Schedule 4 of MP 07-0161 specified when revision of plans and programs needs to be undertaken. Verbal advice from the Department during the audit indicated that the expectation was for the proponent to make a judgement as to whether the plans are fit for purpose and revise accordingly.	The Auditors recommend a modification to this consent condition to reflect this advice.	The revision of management plans has been undertaken periodically throughout the audit period.

Reference	Summary of Non-Compliance	Previous Recommendation	Evidence of implementation / Status
Sampling and Testing of CCA Treated Timber			
NC-016	EPL Condition M7.2 requires sampling and testing of at least one batch of CCA treated timber using methods outlines in AS/NZS 2843.1:2006. A procedure is in place at the treatment plant, however site personnel advised testing was undertaken at random. No records are maintained.	Tests should be completed on at least one batch per month and records of results maintained.	The Auditor was provided with a copy of the Merck test report schedule covering the audit period. The following tests were performed. • 2021 – 8 tests per annum • 2022 – 6 tests per annum • 2023 – 9 tests per annum. DWAU noted that CCA treatment occurs upon demand for CCA-treated timber, which has reduced significantly over the past few years to the point that there are several months of the year where testing it is not undertaken. A recommendation is made that the testing register is updated to document the periods where no timber is produced, therefore no testing has been undertaken for those months.

The status of implementation of the recommendations from the Annual Review has been included in [Table 10](#) below.

Table 10: Actions from the Annual Review

Condition No.	Condition description	Comment	Evidence of implementation / Status
Sch 3 - 9	The Proponent shall ensure that noise generated by the project does not exceed the operational noise limits	Annual monitoring in accordance with the EPL and Project Approval recorded exceedances of noise limits	Annual monitoring is undertaken by a noise consultant. Exceedances have been recorded and are discussed elsewhere in this report.
Sch 3 - 14	Upon completion of building works, or within three (3) years of the date of the approval, a Validation Report and Site Audit Report and Statement must be completed	An internal review has identified that a Validation Report and Site Audit Report and Statement have not been completed.	Not completed. The procurement of an independent EPA site contamination Auditor has commenced.
Sch 3 - 26	Boiler ash is to be stored temporarily on-site for no more than three (3) months	Boiler ash was stored on site for a period of longer than three (3) months as options for potentially recycling and reusing were being investigated.	Cleanaway Environmental Services were engaged to remove the ash and dispose of at NSW EPA licenced landfill. Removal and disposal of ash recommenced on a regular basis

Condition No.	Condition description	Comment	Evidence of implementation / Status
			commenced in August 2023 and therefore compliance with this condition should be achieved on an ongoing basis.

3.6 Adequacy of Environmental Management Plans

The management plans reviewed by the Auditor include the following:

- Air Emissions Management Plan, Bombala Sawmill Project, September 2021
- Product Management Plan Bombala Sawmill Project, September 2021
- Dust and Wood Residue Monitoring and Management Plan
- Energy Efficiency Plan, Bombala Sawmill Project, 26/6/12
- Environmental Management Strategy

The management plans are comprehensive, fit for purpose and have been reviewed periodically throughout the audit period. DWAU have appointed an experienced team of environmental consultants to oversee the ongoing review and implementation of the management plans to ensure compliance and continual improvement.

3.7 Stakeholder Consultation Outcomes

Issues raised by project stakeholders that were consulted with prior to undertaking the Audit are summarised in [Table 11](#) with the Auditor's response to each issue.

Table 11: Key stakeholder issues and Auditor response

Organisation	Key Issues/Comments	Auditor Response
Department of Planning, Housing, and Infrastructure (DPHI)	Consult with the EPA	EPA were consulted with in preparing for the audit. Details of issues raised, and the Auditor's response is provided below.
	what mitigation works (physical, operation hours changes depending on weather etc) in relation to reducing noise have been done on site – did any of these require development consent;	Measures observed by the Auditor during the site inspection to minimise noise included: - Earth mounds. - Acoustic sheds (housing noisy items of plant and machinery). - Acoustic fences. - Acoustic roller doors. - Acoustic shields surrounding conveyors. In addition to the physical measures to mitigate noise, the operational hours have been reduced so there is no work undertaken during evening periods. Further details are provided in Appendix C. Site photographs in Appendix E provide examples of measures implemented to reduce noise impacts.
	what mitigation works have been undertaken at noise affected landholders	There have been no works at nearby neighbours to mitigate noise. Refer below for response relating to consultation undertaken with nearby residents.
	what correspondence and negotiations with noise affected landowners has been carried out (evidence of this, frequency);	Consultation with the two residents has been undertaken by the Acoustic Consultants with details provided in the Noise Impact Assessment (November 2023).  DWAU noted they are committed to progressing negotiations with the owners of both noise-affected properties to achieve an acceptable outcome.
	have all feasible and reasonable noise mitigation measures been carried out in relation to section 3 of the Noise Policy for Industry. What investigations into feasible and reasonable measures have taken place -	A Noise Impact Assessment has been undertaken. Table 6-6 of the Noise Impact Assessment provides an assessment of a range of additional acoustic controls against "reasonable and feasible" criteria. The measures included:

Organisation	Key Issues/Comments	Auditor Response
	are there further measures that could be implemented to reduce noise;	- At source controls - Transmission controls - At receiver controls The Auditor reviewed the NSW EPA "Noise Policy for Industry" and notes the assessment appears to be consistent with Section 3 of the Policy.
	Are the presented impacts correct and are they the best possible outcome	The Auditor cannot accurately determine whether the presented impacts are correct within the context of the scope of this audit. The Auditor notes there are no formal recorded noise complaints during the audit period, and this is a desirable outcome.
	Water and air quality management on site	Water and air quality management were being undertaken competently. Further details of measures implemented are provided in Appendix C.
	Evidence of compliance with commitments contained within all management plans	The Auditor reviewed several of the key management plans including the: - Air Emissions Management Plan - Soil and Water Management Plan - Dust and Wood Residue Monitoring and Management Plan - Environmental Management Strategy Sufficient evidence was provided to the Auditor to demonstrate the management plans have been implemented throughout the audit period.
	Comparison of EA predictions and actual for all parameters.	A comparison of the EA predictions with measured impacts are provided in Section 3.8 for the key environmental issues including noise, air emissions, dust and odour, surface water, groundwater, waste, and product management.
NSW Environment Protection Authority	Relevant conditions of SSD 07_0161 (Modification 4)	Please refer to Appendix C for an assessment of compliance with the relevant conditions of consent.
	Environmental Management Plans (EMP) and Sub-plans and other relevant post approval documents and the adequacy of the system to achieve	The Auditor reviewed several of the key management plans including the: - Air Emissions Management Plan - Soil and Water Management Plan - Dust and Wood Residue Monitoring and Management Plan - Environmental Management Strategy Sufficient evidence was provided to the Auditor to demonstrate the management plans have been implemented throughout the audit period.
	legislative requirements and drive performance improvements. EMPs should be	Examples of management plans reviewed and updated include the Product Management Plan, Air Emissions Management Plan, Dust and

Organisation	Key Issues/Comments	Auditor Response
	reviewed and updated on a regular basis. This should include consideration of complaint and incident handling, compliance tracking and reporting as well as the outcomes of any independent environmental audits	Wood Residue Management Plan and the Environmental Management Strategy. DWAU have appointed an experienced team of environmental consultants to implement the plans and manage compliance with the EPL and the CoA. This includes monthly environmental and compliance meetings with the DWAU management team so any compliance matters or issues may be addressed appropriately.
	Environment Protection Licence 11205	The Audit includes an assessment of compliance with EPL 11205, and this is included in Appendix C
	Pollution Incident Response Management Plan and specific procedures to address potential risks around turbine fires.	The project has prepared a Pollution Incident Response Management Plan (PIRMP). The current revision of the plan is dated 15/4/24 and was recently tested. EPA reference to turbine fires is not considered relevant to the audit as there are no turbines associated with the Project. Turbine fires are more relevant to windfarm projects.
	An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance.	A summary of the environmental performance is provided in the following sections: - Environmental Impacts during the audit period compared with predictions made in the environmental assessment and the physical extent of the works in relation to the approved project boundary is provided in Section 3.8. - A summary of compliance with both the EPL and the MCoA is provided in Section 3.1 with full details provided in Appendix C.
	Following a review of the Licensee's compliance history, the EPA also recommends the Audit focus on air emission sources, which has been the subject of several Pollution Reduction Studies and Programs, and the storage of chemicals and oils.	Air quality monitoring undertaken during the audit period confirmed compliance with the air quality criteria. A positive observation was made in relation to dust management on site. Chemicals and fuels were stored in appropriately sealed and covered area with properly constructed concrete bunds in place to prevent any spillage.
Snowy Monaro Council	Mud and or chip that can be deposited onto the Delegate Road exit from the Mill site. I understand that this is often unavoidable but does pose a risk for motorists.	There was no mud or chip observed on the Delegate Road exit from the Mill Site. Appropriate controls were in place including fully sealed carpark, driveways, and sealed access points, concrete paving of the stack yard and greenmill paving area. These measures appeared to be effective in preventing mud and woodchip tracking on local roads.

3.8 Actual Versus Predicted Impacts

An assessment of operational impacts against those predicted in the Environmental Assessment prepared by Wilmott Timbers is provided in [Table 12](#).

Table 12: Comparison with EA Predictions

Category	EA Prediction (Summary)	Actual Impacts
Noise	- Noise impact assessment undertaken for the EA concluded that the mill would be following the project specific noise levels for the site. - Compliance is achieved through the inclusion of two acoustic barriers and berms in the development. - Potential impact of traffic from the development is not considered to be excessive.	Noise measurements undertaken during the audit period confirm that compliance with the noise criteria in the EIS and the Conditions of Consent has not been achieved. Further details are provided in Appendix C.
Air Quality - Emissions	- Air assessment undertaken for the EA will meet the POEO (Clean Air Regulation) standard of concentration limits and the DECCW impact assessment criteria. Therefore, there is no risk to human health posed by the emissions. - Monitoring of the wood fired boiler emissions will be undertaken during the commissioning of the proposed mill to confirm POEO compliance of these discharges to confirm the POEO compliance of these discharges to air in view of the installation of multicones.	- Testing of air emissions during the audit period confirmed compliance with the air quality criteria. - No complaints have been received relating to air emissions during the audit period. - No incidents have been recorded or reported during the audit period relating to fugitive air emissions or odour.
Air Quality – Odour and dust	- No odour impacts beyond the site boundary are expected. - Dust control measures for the expanded mill are expected to mitigate potential dust impacts compared to current levels.	- Odour was not detected at the project boundary by the Auditor. - No visible dust was observed on or offsite. - No complaints have been received during the audit period relating to dust or odour. - No incidents have been recorded or reported during the audit period relating to dust or odour.
Soil, groundwater, surface water and wastewater	- Measures will be installed to reduce the potential for contaminated land - Existing contamination issues will be assessed and rectified. - Reuse of water will be maximised from clean pond storage for or treated wastewater to reduce the consumption of mains water.	- Measures installed to reduce the potential for contaminated land include concrete bunds for chemical storage, concrete hardstand areas and a geofabric layer to prevent the migration of chemicals to groundwater. - Spill kits were available throughout the site for deployment in the event of a spill with the potential to impact soil or groundwater. - A pollution incident response plan provides response measures to be initiated in the event of a chemical spill and is tested annually. - Actions to rectify existing contamination issues are yet to be undertaken

Category	EA Prediction (Summary)	Actual Impacts
		- Water collected from treated wastewater is beneficially reused for dust suppression. - No complaints have been received during the audit period relating to water or groundwater impacts. - No incidents have been recorded or reported during the audit period relating to water or groundwater.
Waste and Byproduct Management	- Wastes and biproducts generated at the site include general solid waste, liquid waste, treated waste and liquid waste - Waste steel will be recycled - Wood residues generated include bark waste, untreated timber and damaged boards, chips and sawdust, shavings will be reused for boiler fuel or sold - Operations will involve recycling, reusing or selling as much of the waste generated on site as possible	- Suitable waste storage areas are provided on site.. - Solid wastes are classified with a waste register kept up to date. - Liquid waste from septic systems is disposed to Bombala council sewage. - Steel recycling facilities have been provided and were being utilised at the time of the audit site inspection. - Commercial arrangements are in place for the reuse of timber biproducts. Clean wood chip is used to fuel the boiler.
Project Footprint	Figures D4 and D6 of the EA show the approved project boundary	All activities were observed to be with the project footprint described in the EA figures with no activities or storage of materials observed outside the approved EA project boundary.

3.9 Key Strengths

Key strengths were identified during the Audit as follows:

- DWAU have implemented a complex technology-based management system which provides real time monitoring information to ensure the efficient operation of the Sawmill, allowing the prompt identification and resolution of issues.
- The site layout appeared to be well organised with operations undertaken in a systematic and controlled manner. A reasonable degree of investment has been made in implementing measures to controls of key risks including dust, soil and water and noise.

3.10 Non-Compliances and Recommendations for Improvement

Auditor observations, non-compliances and recommendations identified during this Audit are summarised in [Table 13](#): below.

Table 13: Non compliances and other recommendations

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
SSD 070161 – Conditions of Consent				
Sch 3-5	Unless otherwise specified by the Secretary, the Proponent shall; a) Undertake air emissions monitoring in accordance with the EPL(s) for the site; and b) Ensure that emissions from the Project do not exceed the emissions limits specified by the EPA in the EPL(s) for the site.	The 2022/23 Annual Review notes that the Air Emissions Consultant “Ektimo” conducted an internal investigation which deemed it possible that a droplet of CCA liquid may have “splashed” up from the pool inside the CCA tank which inadvertently entered the sampling train. No further action was deemed currently necessary and during the next sampling event, results will be specifically reviewed for this parameter.	As noted in the 2002/23 Annual Review, the results of the next sampling round will be specifically reviewed for the CCA parameter. It is recommended this is added to the project action list to ensure the assessment is undertaken in the next round of monitoring.	Observation
Sch 3-9	The Proponent shall ensure that noise generated by the project does not exceed the noise limits presented in Table 3 or Table 4. (Refer to Appendix C for Tables 3 and 4)	Additional noise testing has been undertaken during the audit period. The noise testing confirms compliance has not been achieved with these conditions.	The following recommendations are made in relation to noise exceedances: • Conclude negotiations with affected residents and implement any agreed “at property” noise treatments as agreed with any resident. • Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure.	Non-Compliant
Sch 3-12	The Proponent shall provide and implement a Remedial Action Plan for the site to the satisfaction of the Secretary. The plan must; a) Be reviewed and endorsed by a suitably qualified independent expert (to be approved by EPA) and approved by the Secretary,	The Remedial Action Plan was approved in DPHI in 2011. The Remedial work has yet to be undertaken. A contaminated sites Auditor has been appointed to oversee the work.	It is recommended the Site Auditor reviews the RAP and any necessary changes are made as advised by the Site Auditor.	Observation

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
	prior to the commencement of any earth or building works on Zone 3; b) Identify the nature and extent of all contamination on the existing mill site (Lot 27 DP1061792), including any offsite impacts (for example on groundwater); c) Justify the remediation criteria for the site; d) Consider options for the remediation of each component of the contamination; e) Justify the remediation strategy proposed; f) Set out the timing and staging of all remediation works to be undertaken; g) Include a site of validation plan; and Demonstrate compliance with the <i>Contaminated Land Management Act 1997</i>			
Sch 3-14	Upon completion of all building works as described in the EA and 07_0161 MOD 1, or within 3 years of the date of this approval (whichever is sooner), or a time/s otherwise agreed to by the Secretary, the Proponent must provide to the Department, EPA and Council; a) A Validation Report, for the whole site, including results of groundwater monitoring, which has been subjected to a site audit in accordance with the <i>Contaminated Land Management Act 1997</i>, to confirm the appropriateness of the Validation Report. The Validation Report must be prepared in accordance with guidelines made or approved by EPA under Section 105 of the <i>Contaminated Land Management Act 1997</i>; and b) Copies of the Site Audit Report and Statement, for the whole site, certifying the appropriateness of the Validation Report(s). <i>Notes: for the purposes of condition 14, those areas of the site already covered by the validation report and statement prepared under condition... can be addressed by referencing the earlier report and statement, as long as the risks of recontamination of</i>	As previously reported to DPHI in the 2022-2023 Annual Review, compliance with this condition hasn't been achieved as a validation report and Site Audit Report has not been completed. DWAU noted that the process for completing this activity has commenced with the initiation of the procurement of an independent site Auditor.	It is recommended: - the remedial works are completed as soon as possible. - the validation report, and audit statement are also completed in accordance with this condition.	Non-Compliant

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
	<i>these areas are minimal.</i>			
Sch 3 - 26	The Proponent shall ensure ash from the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler is stored temporarily on-site for no more than three months in a dedicated concrete bunker. If the ash cannot be re-used or recycled, the Proponent shall classify the waste in accordance with the <i>EPA's Waste Classification Guidelines</i> and dispose of to a facility that may lawfully accept the waste.	During the audit period, boiler ash was stored on site for a period of longer than three (3) months as options for potentially recycling and reusing were being investigated	Cleanaway Environmental Services were engaged to remove the ash and dispose of it an NSW EPA licenced landfill. Removal and disposal of ash recommenced on a regular basis commenced in August 2023 and therefore compliance with this condition should be achieved on an ongoing basis. No additional recommendations are made over and above the actions taken.	Non-Compliant
Sch 4-1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted within 2 months of the date of this approval and approved by the Secretary prior to carrying out any construction; (b) be revised and approved by the Secretary, prior to the commencement of operations of each of the following Stages: Stage 3, Stage 6 and Stage 8 the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1); (c) provide the strategic context for environmental management of the project; (d) identify the statutory requirements that apply to the project; (e) describe in general how the environmental performance of the project would be monitored and managed; (f) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project;	Site environmental checklists have been prepared and are being implemented to provide a mechanism for checking and addressing any site or environmental concerns and issues. Environmental checklists are completed for the various work zones and buildings within the site such as the Despatch area, and the engineering workshop area. The inspections are undertaken by project operational staff. DWAU There currently does not appear to be a site wide checklist that addresses back of house working areas and general common areas.	Undertake a gap assessment of the current content and coverage of the existing site inspection checklists to ensure back of house and common areas are included through routine site inspections.	Recommendation
		The site induction has limited environmental content.	Review and update the site environmental induction to include the following (suggested items): • Incident response notification requirements. • Correct waste disposal requirement.	

