



global environmental solutions

Independent Environmental Audit

MP 08_0255 MOD 1

Report Number 610.16730

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Elf Farm Supplies Pty Ltd

PO Box 615

WINDSOR NSW 2756

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Independent Environmental Audit

MP 08_0255 MOD 1

PREPARED BY:

SLR Consulting Australia Pty Ltd
ABN 29 001 584 612
2 Lincoln Street
Lane Cove NSW 2066 Australia
(PO Box 176 Lane Cove NSW 1595 Australia)
T: +61 2 9427 8100 F: +61 2 9427 8200
sydney@slrconsulting.com www.slrconsulting.com

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DOCUMENT CONTROL

Reference	Status	Date	Prepared	Checked	Authorised
610.16730	v1.0	21 December 2016	Sandy Lonergan	Brad Radloff	Sandy Lonergan

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1 INTRODUCTION

1.1 Background

SLR Consulting Australia Pty Ltd (SLR) was commissioned on 25 August 2016 by Elf Farm Supplies Pty Ltd (Elf) to undertake an Independent Environmental Audit (IEA) for its Mulgrave Substrate Plant facility, Mulgrave, New South Wales (the Site). The IEA was performed in accordance with Condition 3A of Schedule 5 of Project Approval MP 08_0255, first approved on 11 January 2012 and the modified approval (MOD 1) dated 14 March 2016 (Project Approval).

The IEA was undertaken in accordance with the relevant planning approval condition for the Site and focused on the verification of the Site's compliance against those conditions pertaining to the works carried out under MOD 1 of the Project Approval. The modification (MOD 1) relates to the Substrate Plant site only as approved under MOD 1 and includes:

- A new odour management system in the form of a biofilter and six ammonia scrubbers;
- An additional six (6) phase 2/3 tunnels; and
- The continued use of fill associated with the biofilter pad.

At the time of the audit, only civil works had commenced in relation to MOD 1, hence many of the conditions of approval relating to MOD 1 had not been triggered. Conditions of consent pertaining to the original development approval granted in 2012 were excluded from the audit as per Elf instructions.

1.2 Site Description

Elf produces mushroom compost (substrate) and has a certification to do this organically at the Site. The Substrate Plant has operated at 108 Mulgrave Road, Mulgrave since 1981 being a rural property comprising of Lots 13 and 14, DP1138749 and having an area of approximately 12.4 hectares.

The mushroom compost is manufactured from recycled agricultural materials, including wheaten straw, poultry manure, stable bedding, gypsum and other nitrogen rich products, which are combined in the Substrate Plant to produce a high quality mushroom compost product.

The production process includes:

- Raw material storage;
- Bale wetting;
- Pre-wet;
- Phase 1 composting;
- Phase 2 and Phase 3 processing; and
- Product delivery.

The Substrate Plant operates 24 hours per day, seven days per week.

The Substrate Plant has been operating at the Site since 1981 under a series of Development Consents issued by Hawkesbury City Council. On 11 January 2012, the Minister for Planning granted project approval for expansion and continued operation of the Substrate Plant, MP 08_0255. That approval required all previous development consents to be surrendered. In February 2015, Elf Farm Supplies applied for modifications to the existing development consent and this approval (MOD 1) was granted on 14 March 2016 and this modification is the subject of this audit.

The plant is licensed by the Environment Protection Authority (EPA), licence number 6229.

1.3 Audit Scope

This IEA and subsequent report has been prepared pursuant to Condition 3A of Schedule 5 of Project Approval MP 08_0255 MOD 1. As per Elf instructions the scope only relates to MOD 1.

Table 1 lists the requirements of this condition and indicates where each has been addressed in this IEA report.

Table 1 Audit Condition and Where Each Requirement is Addressed in this Report

Condition	Description of Condition	Where Addressed in this Report
3A	Within six months of the approval of MOD 1, and every two years thereafter, unless otherwise agreed by the Secretary, the Proponent shall commission and pay the cost of an Independent Environmental Audit of the Project. This audit must:	This Audit Report
3A (a)	Be conducted by suitably qualified, experienced and independent team of experts (including and odour expert) whose appointment has been endorsed by the Secretary;	Appendix D
3A (b)	Include consultation with the relevant agencies	Section 3.1
3A (c)	Include a full odour audit of the Project, taking into consideration of the relevant technical guidelines and any odour complaints made since the previous audit	Section 4.2
3A (d)	Assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any other licenses and approvals that apply to the project (including any assessment, plan or program required under these approvals);	Section 3 for Project Approval Conditions, Appendix A and Section 4.
3A (e)	Review the adequacy of strategies, plans or programs required under these approvals and if appropriate;	Section 4.6
3A (f)	Recommend measures or actions to improve the environmental performance of the project, and or any assessment, plan or program required under these approvals.	Section 4.6
	Within six (6) weeks of the completion 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 recommendation contained in the audit report.	This Audit report

1.4 Report Structure

This report is structured as follows:

- Section 1 provides an introduction, background, description, scope of the audit, limitations and provides a guide to the structure of the report;
- Section 2 outlines the audit team and audit methodology used in the IEA;
- Section 3 summarises the audit findings including the consultation undertaken, personnel interviewed, audit results and consolidates in table format all the non-compliances identified;
- Section 4 covers the odour audit requirement of MOD 1, along with the review and assessment of the performance of the facility, its management plans and makes recommendations for improvements;

- Section 5 is the conclusion;
- Appendix A contains complete list of all the conditions in the Project Approval and details the audit findings;
- Appendix B contains a selection of photographs from the site visit;
- Appendix C contains the completed Independent Audit Certification form; and
- Appendix D contains the audit team CVs and associated approval letter from the Department of Planning & Environment.

1.5 Limitations

This report has been prepared for Elf to fulfil the requirements of the IEA as specified in the Project Approval. The IEA only pertains to the Substrate Plant and relevant conditions in MOD 1.

The scope of the audit, and subsequent report was limited and should not be used for any purpose other than that described above.

The following should be taken into account when reading and using this report:

- 1 A site visit was undertaken during this audit to familiarise the auditors with the site layout, site conditions and natural environment. Whilst the auditors requested to be shown all features of the sites impacted (environmentally) by the operations, the auditors have relied on information provided by Elf representatives during these site visits, including the selection of the areas of the site for the site inspection.
- 2 Elf provided (at their sole discretion) all of the documentation that has been accessible to the auditors. The auditors relied on the information and documentation provided and Elf to provide all relevant and pertinent information. It should be noted that the range of documentation provided may not have included all of the relevant environmental records held. The auditors asked to receive all relevant documentation. The auditors have not had the opportunity to verify any of the information provided nor have they had the opportunity to consult with any party other than Elf's nominated representatives during this audit.

2 AUDIT TEAM AND METHODOLOGY

2.1 Audit Team

SLR audit team comprised of Sandy Lonergan (Lead Auditor, certified by SAI Global) and Jeff Mann, odour expert. Ms Lonergan has over 20 years auditing experience, has been a third party certification auditor for NCSI, has conducted numerous independent compliance audits for the Commonwealth Government, Planning Departments and Environment Protection Authorities or equivalent in New South Wales and Queensland. Refer to Appendix D for the audit team CVs and letter of approval for the audit team from Planning NSW.

2.2 Methodology

The audit included:

- A desktop review of documentation requested;
- Consultation with relevant agencies, namely Environment Protection Authority (EPA) and Hawkesbury City Council; and
- One day site visit.

The site component of the audit was undertaken by Ms Lonergan, on 13 September 2016 and involved a walk-around of the site, attendance at the site induction and interviews with key staff.

SLR auditors used the following methodologies to gather evidence during the audit:

- Review of documents (letters, plans, reports, emails);
- Interviews with key personnel; and
- Site inspection of the facility.

2.3 Assessment Criteria

SLR adopted the compliance assessment criteria outlined in Section 4.1 and reproduced below in **Table 2**, in the NSW Government, *Independent Audit Guideline for Post-approval requirements for State Significant Developments*, October 2015.

SLR notes that the Guideline includes “should” in a number of key areas, for example, “*The compliance status of each requirement or commitment **should** be assessed in accordance with the criteria in Table 1.*” From an auditing perspective, should does not mean it must be completed, it is optional.

Table 2 Compliance Assessment Criteria

Assessment	Criteria
Compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval has been complied with within the scope of the audit.
Not verified	<p>Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.</p> <p>In the absence of sufficient verification the auditor may in some instances be able to verify by other means (visual inspections, personal communication, etc) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However the auditor could not in the report that they have</p>

Assessment	Criteria
	no reasons to believe that the operation is non-compliant with that requirement.
Non-compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
Administrative non-compliance	A technical non-compliance with a regulatory approval that would not impact on performance and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance related aspects (e.g. exceedance of a noise limit) or where a requirement had not been met all (e.g. noise management plan not prepared and submitted for approval).
Not triggered	A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, therefore a determination of compliance could not be made.
Observation	Observations recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliance or areas where performance may be improved.
Note	A statement or fact, where no assessment of compliance is required.

SLR added an additional assessment criterion of "Not Applicable" as all conditions from the Project Approval were included for completeness, however a number of them were not applicable as they were not part of the scope of the audit.

3 APPROVAL AUDIT FINDINGS

3.1 Consultation Outcomes

Condition 3A(b) requires the independent auditor to consult with the relevant agencies during the Independent Environmental Audit of the Project. SLR contacted the EPA and Hawkesbury City Council.

SLR spoke to EPA representative, Mr Damien Rose, on 20 September 2016. A number of calls were left for Trevor Wilson in previous weeks. SLR updated Mr Rose on the status of the Project and that civil works for the Substrate Plant commenced on 22 August 2016. Mr Rose advised that as the audit only related to the Project (MOD 1) the EPA don't have any comment, however will for next audit when construction is complete and the Substrate Plant operating.

SLR contacted Mr Andrew Johnston from the Hawkesbury City Council on 14 September 2016 and again on 20 September 2016. SLR received an email from Mr Johnston on 20 September 2016 outlining he was seeking advice regarding any matters to be addressed in the environmental audit from colleagues within Council. He requested feedback from them by 30 September 2016. No feedback was received by SLR in regards to the initial communication; however SLR did receive an email on 7 November asking SLR to include the fire incident in the stored straw bales that occurred on 4 November 2016.

3.2 Personnel Interviewed

Table 3 lists the personnel interviewed during the site visit component of the audit.

Table 3 Personnel Interviewed During the Audit

Name	Title
Neil Cockerell	Operations Manager / General Manager
Blake Edwards	WHS & HR Manager
Tete Awotedu	Environmental Consultant
Phil Atkins	Site Coordinator / Construction Manager

3.3 Interviews

Information obtained and statements recorded during the interviews conducted whilst on site at the Substrate Plant were directly recorded as evidence (see **Appendix A**). The auditor also used the interviews as an opportunity to gain an appreciation of the extent to which the systems in place to manage environmental impacts from site operations were understood and being implemented.

The interviews conducted allowed the auditor to form the opinion that the approach to environmental management (and operations more broadly) is well understood by senior staff.

3.4 Summary of Audit Findings

Table 4 shows a summary of the findings of this audit.

Table 4 Summary Table of Compliance with MP 08_0255 MOD 1

Schedule	Total No. of Conditions	Not Applicable	Conditions Audited	Compliance	Not verified	Non-Compliance	Admin Non-Compliance	Not Triggered	Observation	Note
2	18	6	10	7	0	1	0	2	0	2
3	42	11	31	13	0	3	0	15	0	0
5	9	2	7	5	0	0	2	0	0	0
Total	69	19	48	25	0	4	2	17	0	2

Table 5 summarises the non-compliances identified, with relevant comments.

Table 5 Summary of Non-Compliances (including Administrative)

Schedule	Condition	Requirement (Summary)	Comment
2	2	The Proponent shall carry out the Project generally in accordance with the (a) EA; (b) Statement of commitments (See Appendix A); (c) Site layout plans and drawings in the EA; and (d) MOD 1.	Generally Elf is carry out the Project in accordance with the EA, site layout plans and MOD1 however, there was a non-compliance on 7 September 2016 when construction activities occurred outside the nominated hours (activities occurred up until 8pm, which was 2 hours over the 6pm stoppage time). This was identified by Elf, reported as per their internal processes and action taken to mitigate this occurring again. No further action is required for this non-compliance. This non-compliance also relates to Condition 20 in Schedule 3.
3	1A	The revised CEMP shall be implemented throughout the construction works.	Whilst the majority of CEMP is being implemented by Elf, three non-compliances were identified during the site visit. 1. Construction activities occurred outside nominated hours in Construction Noise & Vibration Management Plan (Section 7.0). 2. Evidence of contractors being inducted prior to commencing work as per Section 4.4 of the CEMP was not available for all contractors. Training records were available but not records of contractors signing in when arriving on site (All Dunn Excavations). 3. Corrective Action Statements not available.

