PRODUCT MANAGEMENT PLAN

PORTA PRODUCTS

1 SANDY LANE
BOMBALA NSW

Rev G, 26 March 2026

REVISION HISTORY

Revision No.	Revision Date	Author	Modifications Made	Reviewed by
A	01/08/2012	Dongwha Australia	Issue of draft	Dongwha Australia
B	07/09/2012	Dongwha Australia	Incorporation of EPA and DPIE feedback	Dongwha Australia
C	18/12/2017	Dongwha Australia	Update for MOD2 of Project Approval	Dongwha Australia
D	01/03/2019	Dongwha Australia	Update for MOD3 of Project Approval	Dongwha Australia
E	26/05/2020	Syam Krishna Dongwha Australia	Update for MOD4 of Project Approval	MyungJae Lee Dongwha Australia
F	09/11/2021	Dick Benbow Benbow Environmental	General revision	KyongSeok Min Dongwha Australia
G	26/03/2026	Susannah Price Porta Products	Re-branding from Dongwha Australia to Porta Products and general revision as required every 5 years	Victor Bendevski Porta Products

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1. INTRODUCTION

Porta Products Pty Ltd (Porta) operates a modern timber milling and preservation facility near Bombala, New South Wales. The facility was purchased from Dongwha Australia Pty Ltd (DWAU) in 2025. The site is the subject of a Project Approval (MP07_0161) under Section 75J of the *Environmental Planning and Assessment Act 1979*.

The development sources plantation softwood from the area around Bombala and processes the lumber into a range of treated and untreated sawn timber products for supply to the domestic market. The site has been used for this purpose since 1979.

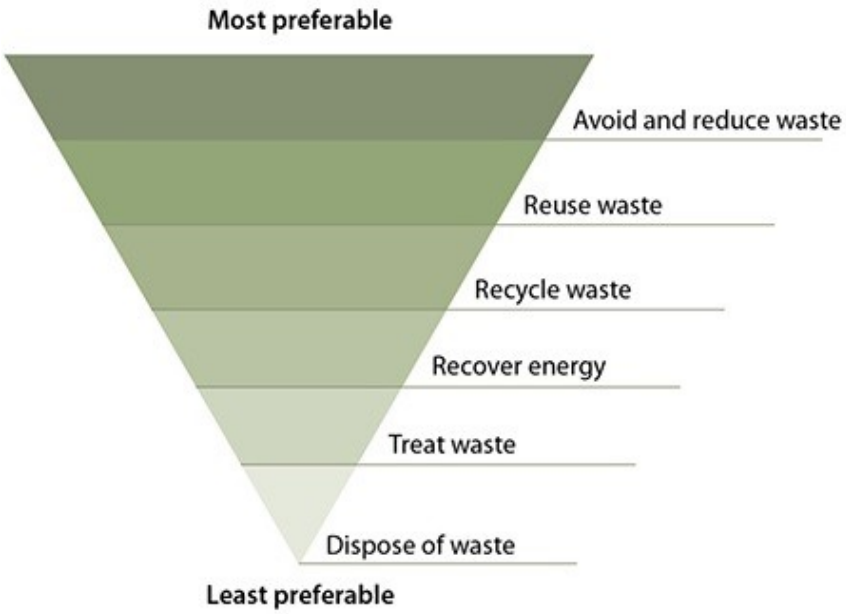
This Product Management Plan (PMP) focuses on products associated with the WASTE section of the Project Approval and has been prepared to meet conditions 28 and 28A in Schedule 3.

The conditions for the plan are reproduced in Table 1-1, below.

