

Our ref: MP08_0255-PA-27

Blake Edwards
WHS Manager
ELF FARM SUPPLIES PTY LTD
108 MULGRAVE ROAD
MULGRAVE 2756
31/10/2023

Sent via the Major Projects Portal only

Subject: Elf Mushroom Facility – Independent Environmental Report - 2021-2023

Dear Mr Edwards

Reference is made to your post approval matter, MP08_0255-PA-27, Independent Environmental Audit (**IEA**) report and Response to Audit Recommendations (**RAR**) for the period 13 March 2021 to 12 March 2023, submitted as required by Schedule 5, Condition 3A of MP08_0255 as modified (**the Consent**) to the NSW Department of Planning and Environment (**NSW Planning**) on 13 October 2023.

NSW Planning considers the IEA report to generally satisfy the reporting requirements of the Consent. The IEA also follows the requirements of the NSW Planning *Independent Audit Post Approval Requirements* (2020). As required by Schedule 5, Condition 8 of the Consent, please make publicly available a copy of the IEA Report on the company/project website.

Please note that NSW Planning's acceptance of this IEA report is not an endorsement of the compliance status of the project.

6 non-compliances were identified in the IEA including against conditions: Schedule 3 Condition 2, 17C, 21A, Schedule 5 Condition 3, 7 and 8. These non-compliances have been assessed by NSW Planning in accordance with its Compliance Policy, and on this occasion it has been determined to record the breaches with no further enforcement action proposed. However, please note that recording the breach does not preclude NSW Planning from taking an alternative enforcement action, should it become apparent that an alternative response is more appropriate.

The department notes that Elf Farm Supplies Pty Ltd did not update the community, via print media, upon completion of construction as required the Community Consultation Strategy. In this instance, considering the time that has elapsed since completion of construction (June 2018) and that the relevant information was made available via the Elf Farm Supplies website, the department does not propose to take any further enforcement action in relation to this matter.

Please include a status update for all actions provided in the RAR in the next IEA/Annual Review/Annual Environmental Management Report, until all actions are completed.

Should you wish to discuss the matter further, please contact Gabriel Peters Shaw, Senior Compliance Officer on 0288376395 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in blue ink, appearing to read "J Pope".

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

INDEPENDENT ENVIRONMENTAL AUDIT

Prepared for:

Elf Farm Supplies Pty Ltd
PO Box 615
WINDSOR NSW 2756

SLR Ref: 610.18204-R03
Version No: -v1.0
September 2023



PREPARED BY

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Elf Farm Supplies Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
610.18204-R03-V1.0	20 September 2023	Sandy Lonergan	Mike Brecko & Varun Marwaha	Sandy Lonergan

EXECUTIVE SUMMARY

SLR Consulting Australia Pty Ltd (SLR) was commissioned 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).

This is the fourth IEA to be conducted against this Project Approval, the first was conducted at the end of 2016, Report Number 610.16730.00000-R01-v3.0. The 2016 IEA covered the period from 11 January 2012 to 1 March 2017. The second IEA reporting period was from 1 March 2017 to 14 March 2019, whilst the third period was 15 March 2019 to 12 March 2021. This IEA reporting period is from 13 March 2021 to 12 March 2023.

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.

Elf Farm Supplies had until March 2018 to complete the construction of the MOD1 facilities, Stage 1. At the beginning of 2018, Elf requested an extension of time for completion from the Department of Planning and Environment. This extension was granted on 14 March 2018, with a revised construction completion date of 30 June 2018. Elf met this revised completion date.

This audit was carried out in August and September 2023, with SLR being supplied information as requested.

Two additional modifications have been made to the original consent since MOD 1, modifications 2 (MOD2) and 3 (MOD3). MOD2 was approved on 4 November 2019, with MOD3 on 16 March 2020. It is noted that Elf Farm Supplies has not commenced MOD3 at the time of this audit.

The Project Approval MP 08_0255 consists of 120 conditions in total. Of the 120 Conditions, 80 (67%) were considered not triggered. Note this number is considerably higher than the previous two IEA reports, this is a result of auditor including the mushroom farm Schedule 4 conditions (38) and previously “closed” conditions now categorised as not triggered.

Of the 120 conditions, 39 were audited, of the 39 auditable conditions, compliance was achieved for 33 (85%), non-compliance recorded for 6 conditions (15%). It is noted that one of the non-compliances related to two odour complaints related to the western dam which the EPA believes was caused by nutrient rich flood waters entering the western dam during floods. All other non-compliances were assessed to be of a low risk.

85% is a slight decrease from the 87.8% compliance recorded in 2021 IEA but will still a marked improvement on the 70% compliance achieved in 2019 IEA and 61% in the 2016 IEA.

During the process, a high degree of senior management commitment at Elf to minimising the impact on the environment was evident. Elf was commended for their proactive nature on managing environmental matters. During the audit, Elf management appeared receptive and encouraged the auditor to identify opportunities for improvement.

EXECUTIVE SUMMARY

Elf has also demonstrated continuous environmental improvement during this IEA reporting period by

- Installing additional balance tanks to assist with water and odour management on-site;
- Installation of a surface aerator in the Western Dam and adding Biostim powder to ensure dam remains aerobic;
- Changing the biofilter media; and
- Installation of solar panel system.

In conclusion, the environmental performance of the site has remained stable since the completion of construction and commencement of the odour control system.

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1 Introduction

1.1 Background

SLR Consulting Australia Pty Ltd (SLR) was commissioned 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 (Project Approval).

This is the fourth IEA to be conducted against this Project Approval, the first was conducted at the end of 2016, Report Number 610.16730.00000-R01-v3.0. The 2016 IEA covered the period from 11 January 2012 to 1 March 2017. The second and third IEA reporting period were from 1 March 2017 to 14 March 2019 and 15 March 2019 to 12 March 2021 respectively. This IEA reporting period is from 13 March 2021 to 12 March 2023.

Elf Farm Supplies applied for a modification to project approval (MOD1) and this was approved on 14 March 2016. MOD 1 related to the Substrate Plant site only and included:

- 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.

Elf Farm Supplies had until March 2018 to complete the construction of the MOD1 facilities, Stage 1. At the beginning of 2018, Elf requested an extension of time for completion from the Department of Planning and Environment. This extension was granted on 14 March 2018, with a revised construction completion date of 30 June 2018. Elf met this revised completion date.

It is noted that Elf Farm Supplies has had two further modification applications approved since MOD1, being MOD2 and MOD3.

MOD2 related to a Section 75W application seeking to the following modifications to the Concept Approval:

- Increase in the building floor area to 88,178m² and
- Modification to ancillary works including access road, parking, landscaping, stormwater and dam design to suit revised building footprint.

MOD2 was approved on 4 November 2019.

MOD3 included an extension of the straw bale storage area and associated works, amended stormwater management system and western tree corridor. This modification was approved on 16 March 2020. It is noted that Elf Farm Supplies has not commenced MOD3 at the time of this audit.

1.2 Audit Team

The audit team comprised of Sandy Lonergan (Lead Auditor, certified by SAI Global) and Varun Marwaha.

Ms Lonergan has over 25 years auditing experience, has been a third party certification auditor for NCSI and has conducted numerous independent compliance audits for the Commonwealth Government, Planning Departments, and Environment Protection Authorities or equivalent in New South Wales and Queensland.