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
	• receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and		• Operational hours. • Community etc. In addition to any other items advised by the environmental advisor.	
Environment Protection Licence # 11205				
L4.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2	Additional noise testing has been undertaken during the audit period. The noise testing confirms compliance has not been achieved with these conditions.	The following recommendations are made in relation to noise exceedances: • Conclude negotiations with affected residents and implement any agreed “at property” noise treatments as agreed with any resident. • Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure.	Non-Compliant
M 7.1	To determine compliance with Condition L4.1, attended noise monitoring must be undertaken in accordance with Conditions L4.5 and L4.6 and: - at the locations EPA Identification Points 32 and 33, as listed in Condition L4.1; - occur annually; - occur during each day, evening and night period as defined in the New South Wales Industrial Noise Policy (EPA 2000) for a minimum of:1.5 hours during the day;30 minutes during the evening; and1 hour during the night - occur for three consecutive days.	As noted in the 2021/2022 Annual Return document, Annual Noise monitoring did not occur within the Annual Return year.	DWAU have appointed an experienced team of environmental consultants to oversee the implementation of the environmental management plans, and to check and ensure compliance with the conditions of consent. Monthly management meetings are attended by the environment team who utilise this forum as a mechanism to check and ensure compliance outcomes are achieved including notifications and reporting obligations. The Auditor notes this is an appropriate mechanism to ensure all administrative, monitoring	Non-Compliant

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
			and reporting non compliances are addressed appropriately	
M 7.2	The licensee must monitor (by sampling and obtaining results by analysis) that timber, treated with copper chrome arsenate (CCA) preservative at the premises, is 'drip free' prior to movement of the treated timber from the sealed drip pad area, by: sampling at least one batch of CCA treated timber each month using the method outlined at Appendix C AS/NZS 2843.1:2006, Timber Preservation Plants - Timber preservation plant site design; and analysing the sample using a field test kit such as Merck Aquaquant Test Kit 1.14441.0001 or equivalent	The Auditor was provided with a copy of the Merck test report schedule covering the audit period. The following tests were performed. • 2021 – 8 tests per annum. • 2022 – 6 tests per annum. • 2023 – 9 tests per annum. Based on the average number of tests performed per annum, compliance with the requirement to undertake monthly tests has not been achieved. DWAU noted that CCA treatment occurs upon demand for CCA-treated timber, which has reduced significantly over the past few years to the point that there are several months of the year where testing it is not undertaken.	Update the testing register to document the periods where no timber is produced, and subsequently no testing has been undertaken for those months.	Observation
R 1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Evidence of the submission of electronic Annual Return Documents is provided on the EPA website. In summary the following Annual Returns were submitted to the EPA. • 3/5/22- 2/5/23 (submitted to EPA on 23 6/24). • 3/5/21- 2/5/22 (submitted to EPA on 01 November 2022). The 2021/22 Annual return document was not submitted to EPA within the required timeframe, therefore compliance with this condition has not been achieved.	DWAU have appointed an experienced team of environmental consultants to oversee the implementation of the environmental management plans, and to check and ensure compliance with the conditions of consent. Monthly management meetings are attended by the environment team who utilise this forum as a mechanism to check and ensure compliance outcomes are achieved including notifications and reporting obligations. The Auditor notes this is an appropriate mechanism to ensure all administrative, monitoring	Non-Compliant

Condition no	Summary of Condition (relevant requirements)	Audit Finding	Recommendation	Risk Level
			and reporting non compliances are addressed appropriately.	

Appendix A DPHI Auditor Approval

Department of Planning, Housing and Infrastructure



NSW Planning ref: MP07_0161-PA-25

Mr Toby Hobbs
Compliance Supervisor
DONGWHA AUSTRALIA PTY LTD
Dongwha Australia 1 Sandy Lane
Bombala New South Wales 2632
28/02/2024

Sent via the Major Projects Portal only

Subject: Dongwha Sawmill – Independent Environment Audit 2024 - Auditor approval request

Dear Mr Hobbs

Reference is made to your post approval matter, MP07_0161-PA-25, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit of the Dongwha Sawmill, submitted as required by Schedule 4, Condition 5 of MP07_0161 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 22 February 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that Mr Richard Peterson of Trigalana Environmental Pty Ltd is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Peterson to undertake the IEA and prepare the IEA report.

Please ensure this correspondence is appended to the IEA Report.

The IEA must be prepared, undertaken, and finalised in accordance with the conditions of approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact me on 029400261 or email compliance@planning.nsw.gov.au

Yours sincerely

Department of Planning, Housing and Infrastructure



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix B Auditor Declaration

Project name	Willmott Sawmill Project
Consent Number	07_0161
Description of Project	Operation of the Willmott Sawmill Project including the processing, cutting, treatment, temporary storage and dispatch of timber products.
Project Address	1 Sandy Lane, Bombala NSW
Proponent	Willmott Timbers Pty Ltd
Date	4 June 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

I declare that

- (i) the Audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- (ii) the findings of the Audit are reported truthfully, accurately and completely;
- (iii) I have exercised due diligence and professional judgement in conducting the Audit;
- (iv) I have acted professionally, objectively and in an unbiased manner;
- (v) I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;
- (vi) I do not have any pecuniary interest in the Audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- (vii) neither I nor my employer have provided consultancy services for the Audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- (viii) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for Auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so

Notes:

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

**Name of Auditor
Signature**

Richard Peterson



Qualification

BE Civil, M Environmental Management

Company:

Trigalana Environmental Pty Ltd

Appendix C Audit Table

SCHEDULE 2 - ADMINISTRATIVE CONDITIONS

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Obligation to Minimise Harm to the Environment				
1	The Proponent shall implement all reasonable and feasible measures to prevent and/ or minimise harm to the environment that may result from the construction, operation, or rehabilitation of the project.	- Site Inspection 10/4/24 - Documented evidence reviewed by the Auditor and noted in this audit report	Reasonable and feasible measures to prevent and minimise harm to the environment observed during the audit inspection included: - Installation of acoustic barriers and noise mounds to minimise noise impacts to surrounding residents - Properly constructed and covered concrete bunded chemical storage areas - Engagement of appropriately experienced and qualified environmental specialists to periodically review and provide advice to DWAU regarding the implementation of environmental measures - Sealed site areas and landscaped areas to prevent erosion, mud tracking and dust - Spill control kits placed throughout the site - Environmental monitoring - Preparation and implementation of Pollution Incident Response Management Please refer to Appendix E for photographic records of the measures implemented.	Compliant
Terms Of Approval				
2	The Proponent shall carry out the project generally in accordance with the following documents and plans and the recommendations made therein: a) EA:	This Audit report	The Project is being operated generally in accordance with the documents and plans as noted in this condition and as evidenced by	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	b) Response to Submissions; c) Statement of commitments; d) MOD 1: e) MOD 2: f) MOD 3: g) MOD 4: and h) Conditions of this consent.		compliance with the conditions of consent as noted in this audit report.	
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency.	Audit Interview 10/4/24	No inconsistencies identified by the Audit.	Not triggered
4	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) Any strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with this approval; and b) The implementation of any actions or measures contained in these documents.	Audit Interview 10/4/24	Day to day management of plans and updates. No specific directions received from the Department.	Compliant
Limits Of Approval				
5	The Proponent shall ensure that the quality of sawlogs received and treated timber produced each year at the site does not exceed; a) 400,000 tonnes of sawlogs a year; and b) 150,000 tonnes (140,000m3) of treated timber a year, upon the completion of all construction.	- Bombala Sawmill (MP07_0161_Annual Review): 01 November 2021 – 31 October 2022 - Bombala Sawmill (MP07_0161_Annual Review): 01 November 2022 – 31 October 2023	The Auditor reviewed the 2001/2022 and the 2022/23 Annual Reviews and note the following production levels are documented in Section 4.2 2021/2022 - Sawlogs received – 291,033 tonnes. - Treatment timber production 104,027 tonnes per annum. 2022/2023 - Sawlogs received – 264,434 tonnes. - Treatment timber production 66,795.6 tonnes per annum.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			These production rates are within the limits as described in this condition.	
Surrender of Consents				
6	Within 12 months of the date of this approval, or as otherwise agreed by the Secretary, the Proponent shall surrender all existing development consents and building applications for the project, to the satisfaction of the Secretary.	- Planning Consent 07_0161 dated 2010 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Outside the period of this audit.	Not triggered
Structural Adequacy				
7	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> <i>Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</i> <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.</i>	- Site Inspection 10/04/24 - Audit interview 10/4/24	The site inspection confirmed there were no new buildings, structures or alterations to buildings or structures during the audit period. This was confirmed by DWAU during the site interview. The only physical alteration to the buildings was the installation of an additional acoustic roller door and the installation of the door did not require any structural alterations to the existing buildings.	Not triggered
Demolition				
8	The Proponent shall ensure that all demolition work is carried out in accordance with the <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	- Site Inspection 10/04/24 - Audit interview 10/4/24	No demolition has been undertaken during the audit period or evidence of demolished buildings or structures observed during the audit site inspection.	Not triggered
Protection of Public Infrastructure				
9	The Proponent shall; a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development;	- Site Inspection 10/04/24 - Audit interview 10/4/24	DWAU advised that there has been no damage to any infrastructure during the Audit Period. The	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	and b) Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.		Auditor did not observe any damage to any infrastructure during the site inspection.	
Operation Of Plant and Equipment				
10	The Proponent shall ensure that all plant and equipment used on site is; a) Maintained in a proper and efficient condition; and b) Operated in a proper and efficient manner.	- Kone 12/16 T Service Schedule dated 3/10/23 - DWAU internal email dated 26/3/24 - Skiptons Inspections and Maintenance Engineering - Certificate of Inspection No 41840 dated 28/11/23	All equipment observed during the audit site inspection was observed to be operating effectively with no visible leaks, spills, smoke, or excessive noise generated. A dedicated facility has been established to provide maintenance support for all operational facilities of the plant. The main items of plant (such as the Hot Water Boiler) are subject to annual compliance testing with relevant Australian Standards.	Compliant
Management Plans/ Monitoring Programs				
11	With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	Audit interview 10/4/24	DWAU confirmed that there have not been any progressive submissions of management plans during the audit period.	Not triggered
Pre-Operation Compliance Audit				
12	Upon completion of all building works as described in the EA and 07_0161 MOD 1 or a time/s otherwise agreed to by the Secretary, the Proponent shall submit work as executed plans to the Department for all the development associated with the project. These plans must be prepared by a suitably qualified and experience expert and include plans showing the work as executed plans laid over the 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 approved plans to	2021 Independent Environmental Audit Report for DWAU, dated 11 May 2021	The building works were completed prior to the previous audit. Not triggered for this audit period.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	demonstrate that the development has been carried out in accordance with the approved plans.			
Australian Standards				
13	The Proponent shall ensure that the projects in constructed and operated in accordance with the relevant Australian Standards, particularly <i>AS/NZS 2843.1:2006 Timber preservation plants – Timber preservation plant site design</i> and <i>AS/NZS 2843.2:2006 Timber preservation plants – Timber area operation</i> , or their latest versions.	• Site Inspection 10/4/24 • Environmental Management Strategy, Bombala Sawmill Project, September 2021 • DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 5/3/23 • DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 27/10/23 • EnviroLab Certificate of Analysis 268125 dated 17/6/21 • Air Emissions Management Plan, Bombala Sawmill Project September 2021 • Noise Impact Assessment Prepared for Dongwha Australia, Pty Ltd, 30/11/23 • Merck fixate test report records and results (2018 – 2023) • Chain of custody form dated 30/5/21 • EnviroLab sample receipt advice dated 30/5/21 • EnviroLab Certificate of Analysis 268125 dated 17/6/21 • Pollution Incident Response Management Plan	Section 2.2 of the Environmental Management Strategy identifies the Australian Standards that are relevant to the operation of the Sawmill. Including: • AS/NZS 2843.1:2006 Timber preservation plants – Timber preservation plant site design and • AS/NZS 2843.2:2006 Timber preservation plants – Timber area operation, or their latest versions. Other relevant Australian standards are referenced in specialist environmental studies and reports including the Noise Impact Assessment, and emissions testing. Evidence reviewed by the Auditor to demonstrate the Sawmill is being operated in accordance with AS/NZS 2843.2:2006 • Fixate testing schedule and results • Testing for contamination of wood materials • Pollution Incident Response Management Plan • Spill management controls and spill kits observed during the audit site inspection • Maintenance records and testing of key items of plant and equipment.	Compliant

SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
AIR QUALITY				
Odour				
1	The Proponent shall not cause or permit the emission of offensive odours from the site as defined under Section 129 of the POEO Act.	- Audit site inspection 10/4/23 - Complaints registers (2022 and 2023) - Environment Protection Licence 11205 - Environment Protection Licence Annual Returns 23/6/23, 01/11/22, 17/6/21	The Auditor did not observe any offensive odours during the audit site inspection. This included an offsite olfactory odour assessment at the project boundary with no odours detected by the Auditor. There have been no odour complaints received during the audit period. The Auditor reviewed non compliances reported in EPL 11205 Annual Returns for 2021, 2022 and 2023 and notes there are no non-compliances reported with the EPL relating to odour (Specifically Condition L5).	Compliant
Dust				
2	The Proponent shall implement all reasonable and feasible measures to minimise dust generated by the project (this must include ensuring that all trucks carrying woodchips or wood residue have their loads covered).	- Audit site inspection 10/4/23 - Air Emissions Management Plan, Bombala Sawmill Project September 2021 - Skid steer sweeper attachment – Positrack – June 2022 Street sweeper attachment (photographic evidence)	Section 6.3 of the AEMP describes potential control measures to minimise dust impacts. During the site audit inspection, the following measures were observed to be implemented to prevent dust: - Fully sealed carpark, driveways, and sealed access points - Concrete paving of the stack yard and greenmill paving area - Permanent landscaping and grass covering/stabilisation of earth batters	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			There were no exposed or unstable surfaces such as soil stockpiles observed that may contribute towards dust generation. There was no observed vehicle tracking of dirt or on Sandy Lane or Delegate Road that would result in the generation of dust. A task observation by the Auditor noted that all trucks exiting the site were equipped with robust dust covers to prevent dust generation during transportation. Evidence was provided to the Auditor to demonstrate a street sweeper attachment has been purchased (in 2022) so that any material with the potential to generate dust could be removed. DWAU noted that a water cart is also available for deployment to prevent dust. Please refer to site photographs for more information.	
3	During construction, the Proponent shall ensure that: a) All trucks entering or leaving the site shall have their loads covered; b) Trucks associated with the project do not track dirt onto the public road network; and c) Public roads used by these trucks, in the vicinity of the site, are kept clean.	• N/A	Not triggered, this condition relates to the construction phase, although the Auditor notes that full compliance with this requirement has been achieved for the operational phase	Not triggered
4	The Proponent must prepare and implement a Dust and Wood Residue Monitoring and Management Plan to the satisfaction of the Secretary. The Plan must; a) Be prepared in consultation with the EPA and approved by the Secretary prior to the commencement of operation of the 15 MW Wood-fired boiler; b) Provide a detailed program for management of the existing	• Audit site inspection 10/4/23 • Letter from DPHI to DWAU Australia titled "DWAU Sawmill (MP07_0161) Dust and Wood Residue Monitoring and Management Plan" • Tax Invoice (Bark) dated 29/2/24 • Tax Invoice (Sawdust) dated 16/2/24	DPHI approved the Dust and Wood Residue Monitoring and Management Plan (DWRMMP) on the 29/1/21 noting the Department is satisfied it meets the requirements of Condition 4. The Auditor reviewed the DWRMP, evidence observed during the site inspection and notes the following:	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	wood residue stockpile; i. Describing how the stockpile would be monitored and managed; ii. Describing the disposal options and progress achieved to date; iii. Setting out the disposal strategy to be implemented, with detailed staging, linking to the stages of the mill expansion, and timing for complete removal of the stockpile; iv. Outlining the contingency measures that would be implemented should the management of the stockpile prove insufficient, or the disposal strategy be delayed; c) Quantify the volumes of wood residue to be produced once operating at full capacity; d) Demonstrate that these volumes can be appropriately stored and disposed of; e) Provide a monitoring strategy to identify; i. Any potential or actual failings in the management of dust and wood residue; ii. When excess wood residue is being produced and when milling is required to cease to avoid exceeding the capacity of the storage area; and f) Outline the contingency measures that would be implemented should; i. The management measures prove insufficient; ii. The disposal options change; or iii. The wood residue produced exceeded the storage capacity on site.	• Tax Invoice (Shavings) dated 29/2/24 • Tax Invoice (Woodchips) dated 29/2/24	• Dust appeared to be managed effectively on site in accordance with Section 1.2 of the DWRMMP • Bark, timber shavings, sawdust and wood chips are removed from site by external contractors with tax invoices provided to the Auditor • Temporary storage is provided on site in concrete storage bunkers (refer to Photographs in Appendix E) in accordance with Section 2.3.2 of the DWRMMP.	
Emission Limits				
5	Unless otherwise specified by the Secretary, the Proponent shall; a) Undertake air emissions monitoring in accordance with the EPL(s) for the site; and b) Ensure that emissions from the Project do not exceed the emissions limits specified by the EPA in the EPL(s) for the	• DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 5/3/23 • DWAU Australia, Bombala Half	April 2023 - Report dated 5/3/23 – Compliant. It is noted that type 1 and 2 substances emissions from the C1 Vacuum Pump Exhaust were outside the NSW EPA Licence limit of	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	site.	Yearly Emission Testing Report, Report Number R014585, Ektimo dated 27/10/23 Bombala Sawmill (MP07_016), Annual Review, 01 November 2022 to 31 October 2023, dated 07/12/23	1mg/m3 at STP dry. Emissions from this location have been tested on ten previous occasions since 2015 with results almost exclusively being measured below 0.1mg/m3 at STP dry. Accordingly, the most recent result could be considered anomalous considering previous measurements. The 2022/23 Annual Review notes that the Air Emissions Consultant “Ektimo” conducted an internal investigation which deemed it possible that a droplet of CCA liquid may have “splashed” up from the pool inside the CCA tank which inadvertently entered the sampling train. No further action was deemed currently necessary and during the next sampling event, results will be specifically reviewed for this parameter. Recommendation As noted above the results of the next sampling round will be specifically reviewed for the CCA parameter. It is recommended this is added to the project action list to ensure the assessment is undertaken in the next round of monitoring.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
5A	Within three months of the commissioning of the 15 MW Wood-fired Boiler (under normal operating conditions and using the fuel mix proposed to be used, as described in MOD 3), the Proponent shall prepare an Air Emissions Validation Report to the satisfaction of the EPA and the Secretary. The report shall: a) Verify that air emissions meet the relevant Group 6 emission limits specified in Schedule 4 of the <i>Protection of the Environment (Clean Air) Regulation 2010</i>; and b) If any non-compliances are detected during this performance monitoring, describe the measures that would be implemented and the timing for the implementation of these measures, to ensure compliance.	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
5B	Prior to commencing construction of the 15 MW Wood-fired Boiler, the Proponent must provide additional design information and manufacturers specifications to the satisfaction of the Secretary and the EPA. Including: a) Emissions controls to be constructed and the associated emissions guarantees; b) Demonstration that the boiler will achieve the prescribed concentrations contained in the <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i>; and c) Confirmation that a discharge sampling port will be installed in accordance with the TM-1 contained in the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i>. <i>Note: This information will be utilised by the EPA for the development of licence limits within the EPL.</i>	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
Boiler Fuel				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
5C	The Proponent shall ensure only unused and uncontaminated wood material is utilised within the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler.	- Audit site inspection 10/4/23. - Chain of custody form dated 30/5/21 - EnviroLab sample receipt advice dated 30/5/21 - EnviroLab Certificate of Analysis 268125 dated 17/6/21	The Auditor inspected the wood fuel burners and noted that clean wood materials were being utilised. The material was stored in area with no chemicals or fuels stored nearby that could potentially contaminate the fuel. Samples of woodchip were tested in 2021 for a range of contaminants including Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Zinc, Molybdenum, Selenium, Boron, Ca Cl2 extract). The results of the laboratory analysis did not detect any of the tested contaminants. Please refer to site photographs for more information.	Compliant
5D	The Proponent shall ensure Copper Chrome Arsenate treated timber is not utilised within the 15 MW Wood-fire Boiler and 2.5 MW Wood-fire Boiler.	- Product management plan - Audit Site Inspection 10/04/24	The Auditor inspected the wood fuel burners and noted that clean wood materials were being utilised. The material was stored in area with no chemicals or fuels stored nearby that could potentially contaminate the fuel. CCA treated timber is not being woodchipped.	Compliant
5E	The Proponent shall ensure they conduct fuel quality testing of the timber to be utilised within the 15 MW Wood-fire boiler and 2.5 MW Wood-fire Boiler.	- Audit site inspection 10/4/23. - Chain of custody form dated 30/5/21 - EnviroLab sample receipt advice dated 30/5/21 - EnviroLab Certificate of Analysis 268125 dated 17/6/21	Samples of woodchip were tested in 2021 for a range of contaminants including Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Zinc, Molybdenum, Selenium, Boron, Ca Cl2 extract). The results of the laboratory analysis did not detect any of the tested contaminants.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
H2F Timber Spray System				
5F	Prior to commencing the H2F spray system, the Applicant must provide the following to the satisfaction of the Planning Secretary and the EPA; a) A performance guarantee (or similar) which confirms the demister is fit-for-purpose for controlling emissions of bifenthrin; and b) A risk review of bifenthrin emissions from the spray unit based on the expected performance of the demister and plant operating conditions, including volumes of pesticide used.	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
5G	Within 3 months of commencing operation of the H2F spray system, the Applicant must undertake the following post-commissioning testing to the satisfaction of the Planning Secretary and EPA; a) Testing on the outlet of the H2F demister fan exhaust to confirm the environmental performance of the demister. The Applicant must perform at least one round of monitoring for the following parameters and analytes; temperature, velocity, moisture, Bifenthrin and Volatile organic compounds, in accordance with the sampling and analysis methodology specified in the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i>. If the Approved Methods do not specify the sampling and analysis methodology, such as for Bifenthrin, the method used should; • Be based on a recognised, published standard or reference method; • Be demonstrated to be fit for purpose; and • The facility conducting the analysis should be familiar with and, where practicable, accredited under ISO 17025 for the analytical method.	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Air Emissions Management Plans				
6	The Proponent shall prepare and implement an Air Emissions Management Plan to the satisfaction of the Secretary. This plan must; a) Be prepared in consultation with the EPA and approved by the Secretary prior to operation of the new; dry mill or treatment plant or green mill or boiler/s or kiln or streamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1); b) Be updated prior to the operation of the 15 MW Wood-fire Boiler, to the satisfaction of the Secretary and the EPA; c) Be prepared in accordance with the requirements of the <i>"Approved Methods for the sampling and analysis of air pollutants in NSW"</i>; d) Identify the air emission limits for the project; e) Demonstrate that the ground level concentration would comply with the requirements of the <i>"Approved methods for the modelling and assessment of air pollutants in New South Wales"</i>; f) Describe the treatments, controls and operational practices to be implemented to manage air emissions, demonstrating best practice process design and emission control; g) Include a program for the ongoing monitoring and reporting of air emissions from the project, describing the location, frequency, method, and pollutants to be monitored; and h) Outline the contingency measures that would be implemented should any air emission limits be exceeded.	- Air Emissions Management Plan, Bombala Sawmill Project September 2021 - Letter from DPHI to DWAU Australia titled "DWAU Sawmill (MP07_0161) Air Emissions Management Plan" dated 24/11/21	The Air emissions management plan was prepared and approved by the Planning Secretary in November 2021. The following was observed by the Auditor during the site inspection: - Weather monitoring station - Dust control measures (refer to Condition 2 (schedule 3)) - Exhaust, extraction processes and enclosures to prevent the fugitive emissions of airborne particles during debarking and timber cutting processes - Enclosed conveyor systems	Compliant
Meteorological Monitoring				
7	During the life of the project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the latest versions of <i>Approved</i>	- Weather monitoring station data (April 2023) - Audit site inspection 10/4/23.	During the site inspection a weather station was observed to be installed. An example of data	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status														
	Methods for Sampling and Analysis of Air Pollutants in New South Wales guidelines.		collected from the weather monitoring station was reviewed by the Auditor.															
NOISE																		
Construction and Operation Hours																		
8	The Proponent shall comply with the construction and operation hours in Table 2. Notes: - Construction and demolition activities may be conducted outside the hours in Table 2 provided that the activities are not audible at any residence beyond the boundary of the site; and - Emergency work to avoid the loss of life, property and/ or prevent environmental harm may be undertaken outside the hours in Table 2. Table 2: Construction and Operation Hours <table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="2">Construction and Demolition</td><td>Monday- Friday</td><td>7am – 6pm</td></tr><tr><td>Saturday, Sunday, and Public Holidays</td><td>8am - 1pm Nil</td></tr><tr><td>Operations – Log Yar, Green Mill and Product Dispatch</td><td>Monday - Saturday</td><td>6am- 10pm</td></tr><tr><td>All other operations</td><td>All days</td><td>All hours</td></tr></table>	Activity	Day	Time	Construction and Demolition	Monday- Friday	7am – 6pm	Saturday, Sunday, and Public Holidays	8am - 1pm Nil	Operations – Log Yar, Green Mill and Product Dispatch	Monday - Saturday	6am- 10pm	All other operations	All days	All hours	- Complaints register - Bombala Sawmill (MP07_016), Annual Review, 01 November 2022 to 31 October 2023, dated 07/12/23 - Complaints register	The following working hours were noted by DWAU during the audit interview and documented in the 2022/23 Annual Review. - Log Yard – Monday to Thursday (6am – 4pm and Friday 6am – 12pm) - Green Mill – Monday to Thursday (6am – 4pm and Friday 6am to 6pm - Treatment Plant – Monday to Thursday 6am – 1pm and Friday 6am – 6pm 15MW Wood fired boiler – Monday to Sunday 6am to 6pm (i.e continuously) The above operational hours are within the limits prescribed by this condition. The Auditor notes that there is no work being undertaken during evening periods (6pm) and this provides additional respite to local sensitive receivers. No complaints have been received for any activities that have occurred outside these working hours.	Compliant
Activity	Day	Time																
Construction and Demolition	Monday- Friday	7am – 6pm																
	Saturday, Sunday, and Public Holidays	8am - 1pm Nil																
Operations – Log Yar, Green Mill and Product Dispatch	Monday - Saturday	6am- 10pm																
All other operations	All days	All hours																
Noise Limits																		
9	The Proponent shall ensure that noise generated by the project does not exceed the noise limits presented in Table 3 or Table 4.	Letter from DPHI to DWAU titled “DWAU Sawmill (MP07_0161)	Additional noise testing has been undertaken during the audit period. The noise testing	Non-Compliant														

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																						
	Table 3: Operation Noise Limits (dBA) <table><tr><th>Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr><tr><td rowspan="2">Any Residence</td><td>L_{Aeq} (15min)</td><td>L_{Aeq} (15min)</td><td>L_{Aeq} (15min)</td><td>L_{Amax}</td></tr><tr><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> Table 4: Construction Noise Limits (dB(A)) <table><tr><th>Location</th><th>Day</th></tr><tr><td></td><td>L_{Aeq} (15min)</td></tr><tr><td>Wedmore Road, west</td><td>45</td></tr><tr><td>Any Other Residence</td><td>40</td></tr></table> Notes: - Unless specified in the EPL; - Noise emission limits apply under all meteorological conditions except for any of the following a) Wind speeds greater than 3 m/s at 10 meters above ground level; or b) Stability category G temperature inversions conditions; or c) Stability category F temperature inversions conditions and wind speeds greater than 2m/s at 10m above ground level. - To determine compliance with this condition, noise from the department must be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary and within 1 m of a dwelling façade, to determine L_{Amax} noise limits. - However, where it can be demonstrated that direct measurement of noise from the development is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.	Location	Day	Evening	Night		Any Residence	L _{Aeq} (15min)	L _{Aeq} (15min)	L _{Aeq} (15min)	L _{Amax}	35	35	35	45	Location	Day		L _{Aeq} (15min)	Wedmore Road, west	45	Any Other Residence	40	Annual Review 1 November 2022 to 31 October 2023" dated 15/12/23 • Bombala Sawmill (MP07_016), Annual Review, 01 November 2022 to 31 October 2023, dated 07/12/23 • Noise Impact Assessment Prepared for Dongwha Australia, Pty Ltd, 30/11/23	confirms compliance has not been achieved with these conditions. Recommendation The following recommendations are made in relation to noise exceedances: • Conclude negotiations with affected residents and implement "at property" noise treatments as agreed with any resident. • Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure.	
Location	Day	Evening	Night																							
Any Residence	L _{Aeq} (15min)	L _{Aeq} (15min)	L _{Aeq} (15min)	L _{Amax}																						
	35	35	35	45																						
Location	Day																									
	L _{Aeq} (15min)																									
Wedmore Road, west	45																									
Any Other Residence	40																									
10	Prior to the operation of the new dry mill, the Proponent must ensure that noise barriers are installed in order to comply with the noise limits presented in Table 3.	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 • Audit site inspection 10/4/23	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled	Not triggered																						