Schedule	Condition	Requirement (Summary)	Comment
3	2	The Proponent shall not cause or permit the emission of offensive odours from the Substrate Plant Site, as defined under Section 129 of the POEO Act.	Numerous odour complaints continue to be received (21 confirmed odour complaints between 1 January 2016 and September 2016). All odour complaints are investigated to determine likelihood of Elf Farm Supplies being the source. Elf is currently undertaking significant works to significantly improve the control, capture and treatment of process odours in accordance with Approval 08_0255 MOD1.
3	20	Construction hours – Monday to Friday – 7am to 6pm	As outlined in Schedule 2, Condition 2 non-compliance, Elf's construction activities occurred up until 8pm one evening on 7 September 2016.
5	3A	By the end of September 2016, and annually thereafter, unless otherwise agreed by the Secretary, the Proponent shall review the environmental performance of the Project to the satisfaction of the Secretary. This review must: (b) analyse the monitoring results and complaints records of the Project during the reporting period, which includes a comparison of these results against the: ii. monitoring results of previous years; and iii. relevant predictions in the EA; (d) identify any trends in the monitoring data over the life of the Project;	The Annual Environmental Performance Report prepared by The Odour Unit contained the majority of the requirements of this Condition, however, the auditor believed the report did not comply with certain aspects of (b) and (d). In relation to (b) the Report does not include any analysis of construction or operational compliance noise monitoring results (reports). Example missing Acoustic Consulting Engineers report dated 2 September 2016 relating to noise monitoring undertaken on 31 August 2016. There is also no reference in main report to relevant EA predictions. In relation to (d) trends in odour emission levels from bioscrubber were not graphed, or presented, in a consolidated table and hence trends did not appear to be reviewed. It is noted the report covered trends in terms of the operational conditions at the time of the complaint.
5	8	Within three months from the date of the approval of MOD 1, the Proponent shall make the following information (unless commercially sensitive) freely available on a publicly accessible website, as it is progressively required under the approval : (c) technical analysis/reports of monitoring results, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; (f) updates on the progress of the construction works associated with MOD 1;	Whilst the website was up and operational as per the Condition, the website was not being maintained with up-to-date information on (c) and (f). The website did not have acoustic report available on the website on 15 September 2016 and the progress report on the construction works was over three months old on 15 September 2016. The Community Consultation Strategy states quarterly updates in relation to the construction works.

4 ASSESSMENT AND REVIEW OF LICENCES AND PLANS

4.1 Introduction

This section of the report:

- Addresses the full odour audit of the Project (MOD 1);
- Assesses the environmental performance of the Project (MOD 1);
- Assesses compliance with relevant requirements (MOD 1 related) in any other licence (EPL No 6229);
- Assesses compliance with relevant plans and programs required in relation to the Project;
- Reviews the adequacy of the plans and programs reviewed and if appropriate; and
- Recommends measures or actions to improve environmental performance of the Project and or any plan or program reviewed as part of the audit scope.

4.2 Odour Audit

The audit team reviewed Condition 3A(c) in Schedule 5 and determined that a full odour audit of the project could not be undertaken during this IEA as the new odour management system is still in the early stages of construction. Hence it was not possible to conduct a full audit as per the condition.

The auditors note that the new odour management system which includes a biofilter and six ammonia scrubbers has already been independently reviewed by an odour specialist prior to construction commencing on the site. This review of the detailed design of the odour emission plant was completed by The Odour Unit in May 2016. The report was titled, *Mushroom Substrate Plant – Mod to Approval Expansion, Odour Emissions Plant Designs Construction Review, Mulgrave NSW, Final Report, May 2016, prepared by The Odour Unit*. The report was endorsed by the Secretary.

4.3 Environmental Performance

As noted throughout this report, construction work commenced on 22 August 2016 on MOD1, construction is due to be completed within the next 18 months. An audit of the Construction Environmental Management Plan (CEMP) was undertaken as per Condition 1A of Schedule C. Refer to Section 4.5 for specific outcomes of that review.

Once the new odour management system is operational, an audit on the environmental performance against the specific MOD 1 elements will occur.

It was noted that the Annual Environmental Management Report prepared for the site by The Odour Unit covered the period from September 2012 to September 2016. Tables 1.1 and 1.2 summarised the compliances and non-compliances (5) in relation to the EPL for the site, while Section 6 provides overview of environmental performance of the site. It is noted that this report, did not include noise monitoring results, nor a review against environmental assessment predictions.

4.4 EPL 6229

The Site operates under EPL No. 6229. The Site had not been complying with condition L5 relating to emission of potentially offensive odour. As per page 30 of the Annual Environmental Management Report (September 2012 – September 2016) prepared by The Odour Unit, a total of 344 complaints were received relating to odour from September 2012 to September 2016. As stated in the Report, of the 344, 128 were unable to be verified based on an uncertain or erroneous wind direction at the time of the complaint. Based on the analysis undertaken there was a revised total of 169 complaints over the review period. The auditor acknowledges that the Project (MOD 1) is being undertaken to address the odour issues for the Site.

A review of the EPL was undertaken to determine those conditions that have been included pertaining to the Project (MOD 1) specifically. The EPL was last amended on 8 March 2016, however the amendments related to the reporting of waste. Hence no existing conditions in the EPL relate to The Project (MOD 1) and hence no conditions of the EPL were audited for the purpose of this IEA.

The environment performance of the Site, including compliance against statutory requirements such as the EPL, is being reviewed by Elf and reported annually under Condition 3, Schedule 5 of the Project Approval. This annual environmental performance covers the entire operation and not just the Project (MOD 1).

4.5 Construction Environmental Management Plan (CEMP)

The audit of the implementation of the CEMP for the Project was undertaken as part of Project Approval audit. Elf demonstrated a high level of compliance in relation to implementation of the CEMP except in relation to the one incident on the 7 September 2016 where construction occurred outside approved hours. Refer to Appendix A, Schedule 3, Condition 1A for an assessment of its implementation.

4.6 Review of the Plans, Strategies and Recommendations for Improvement

During the audit, the auditor sighted and reviewed a number of Environmental Management Plans and the Environmental Management Strategy for the Site. It is clear that the plans and Strategy have evolved over a number of years in line with the Conditions of Approval granted by the Department of Planning in 2012 and then MOD 1.

As Elf personnel have been preparing plans in accordance with the Conditions of Approval since the beginning of 2016 to allow construction activities to commence, it is recommended now that construction has commenced:

1. The Strategy is reviewed and updated to reflect current procedures and plans, or update the Strategy in the form of a modified environmental management system (EMS). The auditor believes a modified EMS would be more beneficial to the long term environmental management on site. Refer to Section 4.6.1 for further details.
2. Elf's Environmental Consultant undertakes a complete review of documents relating to environmental management, review their content for currency and ensure that all plans correctly cross the other associated documents.

4.6.1 Modified EMS

Discussions were held with Elf personnel about updating the current Strategy with a modified an environmental management system based on the principles of ISO/IEC14001:2015. By having the system in place, it would allow the Environmental Aspects and Impacts Register to be reviewed and key risks to be addressed, and procedures to be updated and implemented in a prioritised manner. This system could have the following elements:

- Environmental Policy (and any other environmental types policies – waste, energy, dangerous goods, etc);

- Environmental legislative and other obligations procedure and associated Register;
- Environmental Aspects and Impacts Register;
- Environmental management procedures;
 - Odour,
 - Noise,
 - Dust,
 - Dangerous goods and chemicals,
 - Water / Stormwater,
 - Landscaping (visual),
 - Energy Efficiency,
 - Waste,
- Environmental Roles and Responsibilities;
- Environmental Monitoring procedures;
 - Environmental inspections and audits
 - Odour monitoring
 - Noise monitoring
 - Energy efficiency
- Environmental Reporting;
 - Complaints (procedure, form and log)
 - Non-compliance (procedure, form and log)
 - Environmental incidences (procedure/form and log)
 - Preparation of Annual Environmental Report
 - Third Party Audits
- Environmental Emergencies and Contingency Plans;
 - Flood
 - Fire
 - Plant failure
- Environmental Review;
 - Annual environmental review of site
 - Annual review of policy and procedures.

4.6.2 Other Recommendations for Improvement

Table 6 summarises other recommendations that have come from reviewing Elf's Environmental Management Strategy, Plans, procedures and associated forms.

Table 6 Recommendations for Improvement for Plans, Procedures

Recommendation	Justification
Hold discussions with the Department of Planning and seek amendment to the Conditions of Approval and remove the necessary to have formal Environmental Management Strategy and have it replaced with a modified environmental management	The Strategy that is referenced in Schedule 5, Condition 1 requires an environmental strategy, which in essence is the framework of a modified environmental management system. It would be more practical, effective and efficient to have an

Recommendation	Justification
system.	environmental management manual that provided an overview/summary of the operations environmental policies, procedures, guidelines and plans that are used to manage the sites environmental aspects and legal and other obligations.
SLR recommends that a formal document control procedure and register be developed for all environmental (and possibly quality and health and safety) procedures, forms, guidelines, plans etc for the site.	At present there is no formal way of determining the currency of documents and hence the potential for employees or contractors to use an obsolete procedure or form.
CEMP to be reviewed and updated to include Statement of Commitments which have not been incorporated.	<p>Discrepancies were sighted between the control measures proposed in the Statement of Commitments and the CEMP, for example in the dust control section the following Statement of Commitments were missing from CEMP:</p> <ul style="list-style-type: none"> • Maintain haul routes for fill trucks in a damp state; and • Apply temporary stabilisation to any exposed surface that is unlikely to be further disturbed for a period of one month or longer. <p>A complete review will identify all discrepancy and allow Elf to enhance compliance with regulatory requirements in the future.</p>
Update the Environmental Site Inspection Checklists to include requirements from Schedule 3, Condition 8. (a) all areas are maintained in a condition to minimise the emission of wind-blown or traffic-generated dust	To ensure compliance with Condition 8 and be able to effectively manage the issue and provide evidence that the system is in place and effective.
Update Environmental Site Inspection Checklists to reflect key actions/measures outlined in the CEMP or alternatively development CEMP Audit Checklist which is more detailed and undertaken once a month.	This would enhance Elf internal monitoring of construction activities to ensure construction activities are meeting the requirements of the CEMP.
Complaints procedure - update the Complaints procedure to include documenting corrective action taken and root cause analysis where applicable (Section 6.4.3 of the procedure).	At the moment, the procedure states that corrective action is undertaken but does not state where this is documented and how the corrective actions are reviewed to determine if they were successful or not. The procedure also does not look at the complaint from root cause perspective and this root cause analysis would further enhance Elf ability to identify potentially further action to prevent long term compliance, such as system issue, induction or training issue.
The Complaints Line form to be updated to include other potential complaints (dust, lighting, other) and section for corrective action to be completed/taken if complaint is legit and Elf is the source. Alternatively this could be documented/incorporated into the Non-compliance Form.	The complaints form currently lists noise and odour as the only types of complaint, when potentially they could receive complaints about dust, lighting, runoff for example.
Update Section 7.3 of the <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012</i> , which outlines noise monitoring requirements during operational phase. The table in Section 7.3 is now outdated as noise criteria has changed at several locations and this section of the Strategy needs to be updated to reflect Condition 19 limits.	Ensure compliance with the Project Approval operational noise criterion. The Operational Noise Management Plan, also needs to be reviewed and updated to reflect Project Approval conditions prior to the commencement of operations of MOD 1.
When the Operational Noise Management Plan Substrate Plant Mulgrave, 42.6411.ONMP_Mul:CFCD5, Rev 2 is updated as per Condition 22B it is recommended that a section on the noise mitigation measures that will be implemented during the operation of the facility once the Project (MOD 1) is completed to minimise noise from the operation.	At the moment, the Operational Noise Management Plan does not include any of the controls/measures outlined in the EMS (Section 5.2.2).
Update Elf's NON-COMPLIANCE FORM to include: <ul style="list-style-type: none"> • Name of person writing up non-compliance; • Unique non-compliance referencing number (as per incident reporting); • Name of person responsible for implementing corrective 	<p>These recommendations will allow Elf to:</p> <ul style="list-style-type: none"> • Track non-compliances through unique number, which will assist in reporting; • Allow corrective actions to be monitored and if successful non-compliance will be complete, if not successfully triggers

Recommendation	Justification
<p>action and proposed due date;</p> <ul style="list-style-type: none"> • A "root cause analysis" section; and • A "Closed Out" section, where person has reviewed that all corrective actions were implemented and determines if the action were successful (need to document evidence). Need name and date of person who has signed off that the non-compliance had been adequately addressed. 	<p>further corrective action measures to be determined and actioned. Closed loop. At the moment, corrective actions are proposed but not monitoring implementation and effectiveness of the actions; and</p> <ul style="list-style-type: none"> • Allow root cause of the non-compliance to be investigated.
<p>SLR recommends a non-compliance log (simply excel spreadsheet) to be developed to record non-compliances. For example: Incident No. Date. Nature of Non-compliance.</p>	<p>Allows tracking of non-compliances to occur in a more efficient way and trends in non-compliances to be more easily identifiable.</p>

5 CONCLUSIONS

The Project Approval MP 08_0255 MOD 1 consists of 69 conditions in total. SLR was engaged to conduct the IEA in accordance with Condition 3A of Schedule 5, with the scope of the audit limited to the conditions pertaining to MOD 1 development approval conditions.