Varun Marwaha has over 10 years of environmental and processing experience. Mr Marwaha has acquired broad environmental experience including air quality and odour, impact assessments, emission inventories (including National Pollutant Inventory), air quality dispersion modelling (including Ausplume, CALPUFF and CAL3QHCR), air quality monitoring (including odour), meteorological monitoring, meteorological modelling (The Air Pollution Model [TAPM] & CALMET), greenhouse gas assessments and overall project management. He has conducted numerous environmental audits for a range of industries throughout Australia.

1.3 Audit Objectives

The audit objectives were:

1. To carry out the audit in accordance with Condition 3A of Schedule 5 of Project Approval 08_0255 and subsequent modifications; and
2. To carry out the audit generally in accordance with the Department of Planning and Environment's document titled *Independent Audit Post Approval Requirements*, May 2020.

1.4 Audit Period

This audit period was from 13 March 2021 to 12 March 2023.

1.5 Audit Scope

This IEA and subsequent report were prepared pursuant to Condition 3A of Schedule 5 of Project Approval MP 08_0255. **Table 1** lists the requirements of this condition and indicates where each has been addressed in this IEA report.

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

Condition	Description of Condition	Where Addressed in this Report
3A	By 31 March 2021 and every two years thereafter, unless otherwise agreed by the Secretary, the Proponent must 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 G
3A (b)	Include consultation with the relevant agencies;	Section 3.8, Appendix D
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;	Appendix C
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);	Sections 3.2, 3.3, 3.4, 3.7 and Appendix A.
3A (e)	Review the adequacy of strategies, plans or programs required under these approvals and if appropriate;	Section 3.6
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
	Within six (6) weeks of the completion of this audit, or as otherwise agreed by the Secretary, the Proponent must 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

1.6 Report Structure

This report was 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 methodology. This includes the auditor approval, scope development, compliance evaluation and assessment criteria sections;
- Section 3 summarises the audit findings including;
 - Approval and documentation list;
 - Compliance performance;
 - Summary of Agency Notices, Orders or Penalty Notices;
 - Non-compliances;
 - Previous audit recommendations;
 - Review of plans including sub-plans;
 - Environmental performance;

- Consultation outcomes;
 - Complaints summary;
 - Incidents;
 - Actual versus predicted impacts;
 - Site inspections;
 - Site interviews; and
 - Key strengths.
- Section 4 outlines the recommendations from the audit for the non-compliances and opportunities for improvement; and
 - Section 5 is the conclusion;
 - Appendix A contains the complete list of all the conditions in the DA and details the audit findings;
 - Appendix B contains a selection of photographs from the site visit;
 - Appendix C contains the Odour Audit report;
 - Appendix D contains Consultation with Key Stakeholders;
 - Appendix E contains Attendance Registers;
 - Appendix F contains the completed Independent Audit Certification forms; and
 - Appendix G contains the audit team CVs and associated approval letter from the Department of Planning & Environment.

1.7 Limitations

This report has been prepared for Elf Farm Supplies (Elf) to fulfil the requirements of the IEA as specified in the Project Approval. The IEA only pertains to the Substrate Plant.

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 One site visit was undertaken during this audit to familiarise the auditor with the site layout, site conditions and natural environment. Whilst the auditor 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 inspections; and
- 2 Elf provided (at their sole discretion) all 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 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 Methodology

2.1 Auditor Approval

Ms Lonergan and Mr Marwaha were approved as the auditors by the Department of Planning and Environment (DPE) on the 22 March 2023. Refer to **Appendix G** for the auditors CV's and letter of approval from the DPE.

2.2 Scope Development

The auditors consulted with the following agencies and other relevant stakeholders to obtain their input into the Scope of the Audit:

- Department of Planning and Environment (DPE);
- Environment Protection Authority (EPA); and
- Hawkesbury Local Council.

Any correspondence received from the stakeholders is summarised in **Section 3.8**.

2.3 Compliance Evaluation

The auditor used the following methodologies to gather evidence and evaluate compliance, where applicable:

- A desktop review of records requested;
- Review of records on-site;
- Interviews with key personnel;
- Photographs from site visit/inspection; and
- Observations from the site visit/inspection.

The site visit was undertaken on the 15 August 2023 and involved attendance at the site induction, a site walk-around, taking photographs and interviews with key staff.

Information obtained and statements recorded during the interviews conducted whilst on site were directly recorded as evidence (see **Appendices A and C**). The auditors 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 implemented. Refer to **Section 3.12** for a list of the personnel interviewed.

2.4 Assessment Criteria

SLR adopted the compliance status descriptors outlined in Section 3.8 and reproduced below in **Table 2**, in the NSW Government, *Independent Audit Post Approval Requirements*, May 2020.

Table 2 Compliance Status Descriptors

Assessment	Criteria
Compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	Where the auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the temporal scope of the audit being undertaken (maybe a retrospective or future requirement), therefore an assessment of compliance is not relevant.

The following has been extracted from Section 3.8 from the *Independent Audit Post Approval Requirements*.

The terms partial compliance, partial non-compliance or not verified or administrative non-compliance or other similar terms must not be used.

As part of the Audit evaluation, the auditor may make observations including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in Table 2.

Note: As discussed with the DPIE in October 2022, where a condition was related to a previous IEA period, it will now be listed as “Not triggered” as opposed to “Closed”.

3 Audit Findings

3.1 Approval and Document List

The following key documents were reviewed during the audit:

- Project Approval 08_0255 granted by the then Minister for Planning and Infrastructure for modification 3 (MOD 3);
- Project Approval 08_0255 updated Condition of Approval including MOD 3;
- Environment Protection Licence (EPL) No. 6229;
- Production data for the reporting period;
- Elf Farm Supplies Mushroom Substrata Facility – Annual Environmental Management Review, September 24 2021;
- Elf Farm Supplies Mushroom Substrata Facility – Annual Environmental Management Review, October 11, 2022;
- Elf Farm Supplies Mushroom Substrata Plant, Mulgrave, Water Management Plan, Issue 03, June 2020;
- Substrata Plant Mulgrave, Operational Noise Management Plan, prepared by Acoustic Consulting Engineers Pty Ltd, Report No: 160787-01-02R-DD Revo02, dated 17 January 2019;
- Elf Farm Supplies training needs analysis and training records;
- Environmental incident reports prepared by Elf Farm Supplies;
- SLR Consulting Australia Pty Ltd, *Elf Farm Supplies Biofilter Testing*, September 2020. SLR Ref: 610.30048-R01;
- *EPA Environmental Risk Assessment -Assessment No. 4014836* Total Calculated Risk Score – 40 Overall Regulatory Priority – Low
- *EPA Management Category, Assessment No. 4018173, Assessment Period 20/5/2019 to 19/05/2022*
- Environment Protection Authority *EPA Licensing guideline – Environmental risks levels*, March 2022.
- Todoroski Air Sciences, *Odour Management Plan Elf Farm Supplies Substrate Facility*, Prepared for Elf Farm Supplies Pty Ltd, January 2023;
- SLR Consulting Australia Pty Ltd, *Elf Farm Supplies Biofilter Testing*, September 2021. SLR Ref: 610.30446-R01, Version No. v1.0.
- SLR Consulting Australia Pty Ltd, *Elf Farm Supplies Biofilter Testing*, August 2022. SLR Ref: 610.30900-R01, Version No. v1.0.
- The Odour Unit, *Elf Farm Supplies Pty Ltd, Mushroom Substrate Plant – Modification to Approved Expansion, Odour Impact Assessment, Mulgrave, NSW*. Final Report. 08.01.2015;
- *Air Quality Assessment, Expansion of Substrate Facility, Mulgrave, Elf Farm Supplies*, 9 December 2010, PAE Holmes;
- EPA Annual Returns for this reporting period;
- EPA Notice of Variation to Licence No. 6229 dated 17 December 2020; and
- Various emails and letter correspondence between Elf Farm Supplies, EPA and DPE.