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			and compliance with the condition had been achieved. The Auditors observations during the site inspection are consistent with the previous audit findings	
10A	Construction activities associated with the instillation of the 15 MW Wood-fire Boiler shall be undertaken in a manner that minimises noise emissions from the site in accordance with the <i>Interim Construction Noise Guidelines (DECC 2009)</i> and documentation supporting MOD 3.	N/A	Condition relates to construction and is therefore outside the scope of the audit period.	Not triggered
10B	Jackhammering and concrete cutting activities associated with the installation of the 15 MW Wood-fired Boiler shall only occur between the hours of 9am and 5pm, Monday to Friday.	N/A	Condition relates to construction and is therefore outside the scope of the audit period.	Not triggered
Noise Validation Report				
11	The Proponent shall prepare Noise Validation Reports, to the satisfaction of the Secretary. The reports must; a) Be undertaken - Within 3 months of the commencement of construction, while working under normal construction and operational conditions (i.e. it is expected that the mill will still be operating during most stages of construction and the cumulative noise levels of all works on site must be measured); - Within 3 months of the completion of the building works as described in the EA and 07_0161 MOD 1 or a time otherwise agreed to by the Secretary, - Within 3 months of the commencement of operation of the 15MW Wood Fired Boiler whilst operating; and - Under normal conditions following the receipt of a complaint, if requested by the Secretary; b) Be submitted to EPA and the Secretary within 1 month of each time identified in (a) above;	Noise Impact Assessment Prepared for Dongwha Australia, Pty Ltd, 30/11/23	The Auditors response to each item in this condition is as follows: - These requirements are outside the audit period and are therefore item (i) has not been triggered - These requirements are outside the audit period and are therefore item (ii) has not been triggered triggered - There have not been any complaints during the audit period, therefore item (iii) has not been triggered A noise impact assessment was prepared in November 2023 in response to the previous audit recommendations and non -compliance with the site noise criteria outlined in Schedule 3 Condition 9.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	c) Validate the predictions made in the EA; d) Demonstrate compliance with the limits of this approval; e) Demonstrate the noise controls are working effectively and; f) If any non-compliances are detected, describe the measures that are to be implemented and the timing for implementation of these measures to ensure compliance.			
SOIL, SURFACE AND GROUND WATER				
Remediation				
12	The Proponent shall provide and implement a Remedial Action Plan for the site to the satisfaction of the Secretary. The plan must; a) Be reviewed and endorsed by a suitably qualified independent expert (to be approved by EPA) and approved by the Secretary, prior to the commencement of any earth or building works on Zone 3; b) Identify the nature and extent of all contamination on the existing mill site (Lot 27 DP1061792), including any offsite impacts (for example on groundwater); c) Justify the remediation criteria for the site; d) Consider options for the remediation of each component of the contamination; e) Justify the remediation strategy proposed; f) Set out the timing and staging of all remediation works to be undertaken; g) Include a site of validation plan; and Demonstrate compliance with the <i>Contaminated Land Management Act 1997</i>.	• Letter from DPHI to DWAU titled: Bombala Sawmill Project (07_0161) Management Plans dated 10/11/21 • DWAU Timbers Pty Ltd, Remedial Action Plan	The Remedial Action Plan was approved in DPHI in 2011. The Remedial work has yet to be undertaken Recommendation It is recommended the Site Auditor reviews the RAP and any necessary changes are made as advised by the Site Auditor.	Compliant
13	Prior to the commencement of building works on contaminated areas Zone 3 (as described in the Remedial Action Plan required by Condition 12 of this Schedule), the Proponent must provide Validation Report and Site Audit Report and Statement covering the areas of the site which have been remediated; The: a) The Validation Report and Site Report and Statement	• Audit site inspection 10/4/23	Visual observations made during the site inspection and interviews with DWAU personnel confirm that no remediation works have taken place (except for removal of tanks and buildings).	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	must be provided to the Department, EPA and Council, certifying the appropriateness of the validation report; and the b) Validation report must also; i. Be prepared in accordance with the guidelines made or approved by the EPA under section 105 of the <i>Contaminated Land Management Act 1997</i>; ii. Be subject to a Site Audit in accordance with the <i>Contaminated Land Management Act 1997</i> to confirm the appropriateness of the Validation report; iii. Include the results of surface and groundwater monitoring.		Building works have not commenced. .	
14	Upon completion of all building works as described in the EA and 07_0161 MOD 1, or within 3 years of the date of this approval (whichever is sooner), or a time/s otherwise agreed to by the Secretary, the Proponent must provide to the Department, EPA and Council; a) A Validation Report, for the whole site, including results of groundwater monitoring, which has been subjected to a site audit in accordance with the <i>Contaminated Land Management Act 1997</i>, to confirm the appropriateness of the Validation Report. The Validation Report must be prepared in accordance with guidelines made or approved by EPA under Section 105 of the <i>Contaminated Land Management Act 1997</i>; and b) Copies of the Site Audit Report and Statement, for the whole site, certifying the appropriateness of the Validation Report(s). <i>Notes: for the purposes of condition 14, those areas of the site already covered by the validation report and statement prepared under condition... can be addressed by referencing the earlier report and statement, as long as the risks of recontamination of these areas are minimal.</i>	- Letter from DPHI to DWAU titled "DWAU Sawmill (MP07_0161) Annual Review 1 November 2022 to 31 October 2023" dated 15/12/23 - Bombala Sawmill (MP07_016), Annual Review, 01 November 2022 to 31 October 2023, dated 07/12/23	As previously reported to DPHI in the 2022-2023 Annual Review , compliance with this condition hasn't been achieved as a validation report and Site Audit Report has not been completed. DWAU noted that the process for completing this activity has commenced with the initiation of the procurement of an independent site Auditor. Recommendation It is recommended: - the remedial works are completed as soon as possible. - the validation report, and audit statement are also completed in accordance with this condition.	Non-Compliant
Water Pollution				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
15	The Proponent shall not cause or permit any waters to be polluted, as defined under Section 120 of the POEO Act.	- Audit interview 11/4/24 - Site Inspection 11/4/24 - Environment Protection Licence Annual Returns 23/6/23, 01/11/22, 17/6/21 - Pollution Incident Response Management Plan - Complaints registers 2022/2023	There was no evidence of water pollution observed by the Auditor during the audit site inspection. The site has been rehabilitated in most areas with grass and landscaping with permanent hardstand provided in trafficable areas to prevent sedimentation. Chemicals were stored in appropriately bunded areas. No incidents have been reported to EPA during the audit period. The project has a Pollution Incident Response Management Plan which is tested and updated annually. No complaints have been received during the audit period relating to water pollution.	Compliant
Bunding				
16	All chemicals shall be stored in: a) Appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% (or 120%, where required by the Australian Standards) of the largest container stored within the bund. The bund(s) shall be: i. Designed in accordance with: - The requirements of all relevant Australian Standards; and - The EPA's <i>Storing and Handling Liquids: Environmental Protection – Participants Manual</i>; b) Accordance with the Australian Standard AS1940-2004 <i>the storage and handling of flammable and combustible liquids</i>; and c) Areas above the 1% AEP flood level so as not to cause pollution or hazards during any flood.	- Audit interview 11/4/24 - Site Inspection 11/4/24 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 - Pollution Incident Response Management Plan	Section 6 of the Pollution Incident Response Management Plan provides a summary of the chemicals stored on site and the capacity of each storage location. In summary, the following storage facilities are provided on site: <u>Location 1 – Fully bunded roofed bunker</u> 70,000L steel vertical tank 26,000L stainless steel vertical tank <u>Location 2 – Bunded roofed store.</u> 24,000L (24x1000L IBC's) <u>Location 3 – Self Contained Storage</u>	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			70,000L steel vertical tank <u>Location 4 – bunded roofed store</u> 1000L IBC 3000 L IBC <u>Location 5 – self-contained storage</u> 50,000L Self bunded steel tank Bulk Chemicals were observed to be stored in properly constructed and covered concrete bund with smaller fuel and chemicals stored on mobile bunds on hardstand surfaces, and generally undercover. Refer to Appendix E for photographs of site bunding and chemical storage areas.	
17	The Proponent must implement suitable measures to ensure; the integrity of the bunds is maintained, and to prevent and manage spills on site. These measures must not include; a) Any inventory system to accurately measure and report on production losses; b) An early warning leak detection and prevention system, certified by an accredited site Auditor; c) A bund, tank and pipeline integrity assessment program; and d) A spill prevention and management system, including; i. A Spill Response and Prevention Plan; ii. A Monitoring Program; and iii. Staff training.	- Site Inspection 10/4/24 - Pollution Incident Response Management Plan	The chemical storage bund, tank and pipeline system is operated using a computerised control system which provides an inventory to measure and report production losses, and to provide early warning leak detection. The Auditor was provided with an overview of the system during the audit site inspection. The Pollution incident response management plan provides details of: - Description and likelihood of hazards - Pre-emptive actions to be taken to avoid a pollution incident - Inventory of pollutants - Safety equipment - Processes for minimising harm and for communicating to neighbours	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			The PIRMP is tested Annually.	
18	From the commencement of operations of the new treatment plant onwards, the Proponent must ensure that; a) All treated timber is managed in accordance with the Australian Standard AS/NZS 2843.1:2006 <i>Timber preservation plants – Timber preservation plant site design, or its latest version; and</i> b) All treated timber undergoing CCA-fixation is stored on an impermeable surface and any runoff collected from these areas is separated from runoff that is not contaminate with the CCA.	- Audit site inspection 10/4/24 - Merck fixate test report records and results (2018 – 2023)	All treated timber undergoing CCA fixation was stored within an impermeable concrete bunded and covered area. Fixation testing is undertaken. All timber being treated was stored on an impermeable surface in a covered and bunded area. There was no CCA runoff observed during the audit site inspection.	Compliant
Fill				
19	Any fill material brought to site must be Virgin Excavated Natural Material or material subject to a Resource Recovery Exemption that is permitted to be used as a fill material, in accordance with the provisions of the <i>Protection of the Environment (Waste) Regulation 2005</i>. <i>Note: Any fill material subject to a Resource Recovery Exemption received at the site must be accompanied by documentation demonstrating that material's compliance with the conditions of the exemption, and this documentation must be provided to the Department, Council or the Principle Certifying Authority on request.</i>	- Audit interview 10/4/24 - Audit site inspection 10/4/24	There were no observed stockpiles of material imported to site or evidence thereof. DWAU confirmed there was no fill material imported to the site during the audit period.	Not triggered
Management				
20	The Proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Secretary. This plan must; a) Be approved by the Secretary prior to the commencement of any works on site; b) Be prepared in consultation with Council and EPA (including the Office of Water); c) Include;	- Audit site inspection 10/4/24 - Soil and Water Management Plan, Bombala Sawmill Project, August 2023 - Results of Environmental Monitoring for EPL No 11205. Annual Return 2023-2024: Soil, Surface Water and Groundwater, Bombala Sawmill,	The Soil and Water Management Plan was updated during the audit period and approved by DPHI on Evidence of implementation observed during the audit site inspection included: - Stormwater ponds - Stabilised site access	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	i. A Site Water Balance; ii. A Sediment and Erosion Control Plan; iii. A Stormwater Management Scheme; and iv. A Soil and Water Monitoring Program.	Sandy Lane Bombala, NSW, January 2024 Letter from DPE to DWAU titled "Dongwha Timber Mill (07_0161) – Approval of Updated Soil and Water Management Plan" dated 31/10/23	- Hardstand carparking area - Street sweeper and - Revegetated areas providing groundcover to prevent runoff Clean and uncontaminated site runoff water is extracted and re-used for dust suppression. There is limited opportunity to re-use runoff water for the operation of mechanical plant due to technical requirements. In accordance with the SWMP, testing is undertaken of both surface water, groundwater and soil with results reported to the EPA Annually with the EPL Annual Return.	
21	The site Water Balance for this project must: a) Identify and quantify all water uses on site; b) Include a detailed description of the water management and reuse on site; c) Demonstrate 100% reuse of CCA condensate would be achieved in the treatment plant; d) Quantify the wastewater quality and flows, from each wastewater stream and describe the reuse or disposal method for these wastewater streams; e) Describe the reporting procedures and contingency measures that would be implemented in the event of any issues with the water management and or reuse infrastructure; f) Include detailed consideration of all available options to reduce the water use of the project; and g) Demonstrate that all reasonable and feasible measures to minimise water use would be implemented.	- Soil and Water Management Plan, Bombala Sawmill Project, August 2023 - Letter from DPE to DWAU titled "Dongwha Timber Mill (07_0161) – Approval of Updated Soil and Water Management Plan" dated 31/10/23	The SWMP contains the information required by this condition and was approved by DPHI on 31/10/23.	Compliant
22	The Sediment and Erosion Controls for the project must: a) Be endorsed by an Accredited Site Auditor; b) Be consistent with the requirements of Landcom's (2004)	N/A	The condition relates to construction, demolition, and remediation. None of these activities has	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<i>Managing Urban Stormwater: Soils and Construction</i> manual; c) Manage activities that could cause soil erosion and generate sediment; d) Minimise soil erosion and the potential for the transport of sediment to downstream waters; e) Describe the location, function and capacity of erosion and sediment control structures; f) Describe the measures to be implemented to maintain these structures overtime; and g) Be implemented prior to the commencement of any construction, demolition or remediation and be maintained for as long as necessary to control erosion and sediment on site.		occurred during the audit period, therefore this condition has not been triggered.	
23	The Stormwater Management Scheme must: a) Be prepared in accordance with the EPA's <i>Management Urban Stormwater: Council Handbook</i>; b) Include details of; i. Pre and post development flows; ii. Water quality; iii. The rainwater harvesting and reuse infrastructure to be installed; iv. The stormwater treatment, drainage and retention infrastructure, ensuring there is sufficient capacity to handle the 4% AEP, 144 hour rainfall depth storm event; v. The measures to manage flow during a 1% AEP event; and vi. The measures to be implemented to monitor and manage the stormwater quality and quantity and maintain the stormwater infrastructure over time.	Soil and Water Management Plan, Bombala Sawmill Project, August 2023	Section 5 of the SWMP provides details of the requirements of this condition	Compliant
24	The Soil and Water Monitoring Program must; a) Include detailed data on the existing soil, surface and groundwater quality; b) Identify the potential pollutants from the project; c) Identify the soil, surface water, groundwater and	Results of Environmental Monitoring for EPL No 11205. Annual Return 2023-2024: Soil, Surface Water and Groundwater, Bombala Sawmill, Sandy Lane Bombala, NSW,	Section 8 of the SWMP provides details of the requirements of this condition.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	wastewater impact assessment criteria; d) Describe the monitoring strategy to be implemented, including details of the; i. Monitoring locations; ii. Sampling frequency; iii. Sampling methods; e) Include justification for the proposed monitoring strategy; f) Describe how the monitoring results will be assessed and reported; g) Outline the contingency measures that would be implemented should monitoring identify any exceedance of the impact assessment criteria.	January 2024 Soil and Water Management Plan, Bombala Sawmill Project, August 2023		
25	Prior to undertaking any irrigation, the Proponent must prepare and implement an Irrigation Management and Monitoring Plan to the satisfaction of the Secretary. The plan must; a) Be prepared in consultation with the EPA and approved by the Secretary prior to the commencement of any irrigation on site; b) Be prepared in accordance with the EPA's "<i>Environmental Guidelines: Use of Effluent By Irrigation</i>"; c) Describe the quantity and quality of the water to be irrigated; d) Identify the irrigation area and irrigation rate; e) Include detailed baseline data, and benchmark the existing soil and water conditions; f) Identify the impact assessment criteria; and g) Include a program to monitor and report on the: i. Irrigation water quality ii. Soil and groundwater h) Describe how the results of the monitoring will be used to refine the irrigation system to minimise impacts; and i) Outline the reporting and contingency measures that would be implemented should the impact assessment criteria be exceeded.	- Audit interview 10/4/24 - Audit site inspection 10/4/24	There was no evidence of any irrigation activities observed during the Audit site inspection. DWAU confirmed that no irrigation activities have occurred during the audit period.	Not triggered
WASTE				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
26	The Proponent shall ensure ash from the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler is stored temporarily on-site for no more than three months in a dedicated concrete bunker. If the ash cannot be re-used or recycled, the Proponent shall classify the waste in accordance with the EPA's <i>Waste Classification Guidelines</i> and dispose of to a facility that may lawfully accept the waste.	- Letter from DPHI to DWAU titled "DWAU Sawmill (MP07_0161) Annual Review 1 November 2022 to 31 October 2023" dated 15/12/23 - Bombala Sawmill (MP07_016), Annual Review, 01 November 2022 to 31 October 2023, dated 07/12/23	During the audit period, boiler ash was stored on site for a period of longer than three (3) months as options for potentially recycling and reusing were being investigated. Cleanaway Environmental Services were engaged to remove the ash and dispose of it a NSW EPA licenced landfill. Removal and disposal of ash recommenced on a regular basis commenced in August 2023 and therefore compliance with this condition should be achieved on an ongoing basis. Recommendation No additional recommendations are made over and above the actions taken as noted above	Non-Compliant
27	Condition 27 has been deleted.			
28	The Proponent must prepare and implement a Product Management Plan, to the satisfaction of the Secretary. The Plan must: - Be prepared in consultation with the EPA and approved by the Secretary prior to June 2012. - Identify the types and sources of materials and resources used in the production process including a procurement plan demonstrating that options to reuse and recycle materials (particularly waste products) are maximised. - Identify potential environmental impacts and liabilities at each stage of the products life cycle; - Detail the measure to be implemented to improve the design and reduce the liabilities identified in (c) above, including; - The material intensity of the product; and - Hazardous materials contained in the product; - Describe, classify and quantify the waste produced in the	- Letter from DPHI to DWAU titled "Dongha Sawmill (MP07_0161) Product Management Plan dated 18/11/21 - Product Management Plan Bombala Sawmill Project, September 2021, Rev F 9/11/21	The Product Management Plan has been periodically updated throughout the operational phase and since 2012 has been revised six times in response to EPA and DPHI feedback and to address modifications to the conditions of consent. The latest revision (Rev F) was approved by DPHI on the 18/11/21.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	production process and include measures to maximise the reduction, reuse and recycling of this waste; f) Describe how the effectiveness of the plan would be monitored and reported; and g) Be revised and updated every 5 years to the satisfaction of the secretary.			
28A	Prior to the commissioning of the new Wood-fire Boiler, the Proponent shall update the Product Management Plan to the satisfaction of the Secretary and the EPA, to include details on; a) How waste ash will be managed to ensure that ash is not blown offsite; b) The volume of the bunker(s) for the storage of waste ash, including justification for the bunker size; and c) Reuse or disposal options for waste ash.	- Letter from DPHI to DWAU titled "Dongha Sawmill (MP07_0161) Product Management Plan dated 18/11/21 - Product Management Plan Bombala Sawmill Project, September 2021, Rev F 9/11/21	The Product Management Plan has been periodically updated throughout the operational phase and since 2012 has been revised six times in response to EPA and DPHI feedback and to address modifications to the conditions of consent. The latest revision (Rev F) was approved by DPHI on the 18/11/21. Section 3.5 of the Product Management plan describes the management of boiler ash noting that the ash bins are fully enclosed so there are no emissions off site as well as the volumes of the waste storage bins. In response to the previous audit finding, ash is now removed from site by a waste contractor.	Complaint
29	Any onsite sewage management must be undertaken in accordance with the <i>Environment and Health Protection Guidelines: On-site Sewage Management for Single Households</i> (DLG 1998) and <i>Environmental Guidelines: Use of Effluent by Irrigation</i> (DEC 2004).	- Bombala Waste Management – Septic Tank Tax Invoice dated 25/2/24 and 24/4/24 - Environment Protection Licence 1640	All sewage waste is stored on site in septic tanks with pump out to Bombala Waste Management facility. Records were provided to the Auditor to confirm sewage waste is disposed of appropriately. The Bombala Waste Management facility holds an Environment Protection Licence to lawfully accept the sewage waste.	Compliant
Statutory Requirements				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
29A	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	- Site Waste Register (2023- 24) - Environment Protection Licence (EPL 20148) - Bombala Waste Management – Septic Tank Tax Invoice dated 25/2/24 and 24/4/24 - Environment Protection Licence 1640	The Auditor reviewed the waste tracking register from 03/1/23 – 27/2/24. The tracking register includes the following information: - Date of waste generated - Waste classification - Quantity - Transporter - Disposal location - Docket and invoice number The Waste Contractor is Cleanaway and most of the waste generated is classified as general solid waste (non-putrescible). The disposal location is Bega Central Waste Facility. The Waste Facility holds an Environment Protection Licence to accept general solid waste (putrescible and non-putrescible). The Bombala Waste Management facility holds an Environment Protection Licence to lawfully accept the sewage waste.	Compliant
29B	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's <i>Waste Classification Guidelines Part: Classifying Waste</i> (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	- Site Waste Register (2023- 24) - Environment Protection Licence (EPL 20148) - Bombala Waste Management – Septic Tank Tax Invoice dated 25/2/24 and 24/4/24 - Cleanaway tax invoice dated 30/8/23	The Auditor reviewed the waste tracking register from 03/1/23 – 27/2/24. The tracking register includes the following information: - Date of waste generated - Waste classification - Quantity - Transporter - Disposal location - Docket and invoice number The Waste Contractor is Cleanaway and the majority of waste generated is classified as general solid waste (non-putrescible). The disposal location is Bega Central Waste Facility. The Waste Facility holds an Environment Protection Licence to accept general solid waste	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			(putrescible and non-putrescible). Sewage waste is removed by Bombala Waste Management Services with several tax receipts provided to the Auditor as evidence.	
29C	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal.	- Audit interview 10/4/24 - Audit site inspection 10/4/24	There was no evidence observed of any waste materials stored on site during the audit site inspection. DWAU confirmed there has been any waste material received at the site during the Audit period.	Compliant
29D	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of the EPA.	- Site Waste Register (2023- 24) - Cleanaway tax invoice dated 30/8/23	The Auditor reviewed the waste tracking register from 03/1/23 – 27/2/24. The tracking register includes the following information: - Date of waste generated - Waste classification - Quantity - Transporter - Disposal location - Docket and invoice number	Compliant
TRAFFIC AND ACCSS				
30	The Proponent shall ensure that: - The internal road network and parking on site complies with Australian Standards AS 2890.1:2004 and AS 2890.2:2002; - All geometric road design is in accordance with the <i>RMS Road Design Guide</i>; - All pavement design is in accordance with the <i>AUSTROADS Pavement Design Guide</i>; - All parking generated by the project is accommodated on site; and - Bicycle parking and shower facilities are provided on site	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved. The Auditors observations during the site inspection are consistent with the previous audit findings.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
31	Prior to the commencement of any works on site the Proponent shall prepare and implement a signs and markings plan to safely manage movements across Parsonage Creek Bridge, on Delegate Road (MR93) to the satisfaction of Council and the RTA.	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
32	By June 2012, the Proponent must ensure that the following road upgrades are completed to satisfaction of the RTA: a) The Sandy Lane and Delegate Bombala Road intersection shall be upgraded to a sealed BAL left turn together with a sealed Type BAR right turn configuration as per section 6 of the <i>AUSTROADS Guide to Traffic Engineering Practice – Part 5 Intersections at Grade</i>; and b) The Monaro Highway and Delegate Bombala Road intersection shall be upgraded to provide for the swept path of heavy vehicles turning left onto Delegate Bombala Road.	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
ENERGY				
33	The Proponent shall ensure the project is energy and water efficient, in accordance with industry best practice, to the satisfaction of the Secretary.	- Energy Efficiency Plan, Bombala Sawmill Project, 26/6/12 - Soil and Water Management Plan, Bombala Sawmill Project, August 2023 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	The SWMP and the EEP describe energy efficiency strategies for the facility. Example include - Woodfired boiler, uses wood shavings in lieu of natural gas - LED lights - Use of stormwater for dust suppression	Compliant
34	The Proponent shall prepare and implement an Energy Efficiency Plan for the project, to the satisfaction of the Secretary. The program must; a) Investigate options approved by the Secretary prior to the commencement of operation of the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in	- Energy Efficiency Plan, Bombala Sawmill Project, 26/6/12 - Energy Efficiency Plan, Bombala Sawmill Project Revision 1, 24/9/19	Wood fired boiler to reduce energy consumption. 2019	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	the EA and 07_0161 MOD 1); b) Investigate options to reduce the energy consumption of the project, including the use of solar kilns; c) Describe the energy efficiency measures that would be implemented onsite, quantify the savings made and demonstrating the use of best available technology; d) Demonstrate all reasonable and feasible measures to minimise greenhouse gas emissions would be implemented; and e) Include a program to monitor and report on the effectiveness of the measures implemented and a protocol for periodic review of the plan to ensure the project would continue to operate efficiently.			
HERITAGE				
Aboriginal Cultural Heritage Management Plan				
35	The Proponent shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: a) Be prepared by a suitably experienced and accredited Aboriginal Heritage Consultant; b) Be prepared in consultation with the EPA and the Aboriginal community, and be approved by the Secretary prior to the commencement of any works onsite; c) Describe the survey findings and identify all known artefacts onsite; d) Describe the procedures to be implemented; i. To salvage excavate, or record any artefacts on site; ii. To ensure appropriate Aboriginal groups are given the opportunity to be present on site during all earthworks; and iii. Should additional artefacts or human remains be uncovered onsite.	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 - Audit site inspection 10/4/24 - Audit interview 10/4/24	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved. DWAU confirmed there were no excavation or ground disturbance activities that undertaken during the audit period. This is consistent with observations made by the Auditor during the audit site inspection.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Historical Heritage				
36	The Proponent must ensure that the Wool Pack Inn and Well are; a) Fenced in accordance with the recommendations in the EA prior to the commencement of construction; and b) Protected for the life of the project.	• Audit site inspection 10/4/24 • Audit interview 10/4/24.	Appropriate fencing was observed to be provided surrounding these items during the audit site inspection. Refer to site photographs provided in Appendix E.	Compliant
HAZARDS				
Safety Management System				
37	Prior to commissioning of the new; dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1), the Proponent shall develop a comprehensive Safety Management System, covering all onsite operations. The Safety Management System must be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No.9 'Safety Management'</i> and must be kept up-to-date for the life of the project.	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
VISUAL IMPACT				
Landscaping				
38	The Proponent must prepare and implement a landscape management plan for the project. The plan must; a) Be prepared in consultation with Council and approved by the Secretary prior to the commencement of building works on Zone 3; b) Illustrate the location, species and mature heights of plants to be established on site; c) Illustrate how the landscaping would minimise views of the site;	• 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	d) Use endemic species only in the landscaping, ensuring seed and propagule sources are from local botanical provenance; e) Provide a timetable for the implementation of the plan; and f) Provide for the maintenance of the landscaping.			
38A	Within 12 months of the approval of MOD 2, the Landscape Management Plan (required under Condition 38 and approved on 10 February 2012) shall be updated to the satisfaction of the Secretary in consultation with the EPA. The updated plan shall include: a) Measures to ensure that the final landform of the Rear Stockpile area is free draining; b) Details on the revegetation of the Rear Stockpile area with native species and its integration into the surrounding landscape; c) Measures that would be put in place to ensure sufficient resources are available to implement the proposed rehabilitation measures, and the ongoing management of the vegetation following the complete removal of the Rear Stockpile; and d) The timing for the implementation of the above works including a maintenance schedule.	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Although the requirements of this condition are to be fulfilled outside the Audit period (therefore not triggered), the previous audit noted the requirements of the condition have been fulfilled and compliance with the condition had been achieved.	Not triggered
Lighting				
39	The Proponent shall ensure that all lighting associated with the project: a) Complies with the latest version of Australian Standard AS 4282(INT)- <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and b) Is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties, conservation areas or the public road network.	- Audit site inspection 10/4/24 - Audit interview 10/4/24 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	External lighting is limited to internal access/safety lighting in carpark and pedestrian areas. Lighting was directed downwards. Additional screening to residents is provided by vegetation and noise mounds. No lighting related complaints have been received during the audit period. Please refer to site photographs (Appendix E)	Compliant
Signage And Fencing				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
40	The Proponent shall not install any signage or fencing on site without the written approval of the Secretary. In seeking this approval the Proponent shall: a) Submit detailed plans of the proposed signage or fencing, which have been prepared in consultation with Council; and b) Demonstrate that the proposed signage or fencing is consistent with the relevant requirements in any relevant Council Development Control Plan.	• Audit site inspection 10/4/24 • Audit interview 10/4/24	There was no signage observed to be installed during the Audit site inspection. DWAU confirmed there was no fencing installed on site during the Audit period.	Not triggered
41	Any proposed landscaping, fencing or signage is not to impede the desired sight lines of all road users including pedestrians and cyclists.	• Audit site inspection 10/4/24	There were no noticeable impediments to desired sight lines of road users observed during the audit site inspection.	Compliant

SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Environmental Management Strategy				
1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted within 2 months of the date of this approval and approved by the Secretary prior to carrying out any construction; (b) be revised and approved by the Secretary, prior to the commencement of operations of each of the following Stages: Stage 3, Stage 6 and Stage 8 the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1); (c) provide the strategic context for environmental management of the project; (d) identify the statutory requirements that apply to the project; (e) describe in general how the environmental performance of the project would be monitored and managed; (f) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies; and (g) describe the role, responsibility, authority, and	• Environmental Management Strategy, September 2021 • Letter from DPE to DWAU titled "Dongwha Sawmill (MP07_0161 Environmental Management Strategy" dated 24/11/21 • Environmental Checklists • Project induction • Dongwha Meeting Agenda19 March 2024 • Dongwha Meeting Agenda 20 February 2024	The Environmental Management Strategy was prepared and approved by DPHI in 2021. Substantial evidence was reviewed by the Auditor and observed during the audit site inspection to confirm the effective implementation of the strategy. Observations made by the Auditor regarding the implementation of the Environmental Strategy are as follows: • Site environmental checklists have been prepared and are being implemented to provide a mechanism for checking and addressing any site or environmental concerns and issues. • Environmental checklists are completed for the various work zones and buildings within the site such as the Despatch area, and the engineering workshop area. The inspections are undertaken by project operational staff. • There currently does not appear to be a site wide checklist that addresses back of house working areas and general common areas. • The site induction has limited environmental content.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Recommendations • Undertake a gap assessment of the current content and coverage of the existing site inspection checklists to ensure back of house and common areas are included through routine site inspections. • Review and update the site environmental induction to include the following (suggested items): - o Incident response notification requirements - o Correct waste disposal requirement - o Operational hours - o Community etc In addition to any other items advised by the environmental advisor.	
Annual Review				
2	Within 12 months after the commencement of bulk earthworks in Zone 1, and annually thereafter 12 months of this approval, and annually thereafter, the Proponent shall submit a review of the environmental performance of the project to the Secretary and relevant agencies. This report must: (a) identify the standards and performance measures that apply to the project; (b) describe the works and operations carried out in the past year;	• Bombala Sawmill (MP 07_0161) Annual Review 01 November 2020 to 01 November 2021 • Bombala Sawmill (MP 07_0161) Annual Review 01 November 2021 to 31 October 2022, DWAU Australia Pty Ltd, 26 April 2023	Annual Reviews have been prepared and submitted in accordance with the requirements of this condition.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(c) describe the works and operations that will be carried out in the next year; (d) include a summary on the monthly production levels over the year; (e) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (f) analyse the monitoring results and the complaints received against the: • relevant statutory requirements, limits or performance measures/criteria; • monitoring results from previous years; and • predictions in the EA; (g) identify any trends in the monitoring results over the life of the project; (h) identify any non-compliance during the previous year; and (i) describe what actions were, or are being, taken to ensure compliance.	• Bombala Sawmill (MP 07_0161) Annual Review 01 November 2022 to 31 October 2023, DWAU Australia Pty Ltd, 7 December 2023		
3	Within 3 months of: a) the submission of an Independent Audit under condition 5 of schedule 4; b) the submission of an Incident Report under condition 4 of schedule 4; c) the submission of an Annual Review under condition 2 of schedule 4; d) the approval of any modification of the conditions of this consent; or e) the issue of a direction of the Secretary under condition 4 of schedule 2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	• Letter from DWHA to DPPI titled "Dongwha Sawmill (MP07_0161) Notification of Review of Project Approval Plans" dated 26/3/23 • Letter from DWHA to DPPI titled "Dongwha Sawmill (MP07_0161) Notification of Review of Project Approval Plans" dated 07/03/24	DWAU notified DPPI of their review of management plans following the submission of the 2022 and 2023 Annual Reviews.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
3A	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Secretary. Where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	- Letter from DWHA to DPHI titled "Dongwha Sawmill (MP07_0161) Notification of Review of Project Approval Plans" dated 26/3/23 - Letter from DWHA to DPHI titled "Dongwha Sawmill (MP07_0161) Notification of Review of Project Approval Plans" dated 07/03/24 - Various management plans updated throughout the audit period.	There was sufficient evidence provided to the Auditor to confirm the management plans and strategies have been reviewed and updated throughout the audit period with DPHI approval obtained where required.	Compliant
4	The Proponent shall notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.	- Audit Interview 10/4/24 - Incident Register	DWAU confirmed there have not been any incidents required to be notified to the Department in accordance with this condition. The Auditor reviewed the incident register and confirmed that no incidents require reporting to the Department.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
5	Within 2 years of this approval, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate, (e) recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals. <i>Note: This audit team must be led by a suitably qualified Auditor and include experts in any fields specified by the Secretary.</i>	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 - This Audit report	This audit covering the period 2021-2024 was commissioned and completed within the timeframe required by this condition and within 3 years of the previous audit.	Compliant
6	Within 6 weeks of the completing of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021 - DWAU response to independent audit findings - Letter from DPHI to DWAU titled "Dongwha Sawmill (MP07_0161) Independent Environmental Audit Report, March 2018 to March 2021"	The previous audit report was prepared and submitted to DPHI with the response to audit findings.	Compliant

Environment Protection Licence (EPL 11205)

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status									
1 Administrative Conditions													
A1 What the licence authorises and regulates													
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. <table><thead><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr></thead><tbody><tr><td>Wood or timber milling or processing</td><td>Wood or timber milling or processing</td><td>> 200000 m3 annual processing capacity</td></tr><tr><td>Wood preservation</td><td>Wood preservation</td><td>> 30000 m3 annual processing capacity</td></tr></tbody></table>	Scheduled Activity	Fee Based Activity	Scale	Wood or timber milling or processing	Wood or timber milling or processing	> 200000 m3 annual processing capacity	Wood preservation	Wood preservation	> 30000 m3 annual processing capacity	2022/2023 Annual Review.	Section 4.2 of the 2022/2023 Annual Review notes the following annual production levels: - Sawlogs received – 264,434 tonnes. - Treatment timber production 66,795 tonnes per annum. EPL Condition A 1.1 notes the scale is > the values described in this condition; therefore, compliance has been achieved.	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Wood or timber milling or processing	Wood or timber milling or processing	> 200000 m3 annual processing capacity											
Wood preservation	Wood preservation	> 30000 m3 annual processing capacity											
A2 Premises or plant to which this licence applies													
A2.1	The licence applies to the following premises:	Site Inspection 11/4/24	All activities associated with the operation of the sawmill were being undertaken at the premises described in this condition with no offsite activities observed on adjacent properties etc	Compliant									

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status						
	<table><tr><td>Premises Details</td></tr><tr><td>BOMBALA SAWMILL</td></tr><tr><td>SANDY LANE</td></tr><tr><td>BOMBALA</td></tr><tr><td>NSW 2632</td></tr><tr><td>LOT 2 DP 1016573, LOT 27 DP 1061792</td></tr></table>	Premises Details	BOMBALA SAWMILL	SANDY LANE	BOMBALA	NSW 2632	LOT 2 DP 1016573, LOT 27 DP 1061792			
Premises Details										
BOMBALA SAWMILL										
SANDY LANE										
BOMBALA										
NSW 2632										
LOT 2 DP 1016573, LOT 27 DP 1061792										
A3 Information Supplied to the EPA										
A 3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: - the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and - the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	- Site Inspection 11/4/24 - Documents reviewed in undertaken in the audit and noted in this audit report.	Operation of the sawmill was generally being undertaken in accordance with the EPL.	Compliant						
2 Discharges to Air and Water and Applications to Land										
P1 Location of monitoring/discharge points and areas										

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																								
P 1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point	DWAU Air Emissions 2023.xlsx (live.com) - Weather monitoring station data (April 2023) 2021 Independent Environmental Audit Report for DWAU Australia Pty Ltd, dated 11 May 2021	Meteorological monitoring is undertaken at Point 22 with emissions monitoring undertaken at points 23,36,37.	Compliant																								
	<table><tr><th>EPA identi- fication no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>22</td><td>Meteorological Monitoring</td><td></td><td>Weather Station located to the west of the administration building, labelled "Weather Station MP- 22 and 34" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)</td></tr><tr><td>23</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Exhaust stack from the 2.5MW Redry Boiler (chip fired) labelled "Redry 2.5 mw boiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)</td></tr><tr><td>36</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Exhaust stack from the 15MW wood fired boiler labelled "15 mw BiomassBoiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)</td></tr><tr><td>37</td><td>Discharges to Air</td><td>Discharges to Air</td><td>Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C1 labelled "MP 37 CCA & MICROPRO Vaccum Pump" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)</td></tr><tr><td>38</td><td>Discharge to Air</td><td>Discharge to Air</td><td>Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C2 labelled "Losp Vaccum Pump MP 38" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)</td></tr></table>				EPA identi- fication no.	Type of Monitoring Point	Type of Discharge Point	Location Description	22	Meteorological Monitoring		Weather Station located to the west of the administration building, labelled "Weather Station MP- 22 and 34" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)	23	Discharge to Air	Discharge to Air	Exhaust stack from the 2.5MW Redry Boiler (chip fired) labelled "Redry 2.5 mw boiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)	36	Discharge to Air	Discharge to Air	Exhaust stack from the 15MW wood fired boiler labelled "15 mw BiomassBoiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)	37	Discharges to Air	Discharges to Air	Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C1 labelled "MP 37 CCA & MICROPRO Vaccum Pump" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)	38	Discharge to Air	Discharge to Air	Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C2 labelled "Losp Vaccum Pump MP 38" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)
EPA identi- fication no.	Type of Monitoring Point	Type of Discharge Point	Location Description																									
22	Meteorological Monitoring		Weather Station located to the west of the administration building, labelled "Weather Station MP- 22 and 34" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)																									
23	Discharge to Air	Discharge to Air	Exhaust stack from the 2.5MW Redry Boiler (chip fired) labelled "Redry 2.5 mw boiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)																									
36	Discharge to Air	Discharge to Air	Exhaust stack from the 15MW wood fired boiler labelled "15 mw BiomassBoiler" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)																									
37	Discharges to Air	Discharges to Air	Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C1 labelled "MP 37 CCA & MICROPRO Vaccum Pump" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)																									
38	Discharge to Air	Discharge to Air	Exhaust to atmosphere of vacuum pump attached to the Treatment Plant, Cylinder C2 labelled "Losp Vaccum Pump MP 38" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)																									
P 1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	- Site Inspection 11/4/24 - Audit Interview 11/4/24	There have been no solids or liquids applied to the application area during the audit period	Not triggered																								

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
P 1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point	DWAU Soil & Water 2024.xlsx (live.com)	Soil, Surface water and groundwater sampling is undertaken at the monitoring points in this condition with the results provided on the DWAU website.	Compliant