Table 1-1: Project Approval MP07_0161 (MOD4) – Schedule 3, Conditions 28 and 28A

CONDITION	SECTION OF DOCUMENT ADDRESSING CONDITION
28. The Proponent must prepare and implement a Product Management Plan to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with EPA and approved by the Secretary prior to June 2012;	Section 1.1
(b) 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;	Types and sources of materials are identified in Section 2. A procurement plan developed in Revision A of the PMP is no longer relevant.
(c) identify potential environmental impacts and liabilities at each stage of the products life cycle;	This section was removed in Revision E as approved by the Secretary.
(d) 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;	Section 3
(e) describe, classify and quantify the waste produced in the production process and include measures to maximise the reduction, reuse and recycling of this waste;	Table 2-1
(f) describe how the effectiveness of the plan would be monitored and reported; and	Section 4
(g) be revised and updated every 5 years to the satisfaction of the Secretary.	Section 4
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.	Section 3.5

In preparing this plan, the waste management hierarchy has been considered in each stage of the process as shown in the following diagram:



1.1 BACKGROUND

The first draft Product Management Plan was provided to the EPA for their review. Feedback was received on 17 August 2012. All EPA comments were included in the final 2012 plan (Revision B).

Feedback from the Department of Planning and Infrastructure (now DPHI) was received on 31 August 2012. All comments raised by DPIE were incorporated into the final 2012 plan (Revision B).

The plan was revised in 2017 following receipt of an order dated 13 October 2017 requiring Porta to prepare and submit a Product Management Plan to the Secretary by 18 December 2017 (Term Number 2) noting that the conditions of the approval not complied with were in relation to the requirement for the plan to be prepared in consultation with the EPA and approved by the Secretary within 12 months of the approval of MOD2. Revision C of the plan was submitted and approved by DPIE on 18 December 2017.

Revision D was prepared on 1 March 2019 and Revision E issued on 26 May 2020. A letter dated 26 June 2020 from the DPIE confirm this revision of the PMP dated May 2020 was approved by the Secretary (Appendix 1).

- Benbow Environmental were engaged by DWAU to revise the plan to ensure all requirements under the project approval MP 07_0161 were met and a summary table providing waste quantities, classification and management was provided for clarity Revision F was issued on 09 November 2021 and approved by DPIE on 18 November 2021.This current revision of the Product Management Plan (Revision G) has been prepared by Porta as part of the required 5-yearly revision and update as specified in Condition 28(g) of the Project Approval and will be submitted to DPHI for approval. Updates include re-branding from Dongwha Australia to Porta Products;
- Waste classification of bifenthrin waste;
- Update on investigation of boiler ash re-use;
- Frequency of monitoring inspections; and
- General administrative updates.

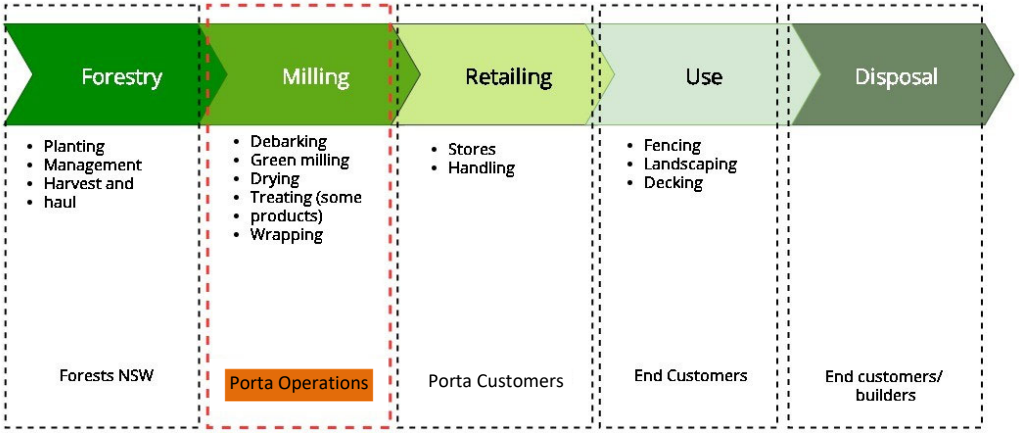
2. MATERIALS AND RESOURCES USED IN PRODUCTION

This section details the material inputs and outputs of the facility in order to identify the by-products and wastes that need to be managed by Porta.