The audit was carried out in September 2016, with SLR being supplied with information subsequent to the site visit and request for information in August 2016. MOD 1 relates to the construction and operation of a new odour management system. Construction commenced on the MOD 1 activities on 22 August 2016, hence many conditions were not triggered at the time of this IEA.

Of the 69, 19 were considered not applicable to MOD 1 and two (2) were classified as notes for information and not requiring auditing, hence 48 conditions were audited.

Of the 48 conditions, 17 were not triggered at the time the audit. Of the 31 remaining, auditable conditions, compliance was achieved for 25 (81%) and non-compliance recorded for 6 conditions (19%). Of the 6 non-compliances, 2 (33%) were classified as administrative non-compliances.

Two of the non-compliances related to the one non-compliance, being construction occurring outside the nominated hours specified in the Approval. This occurred once and Elf took immediate action to mitigate the potential for this to occur again.

Another non-compliance related to the CEMP not being completely implemented and discussions were held with the relevant Elf personnel at the time and implemented changes to immediately address the non-compliance relating to the induction of contractors.

The final non-compliance which was not considered of an administrative nature, was Condition 2, which relates to not permitting emission of offensive odours. This is being addressed by MOD1 development.

All four non-compliance were assessed to be of a low risk.

Two-administrative non-compliance were assessed relating to the Annual Environmental Performance Report not containing all the information required under the condition (3 of Schedule 5) and the website not being up-to-date with the relevant information.

During the audit process it was evident of senior management commitment at Elf to minimising the impact on the environment. Elf is commended for ensuring all incidents and non-compliances are identified and corrective action implemented as soon as possible. During the audit, Elf management were receptive and encouraged the auditor to identify opportunities for improvement.

The introduction of the environmental inspections during the construction phase provides an effective way of minimising the potential for environmental incidents and responding promptly to minor issues.

5.1 Recommendations

The following recommendations, **Table 7**, related to non-compliances, are made to assist in responding to the issues raised in this audit.

Table 7 Audit Recommendations

Recommendation	Justification
Elf Farm Supplies website should be reviewed as the auditor found it difficult to find information, it did not appear to be in logical locations. Also recommend including dates of entry for construction updates, to allow verification of when the updates occurred. Suggest having the Complaints Procedure under Environmental Reporting instead of Document Archive.	Elf Farm Supplies website should be reviewed as the auditor found it difficult to find information, it did not appear to be in logical locations.

5.2 Opportunities for Improvement


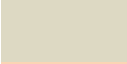



Table 8 summarises additional opportunities for improvement suggested for consideration by Elf to aid in environmental management on site and reduce the risk for potential environmental harm.

Table 8 Additional Recommendations and Opportunities for Improvement

Opportunity	Justification
Ensure all submission and re-submission requirements are entered into a compliance tracking system to ensure they are followed through on in the prescribed timeframes.	Improved compliance with the Project Approval and EPL.
Review and amend as appropriate the Pollution Incident Response Management Plan (PIRMP) and Emergency Evacuation Procedure, Environmental Management Strategy once investigations into the fire incident has been completed.	After any incident all associated plans, strategies and procedures must be reviewed to ensure that lessons learnt or opportunities for improvement are captured and into Elf management system for the site.
Elf engage a suitably qualified acoustic company to carry out an additional round of noise monitoring as soon as possible to determine if Elf is still complying with construction noise limits. It is likely that they are still complying as construction works are occurring on northern side of the existing structures, hence mitigating noise towards the nearest residence to where the straw bales were located.	To determine if the construction noise criterion is being achieved without the straw bales.

APPENDIX A – DETAILED AUDIT FINDINGS

Key:

	Compliant
	Not triggered
	Not applicable to the scope of the audit
	Administrative non-compliance (as per Independent Audit Guideline)
	Non-compliant – with low risk level (as per Independent Audit Guideline)

SCHEDULE 2 OF MOD 1 – ADMINISTRATIVE CONDITIONS

Table 9 Administrative Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Obligation to minimise harm to the environment				
1	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the Project	General Manager – advised all measures have been implemented thus far to prevent harm to the environment.	No letters received from EPA or Planning concerning any environmental incidents that could cause harm to the environment relating to the Project (MOD 1).	Compliant
Terms of Approval				
2	The Proponent shall carry out the Project generally in accordance with the (e) EA; (f) Statement of commitments (See Appendix a); (g) Site layout plans and drawings in the EA;	Site inspection – review of the Erosion and Sediment Control Plan from Appendix D of the CEMP for MOD 1 was reviewed on site and an inspection of implementation was undertaken. It was also noted that the sediment fences had been slightly changed when they were installed based on company recommendation. Auditor recommends	Provided: <i>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision No.1 July 2016, Prepared By Perram & Partners.</i> <i>2015 EA Titled Mushroom Substrate Plant Modification to Approved Project, Environmental</i>	Non-compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	and (h) MOD 1.	<p>updating the Erosion and Sediment Control Plan to reflect actual locations. This has been completed since the site visit.</p> <p>Interview – General Manager also advised of incident when construction operations for MOD 1 went outside hours of construction, till 8pm on 7 September 2016. This was a result of concrete not setting in nominated time-frame. It is noted that corrective action was taken immediately by Elf senior management to ensure this did not occur again. No further incidents have occurred.</p>	<p>Assessment (Perram & Partners, February 2015)</p> <p>Completed Non-Compliance Form relating to working outside construction hours.</p> <p>Updated Erosion and Sediment Control Plan.</p>	
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.			<p>Note: No inconsistency between the documents was identified.</p> <p>Notwithstanding, the conditions of the approval are used as the basis for managing compliance on site.</p>
4	<p>The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:</p> <p>a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and</p> <p>b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.</p>	Interviews - General Manager provided evidence of meeting requests from the Department. For example submitting documents on time.	<p>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016 Perram & Partners.</p> <p>Email from Perram & Partners to the Secretary representative (Emma Barnet) on 12 May 2016 submitting the updated CEMP for review.</p> <p>Email back from Planning requesting changes on 17 May 2016, further email back to Planning from Perram & Partners on 23 May 2016 with the revised CEMP for consideration.</p> <p>Letter received from Department dated 18 July 2016 approving the CEMP.</p> <p>Letter from Department of Planning and Environment dated 13 July 2016 regarding correspondence on 29</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			June 2016 and 6 July 2016 regarding the revised Landscape Design Report and Plant List dated June 2016. Letter from Department of Planning & Environment, dated 23 May 2016 regarding emailed and revised community consultation strategy.	
5	This approval shall lapse if the Proponent does not physically commence the proposed development association with this approval within 5 years of the date of this approval.	Site inspection – MOD1 EA - civil works began on 22 August 2016.	Modification of Minister's Approval, dated 14 March 2016, Project Approval: MP 08_0255 granted by the Minister for Planning on 11 January 2012, Modification Number MP 08_0255 MOD 1.	Compliant
Limits of Approval				
6	(1) The Proponent shall ensure that the Project on the Substrate Plant site does not: a) Product more than 3,200 tonnes per week of phase 1 substrate; subject to (2) below and b) Dispatch more than 1,920 tonnes of phase 3 substrate per week		Elf advised in writing on 5 September 2016 that current production levels for the Substrate Plant was 1,502 tonnes per week for Phase 1.	Compliant
	(2) The proponent shall not produce on the Substrate Plant site more than 1,000 tonnes of phase 1 substrate per week except in accordance with a staged approval granted by the Secretary in accordance with condition 7 Schedule 2 below.		Elf advised in writing on 5 September 2016 that current production levels for the Substrate Plant was 1,502 tonnes per week for Phase 1 Substrate.	Compliant
7	(1) The Proponent may apply to the Secretary for approval to increase production of substrate up to the rate of 1,600 tonnes of phase 1 substrate a week on the Substrate Plant site if – a) The Odour Management Plan required under condition 6 of Schedule 4 has been prepared to the satisfaction of the Secretary and is being implemented; and b) An independent odour audit has been prepared and submitted in accordance	Notes – original conditions. Note conditions referenced no longer exist. the condition should read Condition 4 of Schedule 4 not condition 6. Elf advised that the Odour Management Plan prepared in 2012 is currently being updated as per Condition 4A of Schedule 3.	Viewed Elf Farm Supplies Pty Ltd, Proposed Modifications to Mulgrave Substrate Plant document contained on the Department of Planning website. Document states "Consistent with the approval, the company subsequently submitted environmental plans and strategies, receiving approval to commence construction work and to increase production to 1,600 tonnes pf substrate per week." Viewed Odour Management Plan, Elf Farm Supplies Substrate Facility (19 April 2012) Todoroski Air Sciences.	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	with Condition 5 of Schedule 3.			
	<p>(2) The Proponent may apply to the Secretary for approval to increase production of substrate up to the rate of 2,400 tonnes of phase 1 substrate a week on the Substrate Plant site if –</p> <p>a) The site has been producing phase 1 substrate at a rate between 1,500 and 1,600 tonnes per week in accordance with an approval granted by the Secretary under this condition; and</p> <p>b) An independent audit of the site operating in this range has been prepared and submitted in accordance with Condition 5c) of Schedule 3.</p> <p>Production of up to 2,400 tonnes of phase 1 substrate a week may not occur until the Proponent has received written approval of the Secretary.</p>	Elf advised that the Odour Management Plan prepared in 2012 is currently being updated as per Condition 4A) of Schedule 3.	Viewed <i>Odour Management Plan, Elf Farm Supplies Substrate Facility (19 April 2012)</i> Todoroski Air Sciences.	Not triggered
	<p>(3) The Proponent may apply to the Secretary for approval to increase production of substrate up to the rate of 3,200 tonnes of phase 1 substrate a week on the Substrate Plant site if –</p> <p>c) The site has been producing phase 1 substrate at a rate between 2,300 and 2,400 tonnes per week in accordance with an approval granted by the Secretary under this condition; and</p> <p>d) An independent audit of the site operating in this range has been prepared and submitted in accordance with Condition 5c) of Schedule 3.</p> <p>Production of up to 3,200 tonnes of phase 1 substrate a week may not occur until the Proponent has received written approval of the Secretary.</p>	Elf advised that the Odour Management Plan prepared in 2012 is currently being updated as per Condition 4A) of Schedule 3.	Viewed <i>Odour Management Plan, Elf Farm Supplies Substrate Facility (19 April 2012)</i> Todoroski Air Sciences.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<p>(4) In deciding whether to approve an increase in substrate production under this condition, the Secretary must:</p> <p>a) Assess the odour performance of the premises at its current rate of production; and</p> <p>b) Assess the likely odour impacts from the proposed increase; and</p> <p>c) Consider the requirement not to cause or permit the emission of offensive odours from the Substrate Plant site as defined in section 129 of the POEO Act;</p> <p>d) Consider EPA advice regarding compliance with the POEO Act.</p>			Note
7A	Unless otherwise agreed in writing by the Secretary, the Proponent shall ensure that the work associated with MOD 1, with the exception of the additional Phase 2/3 tunnels and the pre-wet tunnels to be constructed as part of Stage 3 (as identified on the plan in Appendix 2) has been constructed and is operating within two years from the date of the approval of MOD 1.	<p>Interview: General Manager advised that the civil works commenced on 22 August 2016.</p> <p>Inspections – Auditor sighted the civil works that had commenced on the biofilter site.</p>	<p>Email from Elf Farm Supplies on 5 September 2016 confirming civil works commenced on 22 August 2016.</p> <p><i>Viewed: Modification of Minister's Approval, dated 14 March 2016, Project Approval: MP 08_0255 granted by the Minister for Planning on 11 January 2012, Modification Number MP 08_0255 MOD 1.</i></p>	Compliant
7B	Nothing in this approval permits the construction of the landscaped mound along the Substrate Plant site's western boundary identified in the letter from WMA Water dated 21 January 2016.	Statement – not audited		Note
Mushroom Farm Site				
8	The Proponent shall ensure that the Mushroom Farm site does not produce more than 220 tonnes mushrooms per week.		This condition does not relate to MOD 1.	Not applicable
Existing Development Consents and Rights				
9	The Proponent shall surrender all existing development consents in accordance with Clause 97 of the EP&A Regulation for the land referred to in	Not applicable to MOD 1.	This condition is not applicable for MOD 1 project and hence was not audited.	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	Schedule 1, within 12 months of commencement of Stage 1 operations, or as otherwise agreed by the Secretary.			
Transitional Arrangements				
10	All existing environmental management plans that apply to Substrate Plant site under DA No. 0623/02, DA No. 0571/06, DA No. 0921/06, DA No. 0701/07 and DA No. 0120/09 shall continue to be fully applied until replaced under this approval.	Not applicable to MOD 1.	This condition is not applicable for MOD 1 project and hence was not audited.	Not applicable
Structural Adequacy				
11	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. Notes: <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project. 	Not applicable to MOD 1.	This condition is not applicable for MOD 1 project and hence was not audited.	Not applicable
11A	The Proponent shall ensure that any structures which require a relevant alternate solution developed to meet the performance requirements of the BCA shall be designed in consultation with Fire and Rescue.	Inspection: civil works were occurring on the biofilter pad area on 13 September 2016, no other construction works was occurring.	Email from Elf dated 5 September 2016 which states that civil works commenced on 22 August 2016.	Not triggered
Demolition				
12	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	Inspection: MOD 1 - civil works were occurring on the biofilter pad area on 13 September 2016, no other construction works was occurring. No demolition of structures had commenced.	Email from Elf dated 5 September 2016 which states that civil works commenced on 22 August 2016.	Not triggered
Operation of Plant and Equipment				
13	The Proponent shall ensure that all plant and equipment used for the Project is: <ul style="list-style-type: none"> a) Maintained in a proper and efficient 		This related to the original 2012 Development Approval Conditions and hence was not in the scope of the audit.	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	condition and b) Operated in a proper and efficient manner.			
Utilities				
14	Prior to the construction of any utility works, the Proponent shall obtain the necessary approvals from relevant service providers.		This related to the original 2012 Development Approval Conditions and hence was not in the scope of the audit. MOD1 did not require any additional approvals to be granted from service providers, they were all pre-existing from the original development applications.	Not applicable
Submission of Plans or Programs				
15	With the written approval of the Secretary, the Proponent may: a) Submit any reports, plans, strategies or programs required by this approval on a progressive basis; and b) Combine any reports, plans, strategies or programs required for the Substrate Plant site with any similar reports, plans, strategies or programs for the Mushroom Farm site. c) Separate any reports, plans, strategies or programs required for the Substrate Plant site with any similar reports, plans, strategies or programs for the Mushroom Farm site.		Auditor sighted letters of communication and emails between Elf Farm Supplies environmental planning consultant, Perram & Partners and the Department of Planning & Environment seeking approvals of plans on an on-going basis to meet the Conditions of Approval for MOD1. Examples sighted but not limited to: Emails dated 6 May 2016, 23 May 2016 and 17 July 2016 to Planning submitting updated Construction Environmental Management Plan (CEMP) and subsequent revised CEMP after receiving comments back from the Department. Letter from Department of Planning and Environment dated 13 July 2016 regarding correspondence on 29 June 2016 and 6 July 2016 regarding the revised Landscape Design Report and Plant List dated June 2016. Letter from Department of Planning & Environment, dated 23 May 2016 regarding emailed and revised community consultation strategy.	Compliant

SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS

Table 10 Specific Environmental Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Construction Environmental Management Plan				
1	<p>The Proponent shall prepare and implement a Construction Environmental Management Plan for the Substrate Plant site to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> a) Be prepared in consultation with NOW and EPA; b) Be submitted for approval prior to commencement of construction and include: <ul style="list-style-type: none"> - A noise and vibration management plan, including a noise monitoring program that can be used to demonstrate compliance with the construction noise criteria in Condition 18 below; - An air quality management plan; - A soil and water management plan, including details of erosion and sediment control measures to be used on site - A flora and fauna management plan - A heritage management plan - A Traffic management plan; and - A waste management plan 	Not applicable.	<p>Viewed: <i>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016</i> Perram & Partners.</p> <p>Original document was submitted on January 2012 and approved 13 March 2012.</p> <ul style="list-style-type: none"> - A noise and vibration management plan - Section 5.1 - Air quality management plan - Section 5.2 - A soil and water management plan, including details of erosion and sediment control measures to be used on site - Section 5.3 - A flora and fauna management plan - Section 5.4 - A heritage management plan – Section 5.5 - A traffic management plan; and – Section 5.6 - A waste management plan – Section 5.7 <p>This Plan was requested to sight the difference with Condition 1A.</p> <p>This condition related to 2012 Project Approval and does not related to MOD 1 and hence outside scope of this audit.</p>	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1A	<p>The Proponent shall update the CEMP required by Condition 1 of Schedule 3 to include the works associated with MOD 1. The updated plan shall be submitted to and approved by the Secretary prior to the commencement of any construction works associated with MOD 1.</p> <p>The revised CEMP shall be implemented throughout the construction works.</p>	<p>Elf advised that civil works commenced on 22 August 2016.</p> <p>Implementation of the revised CEMP was undertaken during the site visit, however only one contractor was on site carrying out some civil works at the biofilter site, there were no other contractors on site.</p> <p>Noise & Vibration measures sighted as per Section 5.1.2 control measures include:</p> <ul style="list-style-type: none"> - Installed approved noise attenuation barrier at the location of the future southern boundary wall adjacent to the bale storage shed – straw bales were being used during the site visit as per CEMP and subsequent approval from the Department. - Induction program and associated records for employees and contractors includes noise and vibration minimisation – some records were missing. <p>Air Quality measures sighted as per Section 5.2.2 control measures included:</p> <ul style="list-style-type: none"> - Signage to limit vehicle speeds on site. <p>ESCP was being implemented.</p> <p>No complaints have been recorded since construction commenced relating to the Project.</p>	<p>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016 Perram & Partners.</p> <p>Email from Perram & Partners to the Secretary representative (Emma Barnet) on 12 May 2016 submitting the updated CEMP for review.</p> <p>Email back from Planning requesting changes on 17 May 2016, further email back to Planning from Perram & Partners on 23 May 2016 with the revised CEMP for consideration.</p> <p>Letter received from Department dated 18 July 2016 approving the CEMP.</p> <p>Section 7.2 Noise Monitoring – results of the monitoring was available relating to MOD 1. Testing was conducted by Acoustic Consulting Engineers Pty Ltd on 31 August 2016 (Ref 160787-03-01L-CF and 13 October 2016 (160787-03-03L-DD. Both reports sighted. Compliance achieved during both rounds of monitoring.</p> <p>Viewed: completed Environmental Site Inspection Checklist (Rev1, issue date 23 September 2016) dated 12-14 and 18 October 2016 for the construction activities.</p> <p>Viewed email dated 12 September 2016 from Tete Awotedu (Elf's Environmental Consultant) confirming that Head Contractors had been supplied with copy of the CEMP as per Section 7.3.1 of the CEMP.</p> <p>Compliance achieved in regards to updating CEMP and having it approved prior to construction commencing.</p> <p>Section 7.3.2 (i) Environmental Journal is being complied with. This is a combination of Construction Diary which lists activities which have occurred that day and the Environmental Site Inspection Checklists as noted above. Compliance also sighted for Section 7.3.2 (ii) Record of Environmental Incidents. The auditor sighted Incidents report for the fire.</p>	Non-compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1A continued	<p>The Proponent shall update the CEMP required by Condition 1 of Schedule 3 to include the works associated with MOD 1. The updated plan shall be submitted to and approved by the Secretary prior to the commencement of any construction works associated with MOD 1.</p> <p>The revised CEMP shall be implemented throughout the construction works.</p>		<p>Section 7.3.3 Notifications of Emergencies and Incidents were being complied with. Sighted emails dated 11 November 2016 to Department of Planning and Environment and EPA regarding the fire incident on 4 November 2016.</p> <p>Appendix F – Complaints procedure is being followed, viewed completed Elf Farm Supplies Pty Ltd Complaints Line forms from 7 October 2016, Complaint No. 122, 8 October 2016, Complaint No. 123 and 29 October 2016, Complaint No. 126.</p> <p>Opportunities for improvement:</p> <ol style="list-style-type: none"> 1. The Complaints Line form to be updated to include other potential complaints (dust, lighting, other) and section for corrective action to be completed/taken if complaint is legit and Elf is the source. This could be documented on Non-compliance Form. 2. Update Complaints procedure to include documenting corrective action taken and root cause analysis where applicable (Section 6.4.3). <p>Whilst majority of CEMP is being implemented, non-compliances were identified during the site visit.</p> <ol style="list-style-type: none"> 1. Construction activities occurred outside nominated hours in Construction Noise & Vibration Management Plan (Section 7.0). 2. Evidence of contractors being inducted prior to commencing work as per Section 4.4 of the CEMP was not available for all contractors. Training records available but contractors were not signing in when arriving on site to allow full verification of this occurring. This was discussed with WHS/HR Manager at the time of the audit. 3. Corrective Action Statements not available. 	Non-compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2	The Proponent shall not cause or permit the emission of offensive odours from the Substrate Plant Site, as defined under Section 129 of the POEO Act.		Viewed: <i>Complaints Register</i> on the Elf Farm Supplies website. Numerous odour complaints continue to be received. All complaints are investigated to determine likelihood of Elf Farm Supplies being the source. <i>Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Final Report September 2016</i> , prepared by The Odour Unit on behalf of Elf Farm Supplies Pty Ltd. The report covered the period 2012 to September 2016. Section 6.8 states “Elf is currently undertaking significant works to significantly improve the control, capture and treatment of process odours in accordance with Approval 08_0255 MOD 1.”	Non-compliant
Air Quality - Odour Emissions Plant Design and Construction				
3	<p>Prior to the commencement of construction of the works associated with MOD1, the Proponent shall commission and pay the full cost of an independent odour specialist to review the detailed design of the odour emissions plant and assess its capacity to meet the performance criteria within the Environmental Assessment for MOD1. The review shall:</p> <ul style="list-style-type: none"> a) Be provided to the Secretary and the EPA within two weeks of finalisation of the review; and b) Be endorsed by the Secretary in consultation with the EPA prior to the commencement of construction of the works associated with MOD 1. <p>Should the review not certify that the odour emissions plant has the capacity to meet the performance criteria within the Environmental Assessment for MOD 1, then the Proponent shall undertake additional design to meet the criteria, to the satisfaction of the Secretary within the timeframe specified by the Secretary. The additional design is to be endorsed by the independent odour specialist.</p>	Interview – General Manager – advised that The Odour Unit was commissioned to conduct the independent odour specialist review as per this condition. Elf arranged and paid for The Odour Unit personnel to travel overseas to view the technology.	<p>Viewed: <i>Mushroom Substrate Plant – Mod to Approval Expansion, Odour Emissions Plant Designs Construction Review, Mulgrave NSW, Final Report, May 2016, prepared by The Odour Unit, M. Assal & T Schulz</i>, approved by T Schulz.</p> <p>Date of issue to client was 16 May 2016.</p> <p>Letter from the Secretary (Planning) stating report was submitted on 16 May 2016 and was endorsed by EPA and Planning on 15 June 2016.</p> <p>Viewed The Odour Unit tax invoices to Elf for the Odour Emissions Plant Design and Construction Review. Tax invoice numbers N3608 and N3682.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3A	The Proponent shall construct the odour emissions plant in accordance with the final design endorsed by the independent occur specialist required by Condition 3.	Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant had not commenced. Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.	Compliance with this condition will be determined at the next IEA.	Not triggered
3B	Prior to the commencement of operation of the odour emissions plant, the Proponent shall commission and pay the full cost of an independent odour specialist to certify that the 'as constructed' odour emissions plant has been undertaken in accordance with the final detailed design with reference to the Environmental Assessment for MOD 1 and the outcomes of Condition 3 of Schedule 3. A copy of the certification is to be provided to the Secretary and the EPA within one week of its finalisation.	Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant had not commenced. Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.	Compliance with this condition will be determined at the next IEA.	Not triggered
3C	The Proponent shall implement all reasonable and feasible measures to ensure that all new structures are constructed to prevent corrosion from the atmosphere contained within those structures.	Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant had not commenced. Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.	Compliance with this condition will be determined at the next IEA. <i>Viewed: Elf Farm Supplies Pty Ltd, Mushroom Substrate Plant, Modification to Approved Project, Environmental Assessment, Report 136R2, February 2015. Perram & Partners.</i> Observation – this document does not cover this condition. Elf to ensure they have evidence for next audit.	Not triggered
Odour Management Plan				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4	<p>The Proponent shall prepare and implement an Odour Management Plan for the Substrate Plant site to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA by a suitably independent, qualified and experienced expert whose appointment has been endorsed by the Secretary;</p> <p>(b) be submitted to the Secretary for approval within 3 months of the date of this approval;</p> <p>(c) describe in detail the measures that would be implemented on site to minimise the odour impacts of the Project, such as storing the stable bedding in the pre-wet shed extension building in Stages 2 and 3, and to ensure that these measures remain effective over time;</p> <p>(d) identify triggers for remedial and contingency action; and</p> <p>(e) include a program for monitoring the odour impacts of the Project.</p>	Not applicable.	<p>Viewed: <i>Odour Management Plan, Elf Farm Supplies Substrate Facility, 19th April 2012, prepared by Todoroski Air Sciences Pty Ltd.</i></p> <p>This condition is not applicable for MOD 1 project and hence was not audited.</p> <p>This Plan was requested to sight the differences with Condition 4A.</p>	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4A	<p>The Proponent shall update the Odour Management Plan for the Substrate Plant site, in consultation with the EPA, to the satisfaction of the Secretary. This plan is to update the plan approved under Condition 4 of Schedule 3 and shall:</p> <p>(a) be prepared a suitably independent , qualified and experienced expert whose appointment has been endorsed by the Secretary;</p> <p>(b) be submitted to the Secretary for approval within one month of the date of endorsement by the Secretary of the odour emissions plant design as required under Condition 3(a) of the approval;</p> <p>(c) identify of all major sources of odour;</p> <p>(d) include management measures to ensure no offensive odours from the Substrate Plant site;</p> <p>(e) include procedures for the monitoring of odour emissions, in accordance with the requirements of the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> and any requirements of the EPA. The odour monitoring program shall include, but not be limited to:</p> <p>i. results of the complaints handling system; and</p> <p>ii system and performance review for continuous improvement;</p> <p>(f) include odour management performance parameters that are consistent with the manufacturers' performance guarantees provided for the biofilter and scrubbers;</p> <p>(g) include measures to prevent and/or mitigate fugitive emissions;</p> <p>(h) include triggers for remedial and contingency action; and</p> <p>(i) include contingency measures in the event of failure of any component of the odour emissions plant and biofilter system or identification of fugitive emissions from the facility. Contingency measures shall include enclosing the West Water Recycle pit and treating the post 36 hour / emissions from the Phase 2/3 building via the ammonium scrubbers and biofilter.</p>	<p>This was confirmed in on-site interview/meeting with General Manager and Elf Environmental Consultant. They advised that Mr Aleks Todoroski and Mr Philip Henschke from Todoroski Air Sciences were put forward to the Secretary and the Secretary only approved Mr Todoroski.</p>	<p>Viewed:</p> <ol style="list-style-type: none"> 1. Elf has advised in an email dated 5 September 2016 that this not been drafted as yet. 2. NSW Government, Planning and Environment letter dated 24 August 2016 from Chris Ritchie, Director, Industry Assessments, as the Secretary's nominee, confirming Mr Todoroski as suitably independent and approved to update the Odour Management Plan <p>Updated odour Management Plan would therefore be due on 24 September 2016.</p> <ol style="list-style-type: none"> 3. Emails communications between Perram & Partners and Department of Planning and Environment granting extension of time to lodge the site's updated Odour Management Plan. Letter dated 14 September 2016 sent to Planning on 5 October 2016 Planning granted extension to the proposed 18 November 2016 lodgement date. 4. Email from Perram & Partners to Department of Planning and Environment seeking further extension to approximately 20 December 2016. 	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4B	The approval updated Plan (as revised and approved by the Secretary from time to time), shall be implemented for the life of the Project as soon as written endorsement by the Secretary is received.		Updated Odour Management Plan due to be submitted to the Department of Planning around 20 December 2016.	Not triggered
Odour Emissions and Biofilter Control System Audit				
5	<p>The Proponent shall undertake an Odour Emissions and Biofilter Control System Audit to quantify the odour abatement efficiency of the odour emissions plant and assess the effectiveness of all other odour controls on the Substrate Plant site:</p> <p>(a) within six weeks of the commissioning of the biofilter;</p> <p>(b) within six weeks of the decommissioning of the bioscrubber;</p> <p>(c) prior to the commencement of each increase in production, in accordance with Conditions 7(2) and 7(3) of Schedule 2;</p> <p>(d) and as directed by the Secretary;</p> <p>(e) each audit required under (a) to (d) inclusive, shall:</p> <p>i. be undertaken and prepared by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Secretary;</p> <p>ii. be prepared in consultation with the EPA;</p> <p>iii. report on the results of the source emissions sampling and analysis undertaken in accordance with the Odour Management Plan (required by Condition 4A of Schedule 3) or as otherwise agreed to in writing by the EPA;</p> <p>iv. review the Proponent's production data (that are relevant to the audit) and complaints record;</p> <p>v. review any complaints received during the relevant period;</p> <p>vi. determine whether the Project is complying with condition 2 of Schedule 3; and, if necessary;</p> <p>vii. recommend whether any additional management works and/or management practices are required to ensure no offensive odours from the Substrate Plant site.</p>	<p>Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant had not commenced.</p> <p>Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.</p>	<p>Construction of the odour emission plant had just commenced when this audit was undertaken. Civil works commenced on 22 August 2016.</p> <p>Hence this condition has not been triggered as at the time of this audit.</p>	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
6	Within 2 weeks of this audit being completed, or in a timeframe as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to EPA and the Secretary together with an action plan demonstrating how the findings of the audit are to be implemented.	Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant had not commenced. Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.	This condition has not been triggered as at the time of this audit.	Not triggered
6A	Two months after the completion of the audits required under Conditions 5 (a) and 5(b) of Schedule 3, the Proponent shall submit to the satisfaction of the Secretary, a report verifying that any actions identified in the audit have been implemented	Interview: General Manager advised that civil works commenced on the 22 August 2016, construction on the odour emission plant has not commenced. Site inspection: Auditor confirmed that civil works on the biofilter bed had only commenced at the time of the audit.	This condition has not been triggered as at the time of this audit.	Not triggered
Dust				
7	The Proponent shall implement all reasonable and feasible measures to minimise dust generated at the Substrate Plant site.	Site inspection: dust levels were low during the site audit on 13 September 2016.	Viewed: Elf Environmental Site Inspection reports for 4, 12 and 18 October 2016. Dust levels were all reported as acceptable. <i>Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Final Report September 2016</i> , prepared by The Odour Unit on behalf of Elf Farm Supplies Pty Ltd. The report covered the period 2012 to September 2016. Section 6.4 states that there were no dust complaints during the reporting period (September 2012 to September 2016).	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
8	<p>During the construction and operation of the project, the Proponent shall ensure that:</p> <p>(a) all trucks entering or leaving the Substrate Plant site with loads have their loads covered;</p> <p>(b) the trucks associated with the Project do not track dirt onto the public road network;</p> <p>(c) all areas are maintained in a condition to minimise the emission of wind-blown or traffic-generated dust, to the satisfaction of the Secretary</p>	<p>Site inspection: dust levels were low during the site audit on 13 September 2016. No visible dirt was sighted on the public road network entering Elf Farm Supplies.</p>	<p>Viewed:</p> <p>Elf Environmental Site Inspection reports for 4, 12 and 18 October 2016. Dust levels were all reported as acceptable.</p> <p><i>Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Final Report September 2016</i>, prepared by The Odour Unit on behalf of Elf Farm Supplies Pty Ltd. The report covered the period 2012 to September 2016. Section 6.4 states that there were no dust complaints during the reporting period (September 2012 to September 2016).</p>	Compliant
Energy Efficiency Plan				
9	<p>The proponent shall prepare and implement an Energy Efficiency Plan on the Substrate Plant site to the satisfaction of the Secretary. This plan must:</p> <p>(a) Be submitted to the Secretary for approval prior to the commencement of operations on the site;</p> <p>(b) Describe the measures that would be implemented to minimise energy use on the site;</p> <p>(c) Explore the possibility of using renewable energy use to generate power and</p> <p>(d) Include a program to monitor the effectiveness of these measures and a protocol to periodically review the plan</p>		<p>This was an existing condition of consent and not specific to MOD 1 development.</p> <p>The auditor noted that Section 6.6 of the <i>Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Final Report September 2016</i>, prepared by The Odour Unit on behalf of Elf Farm Supplies Pty Ltd summarised the energy consumption data from September 2012 to September 2016.</p> <p>Viewed: Section 5.5 of the <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012</i>, outlines designs features and management procedures in place to maximise energy efficiency.</p>	Not applicable
Fire Management				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
10	<p>The proponent shall;</p> <ul style="list-style-type: none"> a) Implement suitable measures to minimise the risk of fire on the Substrate Plant site; b) Extinguish any fires on the Substrate Plant site promptly; and c) Maintain adequate fire-fighting capacity on the Substrate Plant site. 		<p>The auditor notes that this Condition does not relate to this audit specifically as this was an existing condition pertaining to the site.</p> <p>However, a fire incident did occur during the audit preparation period and Incident report was provided.</p> <p>Viewed: Section 5.9.2 of the <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012</i>, outlines designs features and management procedures in place to minimise the risk of fire and refers to fire management strategy for the site.</p> <p>Viewed: Section 7.3.3 of the <i>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016</i> Perram & Partners, refers to Pollution Incident Response Management Plan.</p> <p>Opportunity for improvement: Ensure that debrief occurs after fire incident from 4 November 2016 investigation is complete and ensure that debrief includes review of all the relevant procedures, strategies and plans that relate to fire and ensure they are all current and incorporate any lessons learnt from the incident.</p>	Not applicable