EPA Identi-	Type of Monitoring Point	Type of Discharge Point	Location Description
	Soil monitoring		Area beside treatment plant labelled "SE-1" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)
2	Soil monitoring		Area beside treatment plant labelled "SE-2" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)
3	Soil monitoring		Area beside treatment plant labelled "SE-3" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)
4	Soil monitoring		Area beside treatment plant labelled "SE-4" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)
5	Water quality monitoring		Pond 1 labelled 'SWE-1' on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
6	Water quality monitoring	Pond 2 labelled 'SWE-2' on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
7	Water quality monitoring	Northern Pond labelled 'SWE-3' on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
10	Groundwater Quality Monitoring	Groundwater monitoring well labelled "MWE-1" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
11	Groundwater quality monitoring	Groundwater monitoring well labelled "MWE-2" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
12	Groundwater quality monitoring	Groundwater monitoring well labelled "MWE-3" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
13	Groundwater quality monitoring	Groundwater monitoring well labelled "MWE-4" on drawing titled "Dongwha EPL locations Fig August 2019", provided to the EPA on 2 August 2019 (DOC19/659401)		
P 1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises	Noise Compliance Assessment for Dongwha Australia, 1 Sandy Lane, Bombala, NSW April 2023	Noise monitoring undertaken during the audit period was at the point nominated in this condition.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																									
<table><tr><th>EPA identi- fication no.</th><th>Type of monitoring point</th><th>Location description</th><td colspan="2"></td></tr><tr><td>21</td><td>Noise monitoring</td><td>Any residence</td><td colspan="2"></td></tr><tr><td>32</td><td>Noise monitoring</td><td>"The Parsonage"</td><td colspan="2"></td></tr><tr><td>33</td><td>Noise monitoring</td><td>114 Wedmore Road</td><td colspan="2"></td></tr><tr><td>34</td><td>Meteorological Station - to determine. meteorological conditions for noise monitoring</td><td>Automated Weather Station</td><td colspan="2"></td></tr></table>					EPA identi- fication no.	Type of monitoring point	Location description			21	Noise monitoring	Any residence			32	Noise monitoring	"The Parsonage"			33	Noise monitoring	114 Wedmore Road			34	Meteorological Station - to determine. meteorological conditions for noise monitoring	Automated Weather Station		
EPA identi- fication no.	Type of monitoring point	Location description																											
21	Noise monitoring	Any residence																											
32	Noise monitoring	"The Parsonage"																											
33	Noise monitoring	114 Wedmore Road																											
34	Meteorological Station - to determine. meteorological conditions for noise monitoring	Automated Weather Station																											
3 Limit Conditions																													
L1 Pollution of Waters																													
L 1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997	- Audit interview 11/4/24 - Site Inspection 11/4/24 - Environment Protection Licence Annual Returns 23/6/23, 01/11/22, 17/6/21 - Complaints registers 2022/2023	There was no evidence of water pollution observed by the Auditor during the audit site inspection. The site has been rehabilitated in most areas with grass and landscaping with permanent hardstand provided in trafficable areas to prevent sedimentation. Chemicals were stored in appropriately bunded areas. No incidents have been reported to EPA during the audit period. The project has a Pollution Incident Response Management Plan which is tested and updated annually. No water pollution related complaints have been received during the audit period.	Compliant																									
L2 Concentration Limits																													

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
L 2.1	For each monitoring/discharge point or utilisation area specified in the tablets below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table	- DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 5/3/23 - DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 27/10/23 DWAU Air Emissions 2023.xlsx (live.com)	April 2023 - Report dated 5/3/23 – Compliant It is noted that type 1 and 2 substances emissions from the C1 Vacuum Pump Exhaust were outside the NSW EPA Licence limit of 1mg/m3 at STP dry. Emissions from this location have been tested on ten previous occasions since 2015 with results almost exclusively being measured below 0.1mg/m3 at STP dry. Accordingly, the most recent result could be considered anomalous in light of previous measurements.	Compliant
L 2.2	Air Concentration Limits		As above	Compliant

Point 23

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Nitrogen Oxides	milligrams per cubic metre	200	Dry, 273 K, 101.3 kPa	7%	As per test method
Volatile organic compounds	milligrams per cubic metre	5	Dry, 273 K, 101.3 kPa	7%	As per test method

POINT 36

Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
------------------	------------------------------------	----------------------	-------------------	------------------

ID	Requirement				Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	milligrams per cubic metre	500	Dry, 273 K, 101.3 kPa	7%	1 hour		
	milligrams per cubic metre	50	Dry, 273 K, 101.3 kPa	7%	1 hour		
	milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa	7%	1 hour		
	milligrams per cubic metre		Dry, 273 K, 101.3 kPa	7%	1 hour		
Point 37							
	Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period	
	Type 1 and Type 2 substances in aggregate	milligrams per cubic metre		Dry, 273K, 101.3kPa		As per test method	
	Copper	milligrams per cubic metre	TBD	Dry, 273K, 101.3kPa		As per test method	
L 3 Waste							
L 3.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.				- Audit interview 10/4/24. - Audit site inspection 10/4/24	There was no evidence observed of any waste materials stored on site during the audit site inspection. DWAU confirmed there has been any waste material received at the site during the Audit period.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status															
	Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence																		
<table> <tr> <th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr> <tr> <td>NA</td><td>General or Specific exempted waste</td><td>Waste that meets all the conditions of a resource recovery exemption under Clause 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014</td><td>As specified in each particular resource recovery exemption</td><td>NA</td></tr> <tr> <td>NA</td><td>Waste</td><td>Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time</td><td></td><td>NA</td></tr> </table>					Code	Waste	Description	Activity	Other Limits	NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular resource recovery exemption	NA	NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA
Code	Waste	Description	Activity	Other Limits															
NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular resource recovery exemption	NA															
NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA															
L 3.2	There must be no incineration or burning of chemically treated timber at the premises.	- Site inspection 11/4/24 - Environment Protection Licence Annual Returns 23/6/23, 01/11/22, 17/6/21 - Complaints registers 2022/2023	No incineration or burning of chemically treated timber was observed at the premises	Compliant															
L4 Noise Limits																			

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status												
L 4.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	EPL 11205 noted noncompliance has noted the LA max exceeded the licence limit at times during the annual noise monitoring event. This was confirmed by noise monitoring undertaken during the audit period. Recommendation The following recommendations are made in relation to noise exceedances: - Conclude negotiations with affected residents and implement any agreed “at property” noise treatments as agreed with any resident. - Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure.	Non-Compliant												
POINT 21,32,33 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>All hours</td><td>LAeq</td><td>Continuous</td><td>35</td></tr><tr><td>Night</td><td>LAmx</td><td>Continuous</td><td>45</td></tr></table>					Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	All hours	LAeq	Continuous	35	Night	LAmx	Continuous	45
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)													
All hours	LAeq	Continuous	35													
Night	LAmx	Continuous	45													
L4.2	For the purpose of Condition L4.1: Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays; Evening is defined as the period 6pm to 10pm; and	N/A	This condition is a note relating to condition 4.1 above.	Note												

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.			
L 4.3	The noise limits set out in Condition L4.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	N/A	This condition is a note relating to condition 4.1 above.	Note
L4.4	For the purposes of Condition L4.3: a) The meteorological data to be used for determining meteorological conditions is the data recorded by the meteorological weather station identified as EPA	N/A	This condition is a note relating to condition 4.1 above. In any case, the most recent noise monitoring undertaken for the project notes that the results would still be non-compliant (despite the weather)	Note

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Identification Point 22 must be used to determine meteorological conditions; and Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the New South Wales Industrial Noise Policy (EPA 2000)			
L4.5	For the purposes of determining the noise generated at the premises a Class 1 or 2 noise monitoring equipment as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA in writing must be used.	Certificate of Calibration (Certificate of Calibration No: SLM29940)	The certificate of calibration for noise monitoring undertaken during the audit period confirms compliance with these standards.	Compliant
L 4.6	To determine compliance with the Leq(15 minute) noise limits in Condition L4.1, the noise measurement equipment must be located: 01.1 approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or 01.2 within 30 metres of a dwelling facade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable 01.3 within approximately 50 metres of the boundary of a National Park, Nature Reserve or State Conservation Area. With the L_{Amax} noise limits in Condition L4.1, the noise monitoring equipment must be located within 1 metre of a dwelling facade.	Noise Compliance Assessment for Dongha Australia, 1 Sandy Lane, Bombala, NSW 2023	Figure 4-2 of the noise compliance assessment report provides the details of the locations of the unattended noise monitoring locations as referenced this EPL (locations 21, 32 and 33).	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	the noise monitoring equipment must be located in a position that is: at the most affected point at a location where there is no dwelling at the location; or at the most affected point within an area at a location prescribed by conditions L4.6(a) or L4.6(b).			
L 4.7	A breach of this Environment Protection Licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the condition L4.1 is detected: a) in an area at a location other than an area prescribed by condition L4.6; and/or b) at a point other than the most affected point at a location.	N/A	Noted, a non-compliance has been raised in relation to Condition L4.1 (refer above).	Noted.
L 4.8	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment	Noise Compliance Assessment for Dongha Australia, 1 Sandy Lane, Bombala, NSW 2023	The noise compliance reports reference the Industrial Noise Policy.	Compliant
L5 Potentially Offensive Odour				
L5.1	No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.	- Audit site inspection 10/4/23 - Complaints registers (2022 and 2023) - Environment Protection Licence 11205	The Auditor did not observe any offensive odours during the audit site inspection. This included an offsite olfactory odour assessment at the project boundary with no odours detected by the Auditor. There have been no odour complaints received during the audit period.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Environment Protection Licence Annual Returns 23/6/23, 01/11/22, 17/6/21	The Auditor reviewed non compliances reported in EPL 11205 Annual Returns for 2021, 2022 and 2023 and notes there are not any non-compliances reported with the EPL relating to odour (Specifically Condition L5).	
4 Operating Conditions				
O 1. Activities must be carried out in a competent manner				
O 1.1	Licensed activities must be carried out in a competent manner. This includes: the processing, handling, movement and storage of materials and substances used to carry out the activity; and the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	- Audit site inspection 10/4/23 - Documents reviewed as documented in this audit report.	Activities being undertaken as observed during the audit site inspection appeared to be undertaken in a competent manner by suitably experienced personnel. Appropriate systems and technical resources have been applied to check and monitor the implementation of controls and measures to ensure ongoing compliance with this condition	Compliant
O 2. Maintenance of plant and equipment				
O 2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: - must be maintained in a proper and efficient condition; and - must be operated in a proper and efficient manner.	- Kone 12/16 T Service Schedule dated 3/10/23 - DWAU internal email dated 26/3/24 - Skiptons Inspections and Maintenance Engineering - Certificate of Inspection No 41840 dated 28/11/23	All equipment observed during the audit site inspection was observed to be operating effectively with no visible leaks, spills, smoke, or excessive noise generated. A dedicated maintenance facility has been established to provide maintenance support for all operational facilities of the plant. The main items of plant (such as the Hot Water Boiler) are subject to annual compliance testing with relevant Australian Standards.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
O 3 Dust				
O 3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premise	- Audit site inspection 10/4/23 - Skid steer sweeper attachment – Positrack – June 2022 Street sweeper attachment (photographic evidence)	During the site audit inspection, the following measures were observed to be implemented to prevent dust: - Fully sealed carpark, driveways, and sealed access points - Concrete paving of the stack yard and greenmill paving area - Permanent landscaping and grass covering/stabilisation of earth batters There were no exposed or unstable surfaces such as soil stockpiles observed that may contribute towards dust generation. There was no observed vehicle tracking of dirt or on Sandy Lane or Delegate Road that would result in the generation of dust. A task observation by the Auditor noted that all trucks exiting the site were equipped with robust dust covers to prevent dust during transportation. Evidence was provided to the Auditor to demonstrate a street sweeper attachment has been purchased (in 2022) so that any material with the potential to generate dust could be removed. DWAU noted that a water cart is also available for deployment to prevent dust. Please refer to site photographs for more information.	Compliant
O 4 Emergency Response				
O 4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the	Pollution Incident Response Management Plan dated 15/4/24	DWAU have prepared a Pollution Incident Response Management Plan (PIRMP). The current revision of the plan is dated 15/4/24 and	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date		was recently tested. The PIRMP is available on site and the DWAU website.	
O 5 Process and management				
O 5.1	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the NSW EPA Waste Classification Guidelines (2014) as in force from time to time	• Site Waste Register (2023- 24) • Environment Protection Licence (EPL 20148) • Bombala Waste Management – Septic Tank Tax Invoice dated 25/2/24 and 24/4/24 • Cleanaway tax invoice dated 30/8/23	The Auditor reviewed the waste tracking register from 03/1/23 – 27/2/24. The tracking register includes the following information: • Date of waste generated • Waste classification • Quantity • Transporter • Disposal location • Docket and invoice number The Waste Contractor is Cleanaway and the majority of waste generated is classified as general solid waste (non-putrescible). The disposal location is Bega Central Waste Facility. The Waste Facility holds an Environment Protection Licence to accept general solid waste (putrescible and non-putrescible). Sewage waste is removed by Bombala Waste Management Services with several tax receipts provided to the Auditor as evidence.	Compliant
O 5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste	• Site Inspection 11/4/24	As observed during the audit site inspection, appropriate segregation facilities have been provided for recycled materials such as steel.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
O 6 Other operating conditions				
O 6.1	The licensee must not move timber treated with copper chrome arsenate (CCA) preservative at the premises from the sealed drip pad until the CCA preservative is 'drip free'.	- Audit site inspection 10/4/24 - Merck fixate test report records and results (2018 – 2023)	All treated timber undergoing CCA fixation was stored within an impermeable concrete bunded and covered area. Fixation testing is undertaken. All timber being treated was stored on an impermeable surface in a covered and bunded area. There was no CCA runoff observed during the audit site inspection.	Compliant
O 6.2	In this licence 'drip free' has the same meaning as in AS/NZS 2843.1:2006, Timber Preservation plants - Timber preservation plant site design.	-	This condition is a definition relating to condition O 6.1	Noted
5 Monitoring and Recording Conditions				
M1 Monitoring Records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Environmental Monitoring records reviewed as part of this audit and noted in this audit report	Monitoring records are retained are made publicly available via the DWAU website	Compliant
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them	- Chain of custody form dated 30/5/21 - EnviroLab sample receipt advice dated 30/5/21 - EnviroLab Certificate of Analysis 268125 dated 17/6/21	Environmental monitoring records provided to the Auditor were in a legible form and in compliance with these requirements	Complaint

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																				
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	- Chain of custody form dated 30/5/21 - EnviroLab sample receipt advice dated 30/5/21 - EnviroLab Certificate of Analysis 268125 dated 17/6/21	Environmental monitoring records provided to the Auditor were in compliance with these requirements.	Compliant																				
M2 Requirement to monitor concentration of pollutants discharged																								
M 2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	DWAU Air Emissions 2023.xlsx (live.com)	Air monitoring is undertaken at Points 23,36 and 37 with the results available for the period 2020 to 2023 on the DWAUwebsite.	Compliant																				
M 2.2	Air Monitoring Requirements	DWAU Air Emissions 2023.xlsx (live.com)	Air monitoring is undertaken at Points 23,36 and 37 with the results available for the period 2020 to 2023 on the DWAUwebsite.	Compliant																				
POINT 23, 36																								
<table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Carbon dioxide</td><td>percent</td><td>Every 6 months</td><td>TM-24</td></tr><tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>Every 6 months</td><td>TM-32</td></tr><tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Every 6 months</td><td>TM-23</td></tr><tr><td>Moisture</td><td>percent</td><td>Every 6 months</td><td>TM-22</td></tr></table>					Pollutant	Units of measure	Frequency	Sampling Method	Carbon dioxide	percent	Every 6 months	TM-24	Carbon monoxide	milligrams per cubic metre	Every 6 months	TM-32	Dry gas density	kilograms per cubic metre	Every 6 months	TM-23	Moisture	percent	Every 6 months	TM-22
Pollutant	Units of measure	Frequency	Sampling Method																					
Carbon dioxide	percent	Every 6 months	TM-24																					
Carbon monoxide	milligrams per cubic metre	Every 6 months	TM-32																					
Dry gas density	kilograms per cubic metre	Every 6 months	TM-23																					
Moisture	percent	Every 6 months	TM-22																					

ID	Requirement		Evidence Collected		Independent Audit Findings & Recommendations	Compliance Status
	Molecular weight of stack gases	grams per gram mole	Every 6 months	TM-23		
	Nitrogen Oxides	milligrams per cubic metre	Every 6 months	TM-11		
	Oxygen (O2)	percent	Every 6 months	TM-25		
	Solid Particles	milligrams per cubic metre	Every 6 months	TM-15		
	Temperature	degrees Celsius	Every 6 months	TM-2		
	Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Every 6 months	TM-12, TM-13 & TM-14		
	Velocity	metres per second	Every 6 months	TM-2		
	Volatile organic compounds	milligrams per gram	Every 6 months	TM-34		
	Volumetric flowrate	cubic metres per second	Every 6 months	TM-2		
POINT 37						
	Pollutant	Units of measure	Frequency	Sampling Method		
	Copper	milligrams per cubic metre	Yearly	TM-12, TM-13 & TM-14		
	Moisture	percent	Yearly	TM-22		
	Temperature	degrees Celsius	Yearly	TM-2		
	Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Yearly	TM-12, TM-13 & TM-14		
	Volumetric flowrate	cubic metres per second	Yearly	TM-2		
M 2.3	Water and/ or Land Monitoring Requirements	• DWAU Soil & Water 2024.xlsx (live.com)		Soil, surface and groundwater sampling undertaken with the results provided on the DWAU website	Compliant	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
----	-------------	--------------------	--	-------------------

Point 1,2,3,4

Pollutant	Units of measure	Frequency	Sampling Method
Arsenic	milligrams per kilogram	2 Times a year	Representative sample
Chromium (total)	milligrams per kilogram	2 Times a year	Representative sample
Chromium (VI) Compounds	milligrams per kilogram	2 Times a year	Representative sample