2.1 PRODUCT LIFECYCLE

A generic lifecycle of the products manufactured at Porta Bombala facility is shown in the following diagram.

Figure 2-1: Product Lifecycle



Responsibility of Porta in the management of by-products and wastes generated by the processes extends to the "milling" component of the lifecycle, including product wrapping (or packaging), as shown in Figure 2-1, above.

- Packaging components are designed to be compatible with established re-use and recycling systems. Porta are committed to continuous improvement of the format and fate of packaging materials to enhance recyclability, reduce waste, and minimise environmental impact by;Adopting approaches that make changes in the way we design, use and buy packaging and packaged products so that packaging uses less resources and is more easily recycled;
- Enabling packaging materials to be returned to the economy thereby minimising waste associated with the generation and consumption of Consumer Packaging across the supply chain; and
- Preventing the impacts of fugitive packaging on the environment by adopting approaches that support new innovations and find solutions to capture packaging materials or waste before it enters the environment or support the adoption of new or alternative types of packaging.

2.2 WASTE DESCRIPTION

Wastes from the production process have been identified and classified in accordance with the NSW EPA Waste Classification Guidelines. Estimated annual quantities and management of these wastes is summarised in Table 2-1, below. Further information regarding management of waste is discussed in Section 3.

Table 2-1: Waste Quantities, Classification and Management

Waste Type/Name	Process/Area generated	Waste Classification[1]	Estimated Annual Quantity	Measures to Reduce/Reuse/Recycle
CCA-, Micro Pro- and LOSP-treated waste	Treatment area	General Waste (Non-putrescible)	<5 m^3 per annum	Yes
CCA- and Micro Pro- drip pad waste (waste code:H170)	Treatment area: Sawdust and splintered timber dislodged from timber packs during loading / unloading of treatment cylinders and dust deposits	Hazardous waste	1.2 m^3 per annum	Current technologies do not support the reuse or recycling of this material.
Bifenthrin waste	H2F Timber Treatment Unit generates wood fibre and wood dust contaminated with bifenthrin	Prior to disposal, waste will be classified in accordance with NSW EPA Waste Classification Guidelines	3 x 200 L drums per annum	Wastewater from cleaning filters and screens is recycled back through CCA treatment system. Remaining waste contaminated with dust requires disposal.
Boiler ash	15MW Boiler 2.5MW boiler	General Solid Waste	700 m^3	Laboratory analysis (latest undertaken in 2025) indicates the ash is not suitable for application to land under the NSW EPA *The ash from burning biomass order 2014*. Further investigations into potential re-use/recycling options were undertaken between 2023 and 2025, however no suitable options were identified. Porta will continue to investigate potential re-use/recycling options for the boiler ash.
Wood Residues including bark, woodchip, sawdust and shavings	De-barking, chipping, trimming, sawing and milling processes.	General Solid Waste (non-putrescible)	168,500 tonnes	Materials that are not used as fuel are managed under the Dust and Wood Residue Management and Monitoring Plan
General & Recyclable waste	Whole Site	General Solid Waste (non-putrescible)	1,820 m^3 (general waste) 340 m^3 (recyclable waste)	Every opportunity is taken to re-use and recycle prior to disposal.

Note: N/A = Not applicable

1. Waste classification is as per the NSW EPA Waste Classification Guidelines (November 2014)

3. MANAGEMENT OF WASTES

Management and measures to improve the design and reduce environmental impacts and liabilities of each waste type is described in the following sub-sections and includes:

- The composition of the product; and
- Hazardous materials contained in the product.