Hazards

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
11	The Proponent shall ensure that all dangerous goods and hazardous substances are stored and handled on the Substrate Plant site in accordance with the Dangerous Goods Code and AS 1940-2004: The storage and handling of flammable and combustible liquids and AS 3780-2008 The Storage and Handling of Corrosive Substances		<p>This condition was not considered part of the audit as no additional areas have been constructed that house dangerous goods or hazardous materials as part of MOD 1.</p> <p>The auditor notes that Elf has the following procedures in place to deal with dangerous goods and hazardous materials:</p> <ol style="list-style-type: none"> 1. POL0002.05, Company Policy and Commitment, Use of Hazardous Substances Policy, Revision No: 0, Date 08.05.2015 2. Elf Farm Supplies Pty Ltd, EFS.OHS.053, Workplace Substances Procedure, reviewed date: 17.11/2016 	Not triggered
Waste				
12	The Proponent shall store, cause, permit, or allow any waste generated outside the Substrate Plant site to be received at the site for storage, treatment, processing, reprocessing or disposal of at the Substrate Plant site, except with the approval of the Secretary and as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.		The auditor notes that this Condition does not relate to this audit specifically as this was an existing condition pertaining to the site.	Not applicable
Bunding				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
13	The Proponent shall store all chemicals, fuels and oils used on the Substrate Plant site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund, unless double-skinned tanks are used. Any bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or DECCW's <i>Storage and handling liquids: Environmental Protection – Participant's Manual</i> .	Construction of the odour emission plant had just commenced when this audit was undertaken. Civil works commenced on 22 August 2016.	<p>This condition was not considered part of the audit as no additional storage areas for chemicals, fuels and oils have been constructed as yet relating to MOD 1.</p> <p>The auditor notes that Elf has the following procedures in place to deal with dangerous goods and hazardous materials:</p> <ol style="list-style-type: none"> 1. POL0002.05, Company Policy and Commitment, Use of Hazardous Substances Policy, Revision No: 0, Date 08.05.2015 2. Elf Farm Supplies Pty Ltd, EFS.OHS.053, Workplace Substances Procedure, reviewed date: 17.11/2016 	Not triggered
Soil and Waster - Discharge Limits				
14	Except as may be expressed provided by an EPL for the Substrate Plant site, the Proponent must comply with Section 120 of the POEO Act.	General Manager – no incidents that could cause environmental harm associated with the pollution of waters associated with MOD 1.	Viewed: <i>Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Final Report September 2016</i> , prepared by The Odour Unit on behalf of Elf Farm Supplies Pty Ltd. Table in Section 3 states that Elf was issued a Clean Up Notice on 28 May 2015 relating to contaminated stormwater and leachate. No water pollution incidents relating to MOD 1 recorded.	Complaint