3.2 Compliance Performance

3.2.1 Development Consent

The Development Consent Conditions for the site were audited as per the requirements of Condition 3A.

Table 3 shows a summary of the findings of this audit in relation to the Development Consent Conditions.

Table 3 Summary Table of Compliance with MP 08_0255

Section	Total No. of Conditions	Conditions Audited	Compliance	Non-Compliance	Not Triggered
1 (Sch 2)	19	8	8	0	11
2 (Sch 3)	53	23	20	3	30
3 (Sch 4)	38	0	0	0	38
4 (Sch 5)	10	8	5	3	2
Total	120	39	33	6	81

3.2.2 EPL 6229

The Site operates under EPL No. 6229. During this IEA period, the EPL was varied as per the letter dated 17 December 2020. The following variations were made to the licence:

- Condition R4.1 has been varied to require “The Licensee must retain records detailing irrigation of waste water from the dam at the premises for four years. These records shall be made available to EPA officers upon request.”;
- Condition O4.2 has been varied to require “The licensee must ensure that the area in which the pre-wet is conducted is fully enclosed within a building which is under negative pressure and ventilated through the Bio-filter.”; and
- Condition O4.7 has been removed.

In general, the site was generally operating in compliance with the EPL conditions during the IEA reporting period. However, Condition L4 was not complied with during the reporting period. Two odour complaints were received. Refer to Section 3.2.3 for further details.

There are no monitoring requirements specified under the EPL. The EPL is due to be reviewed on 15 August 2023.

Elf Farm Supplies has submitted two EPA Annual Returns during this IEA reporting period:

1. Reporting period – 20-05-2020 to 19-05-2021; and
2. Reporting period – 20-05-2021 to 19-05-2022.

A review of the EPA website (Public Register) showed no non-compliances recorded against Elf for the two last reporting periods. For the two reporting periods both returns were submitted on-time, that is within 60 days of the end date of the reporting period. The Pollution incident management plan was last tested on 1 March 2022. The current environmental risk level is Level 1.

As identified in the previous three IEA reports and still current for this IEA, SLR identified the following additional non-compliance, not already identified in this audit report:

- E1.4 f) Odour Complaint Report – Condition f) requires the oxygen content of the compost in the pre-wet processing phase to be recorded from one hour preceding the odour incident until the time the incident is reported to have ceased. This has not been occurring and is not possible as complainants do not usually advise of stop times for odour complaints. In the previous IEA it was recommended that discussions be held with the EPA to remove this condition. SLR has been advised this did not occur.

SLR also reviewed two documents (Assessment Nos. 4018173 and 4014836) from the EPA received by Elf Farm Supplies, which specified the Environmental Management Category (EMC) and Environmental Risk Assessment. The assessment period for the EMC was from 20 May 2019 to 19 May 2022.

The EMC is determined is set out in the Environmental Management Calculation Protocol. The EMC is used to calculate the licence administrative fee and determine the risk level for the licence.

In the assessment the EMC was Category A and overall environmental risk level 1. This is the lowest risk level possible.

As per the EPA Environmental Licensing guideline (March 2022), *The risk-based licensing system aims to ensure that all activities licensed under the Protection of the Environment Operations Act 1997 (POEO Act) receive an appropriate level of regulation based on the level of risk they pose to the environment and human health.*

Section 5.1 Level 1 licenses – Low-risk and good environmental performers.

Generally a level 1 license is for an activity (or activities) that poses a low risk to the environment because:

- *It generates minimal or no discharges (due to its nature, or because there are good environmental controls and management procedures in place) or*
- *It is not situated in a sensitive environment.*

3.2.3 Odour Audit Findings

SLR completed an odour audit as per the requirements of the Condition. Details of the Odour Audit are located in **Appendix C**.

A summary of the findings of the odour audit are as follows:

- 50% of the Biofilter bed was changed over in May 2022. Elf advised the bed media was changed to minimise potential for media compaction.
- Based on the site observations, review of the odour monitoring data, odour complaints, odour impact assessment report and the EPA letters SLR deems the MOD1 to be achieving the desired objective to minimise odour emissions from the site and achieving the predictions in the Odour Impact Assessment; and
- Three odour complaints were received via the EPA during the reporting period, which related to nutrient loaded flood waters entering the western dam when the Hawkesbury river was in flood. The investigation concluded that the western dam likely source of odour due to the high nutrient load from the flood waters. Elf engaged a third party to assist in odour controls during this period and the measures were implemented and details emailed to the EPA. No further complaints have been received by Elf or the EPA.

- The SLR IEA audit team recommends that the annual biofilter testing is carried out every 18 months and within 3 months of the biofilter media being changed.

3.2.4 Water Management and Stormwater System Assessment

During this reporting period the Water Management Plan for the site has been updated (Issue 03 June 2022). The updated plan was approved by the DPE on 9 September 2022.

The site continues to operate generally in accordance with the Water Management Plan as observed by the auditor during the site component of the audit.

Conditions 17B and 17C requirements are covered in the Plan. Condition 17B of Schedule 3 of the project approval requires that the farm dam not be used to receive process water. Condition 17C permits that the farm (western) dam may be used during an emergency, including a high rainfall event or plant breakdown.

Condition 17C permits the use of the Western dam during an emergency, including high rainfall or plant breakdown. When this occurs, the Consent condition requires the DPE to be notified within 7 days. The same reporting is also required to be submitted to the EPA in the same time-frame. There were two incidents within this IEA reporting period where the 7 days was not met.

Below is a summary of the use of the farm dam for the past 7 years due to heavy rainfall/flooding or plant failure (one event)

- 2022 – 3 times (20 March 2021, 4 April 2021, 30 November 2021)
- 2021 – 3 times (24 February 2022, 3 March 2022, 4 to 8 July 2022)
- 2020 – 4 times
- 2019 – 2 times
- 2018 – 2 times;
- 2017 – 2 times; and
- 2016 – 5 times.

During the audit, Elf advised that an additional 2 balance tanks (25,000 litres each in capacity) have been installed to increase rainfall/stormwater storage capacity of the recycle pit to compensate for the stormwater generated on site during rainfall events.

Elf Farm Supplies continues to monitor weather conditions such as La Nino.

3.3 Summary of Agency Notices, Orders or Penalty Notices

No order, nor penalty notices were issued to Elf Farm Supplies during the audit period.

3.4 Non-compliances

Table 4 summarises the non-compliances identified, with relevant comments. Note in some instances the entire condition has not been documented in the table and is included at the end of these conditions. Refer to **Appendix A** for the condition in its entirety.