3.1 WOOD RESIDUE AND DUST

Waste Name:	Wood residues
Description:	Bark, woodchip, sawdust and shavings generated by sawmill
Waste Classification:	General Solid Waste (Non-Putrescible)
Quantity generated:	168,500 tonnes per annum

The historical timber residue stockpile at the rear end of the mill was completely disposed of before 31 January 2018. In addition, and as part of the updated landscape management plan, sections of the rear area were landscaped and revegetated. This work has improved the amenity of the area as well as providing connections to native vegetation areas within and external to the site. Further amenity improvements will come from reductions in noise and dust as well as softening of the visual impact of the site from Sandy Lane.

Currently, the production is meeting market demand for residue and no additional material is anticipated to be produced in future. All wood residue is recycled and/or reused.

In regards to dust management on site, a water cart (10,000L capacity) is used daily on a continuous basis to ensure dust is suppressed. A new water cart, with increased capacity, was purchased in October 2025 to ensure that effective dust suppression was occurring across the site.

The management of this historical residue which was disposed , as well as the wood residues and dust generated during daily operation/production is discussed within the Dust and Wood Residue Monitoring and Management Plan as a requirement of approval condition 4 in schedule 3.

The plan is structured to address all the elements in the project approval condition 28 (schedule 3) for each identified waste stream in turn. The plan was revised in consultation with EPA in September 2021.

3.2 CCA-, MICRO PRO- AND LOSP-TREATED WASTE

Waste Name:	CCA-, Micro Pro- and LOSP-treated waste
Description:	Minor treated waste offcuts
Waste Classification:	General Solid Waste (Non-putrescible)
Quantity generated:	<5 m^3 per annum

Description: This product comprises minor offcuts of milled lumber that has been through the entire treatment process either using Copper Chromium Arsenate (CCA), Micro Pro or Light Organic Solvent Preservative (LOSP).

Reuse/Recycle: Most of the preserved timber not meeting quality standards is reallocated into different supply categories and as such still finds an end use by customers.

Environmental Impacts and liabilities: While the product is in service/use environmental impacts are negligible. The products are manufactured in full compliance with Australian Standards and APVMA guidelines. These guidelines, in addition to NSW EPA and NSW Department of Health publications, should direct the end user of the product in correct handling and disposal measures. If followed the guidelines will ensure that minimal environmental impact occurs from final disposal. It is noted that Porta have no legal jurisdiction over the end users actions.

Material Composition: Extracts from the Safety Data Sheets for CCA and Micro Pro treated timber are below. The concentrations of the active ingredients are identified in the tables.

CCA treated timber, extract from Safety Data Sheets (SDS)

3. COMPOSITION/ INFORMATION ON INGREDIENTS

Ingredient	Identification	Classification	Content
ARSENIC	CAS: 7440-38-2 EC: 231-148-6	T;R23/25 N;R50/53	<0.8%
CHROMIUM	CAS: 7440-47-3 EC: 231-157-5	Not Available	<0.8%
TIMBER (SOFTWOOD/HARDWOOD)	Not Available	Not Available	>98%
COPPER	CAS: 7440-50-8 EC: 231-159-6	Not Available	<0.5%

Micro Pro treated timber, extract from SDS

3. COMPOSITION/ INFORMATION ON INGREDIENTS

Ingredient	Identification	Classification	Content
METHANOL	CAS: 67-56-1 EC: 200-659-6	F;R11 T;R23/24/25 T;R39/23/24/25	0.04 to 0.08%
SODIUM NITRITE	CAS: 7632-00-0 EC: 231-555-9	T;R25 O;R8 N;R50	<0.008%
TIMBER (SOFTWOOD/HARDWOOD)	Not Available	Not Available	>95%
COPPER (II) CARBONATE HYDROXIDE	CAS: 12069-69-1 EC: 235-113-6	Not Available	1 to 2%
ADDITIVE(S)	Not Available	Not Available	<1%
N,N-DIDECYL-N,N-DIMETHYLAMMONIUM CARBONATE	CAS: 894406-76-9	Not Available	0.4 to 0.8%
DISPERSANT(S)	Not Available	Not Available	0.1 to 0.3%
PROPYLENE GLYCOL (PROPANE-1,2-DIOL)	CAS: 57-55-6 EC: 200-338-0	Not Available	0.05 to 0.15%
DIDECYL TERTIARY AMINE	CAS: 7396-58-9 EC: 230-990-1	Not Available	<0.08%