Point 5,6,7

Pollutant	Units of measure	Frequency	Sampling Method
Arsenic	milligrams per litre	2 Times a year	Representative sample
Chromium (total)	milligrams per litre	2 Times a year	Representative sample
Chromium (VI) Compounds	milligrams per litre	2 Times a year	Representative sample
Copper	milligrams per litre	2 Times a year	Representative sample
Dissolved Oxygen	colour units	2 Times a year	In situ
Electrical conductivity	siemens	2 Times a year	In situ
Hardness (as calcium carbonate)	milligrams per litre	2 Times a year	In situ
pH	pH	2 Times a year	In situ
Redox potential	millivolts	2 Times a year	In situ
Total organic carbon	milligrams per litre	2 Times a year	Representative sample

POINT 10,11,12,13,14,15,16,17,18,19

Pollutant	Units of measure	Frequency	Sampling Method
Arsenic	milligrams per litre	Yearly	Representative sample
Chromium (total)	milligrams per litre	Yearly	Representative sample
Chromium (VI) Compounds	milligrams per litre	Yearly	Representative sample

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Copper milligrams per litre Yearly Representative sample Dissolved Oxygen colour units Yearly In situ Electrical conductivity siemens Yearly In situ Iron milligrams per litre Yearly Representative sample pH pH Yearly In situ Total copper milligrams per litre Yearly Representative sample Total dissolved solids milligrams per litre Yearly Representative sample Total organic carbon milligrams per litre Yearly Representative sample Zinc milligrams per litre Yearly Representative sample			
M3 – testing methods – concentration limits				
M 3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	- DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 5/3/23 - DWAU Australia, Bombala Half Yearly Emission Testing Report, Report Number R014585, Ektimo dated 27/10/23	The test methods adopted for air quality testing are documented in Section 4 of the 6 monthly emissions testing reports undertaken by Etkimo.	Compliant
M 3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in	Results of Environmental Monitoring for EPL No 11205. Annual Return 2023-2024: Soil, Surface Water and Groundwater, Bombala Sawmill, Sandy Lane Bombala, NSW,	Environmental monitoring is undertaken by experienced environmental consultants. A description of the methodology, quality control procedures and compliance with the EPL requirements is noted in the environmental	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	writing before any tests are conducted. Note: The <i>Protection of the Environment Operations (Clean Air) Regulation 2021</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW"	January 2024	monitoring report that has been submitted to the EPA.	
M4 Weather Monitoring				
M4.1	The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in this section. For each monitoring point specified in the table below the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.	- Weather monitoring station data (April 2023) - Audit site inspection 10/4/23.	During the site inspection a weather station was observed to be installed. An example of data collected from the weather monitoring station was reviewed by the Auditor. The data included the parameters required by this condition	Compliant
M4.2	For each monitoring point specified in the table below the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns	- Weather monitoring station data (April 2023) - Audit site inspection 10/4/23.	During the site inspection a weather station was observed to be installed. An example of data collected from the weather monitoring station was reviewed by the Auditor. The data included the parameters required by this condition	Compliant
	Point 22 – Automated Weather Station			

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																																								
	<table><tr><th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Averaging Period</th><th>Sampling Method</th></tr><tr><td>Temperature@ 2 metres</td><td>°C</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr><tr><td>Wind direction @ 10 metres</td><td></td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr><tr><td>Wind speed@ 10 metres</td><td>m/s</td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr><tr><td>Sigma theta @ 10 metres</td><td></td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr><tr><td>Rainfall</td><td>mm</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr><tr><td>Temperature@ 10 metres</td><td>°C</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr><tr><td>Solar radiation</td><td>W/m2</td><td>Continous</td><td>15 minute</td><td>AM-4</td></tr></table>	Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method	Temperature@ 2 metres	°C	Continuous	15 minute	AM-4	Wind direction @ 10 metres		Continuous	15 minute	AM-2 & AM-4	Wind speed@ 10 metres	m/s	Continuous	15 minute	AM-2 & AM-4	Sigma theta @ 10 metres		Continuous	15 minute	AM-2 & AM-4	Rainfall	mm	Continuous	15 minute	AM-4	Temperature@ 10 metres	°C	Continuous	15 minute	AM-4	Solar radiation	W/m2	Continous	15 minute	AM-4			
Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method																																								
Temperature@ 2 metres	°C	Continuous	15 minute	AM-4																																								
Wind direction @ 10 metres		Continuous	15 minute	AM-2 & AM-4																																								
Wind speed@ 10 metres	m/s	Continuous	15 minute	AM-2 & AM-4																																								
Sigma theta @ 10 metres		Continuous	15 minute	AM-2 & AM-4																																								
Rainfall	mm	Continuous	15 minute	AM-4																																								
Temperature@ 10 metres	°C	Continuous	15 minute	AM-4																																								
Solar radiation	W/m2	Continous	15 minute	AM-4																																								
M4.3	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	- Weather monitoring station data (April 2023) - Audit site inspection 10/4/23.	During the site inspection a weather station was observed to be installed. An example of data collected from the weather monitoring station was reviewed by the Auditor. The data included the parameters required by this condition	Compliant																																								
	POINT 34 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Temperature at 2 metres</td><td>AM-4</td><td>degrees Celsius</td><td>15 minutes</td><td>Continuous</td></tr><tr><td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>Degrees</td><td>15 minutes</td><td>Continuous</td></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>15 minutes</td><td>Continuous</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Temperature at 2 metres	AM-4	degrees Celsius	15 minutes	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	15 minutes	Continuous	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous																							
Parameter	Sampling method	Units of measure	Averaging period	Frequency																																								
Temperature at 2 metres	AM-4	degrees Celsius	15 minutes	Continuous																																								
Wind Direction at 10 metres	AM-2 & AM-4	Degrees	15 minutes	Continuous																																								
Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous																																								

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Sigma Theta AM-2 & AM-4 Degrees 15 minutes Continuous Rainfall AM-4 millimetres per hour 15 minutes Continuous Temperature at 10 metres AM-4 degrees Celsius 15 minutes Continuous Total Solar Radiation AM-4 Watts per square metre 15 minutes Continuous			
M5 Recording of Pollution Complaints				
M 5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Complaints register 2022/2023	The complaints register was sighted, a copy was provided to the Auditor	Compliant
M 5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken	Complaints register 2022/2023	The complaints register was sighted, a copy was provided to the Auditor	Compliant
M 5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Complaints register 2022/2023	Complaints registers for the audit period were provided to the Auditor.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
M 5.4	The record must be produced to any authorised officer of the EPA who asks to see them	Complaints register 2022/2023	Complaints registers for the audit period were provided to the Auditor.	Compliant
M6 Telephone Complaints Line				
M 6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Environmental (DWAU Environmental) - DWAU	The telephone complaints line is available in the environmental section of the DWAU Project website	Compliant
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint	Environmental (DWAU Environmental) - DWAU	The telephone complaints line is available in the environmental section of the DWAU Project website	Compliant
M7 Other Monitoring and recording conditions				
M 7.1	To determine compliance with Condition L4.1, attended noise monitoring must be undertaken in accordance with Conditions L4.5 and L4.6 and: - at the locations EPA Identification Points 32 and 33, as listed in Condition L4.1; - occur annually; - occur during each day, evening and night period as defined in the <i>New South Wales Industrial Noise Policy</i> (EPA 2000) for a minimum of: 1.5 hours during the day; 30 minutes during the evening; and	2021/2022 Annual Return	As noted in the 2021/2022 Annual Return document, Annual Noise monitoring did not occur within the Annual Return year. DWAU have appointed an experienced team of environmental consultants to oversee the implementation of the environmental management plans, and to check and ensure compliance with the conditions of consent. Monthly management meetings are attended by the environment team who utilise this forum as a mechanism to check and ensure compliance outcomes are achieved including notifications and reporting obligations. The Auditor notes this is an appropriate mechanism to ensure all administrative, monitoring and reporting non compliances are addressed appropriately.	Non-Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	• 1 hour during the night. d) occur for three consecutive days.		Recommendation No additional recommendations are made over and above the actions noted above.	
M 7.2	The licensee must monitor (by sampling and obtaining results by analysis) that timber, treated with copper chrome arsenate (CCA) preservative at the premises, is 'drip free' prior to movement of the treated timber from the sealed drip pad area, by: 1. sampling at least one batch of CCA treated timber each month using the method outlined at Appendix C AS/NZS 2843.1:2006, Timber Preservation Plants - Timber preservation plant site design; and analysing the sample using a field test kit such as Merck Aquaquant Test Kit 1.14441.0001 or equivalent	• Merck fixate test report records and results (2018 – 2023)	The Auditor was provided with a copy of the Merck test report schedule covering the audit period. The following tests were performed. • 2021 – 8 tests per annum • 2022 – 6 tests per annum • 2023 – 9 tests per annum. d. DWAU noted that CCA treatment occurs upon demand for CCA-treated timber, which has reduced significantly over the past few years to the point that there are several months of the year where testing it is not undertaken. Recommendation It is recommended the testing register is updated to document the periods where no timber is produced, therefore no testing has been undertaken for those months.	Compliant
6 Reporting Conditions				
R1 Annual Return Documents				
R 1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance,	• Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	Evidence of the submission of electronic Annual Return Documents is provided on the EPA website. The Annual returns were prepared for the respective reporting periods.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	b) a Monitoring and Complaints Summary, c) a Statement of Compliance – Licence Conditions, d) a Statement of Compliance – Load based Fee, e) a Statement of Compliance – Requirement to Prepare Pollution Incident Response Management Plan, f) a Statement of Compliance – Requirement to Publish Pollution Monitoring Data; and g) a Statement of Compliance – Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.			
R 1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below Note: The term “reporting period” is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	Evidence of the submission of electronic Annual Return Documents is provided on the EPA website. The Annual returns were prepared for the respective reporting periods.	Compliant
R 1.3	Where this licence is transferred from the licensee to a new licensee: the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	There have not been any changes in licence during the audit period.	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Note: An application to transfer a licence must be made in the approved form for this purpose.			
R 1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: in relation to the surrender of a licence – the date when notice in writing of approval of the surrender is given; or in relation to the revocation of the licence – the date from which notice revoking the licence operates	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	The licence has not been surrendered or revoked during the audit period	Not triggered
R 1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	Evidence of the submission of electronic Annual Return Documents is provided on the EPA website. In summary the following Annual Returns relating to the audit period were submitted to the EPA 3/5/22- 2/5/23 (submitted to EPA on 23 6/24) 3/5/21- 2/5/22 (submitted to EPA on 01 November 2022) The 2021/22 Annual return document was not submitted to EPA within the required timeframe, therefore compliance with this condition has not been achieved.	Non-Compliant
R 1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	DWAU confirmed all Annual Return documents submitted to EPA are retained.	Compliant
R 1.7	Within the Annual Return, the Statements of Compliance must be certified, and the Monitoring and Complaints	Environment & Heritage POEO Licences, Application and Notice Detail (nsw.gov.au)	DWAU confirmed all Annual Return statements of compliance are signed by the appropriate persons in accordance with this condition.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Summary must be signed by: the licence holder; or by a person approved in writing by the EPA to sign on behalf of the licence holder	Detail (nsw.gov.au)		
R 1.8 Monitoring Report				
R 1.8	The licensee must supply with the Annual Return a report, which provides a) an analysis and interpretation of monitoring results; and b) actions to correct identified adverse trends. T	Results of Environmental Monitoring for EPL No 11205. Annual Return 2023-2024: Soil, Surface Water and Groundwater, Bombala Sawmill, Sandy Lane Bombala, NSW, January 2024	A detailed report is provided with the Annual Return that addresses the requirements of this condition.	Compliant
R 1.9	The licensee must supply with the Annual Return a report for each reporting period which contains: a) an analysis and interpretation of monitoring results, and b) actions to correct identified adverse trends.	Results of Environmental Monitoring for EPL No 11205. Annual Return 2023-2024: Soil, Surface Water and Groundwater, Bombala Sawmill, Sandy Lane Bombala, NSW, January 2024	A detailed report is provided with the Annual Return that addresses the requirements of this condition.	Compliant
R 2 Notification of Environmental Harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555	- Incident Register - Audit Interview 11/4/24 - Pollution Incident Response Management Plan 16/6/24	No incidents have been reported to EPA during the audit period. The project has a Pollution Incident Response Management Plan which is tested and updated annually	Compliant
R 2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	- Incident Register - Audit Interview 11/4/24 - Pollution Incident Response Management Plan 16/6/24	No incidents have been reported to EPA during the audit period. The project has a Pollution Incident Response Management Plan which is tested and updated annually	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
R 3 Written Report				
R 3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: where this licence applies to premises, an event has occurred at the premises; or a) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, b) and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	- Incident Register - Audit interview 11/4/24	No incidents have been reported to EPA during the audit period. The EPA have not requested a written report.	Compliant
R 3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	- Incident Register - Audit interview 11/4/24	No incidents have been reported to EPA during the audit period	Compliant
R 3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;	- Incident Register - Audit interview 11/4/24	No incidents have been reported to EPA during the audit period	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.			
R 3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	- Incident Register - Audit Interview 11/4/24	No incidents have been reported to EPA during the audit period	Compliant
R 4.1	A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the annual monitoring required by Condition M7.1. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits presented in Condition L4.1; and b) an outline of any management actions taken within the monitoring period to address any exceedences of the limits contained in Condition L4.1	Email from DWAU to EPA titled "Dongwha Sawmill -EPL no 11205" dated 4/5/24	The email to EPA notes the noise compliance assessment report was provided to EPA on the 4/5/24, within 30 days of the noise testing undertaken between 11-13 of April 2023.	Compliant
7 General Conditions				
G 1.1	A copy of this licence must be kept at the premises to which the licence applies.	Environment Protection Licence 11205	The EPL was available at the premises	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
G 1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Environment Protection Licence 11205	The EPLwas available at the premises for any EPA officer who asks to see it	Compliant

Appendix D Consultation

[REDACTED]

From: Richard Peterson [REDACTED]
Sent: Thursday, 14 March 2024 5:51 PM
To: Katrina O'Reilly
Cc: DPE PSVC Compliance Mailbox
Subject: Bombala Sawmill MP07_0161 - Independent Environmental Audit

Hi Katrina

I am sure you are aware that I have been engaged to undertake an Environmental Audit of the Bombala Sawmill (DPHI approval reference is MP07_0161)

Purpose of this email is to consult with the Department to determine if there are any issues the Department would like to be considered by the audit.

At this stage I am also planning on consulting with EPA and Council. Please let me know if there are others.

I am booked in to undertake the site component of the audit on 11th of April, I would appreciate a response by say 4th of April

Many thanks



Richard Peterson | Director
Trigalana Environmental Pty Ltd

[REDACTED]

[REDACTED]

Please consider the environment before printing this e-mail

This email (including any attachments) is confidential. If you are not the intended recipient you must not copy, use, disclose, distribute or rely on the information contained in it. If you have received this email in error, please notify the sender immediately by reply email and delete the email from your system. Confidentiality and legal privilege attached to this communication are not waived or lost by reason of mistaken delivery to you. Trigalana Environmental does not guarantee that this email or the attachment(s) are unaffected by computer virus, corruption or other defects.

Sent from [Mail](#) for Windows 10

From: Richard Peterson
Sent: Thursday, 14 March 2024 6:25 PM
To: council@snowymonaro.nsw.gov.au
Subject: Bombala Sawmill

To Snowy Monaro Council

I have recently been appointed to undertake an Independent Audit of Bombala Sawmill. [Dongwha Australia \(Dongwha | Dongwha Australia \) - Dongwha](#)

The audit is to be undertaken of the Project Conditions of Approval (attached) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 11th April 2024 and as part of the audit, I am consulting with Council that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 4 April 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd

[Redacted contact information]

[Redacted contact information]

Please consider the environment before printing this e-mail

This email (including any attachments) is confidential. If you are not the intended recipient you must not copy, use, disclose, distribute or rely on the information contained in it. If you have received this email in error, please notify the sender immediately by reply email and delete the email from your system. Confidentiality and legal privilege attached to this communication are not waived or lost by reason of mistaken delivery to you. Trigalana Environmental does not guarantee that this email or the attachment(s) are unaffected by computer virus, corruption or other defects.

From: Richard Peterson
Sent: Thursday, 14 March 2024 6:15 PM
To: Richard Peterson; info@epa.nsw.gov.au
Subject: Bombala Sawmill

To the EPA

I have recently been appointed to undertake an Independent Audit of Bombala Sawmill. [Dongwha Australia \(Dongwha | Dongwha Australia \) - Dongwha](#)

The audit is to be undertaken of the Project Conditions of Approval (attached) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 11th April 2024 and as part of the audit, I am consulting with EPA that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 4 April 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd



Please consider the environment before printing this e-mail

This email (including any attachments) is confidential. If you are not the intended recipient you must not copy, use, disclose, distribute or rely on the information contained in it. If you have received this email in error, please notify the sender immediately by reply email and delete the email from your system. Confidentiality and legal privilege attached to this communication are not waived or lost by reason of mistaken delivery to you. Trigalana Environmental does not guarantee that this email or the attachment(s) are unaffected by computer virus, corruption or other defects.

[REDACTED]

From: Katrina O'Reilly [REDACTED]
Sent: Tuesday, 2 April 2024 9:39 AM
To: Richard Peterson
Cc: Dave Auster; Joanna Bakopanos
Subject: RE: Bombala Sawmill MP07_0161 - Independent Environmental Audit

Good morning Richard,

Further to my phone message this morning NSW Planning would like the below issues to be a focus (as well as the conditions of the approval);

- Consult with the EPA
- what mitigation works (physical, operation hours changes depending on weather etc) in relation to reducing noise have been done on site – did any of these require development consent;
- what mitigation works have been undertaken at noise affected landholders;
- what correspondence and negotiations with noise affected landowners has been carried out (evidence of this, frequency);
- have all feasible and reasonable noise mitigation measures been carried out in relation to section 3 of the Noise Policy for Industry. What investigations into feasible and reasonable measures have taken place - are there further measures that could be implemented to reduce noise;
- Are the presented impacts correct and are they the best possible outcome;
- Water and air quality management on site;
- Evidence of compliance with commitments contained within all management plans and
- Comparison of EA predictions and actual for all parameters.