Table 4 Summary of Non-Compliances

Schedule	Condition	Requirement (Summary)	Comment
3	2	The Proponent must not cause or permit the emission of offensive odours from the Substrate Plant Site, as defined under Section 129 of the POEO Act.	<p>Three odour complaints were received by the EPA in August and September 2022. Investigations were carried out by Elf and EPA and it was concluded the likely source was the Western Dam which was breached during recent flood events and the odours are likely to be a result of this flood water.</p> <p>Elf engaged third party to nominate mitigation measures to deal with the anaerobic conditions. Elf installed a surface aeration and applied the Biostim powder as recommended.</p> <p>Action: No further action required.</p>
3	17C	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 must be provided to the Secretary in writing within 7 days of the emergency.	Two times notification did not occur within the 7 days period. Emergency use of the dam on 12 January 2022 was reported on 21 January 2022 and emergency use of the dam on 3 March 2022 was reported on 11 March 2022.
3	21A	The Proponent must continue to implement the “other noise mitigation measures” approved by the Department in its letter dated 18 July 2016 until the noise barrier referred to in Schedule 3, Condition 21 of this approval is constructed.	<i>DPE letter dated 14 December 2022</i> – Warning Letter – breach of Schedule 3 Condition 21A – removal of hay bales from the temporary noise wall.

Schedule	Condition	Requirement (Summary)	Comment
5	3	<p>By the 30 September 2020, and annually thereafter, unless otherwise agreed by the Secretary, the Proponent must review the environmental performance of the Project to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> (a) describe the operations that were carried out during the reporting period; (b) analyse the monitoring results and complaints records of the Project during the reporting period, which includes a comparison of these results against the: <ul style="list-style-type: none"> i. relevant statutory requirements, limits or performance measures/ criteria; ii. monitoring results of previous years; and iii. relevant predictions in the EA; (c) identify any non-compliance during the reporting period, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Project; and (e) describe what measure(s) will be implemented during the next reporting period to improve the environmental performance of the Project. 	<p>DPE letter to Elf, 26 October 2018 specifying requirements for future AEMRs.</p> <p>Non-compliance against several aspects – Items 5, 6 and 7 not complied with in both or one of the AEMRs reviewed for this reporting period.</p>
5	7	<p>The approved Strategy (as revised and approved by the Secretary from time to time), must be implemented for the life of the Project as soon as written endorsement by the Secretary is received.</p>	<p>Implementation of the Community Consultation Strategy last occurred in March 2018 which precedes the completion of construction works in June 2018. There has also been no media release for construction being completed as specified in the Strategy.</p> <p>Action: Elf to update the Community as per the strategy regarding the completion of the construction works.</p>

Schedule	Condition	Requirement (Summary)	Comment
5	8	<p>Within three months from the date of the approval of MOD 3 the Proponent must 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; MOD 2 and MOD 3 and</p> <p>(g) any other material as required by the Secretary</p>	<p>Auditor did not deem Elf was complying with (c) technical reports being freely available. Annual Biofilter Testing reports for 2021 and 2022 and the 2021 IEA were not located on Elf Farm Supplies website under Environmental Reporting.</p> <p>The above reports are located on the website but the public would need to search for them as they are located in AEMRs.</p> <p>Action: Elf to update website and uploaded all IEAs and all Annual Biofilter Testing reports to the website under Environmental Reporting.</p> <p>Condition 8(f) was also not complied with. Construction updates ceased in March 2018 however, construction was completed in June 2018 but no update has occurred.</p> <p>Action: Elf to update the Community as per the strategy regarding the completion of the construction works.</p>

3.5 Previous Audit Recommendations

Table 5 summarises the recommendations made in the 2016 IEA and provides an updated on whether ELF implemented the recommendations, if it is still outstanding (ongoing), or Elf decided not to proceed. Table 6 summarises the recommendations made in the 2019 IEA and Table 7 summarises the recommendations made in the 2021 IEA.

Table 5 2016 IEA Recommendations

2016 Recommendation	Update	Status
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 system.	Elf held discussions on 30 November 2016 with the Department to confirm that using an EMS framework to address all the elements of the condition would be acceptable. Elf anticipated completion date was 21 April 2017. This was not achieved and still on-going. Closed as Elf is not pursuing this.	Closed
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.	The existing safety document control procedure and register was to be adapted. Elf anticipated completion date was 20 March 2017. This was not achieved and still on-going. Elf advised they are satisfied with current system no changes to be implemented.	Not implemented and closed
CEMP to be reviewed and updated to include Statement of Commitments which have not been incorporated.	Elf agreed to this recommendation originally. However not implemented prior to construction being completed and hence CEMP no longer required.	Not implemented and closed
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	Recommendation implemented. Revised Environmental Site Inspection Checklist sighted.	Implemented and closed
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.	Recommendation implemented. Revised Environmental Site Inspection Checklist sighted.	Implemented and closed
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).	Decision was made not to implement this recommendation.	Not implemented and closed
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.	Recommendation implemented. Revised Complaints Line form sighted.	Implemented and closed

2016 Recommendation	Update	Status
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.	Recommendation implemented. Revised Environmental Management Strategy, dated 16 January 2017 sighted. However, Section 7.3 does not have the current noise levels specified.	Closed as updated Strategy has been reviewed as part of 2023 IEA audit.
When the Operational Noise Management Plan Substrate Plant Mulgrave, 42.6411.ONMP_Mul:CFC5, 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.	Recommendation implemented. Revised Operational Noise Management Plan, dated 26 June 2018, sighted.	Implemented and closed
Recommend all emergency scenarios in the Pollution Incident Response Management Plan (PIRMP) are tested at least annually.	Elf incorporated into the projects compliance tracking and tasks management log. Evidence sighted of annual test.	Implemented and closed
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 action and proposed due date; 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. 	Implemented.	Implemented and closed
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.	Implemented.	Implemented and closed

Table 6 2019 IEA Recommendations

2019 Recommendation	Update	Status
Ensure that the critical spares for machinery and equipment relating to the new facility is obtained from Europe as soon as possible.	Elf Farm Supplies advised this occurred and now considered closed.	Closed
Elf to implement a system to ensure compliance with meeting reporting requirements.	Elf has a projects compliance tracking and tasks management log.	Closed
Elf to specify what is considered to be a "high rainfall" event and document that in the Water Management Plan and ensure the Department is notified accordingly.	Elf advised no longer applicable as additional balance tanks have been installed.	Closed
Elf to update the Community as per the Community Consultation strategy regarding the completion of the construction works.	Not completed.	Closed
Elf to update their website as per the requirements of Schedule 5, Condition 8.	Elf agreed with recommendation and uploaded documents.	Closed

2019 Recommendation	Update	Status
Environmental Management Strategy, Section 7.3, needs to be updated to reflect the current criteria.	Elf agreed with recommendation but when Strategy was updated in June 2022 the Table was removed completely however Section 5.2.1 states Condition 19 specifies operation noise criteria that are reproduced in Section 7.3	On-going
Environmental Management Strategy including appendices need to be reviewed and updated	Elf completed review and update of the EMS in June 2022 which was subsequently accepted by DPE 9 September 2022.	Closed
Update the Water Management Plan to include the two additional 100,000 litres tanks recently installed to assist with managing the site water and wastewater.	Completed when Water Management Plan amended for MOD 3 application.	Closed
Update the Odour Management Plan to include the covering and extraction of air from the western pit to the biofilter control system and the additional tanks.	Not completed.	Closed