Hazardous Materials: Chromium and Arsenic

Classification and Quantity:

Under the NSW EPA Waste Classification Guidelines, CCA and LOSP-treated timber within building and demolition waste is pre-classified as General Solid Waste (non-putrescible) as:

> *timber, including unsegregated timber, that may contain timber treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP)*

3.3 CCA & MICRO PRO DRIP PAD WASTE

Waste Name:	CCA and Micro Pro Drip Pad Waste
Description:	H170 – Waste from the production, formulation and use of wood-preserving chemicals
Waste Classification:	Hazardous Waste
Quantity generated:	1.2 m^3 per annum

Description: This waste stream comprises sawdust and splintered timber dislodged from the timber packs during loading and unloading of the treatment cylinders. In addition, small amounts of dust that deposits under the covered area are picked up into this waste stream. The material is collected from the area and stored in dedicated receival containers. These containers are removed from site by waste contractors for disposal by landfill at the Kemps Creek facility.

Reuse/Recycle: Current technologies do not support the reuse or recycling of this material.

Environmental Impacts and Liabilities: This material contains only dilute concentrations of the treatment product typical of the concentrations of the mainstream treated timber. It is managed and handled with similar processes used for managing the treated damaged boards. The system is completely closed and supported by robust engineering solutions.

The volume of the waste created had been minimized by utilizing dedicated plant for the drip pad area. This ensures that material is not tracked into the dip pad area from outside. In addition, stringent housekeeping policy ensures that foreign materials entering the area are minimised. Similarly mechanical handling practices of the packs of timber is reviewed regularly with the aim to minimise damage to the product, this also minimises generation of this waste stream.

Design Improvement and Liability Reduction: Porta are progressively minimising dust and foreign material contamination site wide. The planned rollout of construction of concrete hardstand areas and bitumen sealed haul roads as well as ongoing targeted water spray tanker operations contribute to reduced dust generation and migration. In addition, targeted mechanical sweeping of high impact areas is being undertaken as a solution across the site.

Material Composition: The material is considered to be primarily made up of treated timber sawdust and splintered material. Extracts from the Safety Data Sheets for CCA and Micro Pro treated timber are below. The concentrations of the active ingredients are identified in the tables.

<u>Hazardous Materials: Chromium and Arsenic</u>

Classification and Quantity: The quantity of material produced is estimated at 1.2 cubic metres per annum. The material is disposed of at the Kemps Creek facility. Drip pad wastes are currently classified as Hazardous Waste under the NSW EPA Waste Classification Guidelines.

Effectiveness of this element of the Product Management Plan ismeasured by the amount of drip pad waste (cubic metres) produced as a percentage of the throughput of the CCA treatment cylinder (cubic metre) per calendar year. This calculation will be included in an annual review process built into the site wide quality management system.

3.4 BIFENTHRIN WASTE (H2F TREATMENT)

Waste Name:	Bifenthrin Waste
Description:	Includes dust/debris within the preservative solution.
Waste Classification:	Prior to disposal, waste will be classified in accordance with NSW EPA Waste Classification Guidelines
Quantity generated:	1.2 m^3 per annum

Porta has an enclosed H2F Timber spray unit in the Satellite building of the site. The preservative chemical used in this system is called Determite that has an active ingredient called Bifenthrin, which is used in timber treatment, domestic pest control and agricultural purposes. The treatment will be applied to the surface of the pine framing material as a final process prior to packaging for sale. IBCS containing Bifenthrin will be stored in the treatment plant and are transported by the forklift operators to the satellite building for the process.