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
15	The Proponent shall ensure that only VENM and/or ENM or material approved by the EPA is used as a fill.		<p>Viewed: <i>Supplementary Report to Elf Farm Supplies on Compaction Report for Biofilter Imported Fill Material at 108 Mulgrave Road, Mulgrave NSW</i>, dated 11 May 2016, prepared by Compaction & Soil Testing Services Pty Limited. Section 2 states that processed product described as recycled screened soil was used as the fill material for the biofilter area. Section 3.1 states that Hawkesbury Council granted approval for the use of this material within the project.</p> <p>Viewed: <i>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016</i> Perram & Partners, Section 2.2.33 states "that where further fill material is required, it will continue to be sourced from construction projects in the Sydney Region that have surplus excavated material at the time filling is underway. Imported fill is excavated natural material certified to be free from contamination."</p>	Compliant
16	The Proponent shall ensure that filling of the manoeuvring area shall be undertaken in accordance with plans submitted with DA 0571/06.		Viewed: <i>Supplementary Report to Elf Farm Supplies on Compaction Report for Biofilter Imported Fill Material at 108 Mulgrave Road, Mulgrave NSW</i> , dated 11 May 2016, prepared by Compaction & Soil Testing Services Pty Limited. Section 2.2 states that filling was completed in December 2014, hence this condition was prior to MOD 1 and cannot be audited.	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
16A	The Proponent shall ensure that the earthworks associated with the biofilter pad do not act as a source of sedimentation. The Proponent shall stabilise the area of fill associated with the biofilter within one week of the approval of MOD 1	Site inspection – not evidence was sighted during the site inspection of the biofilter pad acting as a source of sedimentation. General Manager – no incidents relating to the sediment fences have been recorded.	Auditor verified the second element of this condition through review of CSTS Report. The importation of recycled soil and materials for biofilter area began in September 2012 and was completed in December 2014. Throughout this period the material was being continuously tested for compaction testing. The number of tests exceeded the minimum requirements and all tests were conforming with AS3798. Viewed: <i>Compaction & Soil Testing Services Pty Ltd (CSTS) Supplementary Report to Elf Farm Supplies Pty Ltd on Compact Report for Biofilter Imported Fill Material at 108 Mulgrave Road, Mulgrave NSW, 11 May 2016.</i>	Compliant
16B	Prior to the commencement of construction of the biofilter, the Proponent shall submit to the Secretary, details demonstrating that the earthworks in the area of the biofilter have been: (a) undertaken in accordance with AS 3798; and (b) compacted to 98% Standard dry density ratio (AS1289 E4.1).		Viewed: <i>Compaction & Soil Testing Services Pty Ltd (CSTS) Supplementary Report to Elf Farm Supplies Pty Ltd on Compact Report for Biofilter Imported Fill Material at 108 Mulgrave Road, Mulgrave NSW, 11 May 2016.</i> Email from Department of Planning & Environment dated 16 November 2016 confirmed they received hard copy of the CSTS Report.	Compliant
Soil and Water – Water Management Plan				
17	The Proponent shall prepare and implement a Water Management Plan for the Substrate Plant site to the satisfaction of the Secretary. The plan must be submitted to the Secretary for approval prior to the commencement of operation of Stage 1 and be prepared in consultation with EPA and NOW.		Viewed: <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i> prepared by Perram & Partners May 2012. This condition was not part of the scope of the audit.	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
17A	<p>The Proponent shall prepare an updated Water Management Plan for the Substrate Plant site required by Condition 17 of Schedule 3 to include the works associated with MOD 1. The plan shall be submitted to the Secretary for approval prior to the commencement of operation of MOD 1.</p> <p>Operation of works associated with MOD 1 shall not commence until the Proponent has received written approval of the plan. The approved Plan shall be implemented for the life of the Project.</p>	<p>Interview – General Manager advised this Plan has not been updated as yet, it will be prior to the commencement of operations of MOD 1.</p>	<p>Viewed: <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i> prepared by Perram & Partners May 2012. This plan will be updated prior to operations commencing relating to MOD 1. This plan will be audited at next IEA.</p>	Not triggered
17B	<p>The Proponent shall ensure that the western dam at the Substrate Plant site (identified on the plan in Appendix 2 of this approval) does not receive process water.</p> <p>Notes: The dam may receive water from direct rainfall, area runoff and groundwater and during times of emergency.</p>	<p>Interview: General Manager – on 2 occasions this year, dam has been used in emergency situations. Neither related to MOD 1 but existing operations.</p>	<p>Viewed: <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i> prepared by Perram & Partners May 2012.</p> <p>Viewed: <i>Elf's Water Management Incident Report</i> for 20 and 21 July 2016.</p>	Compliant
17C	<p>Notwithstanding Condition 17B of Schedule 3, in the event of an emergency such as a high rainfall event or plant breakdown, the Proponent may use the western dam. Notification of any emergency use of the dam shall be provided to the Secretary in writing within 7 days of the emergency.</p>	<p>Interview: General Manager – on 2 occasions this year, dam has been used in emergency situations. Neither related to MOD 1 but existing operations.</p>	<p>Viewed: <i>Elf's Water Management Incident Report</i> for 20 and 21 July 2016.</p> <p>Viewed: Email to Planning representative, Anthony Pizzolato, on 7 June 2016 relating to the Environmental incident relating to the western dam 5 and 6 June 2016.</p> <p>Email to Planning representative, Anthony Pizzolato, on 21 July 2016 relating to the environmental incident relating to the western dam 20 July 2016.</p> <p>Opportunity – Elf to seek clarification from Department as to whether Conditions 17B and 17C only come into effect once MOD 1 operational. Not clear to auditor.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status												
Noise – Construction Noise Criteria																
18	<p>The Proponent shall ensure that the construction noise generated at the Substrate Plant site does not exceed the criteria in Table 1</p> <p>Table 1: Construction Noise impact assessment criteria dB A</p> <table><tr><th>Receiver/Location</th><th>Day LAeq(15 minute)</th></tr><tr><td>R1 - 46 Mulgrave Road, Mulgrave</td><td>52</td></tr><tr><td>R2- Mulgrave Industrial area</td><td>65</td></tr><tr><td>R3 - 2 Railway Road, Mulgrave</td><td>52</td></tr><tr><td>R4- 126 Mulgrave Road, Mulgrave</td><td>52</td></tr><tr><td>R5- Chisholm Place, South Windsor</td><td>51</td></tr></table> <p>Notes:</p> <p>Noise generated by the Project is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</p>	Receiver/Location	Day LAeq(15 minute)	R1 - 46 Mulgrave Road, Mulgrave	52	R2- Mulgrave Industrial area	65	R3 - 2 Railway Road, Mulgrave	52	R4- 126 Mulgrave Road, Mulgrave	52	R5- Chisholm Place, South Windsor	51		<p>Viewed: Acoustic Consulting Engineers Pty Ltd reports for monitoring undertaken on 31 August 2016 (Ref 160787-03-01L-CF and 13 October 2016 (160787-03-03L-DD). Compliance with the construction noise limits was achieved in both monitoring events.</p> <p>Viewed: <i>Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016</i> Perram & Partners. Appendix C, Atkins Acoustic and Associates Pty Ltd, Construction Noise & Vibration Management Plan, Substrate Plant, Mulgrave, 46.6411.CNVMP_MUL: GD/DT/CF/2016 Rev 07, April 2016. Section 2.1, Table 1 specifies these construction noise limits.</p>	Compliant
Receiver/Location	Day LAeq(15 minute)															
R1 - 46 Mulgrave Road, Mulgrave	52															
R2- Mulgrave Industrial area	65															
R3 - 2 Railway Road, Mulgrave	52															
R4- 126 Mulgrave Road, Mulgrave	52															
R5- Chisholm Place, South Windsor	51															

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status																		
Noise – Operational Noise Criteria																						
19	<p>The Proponent shall ensure that the operational noise generated by the Substrate Plant site does not exceed the criteria in Table 2</p> <p>Table 2: Operational Noise impact assessment criteria dB(A)</p> <table><tr><th>Receiver/Location</th><th>Day LAeq(15 minute)</th><th>Night LAeq(15 minute)</th></tr><tr><td>R1 - 46 Mulgrave Road, Mulgrave</td><td>43</td><td>43</td></tr><tr><td>R2- Mulgrave Industrial area</td><td>42</td><td>37</td></tr><tr><td>R3 - 2 Railway Road, Mulgrave</td><td>44</td><td>41</td></tr><tr><td>R4- 126 Mulgrave Road, Mulgrave</td><td>44</td><td>42</td></tr><tr><td>R5- Chisholm Place, South Windsor</td><td></td><td></td></tr></table> <p>Notes:</p> <p>Noise generated by the Project is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy</p>	Receiver/Location	Day LAeq(15 minute)	Night LAeq(15 minute)	R1 - 46 Mulgrave Road, Mulgrave	43	43	R2- Mulgrave Industrial area	42	37	R3 - 2 Railway Road, Mulgrave	44	41	R4- 126 Mulgrave Road, Mulgrave	44	42	R5- Chisholm Place, South Windsor			<p>Site inspection: construction activities had only just commenced less than 4 weeks ago.</p>	<p>Not triggered as the Project (MOD 1) still in construction phase.</p> <p>Viewed: Section 7.3 of the <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012</i>, outlines noise monitoring requirements during operational phase.</p> <p>It should be noted that the table in Section 7.3 is now outdated as noise criteria has changed at several locations and this section of the Strategy needs to be updated to reflect Condition 19 limits.</p>	Not triggered
Receiver/Location	Day LAeq(15 minute)	Night LAeq(15 minute)																				
R1 - 46 Mulgrave Road, Mulgrave	43	43																				
R2- Mulgrave Industrial area	42	37																				
R3 - 2 Railway Road, Mulgrave	44	41																				
R4- 126 Mulgrave Road, Mulgrave	44	42																				
R5- Chisholm Place, South Windsor																						

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status															
Noise – Hours of Work																			
20	<p>The Proponent shall comply with the operating hours in Table 3 at the Substrate Plant site, unless otherwise agreed to in writing by the Secretary.</p> <p>Table 3: Operating hours</p> <table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="4">Construction</td><td>Monday – Friday</td><td>7.00am – 6.00pm</td></tr><tr><td>Saturday</td><td>8.00am – 1.00pm</td></tr><tr><td>Sunday and Public Holidays</td><td>Nil</td></tr><tr><td>All days</td><td>Anytime</td></tr><tr><td>Operation</td><td></td><td></td></tr></table>	Activity	Day	Time	Construction	Monday – Friday	7.00am – 6.00pm	Saturday	8.00am – 1.00pm	Sunday and Public Holidays	Nil	All days	Anytime	Operation			<p>Interview – General Manager advised that Elf was generally working with the construction operating hours, however, they had a non-compliance on 7 September 2016 when they worked till 8pm due to concrete taking longer to set than anticipated.</p>	<p>Viewed: Elf's Non-Compliance form which was completed to record the non-compliance for 7 September 2016.</p> <p>Observation: Non-compliance form could be improved through document control elements added (issue date, version number) and also adding a unique number for each non-compliance (NC No.xxx), name of the person completing the form. Name of the person responsible for implementing corrective action. Adding section Close Out, which can only occur once efficient time has passed for the corrective action measures to be implemented and effectiveness assessed.</p>	Non-compliant
Activity	Day	Time																	
Construction	Monday – Friday	7.00am – 6.00pm																	
	Saturday	8.00am – 1.00pm																	
	Sunday and Public Holidays	Nil																	
	All days	Anytime																	
Operation																			
Noise – Additional Noise Mitigation Measures																			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
21	<p>The Proponent shall construct the 7 m high noise wall adjacent to the southern side of the bale storage shed or implement 'other noise mitigation measures' with the same or greater effect, prior to commencement of Stage 2B construction works.</p> <p>Should 'other noise mitigation measures' be implemented, the Proponent shall demonstrate, to the satisfaction of the Secretary, that the chosen measures will be as effective as modelled for the noise wall. Construction of Stage 2B cannot commence unless the Proponent has received the Secretary's approval for the 'other noise mitigation measures'.</p>	<p>Interview: General Manager advised straw bales have been in use since 2012.</p> <p>Auditor sighted the straw bales during site inspection on 13 September 2016.</p> <p>Subsequent to the site inspection, Elf advised the auditor of fire incident which occurred on 4 November 2016 at the site, which destroyed the straw bales. The General Manager advised that Elf will now be progressing designing and installing permanent noise mitigation barrier.</p>	<p>Viewed: Letter from Department of Planning & Environment dated 18 July 2016 approving the use of straw bales as "other noise mitigation measures".</p> <p>Viewed: Acoustic Consulting Engineers Pty Ltd reports for monitoring undertaken on 31 August 2016 (Ref 160787-03-01L-CF and 13 October 2016 (160787-03-03L-DD). Compliance with the construction noise limits was achieved in both monitoring events.</p> <p>Elf Farm Supplies Incident Report dated 11 November 2016 was reviewed. The straw bales that were being used as an "other noise mitigation measure" caught fire and were destroyed. Elf notified the relevant authorities on the day the fire commenced.</p> <p>Recommendation: Elf engage a suitably qualified acoustic company to carry out an additional round of noise monitoring as soon as possible to determine if Elf is still complying with construction noise limits. It is likely that they are still complying as construction works are occurring on western side of the existing structures, hence those structures will be acting as noise mitigation barrier towards the nearest residence to where the straw bales were located (R4).</p>	Compliant
Noise – Noise Management Plan				
22	<p>The Proponent shall prepare and implement a Noise Management Plan for the Substrate Plant site in consultation with EPA to the satisfaction of the Secretary. The Plan must be submitted to the Secretary for approval prior to commencement of operations, and include a noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval</p>		<p>This condition does not relate to MOD 1 and hence was not audited.</p>	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
22A	The Proponent shall update the Noise Management Plan for the Substrate Plant site, to the satisfaction of the Secretary. This plan is to update the plan approved under Condition 22 of Schedule 3 and shall include: (a) the works associated with MOD 1; and (b) a revised monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval once all construction works associated with MOD 1 are complete.	Interview: General Manager advised that this Plan has not been updated as yet, as construction has only recently commenced, however it will be prior to operation of works associated with MOD 1 commence.	This Plan has not been updated as yet. Observation – Elf to ensure that the Operational Noise Management Plan contained in Appendix D of the <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012</i> , is updated and submitted as per the Approval Conditions.	Not triggered
22B	Operation of works associated with MOD 1 shall not commence until the Proponent has received the Secretary's written approval of the plan. The approved Plan (as revised and approved by the Secretary from time to time), shall be implemented for the life of the Project as soon as written endorsement by the Secretary is received	Interview: General Manager advised that this Plan has not been updated as yet, as construction has only recently commenced, however it will be prior to operation of works associated with MOD 1 commence.	This Plan has not been updated as yet.	Not triggered
Biodiversity – Riparian Management Area				
23	The Proponent shall establish a fenced, 35 metre wide riparian corridor along the length of South Creek within 12 months of commencement of operation of Stage 1. The Proponent shall consult with the Hawkesbury-Nepean Catchment Management Authority on Methods and species selection to ensure that best practice techniques are used at the site, to the satisfaction of the Secretary.		This condition does not apply to this Project (MOD 1).	Not applicable
Visual Amenity – Lighting				
24	The Proponent shall ensure that all external lighting associated with the Substrate Plant site: a) Does not create nuisance to surrounding properties or roadways and b) Complies with AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting.		This condition does not apply to this Project (MOD 1).	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
24A	The Proponent shall prepare a Landscape Management Plan for the Substrate Plant site. The plan shall: (a) be prepared in consultation with Council; (b) identify screen planting to minimise visual impacts of the site, particularly the new biofilter; and (c) be approved by the Secretary prior to the commencement of construction of the works associated with MOD 1.	Interview: General Manager advised that Andrew Johnston was contact in Hawkesbury City Council.	Viewed: <i>Landscape Design Report and Plant List for Elf Farm Supplies Pty Ltd, 108 Mulgrave Road, Mulgrave 2756, June 2016, prepared by Huon Design, Rodney Cox</i> (a) Mr Andrew Johnston from Hawkesbury Council confirmed in an email on 8 November 2016 that Council's Park Officer and himself reviewed the Landscape Plan. (b) Landscape Design Report and Plant List, June 2016 (c) NSW Government, Planning and Environment letter dated 13 July 2016 from Chris Ritchie, Director, Industry Assessments, as the Secretary's nominee. Confirming Revision 1 of the Landscape Design Report and Plant List has been prepared in accordance with Condition 24A of Schedule 3.	Compliant
24B	The landscaping around the site of the new biofilter required under MOD 1 shall be installed within three months following the completion of the construction of the biofilter. All other landscaping shall be installed prior to the commencement of operation of the works associated with MOD 1	Interview: General Manager advised construction of the civil works for the biofilter commenced on 22 August 2016 and all landscaping has been completed as per the Plan. Site inspection: Sighted all the plantings that had occurred around the site.	Viewed: <i>Landscape Design Report and Plant List for Elf Farm Supplies Pty Ltd, 108 Mulgrave Road, Mulgrave 2756, June 2016, prepared by Huon Design, Rodney Cox</i>	Not triggered
Signage				
25	The Proponent shall not install any advertising signs on the Substrate Plant site without the written approval of the Secretary.		This condition does not apply to this Project (MOD 1).	Not applicable
Transport				
26	The Proponent shall ensure that: (a) car parking is constructed in accordance with the relevant requirements of the latest version of AS 2890.1; and (b) vehicles associated with the Substrate Plant site do not park or queue on the public road network at any time	Site inspection: no queueing was sighted during the site visit and no parking on public roads was occurring.		Compliant

SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT AND REPORTING CONDITIONS

Table 11 Environmental Management and Reporting Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Environmental Management Strategy				
1	<p>The Proponent shall prepare and implement an Environmental Management Strategy for the Project to the satisfaction of the Secretary. The Strategy must:</p> <ol style="list-style-type: none"> Be submitted to the Secretary for approval prior to the commencement of operation; Provide the strategic framework for environmental management of the Project; Identify the statutory approvals that apply to the Project; Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Project Describe the procedures that would be implemented to: <ul style="list-style-type: none"> 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; and Respond to emergencies. Include <ul style="list-style-type: none"> Copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved and A clear plan depicting all the monitoring currently being carried out within the Project Area. 	<p>Interview: General Manager advised that with the MOD 1 development application, Elf delayed the 3 yearly reviewed required under the previous Approval to co-inside with the first annual environmental performance review of the “new” Approval. It is Elf intentions to review the Strategy at the conclusion of this review, which is currently underway by The Odour Unit.</p> <p>Note: This report has now been completed.</p>	<p>This condition is not applicable for MOD 1 project and hence was not audited.</p> <p>Viewed: Elf Farm Supplies Pty Ltd, Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, May 2012. Perram & Partners.</p> <p>Opportunity for improvement: Elf personnel to review and update the Strategy to include the MOD 1 development and associated updated plans, practices and procedures which are now in place.</p> <p>It is noted that Section 8.2.2 outlines a three yearly review; hence the Strategy was due for review in May 2015.</p>	Not applicable

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Management Plan Requirements				
2	<p>The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:</p> <p>a) detailed baseline data;</p> <p>b) a description of:</p> <ul style="list-style-type: none"> • the relevant statutory requirements (including any relevant approval, licence or lease conditions) ; • any relevant limits or performance measures/criteria; and • the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Project or any management measures; <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements , limits, or performance measures/criteria</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> • impacts and environmental performance of the Project; • effectiveness of any management measures (see c above); <p>e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the Project over time;</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the relevant limits and/or performance measures I criteria; and <p>h) a protocol for periodic review of the plan</p>		This condition is not applicable for MOD 1 project and hence was not audited.	Not applicable.
Review				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3	<p>By the end of September 2016, and annually thereafter, unless otherwise agreed by the Secretary, the Proponent shall review the environmental performance of the Project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the operations that were carried out during the reporting period;</p> <p>(b) analyse the monitoring results and complaints records of the Project during the reporting period, which includes a comparison of these results against the:</p> <p>i. relevant statutory requirements, limits or performance measures/ criteria;</p> <p>ii. monitoring results of previous years; and</p> <p>iii. relevant predictions in the EA;</p> <p>(c) identify any non-compliance during the reporting period, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the Project; and</p> <p>(e) describe what measure(s) will be implemented during the next reporting period to improve the environmental performance of the Project</p>	<p>Interview: General Manager advised that Elf had engaged The Odour Unit to complete the report on their behalf.</p>	<p>Viewed: Elf Farm Supplies Pty Ltd – <i>Mushroom Substrate Facility, Mulgrave, NSW, Annual Environmental Management Report</i> (September 2012 – September 2016), dated 23 September 2016, prepared by The Odour Unit.</p> <p>(a) Section 2.1 describes the existing operations. Note: production levels/data was not included. Opportunity for improvement.</p> <p>(b) Compliance for statutory requirements for limits on bioscrubber Section 6.1 and Table 1.1 and Table 1.2, Appendices contain Odour Monitoring Results from bioscrubber. Compliance for analysis of odour complaints (Section 7.2). Non-compliant</p> <p>i. Report does not include any analysis of construction compliance noise monitoring results (reports). Example missing Acoustic Consulting Engineers report dated 2 September 2016 relating to noise monitoring undertaken on 31 August 2016.</p> <p>ii. No reference in main report to relevant EA predictions.</p> <p>(c) Compliance – Table 1.2.</p> <p>(d) Non-compliance – trends in odour emission levels from bioscrubber where not graphed or presented in consolidated table and hence trends did not appear to be reviewed. It is noted the report covered trends in terms of the operational conditions at the time of the complaint.</p> <p>(e) Compliance – Section 6.8 and Section 4.</p>	Administrative non-compliance

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Independent Environmental Audit				
3A	<p>Within six months of the approval of MOD 1, and every two years thereafter, unless otherwise agreed by the Secretary, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the Project. This audit must:</p> <p>(a) be conducted by suitably qualified, experienced and independent team of experts (including an odour expert), whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) include a full odour audit of the Project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit;</p> <p>(d) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any other licenses and approvals that apply to the project, (including any assessment, plan or program required under these approvals) ;</p> <p>(e) review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate;</p> <p>(f) recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.</p> <p>Within six 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</p>	Not applicable	<p>610.16730-P01-v1.0 20160816 - Offer of Services sighted from SLR Consulting Australia Pty Ltd dated 16 August 2016. Offer related to Schedule 5, Condition 3A.</p> <p>Email sighted from Elf to SLR (Sandy Lonergan) dated 25 August 2016 engaging SLR to complete the independent audit as per Condition 3A, order number C23190.</p> <p>a) Compliant - Letter dated 24 August 2016 from Planning to Perram and Partners endorsing Ms Lonergan and Mr Mann as independent environmental auditors.</p> <p>b) Compliant – refer to Section 3.1 of this report.</p> <p>c) Not triggered – project only in construction phase.</p> <p>d) Compliance – This report.</p> <p>e) Compliant – refer to Section 4 of this report.</p> <p>f) Compliant – refer to Section 4 of this report.</p>	Compliant
Revision of Plans and Programs				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4	<p>Within three months of the submission of an:</p> <p>(a) incident report under condition 5 of schedule 5;</p> <p>(b) review under condition 3 of schedule 5, and</p> <p>(c) audit under condition 3A of Schedule 5,</p> <p>the Proponent shall review, and if necessary revise the plans and programs required under this approval to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Project.</p>	<p>Interview 13 September 2016: General Manager – on 2 occasions this year, dam has been used in emergency situations. Neither related to MOD1 but existing operations.</p> <p>Note that during the preparation of this audit report, SLR were advised by Elf of an incident that saw fire destroyed the straw bales being used as an “other noise mitigation measure” for MOD1 project.</p>	<p>Viewed Elf Farm Supplies Pty Ltd Incident Report dated 11 November 2016 pertaining to the fire incident. As investigations are still on-going and still within the three month period of the date of the incident this condition could not be audited. However it will be noted that this will be audited during next independent audit and records/evidence of the review of the relevant plans has occurred.</p> <p>b) and c) not triggered</p>	Compliant
Incident				
5	<p>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.</p>	<p>During the preparation of this audit report, SLR were advised by Elf of an incident that saw fire destroy the straw bales being used as an “other noise mitigation measure” for MOD1 project.</p>	<p>Viewed Elf Farm Supplies Pty Ltd Incident Report dated 11 November 2016 pertaining to the fire incident.</p> <p>Email sighted from Elf to Planning and the EPA on 11 November 2016 providing detailed report on the incident.</p>	Compliant
Access to Information				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
6	<p>The Proponent shall prepare a Community Consultation Strategy for the Substrate Plant site to address existing and future operations at the Substrate Plant site, including construction of works associated with MOD 1. This Plan shall:</p> <p>(a) be submitted to the satisfaction of the Secretary within one month from the approval of MOD 1;</p> <p>(b) include procedures for updating the community on the general operation of the site as well as the progress of any construction works; including</p> <p>i. a newsletter for the local community which details the</p> <ul style="list-style-type: none"> • construction activities and the expected duration of works; • a general summary of the environmental management to be implemented ; and • telephone number for taking complaints or enquiries in relation to the activities; <p>ii. the website required by Condition 7 of Schedule 5; and</p> <p>iii. public meetings;</p> <p>(c) describe the distribution area for the newsletter (at a minimum all residents within 2 km from the site boundary), prepared in consultation with Council; and</p> <p>(d) include procedures for handling and monitoring all complaints received; and detail what management and/or contingency actions will be taken if complaints are received</p>	<p>Elf advised that this was prepared by Straighttalk, who they have engaged to manage and facilitate the Community Consultation process.</p>	<p><i>Community Consultation Strategy Elf Farm Supplies</i>, 17 May 2016, Revision 1, prepared by Straight Talk.</p> <p>Compliant - Approval was granted on 14 March 2016, letter from Straight Talk to Department of Planning dated the 12 April 2016 sighted.</p> <p>The auditor notes that this was not approved and subsequent Strategy was submitted on 17 May 2016 to the Department and this revised Strategy was approved on 23 May 2016.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
7	The approved Strategy (as revised and approved by the Secretary from time to time), shall be implemented for the life of the Project as soon as written endorsement by the Secretary is received	Interview: General Manager advised that the owner (Rob Tulson) and Environmental Consultant conducted the door knock of the immediate neighbours on 30 August 2016.	<p>Good Neighbours procedure sighted. As per procedure – door knocking and information provided to all residents within 100 m occurred on 30 August 2016 by Rod Tulson (owner) and Environmental Manager/Consultant.</p> <p>Straight talk Reports for four sessions held in August:</p> <ul style="list-style-type: none"> - Report dated 8 August 2016 relating to session one held on Saturday 6 August 2016 from 11am to 2pm at the Hawkesbury Public Library. - Report dated 11 August 2016 from the Public information session held on Wednesday 10 August 2016. This was the second session. - Report dated 19 August 2016 from the public information session held on Wednesday 17 August 2016. This was the third session. - Report dated 29 August 2016 from the public information session held on Saturday 27 August 2016. This was the fourth session. <p>Sighted:</p> <ul style="list-style-type: none"> - Advertisements in Hawkesbury Courier, Thursday 7 July 2016 – Elf Farm Supplies – Community information and contained: Elf website details, public information sessions, complaints line - Same ad also sighted in Hawkesbury Gazette on Wednesday 6 July 2016 - Same ad in Hawkesbury Independent publication, dated July 2016. <p>Reviewed Elf website and sighted online complaints form under Contact Us, as per Section 6.2.5 of the Community Consultation Strategy.</p> <p>Article in Hawkesbury Gazette on 24 August 2016.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
8	<p>Within three months from the date of the approval of MOD 1, the Proponent shall make the following information (unless commercially sensitive) freely available on a publicly accessible website, as it is progressively required under the approval :</p> <p>(a) all current statutory approvals, including this approval and any modifications to it;</p> <p>(b) plans and programs required under this approval;</p> <p>(c) technical analysis/reports of monitoring results, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</p> <p>(d) a complaints register, which is to be updated on a monthly basis;</p> <p>(e) a copy of any review as required under Condition 3 of Schedule 5 (over the last five years);</p> <p>(f) updates on the progress of the construction works associated with MOD 1; and</p> <p>(g) any other material as required by the Secretary</p>		<p>Compliance was achieved in terms of website being activated and information publicly available. Auditor viewed email from Straight-Talk to Elf dated 13 June 2016 advising the website is live:</p> <ul style="list-style-type: none"> a) Compliance – sighted current approvals on the website; b) Compliance – sighted Construction EMP; c) Non-compliance – noise monitoring reports were not available under Environmental Reports on the website on the 13th September 2016; d) Compliance – Complaints Register located under Environmental Reporting and was last updated on 14 November 2016; e) Compliance – it was noted that September 2016 report will be uploaded once approved by the Department. f) Non-compliance – under Indicative Timeframe section, states (16 September 2016). <p><i>That Elf Farm Supplies is currently waiting for approval from Department of Planning and Environment (DPE) of an independent review of its proposed mitigation technology. DPE must approve the design of the technology before Elf Farm Supplies can finalise all the necessary pre-construction requirements. This independent review was approved on 15 June 2016, hence it has been 3 months since approval was granted and sufficient time to update.</i></p>	Administrative non-complaint

APPENDIX B – PHOTOGRAPHS

The following photographs were taken on site on 13 September 2016, approximately 3 weeks after civil works commenced.