Table 7 2021 IEA Recommendations

Recommendation	Justification	Update	Status
AEMR – do not use administrative non-compliance in Compliance Table	The use of Administrative non-compliance is not permitted under the NSW Government, Requirement 1, Compliance Reporting – Post Approval Requirements, May 2020.	Review of 2021 and 2022 AEMRs still had Administrative non-compliance (page 8 – 2021 report and 11 – 2022 report)	On-going
AEMR – add additional one line in each Management and Monitoring section - Reference the Management Plan/Strategy which addresses this matter	The letter from the Department of Planning and Environment dated 28 October 2018 required (item 2) Brief summarises on the effectiveness of the management plans applicable to the Substrate plant. Including the reference to the relevant plan or strategy would ensure compliance with this requirement.	Review of 2021 and 2022 AEMRs has line item – trend, key management actions and another line proposed management actions. Both AEMRs accepted by DPE. Considered closed.	Completed and closed.
AEMR – include aerial photograph of the site showing the operational disturbance footprint.	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 5).	Review of 2021 and 2022 AEMRs showed this has not been completed.	On-going
AEMR – include Appendix which has Compliance table as per Department Compliance Reporting – Post Approval Requirements document which covers ALL conditions	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 6).	Review of 2021 and 2022 AEMRs showed this has not been completed.	On-going
AEMR – include Appendix Department of Planning – Annual Review letter (26 October 2018)	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 7).	Review of 2021 and 2022 AEMRs showed this has not been completed.	On-going

Recommendation	Justification	Update	Status
AEMR – include a section in the main report Action items from the previous AMER and provide update on status	This is to ensure that Elf is continuously improving and does not miss implementing actions from the previous 12 months.	Review of 2021 and 2022 AEMRs showed this has not been completed.	On-going
AEMR – include section under Section 4 relating to annual testing of the PIRMP.	To act as a reminder to Elf to undertake annual testing of the PRIMP as required by the EPA and record compliance with this requirement in the AMER as it is a regulatory requirement.	Review of 2021 and 2022 AEMRs showed this has not been completed.	On-going
2019 Outstanding Recommendations			
Environmental Management Strategy, Section 7.3, needs to be updated to reflect the current criteria.	The Operational Noise Management Plan refers to in Section 2.1 the Department of Planning replacing the noise assessment objectives set out in Condition 19 of Schedule 3. Evidence of this change sighted in Modification of Minister's Approval issued on 14 March 2016 for Project Approval MP 08_0255.	Strategy was updated in June 2022 but the Table was removed completely however Section 5.2.1 states Condition 19 specifies operation noise criteria that are reproduced in Section 7.3	Closed as will be addressed in 2023 IEA recommendations.
Environmental Management Strategy including appendices need to be reviewed and updated		Strategy was updated in June 2022	Closed
Update the Water Management Plan to include the two additional 25,000 litres tanks recently installed to assist with managing the site water and wastewater.	To ensure that the Water Management Plan reflects all current practices on site to manage water.	Not completed. Elf advised that any change even minor means approval for the update Plan is required from the Department. Elf to update when MOD3 occurs.	Closed
Update the Odour Management Plan to include the covering and extraction of air from the western pit to the biofilter control system and the additional tanks.	To ensure that the Odour Management Plan reflects all the current practices on site for managing odour.	Not completed and given Odour Management Plan was updated in January 2023 it is being recorded as not implemented and closed.	Closed
Develop and implement a modified environmental management system.	This was a recommendation from 2016 IEA that Elf agreed to implement and is still ongoing.	Elf satisfied with current system. Not implemented and closed.	Closed
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.	This was a recommendation from 2016 IEA and 2019 IEA that Elf agreed to implement and is still ongoing.	Not implemented.	Closed
Implementation of the recommendations from the Odour Emissions and Biofilter Control System audit.	To assist with maintaining compliance with the EPA requirements of managing offensive odours beyond the boundary.	Not implemented.	Closed

3.6 Review of Plans, Sub-Plans

During the audit, the auditor sighted and reviewed a number of Annual Environmental Management Reports (AEMRs), environmental management plans including but not limited to the Operational Noise Management Plan, Water Management Plan, Odour Management Plan 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. The Environmental Strategy has been updated since the last IEA period, June 2022.

3.7 Environmental Performance

3.7.1 Summary

A review was undertaken of the following information:

- Monitoring reports
- Two Annual Environmental Management Reports (AEMR) prepared for the site by Elf covering the periods:
 - September 2020 to August 2021; and
 - September 2021 to August 2022.
- EPA correspondence
- Complaints Register

Overall, the environmental performance of the facility has improved since the last IEA gauged on the number of non-compliances identified in the IEA and the investments in new infrastructure over the 2 year period. The number of complaints has significantly reduced (as outlined in Section 4.3.6 Tables 11 and 12 and this is supported by the annual odour monitoring of the biofilter and odour field surveys conducted in 2019 and 2020 (Odour Audit – Appendix C). This improvement is also reflected in the EPA EMC and overall environmental risk which is now at the lowest (best) level possible.

All EPL and Project Approval monitoring required in 2021 and 2022 (odour monitoring) has been carried out and compliance achieved.

In response to the AEMR submitted to the Department covering the reporting period of September 2017 to August 2018, the Department requested additional information be incorporated into future reports. This was specified in a letter dated 26 October 2018.

Table 8 summarises the additional requirements and whether the additional requirements were incorporated into the AEMRs for 2021 and 2022.

Table 8 Department of Planning and Environmental – Additional Requirements for AEMR

Planning Requirement	2021 AEMR Compliance	2022 AEMR Compliance
A production and dispatch summary for the Substrata Plant consistent with Table 1 in Attachment 1	Yes – Table C – Section 5	Yes – Table C – Section 5
Brief summaries on the effectiveness of the management plans applicable to the substrate plant. Please include details of any improvement measures that Elf Farm proposes to undertake with respect to its management plans in the next reporting period	Yes – Sections 4.3 to 4.8	Yes – Sections 4.3 to 4.8
A title block at the beginning of the annual review that is consistent with Table 2 in Attachment 2	Yes – page i	Yes – Page i
Contact details of key personnel who are responsible for the environmental management of the site in the introduction section of the report.	Yes – Section 2 Introduction	Yes – Section 2 – Introduction
Maps and aerial photography of the main body of the annual review showing the operational disturbance footprint and offset areas	No – no map or aerial photograph in main body of the report. It is noted that the Project Approval conditions in Appendix A has some site layouts as an appendix	No – no map or aerial photograph in main body of the report. It is noted that the Project Approval conditions in Appendix A has some site layouts as an appendix
Summaries table assessing the compliance status of all conditions of the approval as an attachment to annual review and not in the main body of the report. The summaries table should be consistent with the Attachment A – Compliance Table Example in Compliance Reporting Post Approval Requirements.	Yes – IEA Report included as an Appendix	No
A copy of this letter as an attachment to the main report	No	No

3.7.2 Noise

As outlined in Section 3.2.2, the site operates under EPL 6229, under the EPL there is no specific noise monitoring requirements.

Section 6.1 Noise Monitoring of the approved Operational Noise Management Plan states:

Schedule 3 – Condition 22 requires noise monitoring to evaluate noise compliance. Accordingly this ONMP recommends that noise monitoring be incorporated into the site Environmental Management Plan.

The Atkins Acoustics' report recommends that within six (6) months of completion of each stage of the proposed upgrade of the substrata plant, noise monitoring be conducted at two (2) reference locations consistent with the closest residential receivers identified in Table 1, specifically Chisholm Place to the west and Railway Road/126 Mulgrave Road to the south-east. Where access to the identified receiver is not practical, alternative locations representative of the subject receiver/s could be considered.

Where practical, near-field measurements of fixed and mobile plant and equipment would also be conducted within six (6) months of completion of each stage of the proposed upgrade or when there is significant changes to site plant, to ensure compliance.