Koppers H2F RTU Work solution; extract from SDS

3. COMPOSITION/ INFORMATION ON INGREDIENTS

3.1 Substances / Mixtures

Ingredient	CAS Number	EC Number	Content
DISTILLATES (PETROLEUM), HYDROTREATED LIGHT	64742-47-8	265-149-8	2 to 3%
ADDITIVE(S)	-	-	0.5 to 1.5%
BIFENTHRIN	82657-04-3	617-373-6	0.4 to 0.6%
DYE(S)	-	-	0.4 to 0.6%
WATER	7732-18-5	231-791-2	>90%

Koppers H2F Timber Preservative; extract from SDS

3. COMPOSITION/ INFORMATION ON INGREDIENTS

3.1 Substances / Mixtures

Ingredient	CAS Number	EC Number	Content
DISTILLATES (PETROLEUM), HYDROTREATED MIDDLE (REFINED)	64742-46-7	265-148-2	>60%
BIFENTHRIN	82657-04-3	617-373-6	10%
NON HAZARDOUS INGREDIENTS	Not Available	Not Available	10 to 30%

Waste produced will be very minimal and will predominantly consist of wood fibre and wood dust collected from the filtration systems. As the timber will be treated in its final shape and form there will be very little wood dust/debris on the timber. The dust/debris that finds its way into the preservative solution is filtered through the extensive filtration system. The waste from the filters will be placed into an approved lined drum for collection. Drums are of 200 litres and are stored in designated bunded area.

Small amounts of waste water will also be generated from cleaning the filters and screens. All the waste water is collected with the majority to be recycled back through the CCA treatment system. The collection, transportation and disposal of waste generated from the process will be as per EPA waste licence requirements defined under Condition O5 of the site EPL:

O5.1: 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 timeO5.2: The licensee must ensure that waste identified for recycling is stored separately from

other waste.

As per the process and Porta's estimation the spray unit is expected to generate less than 3 x 200 litres drums of waste annually. However, the quantity of this waste is so minor that it has not yet required removal.

Waste Classification: This waste is yet to be classified. Once 3 x 200 L of the waste has been generated, a sample needs to be taken and sent for waste classification purposes. Based on information provided in the SDS, it is unlikely to be "hazardous waste" as it is not classified as a dangerous good (Note: Class 9 Environmentally hazardous chemicals are not subject to the ADGC). Chemical analysis in accordance with Step 5 of the Waste Classification Guidelines needs to be undertaken to confirm the waste classification for this waste.

3.5 BOILER ASH

Waste Name:	Boiler Ash
Description:	Ash generated from the operation of the 15MW biomass boiler and the 2.5MW redry boiler.
Waste Classification:	General Solid Waste
Quantity generated:	700 m^3 per annum

The 15 MW boiler is fuelled by clean, untreated timber residue product (generally in the form of sawdust) generated on site during milling. Ash is generated from the operation of the boiler. There are 3 x 10m^3 enclosed steel holding bins, where the ash is stored. The ash outlet pipe is attached to one of the bins which captures the ash. Once full, the bin is left on site for a short period while the ash cools to a temperature suitable for offsite disposal. The third bin remains empty and ready for use when a bin is filled.. These bins have approximately 10 days' worth of storage capacity. The ash is currently taken offsite, once cooled, by a local contractor to be disposed of at the EPA-licenced Cooma landfill under an agreement with Snowy Monaro Regional Council.

It is noted that there is no concrete bunker used or required to store ash (as referenced in the project approval). The ash bins are fully enclosed and there are no emissions from the bins.

Ash from the 2.5MW redry boiler is captured within a metal tray. This is transferred to the steel holding bins and disposed off-site as noted above for the 15 MW boiler.

Laboratory testing of the ash with reference to NSW EPA *The ash from burning biomass Order and Exemption (2014)* was undertaken in 2025. Results indicated the concentrations of boron, copper, cadmium and zinc exceeded the chemical requirements under this EPA Resource Recovery Order and therefore the ash cannot be used for application to land as a soil amendment under this Order.