Regards
Katrina

Katrina O'Reilly
Team Leader
Development Assessment
Department of Planning, Housing and Infrastructure

[REDACTED]

dpie.nsw.gov.au





DOC24/218135-1

Mr Richard Peterson
TRIGALANA ENVIRONMENTAL PTY LTD

By email: [REDACTED]

26 March 2024

Dear Mr Peterson

Bombala Sawmill (EPL 11205) – Request for EPA input to Independent Audit

I am writing in response to your email correspondence dated 14 March 2024 seeking input from the NSW Environment Protection Authority (EPA) regarding an Independent Audit (Audit) of the Bombala Sawmill located at Sandy Lane, Bombala, NSW, 2632 (Premises).

The EPA regulates the Premises in accordance with the Environment Protection Licence No. 11205 (Licence) issued to Dongwha Australia Pty Ltd (Licensee) to carry out the scheduled activity of wood preservation and wood or timber milling or processing at the Premises.

The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations. The Licensee retains primary responsibility for the environmental performance of its project and activities carried on at the Premises. The onus is on the Licensee to ensure compliance with relevant Acts includes but is not limited to the *Protection of the Environment Operations Act 1997* and associated regulations.

The scope of the audit should include:

- An assessment of compliance against:
 - o Relevant conditions of SSD 07_0161 (Modification 4)
 - o Environmental Management Plans (EMP) and Sub-plans and other relevant post approval documents and the adequacy of the system to achieve legislative requirements and drive performance improvements. EMPs should be reviewed and updated on a regular basis. This should include consideration of complaint and incident handling, compliance tracking and reporting as well as the outcomes of any independent environmental audits.
 - o Environment Protection Licence 11205
 - o Pollution Incident Response Management Plan and specific procedures to address potential risks around turbine fires.
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance.
- An assessment of the implementation of previous audit findings, recommendations and actions.

Following a review of the Licensee's compliance history, the EPA also recommends the Audit focus on air emission sources, which has been the subject of several Pollution Reduction Studies and Programs, and the storage of chemicals and oils.

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

TTY 133 677, then
ask for 131 155

Locked Bag 5022
PARRAMATTA
NSW 2124

6&8 Parramatta
Square 10 Darcy
Street
PARRAMATTA NSW
2150

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

If you have any further questions about this issue, please contact Bree Turkington on 131 555 or at info@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Stricker', written in a cursive style.

ANDREAS STRICKER
A/Unit Head
Operations

Appendix E Photographs



Photo 1: Skip bins for general waste and steel recycling



Photo 2: Acoustic hoarding and speed restriction signage



Photo 3: Sawdust stockpile stored for boiler fuel



Photo 4: Grass covered areas reducing the risk of wind and soil erosion



Photo 5: Dust cover on truck

**Shiptons Inspections
and Maintenance Engineering**
ABN 22 134 566 859
PO Box 30112 Umina Beach NSW 2257
Ph (02) 4342 4111 Mfr 0417 492 609
Email: admin@stiam.net.au

**Siam
Engineering**

**Boiler / Pressure Vessel Inspection
to AS/NZS 3788 and
WORK HEALTH AND SAFETY ACT 2011
WORK HEALTH AND SAFETY REGULATION 2017
NATIONAL STANDARD FOR PLANT**

CERTIFICATE OF INSPECTION

No. 41840

This is to certify that **Greg Shipton**
inspected the **Hot Water Boiler (Hi Temp.)**
owned by **Dongwha Australia**
and situated at **1 Sandy Lane, Bombala**
on the **28/11/2023**

Identifying Numbers
Asset No.
Design Reg. No. **V1802510**
Item Reg. No.
Serial No. **18-1857-1**
AIES No. **186-B-927**

Boiler Details:	Model	Manufacture Date	Type of Vessel	Location on Site
Manufacturer Danstoker	TDC-F25	11/2018	Boiler - Firetube	Large Boiler

	Design Pressure	Design Temp.	Chamber Volume	AS4343 Hazard	Fluid Type / Phase	Heating Surface	Boiler Power	Attendance Category
Shell	1600 kPa	204 C	54720 L	B	Harmful / Gas	692 sq.m	17,000 kW	Attended

This inspection was **Internal & External** Recommended next inspection **External - 11/2024 Internal - 11/2024***
This vessel is considered Safe to Operate at the maximum allowable working pressure(s) of :-

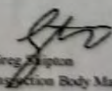
Shell 1600 kPa

Comments :

Attended operation to AS2593 table 1.3

Shell - Sludge-like deposit in bottom of shell. Nil scale, Nil corrosion. - Satisfactory
Tubes - Soft buildup on tubes. Likely to be treatment chemicals. Nil scale, nil corrosion - Satisfactory
Tubeplates - Satisfactory
Furnace - Satisfactory
Stays - Leaking from 18+ wall stays at toe of stay weld. See attached report 41840R.
Refractory - Satisfactory
Safety Valve - P&SS S/N 100381765-050-21 65mm 1600kPa 05/23 - Satisfactory
Safety Valve - P&SS S/N 100340381-033 65mm 1600kPa 08/22 - Satisfactory

* Due to stay leaks, consideration should be given to repairs before the next recommended date, boiler is potentially unreliable and may not continue to hold pressure


Greg Shipton
Inspection Body Manager
MIEAust

Note - All accessible components of this item, unless otherwise noted, have been inspected to the requirements of AS3788.
If no comment is made regarding a component of this item, it is deemed Unremarkable and Satisfactory

General Requirements

This equipment is to be operated only while maintained in a safe condition with its fittings in correct adjustment, and where necessary, by a trained person.
This certificate is to be made available to be read by persons operating the pressure equipment.
Proposed repairs or alterations must be reported to the inspector

Photo 6: Annual Inspection testing certificate - boiler



Photo 7: Surface water pond



Photo 8: Stacked timber (despach area)



Photo 10: Timber processing operations contained within acoustic shed



Photo 11: Weather monitoring station



Photo 12: Chemical Storage and bunded area



Photo 13: Site exit point with no mud tracking



Photo 14: Acoustic mound



Photo 15: Rehabilitation area and groundwater monitoring well



Photo 16: Visual screening



Photo 17: Covered and banded timber treatment and drying area



Photo 18: weighbridge



Photo 19: Surface water detention pond



Photo 20: Security and carpark lighting



Photo 21: Acoustic roller door

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
NON-COMPLIANCES				
Project Approval Schedule 3 Condition 9	The Proponent shall ensure that noise generated by the project does not exceed the noise limits presented in Table 3 or Table 4. (Refer to Appendix C for Tables 3 and 4)	Additional noise testing has been undertaken during the audit period. The noise testing confirms compliance has not been achieved with these conditions.	The following recommendations are made in relation to noise exceedances: • Conclude negotiations with affected residents and implement any agreed "at property" noise treatments as agreed with any resident. • Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure.	This non-compliance has been previously reported to DPHI and EPA. Consultation with DPHI and EPA is ongoing to resolve this issue following completion of a recent Noise Impact Assessment and associated review of reasonable and feasible noise mitigations at the site. Negotiations with affected residents will be progressed upon guidance from DPHI and EPA as to the preferred method to resolve the ongoing noise exceedance issues at the site. The production team will continue to review and implement any potential measures to reduce noise emissions inclusive of the Auditor's suggestion to arrange timber stacks in such a fashion that they may provide some noise attenuation.
Project Approval Schedule 3 Condition 14	Upon completion of all building works as described in the EA and 07_0161 MOD 1, or within 3 years of the date of this approval (whichever is sooner), or a time/s otherwise agreed to by the Secretary, the Proponent must provide to the Department, EPA and Council; a) A Validation Report, for the whole site, including results of groundwater monitoring, which has been subjected to a site audit in accordance with the <i>Contaminated Land Management Act 1997</i>, to	As previously reported to DPHI in the 2022-2023 Annual Review, compliance with this condition hasn't been achieved as a validation report and Site Audit Report has not been completed. DWAU noted that the process for completing this activity has commenced with the initiation of the procurement of an independent site Auditor.	It is recommended: • the remedial works are completed as soon as possible • the validation report, and audit statement are also completed in accordance with this condition	This non-compliance has been previously reported to DPHI and in accordance with the Department's correspondence of 27 Feb 2024, Dongwha Australia is providing an update to the Department every 2 months regarding progress to resolve this non-compliance. The most recent update was provided on 23 Apr 2024 and the next update is due before 27 Jun 2024.

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
	confirm the appropriateness of the Validation Report. The Validation Report must be prepared in accordance with guidelines made or approved by EPA under Section 105 of the <i>Contaminated Land Management Act 1997</i>; and b) Copies of the Site Audit Report and Statement, for the whole site, certifying the appropriateness of the Validation Report(s). <i>Notes: for the purposes of condition 14, those areas of the site already covered by the validation report and statement prepared under condition... can be addressed by referencing the earlier report and statement, as long as the risks of recontamination of these areas are minimal.</i>			
Project Approval Schedule 3 Condition 26	The Proponent shall ensure ash from the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler is stored temporarily on-site for no more than three months in a dedicated concrete bunker. If the ash cannot be re-used or recycled, the Proponent shall classify the waste in accordance with the EPA's <i>Waste Classification Guidelines</i> and dispose of to a facility that may lawfully accept the waste.	During the audit period, boiler ash was stored on site for a period of longer than three (3) months as options for potentially recycling and reusing were being investigated	Cleanaway Environmental Services were engaged to remove the ash and dispose of it a NSW EPA licenced landfill. Removal and disposal of ash recommenced on a regular basis commenced in August 2023 and therefore compliance with this condition should be achieved on an ongoing basis. No additional recommendations are made over and above the actions taken.	This non-compliance has been previously reported to DPHI and, as noted by the Auditor, removal and disposal of ash recommenced in August 2023.
EPL 11205 L4.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels	Additional noise testing has been undertaken during the audit period. The noise testing confirms	The following recommendations are made in relation to noise exceedances: Conclude negotiations with affected residents and implement any agreed	This non-compliance has been previously reported to DPHI and EPA. Consultation with DPHI and EPA is ongoing to resolve this issue following completion of a recent

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
	specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2	compliance has not been achieved with these conditions.	"at property" noise treatments as agreed with any resident. Where feasible and practical to do so, re-arrange the temporarily stored stacked timber product so it acts as an additional noise attenuation measure	Noise Impact Assessment and associated review of reasonable and feasible noise mitigations at the site. Negotiations with affected residents will be progressed upon guidance from DPHI and EPA as to the preferred method to resolve the ongoing noise exceedance issues at the site. The production team will continue to review and implement any potential measures to reduce noise emissions inclusive of the Auditor's suggestion to arrange timber stacks in such a fashion that they may provide some noise attenuation.
EPL 11205 M7.1	To determine compliance with Condition L4.1, attended noise monitoring must be undertaken in accordance with Conditions L4.5 and L4.6 and: - at the locations EPA Identification Points 32 and 33, as listed in Condition L4.1; - occur annually; - occur during each day, evening and night period as defined in the New South Wales Industrial Noise Policy (EPA 2000) for a minimum of:1.5 hours during the day;30 minutes during the evening; and1 hour during the night - occur for three consecutive days.	As noted in the 2021/2022 Annual Return document, Annual Noise monitoring did not occur within the Annual Return year.	DWAU have appointed an experienced team of environmental consultants to oversee the implementation of the environmental management plans, and to check and ensure compliance with the conditions of consent. Monthly management meetings are attended by the environment team who utilise this forum as a mechanism to check and ensure compliance outcomes are achieved including notifications and reporting obligations. The Auditor notes this is an appropriate mechanism to ensure all administrative, monitoring and reporting non compliances are addressed appropriately	Dongwha Australia notes this non-compliance and considers that no further action is required as a range of management measures, as noted by the Auditor, have been implemented to address this non-compliance.

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
EPL 11205 R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Evidence of the submission of electronic Annual Return Documents is provided on the EPA website. In summary the following Annual Returns were submitted to the EPA • 3/5/22- 2/5/23 (submitted to EPA on 23 6/24) • 3/5/21- 2/5/22 (submitted to EPA on 01 November 2022) The 2021/22 Annual return document was not submitted to EPA within the required timeframe, therefore compliance with this condition has not been achieved.	DWAU have appointed an experienced team of environmental consultants to oversee the implementation of the environmental management plans, and to check and ensure compliance with the conditions of consent. Monthly management meetings are attended by the environment team who utilise this forum as a mechanism to check and ensure compliance outcomes are achieved including notifications and reporting obligations. The Auditor notes this is an appropriate mechanism to ensure all administrative, monitoring and reporting non compliances are addressed appropriately	Dongwha Australia notes this non-compliance and considers that no further action is required as a range of management measures, as noted by the Auditor, have been implemented to address this non-compliance.
RECOMMENDATIONS				
Project Approval Schedule 4 Condition 1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted within 2 months of the date of this approval and approved by the Secretary prior to carrying out any construction; (b) be revised and approved by the Secretary, prior to the commencement of operations of each of the following Stages: Stage 3, Stage 6 and Stage 8 the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1);	Site environmental checklists have been prepared and are being implemented to provide a mechanism for checking and addressing any site or environmental concerns and issues. Environmental checklists are completed for the various work zones and buildings within the site such as the Despatch area, and the engineering workshop area. The inspections are undertaken by project operational staff. DWAU There currently does not appear to be a site wide checklist that	Undertake a gap assessment of the current content and coverage of the existing site inspection checklists to ensure back of house and common areas are included through routine site inspections.	Dongwha Australia have reviewed all relevant management plans and relevant monitoring requirements inclusive of inspection checklists and consider they remain appropriate and therefore no further action is proposed.

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
	(c) provide the strategic context for environmental management of the project; (d) identify the statutory requirements that apply to the project; (e) describe in general how the environmental performance of the project would be monitored and managed; (f) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and	addresses back of house working areas and general common areas.		
		The site induction has limited environmental content.	Review and update the site environmental induction to include the following (suggested items): • Incident response notification requirements • Correct waste disposal requirement • Operational hours • Community etc In addition to any other items advised by the environmental advisor.	The site induction will be updated to include the Auditor's suggestions.
OBSERVATIONS				
Project Approval Schedule 3 Condition 5	Unless otherwise specified by the Secretary, the Proponent shall; a) Undertake air emissions monitoring in accordance with the EPL(s) for the site; and b) Ensure that emissions from the Project do not exceed the emissions limits specified by the EPA in the EPL(s) for the site.	The 2022/23 Annual Review notes that the Air Emissions Consultant "Ektimo" conducted an internal investigation which deemed it possible that a droplet of CCA liquid may have "splashed" up from the pool inside the CCA tank which inadvertently entered the sampling train. No further action was deemed currently necessary and during the next sampling event, results will be specifically reviewed for this parameter.	As noted in the 2002/23 Annual Review, the results of the next sampling round will be specifically reviewed for the CCA parameter. It is recommended this is added to the project action list to ensure the assessment is undertaken in the next round of monitoring.	This observation is noted by the compliance team and the results of the next sampling round will be specifically reviewed for the CCA parameter.

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
Project Approval Schedule 3 Condition 12	The Proponent shall provide and implement a Remedial Action Plan for the site to the satisfaction of the Secretary. The plan must; - Be reviewed and endorsed by a suitably qualified independent expert (to be approved by EPA) and approved by the Secretary, prior to the commencement of any earth or building works on Zone 3; - Identify the nature and extent of all contamination on the existing mill site (Lot 27 DP1061792), including any offsite impacts (for example on groundwater); - Justify the remediation criteria for the site; - Consider options for the remediation of each component of the contamination; - Justify the remediation strategy proposed; - Set out the timing and staging of all remediation works to be undertaken; - Include a site of validation plan; and Demonstrate compliance with the <i>Contaminated Land Management Act 1997</i>	The Remedial Action Plan was approved in DPHI in 2011. The Remedial work has yet to be undertaken. A contaminated sites Auditor has been appointed to oversee the work.	It is recommended the Site Auditor reviews the RAP and any necessary changes are made as advised by the Site Auditor.	As noted in the Dongwha Australia's correspondence to DPHI on 23 Apr 2024 an NSW EPA-accredited site auditor (contaminated sites) has been retained to conduct a site audit in accordance with the <i>Contaminated Land Management Act 1997</i> and their work will involve review of the RAP.
EPL 11205 M7.2	The licensee must monitor (by sampling and obtaining results by analysis) that timber, treated with copper chrome arsenate (CCA) preservative at the premises, is 'drip free' prior to movement of the treated timber from the sealed drip	The Auditor was provided with a copy of the Merck test report schedule covering the audit period. The following tests were performed. 2021 – 8 tests per annum 2022 – 6 tests per annum	Update the testing register to document the periods where no timber is produced, therefore no testing has been undertaken for those months.	This observation is noted and the testing register will be updated to include a comment when no CCA treatment has occurred.

Condition	Summary of Condition	Audit Finding	Recommendation	Proponents' Proposed Action
	pad area, by: sampling at least one batch of CCA treated timber each month using the method outlined at Appendix C AS/NZS 2843.1:2006, Timber Preservation Plants - Timber preservation plant site design; and analysing the sample using a field test kit such as Merck Aquaquant Test Kit 1.14441.0001 or equivalent	• 2023 – 9 tests per annum. Based on the average number of tests performed per annum, compliance with the requirement to undertake monthly tests has not been achieved. DWAU noted that CCA treatment occurs upon demand for CCA-treated timber, which has reduced significantly over the past few years to the point that there are several months of the year where testing it is not undertaken.		