Noise measurements were undertaken at the end of the previous IEA period and it noise levels were deemed to be complying with Condition of Approval noise limits. As no other stage of the proposed upgrade of the substrata plant has occurred in this reporting period and no noise complaints received, there has been no noise monitoring conducted during this period.

It was noted by the auditor that Elf self reported a non-compliance with Schedule 3 Condition 21A in the 2022 AEMR. The non-compliance related to the removal of the temporary noise wall (made up of hay bales). A number of hay bales were removed and used on site due to shortage of straw (hay bales) due to floods. As soon as the supply increased the section of the noise barrier removed was re-built.

During the audit it was noted that the noise barrier was built.

3.7.3 Water and Stormwater Management (including irrigation management)

As outlined in Section 3.2.4, Elf Farm Supplies continues to operate in accordance with the facility's Water Management Plan. Irrigation has continued to occur as per Section 4.5.2 of the Plan.

Elf increased on-site storage of first flush system by another 50,000 litres during the reporting period.

No incidents of water pollution have been recorded in this reporting period.

3.7.4 Flooding

Part of the site is located on a flood plain (as shown in Figure 1 of the Water Management Plan). The plant was constructed on a filled platform raised to 16 metres AHD to provide protection against most floods. The 100 Year ARI flood level is stated by Hawkesbury City Council to be 17.3 metres AHD. The plant can continue to operate during times of minor flooding, when the levels remain below the bench height of the plant. For example, this occurred during the Hawkesbury floods in the first quarter of 2022. If there is a major flood the facility implements the procedures outlined in the Environmental Management Strategy.

3.7.5 Erosion and Sediment Controls

Erosion and sediment controls were required to be specified in the Construction Management Plan for the MOD1. This project is now complete. The Water Management Plan outlines how stormwater is managed on site to minimise potential for erosion to occur. During the audit, the irrigation area had no bare patches and there was no evidence of erosion issues.

3.7.6 Hazards – Fuels and Chemicals

As outlined in the Environmental Management Strategy, the facility stores fuels on site (above and below ground) to enable machinery to be refuelled on site when required. Refuelling areas are bunded to collect any spillage and there is a canopy over the above ground tank to prevent the bunded area from being filled with rainwater. There are also appropriate spill kits available.

No chemicals are used in the production process. The only chemicals stored on site are various cleaning chemicals, pesticides. A register of the dangerous goods is contained in the site's Dangerous Goods manifest.

3.7.7 Visual

Elf Farm Supplies have planted a large number of native trees and shrubs around the plant to provide screening from adjacent roads. As the trees and shrubs continue to grow the visibility of the plant will be reduced.

3.8 Consultation Outcomes

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

Refer to Appendix D for extracts from the correspondence received.

3.9 Complaints Summary

No complaints have been recorded by Elf during this IEA period. Three complaints were received by the EPA regarding alleged odour coming from Elf operations. These were investigated by Elf and report supplied to the EPA.

EPA advised via email the following on 19 October 2022

As discussed on the day, the EPA note that the main source of odour observed at the premises during the inspection was from the emergency dam water. The EPA understand that this dam was breached during recent flood events and the odours are likely a result of this flood water. This flood water may have been impacted by the nearby sewage treatment plant, and the dam has potentially become anaerobic due to the excessive nutrient load. It is also noted that leachate from the biofilter flows into the dam and is an ongoing operational source of inflow into the dam.

Elf engaged a third party to assist in odour management controls for the Western Dam and by 31 October 2022 they had implemented the recommendations of the third party and installed a surface aerator and applied Biostim powder. The details were emailed to the EPA on 31 October 2022. No further complaints have been received by Elf or the EPA.

The auditor sighted the aerator and was advised that the powder is being used.

Elf Farm Supplies has an established and well document complaints procedure. SLR noted that complaints are recorded and investigated as per their EPL requirements.

3.10 Incidents

No environmental incidents were recorded during this IEA period for the site. A high level of environmental management was observed. Note the auditor does not consider notification for emergency use of the western dam as an environmental incident, as use of the dam is permitted under certain circumstances.

3.11 Site Inspection

Refer to detailed **Appendices A and C** for observations made during the site inspection, while **Appendix B** contains photographs taken during the site inspection.

3.12 Site Interviews

Table 9 lists the personnel interviewed during the site visit component of the audit.

Table 9 Personnel Interviewed During the Audit

Name	Title
Blake Edwards	WHS & HR Manager
David Tolson	General Manager

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

3.13 Key Strengths

The following strengths in terms of environmental management were identified:

- Commitment from senior management to protection of the environment;
- Resources dedicated to environmental management within the business;
- Knowledge of senior management of their environmental management processes;
- Well established and documented plans;
- Regular inspections of key environmental issues; and
- Well established environmental training for employees and contractors.

4 Recommendations

4.1 Non-compliances

Table 10 summarises the non-compliances identified during the audit against the DA conditions and puts forward recommendations for Elf Farm Supplies to consider to assist in resolving these if action is required.

Table 10 Recommendations to Address Non-compliances with Project Conditions

Schedule	Condition	Topic of Non-Compliance	SLR Recommendation (Actions)
5	3	AEMR not including DPE requirements	Prepare template AEMR and have it reviewed to ensure covers all element of DPE letter dated October 2018 as well as letters from DPE.
5	7 and 8	Community Consultation Strategy implementation	Elf to update the Community as per the strategy regarding the completion of the construction works.
5	8	Make freely available on a publicly accessible website...	Elf to update website and uploaded all IEAs and all Annual Biofilter Testing reports to the website under Environmental Reporting.

4.2 Plans and Procedures - Opportunities for Improvement

Table 11 summarises other recommendations that have come from reviewing Elf's AEMR's, Environmental Management Strategy, Plans, procedures and associated forms.

Table 11 Recommendations for Improvement for Plans and Procedures

Recommendation	Justification
AEMR – do not use administrative non-compliance in Compliance Table	The use of Administrative non-compliance is not permitted under the NSW Government, Requirement 1, Compliance Reporting – Post Approval Requirements, May 2020.
AEMR – add additional one line in each Management and Monitoring section - Reference the Management Plan/Strategy which addresses this matter	The letter from the Department of Planning and Environment dated 28 October 2018 required (item 2) Brief summarises on the effectiveness of the management plans applicable to the Substrate plant. Including the reference to the relevant plan or strategy would ensure compliance with this requirement.
AEMR – include aerial photograph of the site showing the operational disturbance footprint.	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 5).
AEMR – include Appendix which has Compliance table as per Department Compliance Reporting – Post Approval Requirements document which covers ALL conditions	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 6).
AEMR – include Appendix Department of Planning – Annual Review letter (26 October 2018)	Ensure compliance with the letter from the Department of Planning and Environment dated 26 October 2018 (item 7).
AEMR – include a section in the main report Action items from the previous AMER and provide update on status	This is to ensure that Elf is continuously improving and does not miss implementing actions from the previous 12 months.
AEMR – include section under Section 4 relating to annual testing of the PIRMP.	To act as a reminder to Elf to undertake annual testing of the PRIMP as required by the EPA and record compliance with this requirement in the AMER as it is a regulatory requirement.
2019 Outstanding Recommendations	

Recommendation	Justification
Environmental Management Strategy, Section 7.3, needs to be updated to reflect the current criteria.	The Operational Noise Management Plan refers to in Section 2.1 the Department of Planning replacing the noise assessment objectives set out in Condition 19 of Schedule 3. Evidence of this change sighted in Modification of Minister's Approval issued on 14 March 2016 for Project Approval MP 08_0255.
Environmental Management Strategy including appendices need to be reviewed and updated	For examples, Sections 4.3, 5.2.2, 5.3, 5.9.3, 7.2, 7.3 and 8.2 are not current. The Figures in the Strategy should also be updated. Reporting section of the report needs to be updated to include the additional information that the Department of Planning and Environment requires in the Annual Management Environmental Review report as per their letter dated 26 October 2018. Appendices to be updated to ensure personnel have current plans and licences to refer to and ensure correct management practices and procedures are followed. Appendix A has obsolete EPL, Appendix C has obsolete Water Management Plan, Appendix D has obsolete Operational Noise Management Plan. Appendix E has obsolete Odour Management Plan.
Update the Water Management Plan to include the two additional 25,000 litres tanks recently installed to assist with managing the site water and wastewater.	To ensure that the Water Management Plan reflects all current practices on site to manage water.
Update the Odour Management Plan to include the covering and extraction of air from the western pit to the biofilter control system and the additional tanks.	To ensure that the Odour Management Plan reflects all the current practices on site for managing odour.