Waste Classification: Laboratory testing undertaken on the ash indicates the concentrations of potential contaminants are below the chemical thresholds for CT1 and therefore the waste can be classified as "General solid waste". However, the pH is >12.5 which indicates the ash is alkaline.

Porta will continue to investigate potential re-use/recycling options for the boiler ash as a fertiliser or soil amendment (under a site-specific Resource Recovery Exemption).

3.6 GENERAL & RECYCLABLE WASTE

Waste Name:	General & Recyclable waste
Description:	Includes: packaging waste, metal, organics, plastics, paper and cardboard and other general waste
Waste Classification:	General Waste (Non-Putrescible)
Quantity generated:	1,820 m^3 per annum (general waste) 340 m^3 per annum (recyclable waste)

The Bombala Mill has been part of the Bin Trim program which provides free help and support to NSW businesses to maximise recycling and minimise waste to landfill. This program is funded by the NSW EPA and identified additional recycling opportunities for general waste across the site.

Waste is segregated into general waste and recyclable waste and current quantities generated are 35 m^3 per week of general waste and 6.5m^3 per week of recyclable waste.

3.7 CCA AND MICRO PRO TREATMENT CYLINDER LIQUID RESIDUE

This waste comprises liquid residues flushed from the treatment cylinder. 100% of this material is recovered and returned back to the treatment chemical storage for reuse.

3.8 WASTE PRODUCT MANAGEMENT FUTURE

Porta does not anticipate in the foreseeable future, the creation of any issues in regards to waste management. Porta understands that the management of waste generation should be given priority as waste production represents an economic disadvantage to the facility

4. MONITORING & REVIEW

Monitoring and review of the Product Management Plan shall be undertaken in accordance with the Environmental Management Strategy. Specific details for the PMP are provided below.

4.1 ENVIRONMENTAL MONITORING

The Leading Hands undertake monthly inspections of the site ensuring compliance with relevant legislative environmental requirements and management plans. A checklist has been developed and record of the inspection is maintained.

Waste records, including waste classification results where required, for waste removed from site for disposal to landfill, off-site reuse or recycling are maintained by the Work Health, Safety and Environment Officer on a Waste Register. This assists in identifying further opportunities for the reduction, potential reuse and recycling of wastes generated at the site.

As part of continued good environmental management of the site, the Work Health, Safety and Environment Officer will ensure that waste is managed in accordance with legal requirements and investigations into reuse and recycling options are undertaken where opportunities are identified.

4.2 REVIEWS

The Manager is responsible for ensuring the adequacy of the Product Management Plan following (where relevant):

- The recommendations of an audit or corrective action;
- An environmental incident;
- Receipt of a community compliant;
- Instruction from a Regulatory Authority; and/or
- Changes to the production process.

This review will enable a continual improvement process to ensure the continuing suitability, adequacy and effectiveness of the management plan and its implementation.

The Manager shall ensure the Product Management Plan is revised and reviewed every 5 years to the satisfaction of the Secretary of DPHI.

5. DEFINITIONS AND ABBREVIATIONS

ABBREVIATION	DESCRIPTION
BOM	Bureau of Meteorology
CCA	Copper Chrome Arsenate
DWAU	Dongwha Australia Pty Ltd
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment
ECO	Emergency Control Organisation
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPC	Emergency Planning Committee
EPL	Environment Protection Licence
NGER	National Greenhouse and Energy Reporting
NPI	National Pollutant Inventory
NRC	Natural Resources Commission
NSW	New South Wales
OSD	On-site detention
LOSP	Light Organic Solvent Preservative
PIRMP	Pollution Incident Response Management Plan
PM_{10}	Particulate matter of size 10 µm
Porta	Porta Products Pty Ltd
RAP	Remediation Action Plan
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
WHS	Work, Health and Safety