Photo 1 Biofilter Construction Area



Photo 2 Biofilter Construction Area



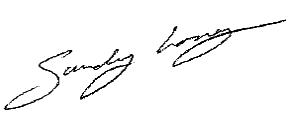
Photo 3 Erosion Control Fence and Tree Plantings



Photo 4 Dam with Erosion Control Fence and Landscaping



APPENDIX C – INDEPENDENT AUDIT CERTIFICATION FORM

Independent Audit Certification Form	
Development Name	Elf Farm Supplies Pty Ltd
Development Consent No.	MP 08_0255 (MOD 1)
Description of Development	Elf produces mushroom compost (substrate) at the site and recently commenced construction of a new odour management system on the site as per MOD 1.
Development Address	108 Mulgrave Road, Mulgrave New South Wales
Operator	As above
Operator Address	As above
Independent Audit	
Title of Audit	Independent Environmental Audit
<p>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</p> <ul style="list-style-type: none"> The audit has been undertaken in accordance with the relevant approval condition(s) and in accordance with the auditing standard AS/NSZ ISO 19001:2014 and Post Approval Guidelines – Independent Audits; The findings of the audit are reported truthfully, accurately and completely; I have exercised due diligence and professional judgement in conducting the audit; I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit; I am not related to any owner or operator of the development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediately family); Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and I have not accepted, not intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested parties. I have not knowingly allowed, not intend to allow my colleagues to do so. <p>Note:</p> <ol style="list-style-type: none"> The Independent Audit is an environmental audit for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental authority if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000. The Crimes Act 1900 contains other offences relating to false and misleading information; section 192G (Intention to defraud by false or misleading statement – maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/document – maximum penalty 2 years imprisonment or \$22,000, or both). 	
Signature	
Name of Lead / Principal Auditor	Sandy Lonergan
Address	2 Lincoln Street, Lane Cove, NSW 2066
Email Address	slonergan@slrconsulting.com
Date	21 December 2016

APPENDIX D – INDEPENDENT AUDITORS CV AND APPROVAL LETTER

QUALIFICATIONS

BAppSc (Environmental Assessment and Management) (University of Newcastle, 1993)

Qualified Lead Auditor for Management Systems Team Audits

Qualified Lead Auditor for quality audits

Qualified Lead Auditor of occupational health and safety management systems

Certificate of Wastewater Treatment, Meadowbank TAFE 1994

BACKGROUND

Sandy has worked as an environmental consultant since graduating from the University of Newcastle.

Her experience provides her with the flexibility to analyse non-technical and technical issues in a logical and systematic manner, to distinguish key issues, identify options and put forward appropriate solutions.

Sandy has experience in working in many industries including but not limited to the coal seam gas, coal, petroleum (refineries), meat industry (red and white meat processing facilities, hatcheries, feed mills, poultry farms), food manufacturers, waste management centres, glass manufacturing.

Sandy is a qualified environmental auditor of Environmental Management System to ISO/IEC 14001 and has been previously engaged by NCSI to conduct EMS certification audits on their behalf.

Sandy has developed and implemented numerous EMS in accordance with ISO/IEC14001.

Sandy has over 20 years experience in conducting environmental audits ranging from compliance to due diligence.

Between 2006 and 2011 she was the Operational and Environmental Manager of an emissions testing company. Her responsibilities included quoting, scheduling and project management. Sandy also developed, implemented and maintained the company's NATA accreditation to ISO/IEC17025 for the company's emission testing and analysis activities. She conducted regular internal audits as well as being part of the external audits.

Since joining SLR she has developed and integrated the Air Quality technical discipline into the company's quality management system, which included obtaining NATA accreditation to ISO/IEC17025.

Due to her expertise in management systems and auditing skills she also manages, as well as conducts the company's internal and external audits in relation to ISO9001 & ISO/IEC17025 and is SLR APAC Systems Manager.

SPECIAL EXPERTISE

- Environmental compliance audits
- Development and auditing of environmental management systems to ISO/IEC14001
- Quality, health and safety and ISO/IEC17025 auditing
- System development and management to ISO/IEC 17025, ISO/IEC9001 and ISO18001.
- Due diligence audits
- Detailed knowledge of legislative requirements for air emission testing
- Environmental Management Plans (Construction and Operational)
- Environmental monitoring programs
- Project management.

SELECTED PROJECT EXPERIENCE

Environmental Audits

- Third Party Compliance Environmental Audit of Fairview and Arcadia Valley Project Areas of coal seam gas project for Santos
- Environment Protection and Biodiversity Conservation Act (EPBC) Audit of coal seam gas project development for Santos for Commonwealth government
- Third Party Compliance Environmental Audit of the Fairview Project Area for Santos
- Environmental Compliance Audit for Shoalhaven Starches
- Due diligence environmental audits for Smallgoods Processing Facilities in Qld, NSW and SA
- Due Diligence Audit for Abattoir, Cannon Hill, Qld
- Environmental compliance audit for Sydney Water
- Environmental audits of breeder and broiler farms, hatcheries, feed mills and processing plants in WA, Qld and Vic

HSE Audits

- Internal HSE gap audit against client specifications for a LNG development project in PNG for ERIAS

ISO/IEC14001 Certification Audits on behalf of NSCI

- BHPSteel Lysaght
- Panasonic AVC Networks Australia Pty Ltd
- Baiada Poultry
- Tetra Pak

QUALIFICATIONS

Certificate (Diploma), Mechanical Engineering
(Sydney Institute Of Technology, 1984)

MEMBERSHIP

NATA (National Association Of Testing
Authorities) Technical Assessor

Clean Air Society of Australia and New
Zealand

United States EPA Pollution Prevention
Information Clearinghouse

Air and Waste Management Association, USA

Water Environment Federation, USA

BACKGROUND

Jeff has 35 years of experience in air quality and dust, gas, vapour and odour air pollution control. Over the last 25 years he has worked in the fields of air pollution emissions estimation and measurement, the assessment of impacts from emissions to the atmosphere, and the conceptual design of emissions control solutions.

Jeff has extensive experience in the assessment and control of odour emissions from a wide range of industries. He also has significant experience in the development of odour policy, odour impact assessment methodologies and odour measurement methodologies.

SPECIAL EXPERTISE

- Air quality impact assessments
- Atmospheric dispersion modelling studies
- Odour measurement
- Meteorological analysis
- Air Quality Management Plans
- Negotiations with regulatory authorities
- Conceptual and detailed design of emission control systems including selection of applicable technology, costings and program / schedule generation, manual writing and personnel training
- Contract management and expediting, site supervision and commissioning

SELECTED PROJECT EXPERIENCE

Fertiliser Manufacturing, NSW

Investigation of odour emissions from chicken manure stockpiling, materials handling and manure processing. An impact assessment and dispersion modelling of a proposed new facility was performed. Following this, design, a budget costing and specification for the ventilation and odour control system for the fully-enclosed manure stockpile, manure driers and manure mechanical handling system was prepared. Post-installation an inspection of the installed equipment was performed.

North Head STP Odour Control Ventilation Project

Investigation and conceptual design of the upgraded underground ventilation scope of the North Head STP odour control upgrade project.

North Head STP Central Odour Control Facility

Investigation of non-performance of large air movement fans for the Central Odour Control Facility. Determination of root causes of fan failure and management of fan replacements.

Glass Manufacturing Air Quality Impact Assessment, NSW and South Australia

Air emission assessment (odour, acid gas and products of combustion) of several glass container manufacturing facilities.

Ti Tree Bend WWTP Odour Control

Investigation and derivation of site wide odour control master plan and community odour impact assessment protocols.

Belconnen Trunk Sewer Septicity Model

A project which developed and linked a sophisticated septicity, hydrogen sulphide and airflow model to an hydraulic model.

Ambient Air Monitoring, Malaysia

Investigation plan, sampling and analysis design, coordination of international personnel and laboratories for ambient air quality and HAPs surrounding a petrochemical storage facility in a densely populated residential area.

Rutile Manufacturing Odour Control, Western Australia

Process and construction review of existing emission control system which was not

operating as required. Recommendations for process and hardware modifications to optimise performance and remove design flaws.

Hazardous Liquid Waste Odour Control, NSW

Supervision and co-ordination of a team of 6 independent odour consultants. Provision of expert technical advice for a project involving the investigation of the causes of odour problems at the site and recommendations for problem resolution. The project involved process review, pilot plant trial, continuous monitoring and dispersion modelling for a facility adjacent to the Olympics site at Homebush, NSW.

Combustion Stack Impact Assessment, VIC

Investigation using dispersion modelling of the near field impacts of stack emissions on nearby structures.

Food Manufacturing Air Impact Assessment, Singapore

Air emission assessment (products of combustion, HAPs) of a confidential chemical manufacturing facility.

Particle Board Manufacture, Queensland

Air emission assessment (particulates, HAPs) of a particle board manufacturing facility.

Sludge Processing Odour Control, Perth

Investigation, troubleshooting and process modification recommendations for an odour control system treating off-gasses from an oil from sludge facility.

Emissions Assessment From Ethanol Plant, NSW

Air emissions assessment (odours, particulates) of a combined starch and ethanol production facility. This included negotiations with regulatory authorities.

Medical Waste Incineration, Canberra

Estimation of emissions, dispersion modelling, and prediction of air impacts from a proposed clinical waste incinerator located close to a residential area.

Aluminium Container Manufacturing, NSW

Review of oven exhaust systems. Recommendations / redesign for ventilation

system modifications to prevent condensate build-up and associated fire risk. Review of applicable odour control technologies to prevent odour impact on local communities. Pilot plant trials of applicable technology. Budget estimating and scheduling of full scale emission control plant for an aluminium can forming and coating facility.

Insulation Manufacturing, NSW

Manufacturing process review, odour and chemical emission measurement, dispersion modelling, health risk assessment, emission control technology options review, pilot plant trials, emission control system design, Local government and EPA negotiations, compilation of performance specifications for a glass wool insulation manufacturing emission control facility.

Ceramic Roof Tiles, NSW

Investigation of chemical and odour emissions. Odour measurement, dispersion modelling, health risk assessment, emission system design, EPA negotiations for a roof tile coating facility.

Foundry Emission Control, Sydney

Investigation, design, installation and commissioning of the refurbishment of a dust collection and control system at a metal casting foundry.

Hazardous Vapours Control, Victoria

Investigation of a hazardous vapour emission control system for an adhesive manufacturing facility.

Dust Control, Geelong

Investigation, design, installation, commissioning and maintenance of a dust emission control system for paint mixing operations.

Food Manufacturing, Sydney

Investigation and design of an odour emission control system for a chocolate factory located near residential areas.

Tank Farm Vapour Emission Control

Design, installation, commissioning, troubleshooting and refurbishment of multiple emission control systems for tank farm installations and bulk chemical liquid storage terminals.



Contact: Emma Barnet
Phone: (02) 9228 6412
Email: emma.barnet@planning.nsw.gov.au

Mr Terry Perram
Perram and Partners
12 Clanwilliam Street
Eastwood NSW 2122

Dear Mr Perram

Elf Mushroom Farm and Substrate Plant (08_0255 MOD 1) endorsement of independent environmental auditors

I refer to your letter of 17 August 2016 requesting approval for Ms Lonegran and Mr Mann of SLR to undertake the Independent Environmental Audit in accordance with condition 3A of schedule 5 of the approval (MP 08_0255 MOD 1).

I endorse Ms Lonegran and Mr Mann to undertake the Independent Environmental Audit having considered their qualifications, experience and independence.

I want to take this opportunity to advise that approval is granted:

- to Ms Lonegran and Mr Mann as people, not SLR as a company; and
- for the carrying out of the 2016 Independent Audit only, specific approvals must be sought for other audits.

Yours sincerely

Chris Ritchie
Director
Industry Assessments
As the Secretary's nominee

24/8/16.