Note: The auditor acknowledges that each time Elf updates a Management Plan for the site, Elf is required to seek approval from the Department. This process is time consuming as such the recommendation made in Table 11 regarding updating the Strategy and management plans will be completed when Elf submits its next Modification.

4.3 Additional Opportunities for Improvement

Table 12 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 12 Additional Recommendations and Opportunities for Improvement

Opportunities / Recommendations	Justification
Document Management Index – create a separate tab for Environment Documents and include the Environmental Management Strategy and all the management plans developed for the site, as well as a last reviewed date column	The current Document Management index does not include any of the management plans for the site, odour, noise, water nor the Environmental Management Strategy. Having documents listed enables Elf to know all the relevant plans and strategies which are to be implemented, the last version number and last review date.
Western Dam usage. When the Western Dam receive water as per the management plan and the EPA and DPE are to be notified, recommend that these are called "Notifications" reports and not "Incident" reports	There are not incidents.

5 Conclusions

The Project Approval MP 08_0255 consists of 120 conditions in total. This IEA covers the period from 13 March 2021 to 12 March 2023. The audit was carried out in August and September 2023, with SLR being supplied information as requested.

Of the 120 Conditions, 81 (68%) were considered not triggered. Note this number is considerably higher than the previous two IEA reports, this is a result of auditor including the mushroom farm Schedule 4 conditions (38) and previously “closed” conditions now categorised as not triggered.

Of the 120 conditions, 39 were audited, of the 39 auditable conditions, compliance was achieved for 33 (85%), non-compliance recorded for 6 conditions (15%). It is noted that one of the non-compliances related to two odour complaints related to the western dam which the EPA believes was caused by nutrient rich flood waters entering the western dam during floods. All other non-compliances were assessed to be of a low risk.

85% is a slight decrease from the 87.8% compliance recorded in 2021 IEA but will still a marked in improvement on the 70% compliance achieved in 2019 IEA and 61% in the 2016 IEA.

During the process, a high degree of senior management commitment at Elf to minimising the impact on the environment was evident. Elf was commended for their proactive nature on managing environmental matters. During the audit, Elf management appeared receptive and encouraged the auditor to identify opportunities for improvement.

Elf has also demonstrated continuous environmental improvement during this IEA reporting period by installing surface aerator and applying Biostim powder to the western dam to ensure it remains aerobic, installing additional balance tanks to assist with water and odour management on-site, changing the biofilter media and installation of solar panel system.

In conclusion, the environmental performance of the site has remained stable since the completion of construction and commencement of the odour control system.

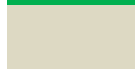
APPENDIX A

Detailed Audit Findings

Key:



Compliant



Not triggered



Non-compliant

08_255 MOD 1 – Approved 14 March 2016

08_255 MOD 2 – Approved 4 November 2019

08_255 MOD 3 – Approved 16 March 2020

Schedule 2 of MOD 1 – Administrative Conditions

Table 13 Administrative Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Obligation to minimise harm to the environment				
1	The Proponent must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Project.	Interview: General Manager – advised all measures have been implemented thus far to prevent harm to the environment.	<p>Documentation viewed:</p> <ul style="list-style-type: none"> • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. • <i>DPE letter dated 14 December 2022 – Warning Letter – breach of Schedule 3 Condition 21A – removal of hay bales from the temporary noise wall.</i> • <i>DPE letter dated 21 December 2021 – Warning Letter – breach of Schedule 3, Condition 23 – Failure to establish riparian corridor and Schedule 5, Condition 4(d) – failure to review EMS.</i> • <i>EPA Environmental Risk Assessment - Assessment No. 4014836 Total Calculated Risk Score – 40 Overall Regulatory Priority – Low</i> • <i>EPA Environmental Management Category – Assessment No. 4018173, Assessment Period – 20/5/2019 to 19/5/2022 – Total Score of Environmental Management – 0 – Environmental management category A</i> 	Compliant

			<p>Category A is Level 1 taking into account Low overall priority under Section 5.1 – Level 1 licences – low-risk and good environmental performers.</p> <ul style="list-style-type: none"> <i>EPA Licensing guidelines – Environmental risk levels – March 2022.</i> <p>No penalty notices have been issued to Elf in the past two reporting periods by either the EPA or Planning.</p> <p>No letters received from EPA or Planning concerning any environmental incidents that could cause harm to the environment.</p>	
Terms of Approval				
2	<p>The Proponent must carry out the Project in accordance with the</p> <ul style="list-style-type: none"> (a) EA; (b) Statement of commitments (See Appendix 1); (c) Site layout plans and drawings in the EA; (d) MOD 1 (e) MOD 2; and (f) MOD 3 	<p>Site inspection – MOD 1 completed generally in accordance with the plan.</p> <p>MOD 1 construction completed on 3 October 2018.</p> <p>MOD 3 has not commenced.</p> <p>Interview – Administration Manager</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <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 Assessment (Perram & Partners, February 2015)</i> <p>Other documents sighted included:</p> <ul style="list-style-type: none"> <i>Elf Farm Supplies Pty Ltd and Elf Mushrooms Pty Ltd Mushroom Expansion in Western Sydney, Preliminary Environmental Assessment, Perram & Partners, November 2008 121R1.</i> <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021, prepared by Elf Farm Supplies Pty Ltd.</i> <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental</i> 	Compliant

			<p><i>Management Review, Mulgrave, NSW, Revision 1, October 11 2022, prepared by Elf Farm Supplies Pty Ltd.</i></p> <p>No penalty notices have been issued to Elf in the past two reporting periods by either the EPA or Planning.</p> <p>No letters received from EPA or Planning concerning any environmental incidents that could cause harm to the environment.</p>	
3	If there is any inconsistency between the above documents, the conditions of this approval must prevail to the extent of any inconsistency.			Not triggered.
4	<p>The Proponent must 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, WHS Manager provided evidence of meeting requests from the Department. For example submitting documents on time. Started submitting on-line for 2020 AEMR. Managers did state that Department does not provide any notification back to Elf that it was received, hence no evidence available.	<p>Documents viewed:</p> <ol style="list-style-type: none"> Proponents to submit all post approval and compliance documents online, via the Major Projects Website. Elf Farm Supplies website review - AEMRs and IEA reports, Elf responses sighted. 	Compliant
5	This approval must 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	<p>(1) The Proponent must ensure that the Project on the Substrate Plant site does not:</p> <p>a) Product more than 3,200 tonnes per week of phase 1 substrate; subject to (2) below and</p> <p>b) Dispatch more than 1,920 tonnes of phase 3 substrate per week</p>		<p>Documentation viewed:</p> <ul style="list-style-type: none"> Planning letter dated 31 October 2019 – Approval to increase production Phase 1 substrate to 2,400 tonnes per week. Excel production data spreadsheet supplied by Elf. 	Compliant

			<p>Phase 1 – Average weekly tonnes per week for the period March 2021 to March 2023 – 1,924 tonnes per week</p> <p>Phase 3 – Average weekly tonnes per week sold for the period March 2021 to March 2023 was 1052 tonnes per week.</p>	
	(2) The proponent must 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.		<p>Documentation viewed:</p> <ul style="list-style-type: none"> Planning letter dated 31 October 2019 – Approval to increase production Phase 1 substrate to 2,400 tonnes per week. Production data for Phase 1 substrate from April 2019 to the end of February 2021. 	Compliant
7	<p>(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 –</p> <p>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</p> <p>b) An independent odour audit has been prepared and submitted in accordance with Condition 5 of Schedule 3.</p>	Notes – original conditions. Note conditions referenced no longer exist. The condition should read Condition 4 of Schedule 4 not condition 6.	This condition related to previous IEA.	Not triggered
	<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</p>		<p>Documentation viewed:</p> <ul style="list-style-type: none"> Planning letter dated 31 October 2019 – Approval to increase production Phase 1 substrate to 2,400 tonnes per week. 	Compliant

	<p>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 5(c) 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>			
	<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 5(c) 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>	Not applicable.	Not applicable.	Not triggered
	<p>(4) In deciding whether to approve an increase in substrate production under this condition, the Secretary must:</p>	Not applicable.	Not applicable.	Not triggered

	<ul style="list-style-type: none"> a) Assess the odour performance of the premises at its current rate of production; b) Assess the likely odour impacts from the proposed increase; and 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; d) Consider EPA advice regarding compliance with the POEO Act. 			
7A	Unless otherwise agreed in writing by the Secretary, the Proponent must 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.		This condition related to previous IEA (2019).	Not triggered
7B	Nothing in this approval permits the construction of the landscaped mound along the Substrate Plan site's western boundary identified in the letter from WMA Water dated 21 January 2016.	WHS/HR Manager advised in writing MOD4 still in progress.	This condition related to previous IEA (2016).	Not triggered
Mushroom Farm Site				
8	The Proponent must ensure that the Mushroom Farm site does not produce more than 220 tonnes mushrooms per week. Records of weekly mushroom production levels and details of the break-down of the total volume distributed must be kept on site at all times and made immediately available to the Secretary on request.	Interview: WHS & HR Manager advised in writing in March 2023 that the mushroom farm has not been constructed.	Not triggered.	Not triggered.
Existing Development Consents and Rights				

9	<p>The Proponent must surrender all existing development consents in accordance with Clause 97 of the EP&A Regulation for the land referred to in Schedule 1, within 12 months of commencement of Stage 1 operations, or as otherwise agreed by the Secretary.</p> <p><i>Note: This requirements does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 4A of the EPA&A Act. Surrender of a consent or approval should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i></p>		This condition related to previous IEA (2016).	Not triggered
Transitional Arrangements				
10	<p>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 must continue to be fully applied until replaced under this approval.</p>		All consents have been surrendered as per Condition 9. This condition considered closed.	Not triggered
Structural Adequacy				
11	<p>The Proponent must 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.</p> <p><i>Notes:</i></p> <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. 	WHS/HR Manager advised in writing in April 2023 that this project (MOD3) has not commenced.	This condition related to previous IEA (2019) and MOD3 construction has not commenced.	Not triggered

11A	The Proponent must ensure that any structures which require a relevant alternate solution developed to meet the performance requirements of the BCA must be designed in consultation with Fire and Rescue.	WHS/HR & Compliance Manager advised in writing in April 2023 that this project (MOD 3) has not commenced.	This condition related to previous IEA (2019) and MOD3 construction has not commenced.	Not triggered
Demolition				
12	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	Site inspection: Phase 1 tunnel and existing weighbridge sighted. No demolition of structures has occurred in this reporting period.	Documentation viewed (reference only on what was proposed): <ul style="list-style-type: none"> Perram & Partners, July 2016, <i>Elf Farm Supplies, Staged Development Of Mushroom Substrate Plant, Construction Environmental Management Plan</i>, Revision No1, 137R1. Section 2.2.2 states <i>There is no significant demolition associated with the project. Minor demolition works including removing sections of the western wall of the existing pre-wet shed, removing part of the northern façade of the Phase 1 tunnel building and removing an existing weighbridge.</i>	Not triggered
Operation of Plant and Equipment				
13	The Proponent must ensure that all plant and equipment used for the Project is: <ol style="list-style-type: none"> Maintained in a proper and efficient condition and Operated in a proper and efficient manner. 	WHS/HR & Compliance Manager advised in August 2023 – 4 full time maintenance staff including Maintenance Manager, Elf manages plant and equipment via a number of mechanisms including: <ul style="list-style-type: none"> Equipment Register (since 2015) Daily maintenance records thru employee diaries Maintain a Major Plant Item spreadsheet Have Standard Operating Procedures (SOPs) for all major pieces of plant Training needs analysis process in place for personnel to ensure they are competent to operate plant and equipment. 	Documents viewed: <ul style="list-style-type: none"> Master Document Management Index 2023 – includes Training Policy, Contractors Equipment Policy, Contractors Critical Rules Policy. Training Needs Analysis (TNA) records sighted for Steven Duff (Loader Operator) (December 2021), Elliot Black (Machine Operator) (March 2022) & Justin Scott (General Hand) (June 2022). 	Compliant

Utilities				
14	Prior to the construction of any utility works, the Proponent must obtain the necessary approvals from relevant service providers.	WHS/HR & Compliance Manager advised in writing in April 2023 that no utility works has occurred during this IEA reporting period.		Not triggered
Submission of Plans or Programs				
15	With the written approval of the Secretary , the Proponent may: <ul style="list-style-type: none"> 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. 		Documents viewed included: <ul style="list-style-type: none"> • Planning letter dated 31 October 2019 – Approval to increase production Phase 1 substrate to 2,400 tonnes per week. • Letter from Department of Planning and Environment dated 20 December 2019 advising that the AEMR and IEA reviewed both documents and is satisfied that they meet the requirements of Schedule 5, Condition 3 and 3A of the Consent. 	Compliant
16	Where conditions of this approval require consultation with an identified party, the Proponent must: <ul style="list-style-type: none"> (a) Consult with the relevant party prior to submitting the subject document to the Secretary for the approval; and (b) Provide details of the consultation undertaken, matters resolved and unresolved and (c) Details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved. 	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.	This condition relates to MOD3 which was approved on 16 March 2020. This has not been triggered in relation to any new or amended plans.	Not triggered

Schedule 3 – Specific Environmental Conditions

Table 14 Specific Environmental Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Construction Environmental Management Plan				
1	<p>The Proponent must 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 DPIE Water and the 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 		This condition related to previous IEA period (2016) and is now closed.	Not triggered
1A	<p>The Proponent must update the CEMP required by Condition 1 of Schedule 3 to include the works associated with MOD 1. The updated plan must 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 must be implemented throughout the construction works.</p>		This condition related to previous IEA period (2019) and is now closed.	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
1B	<p>Prior to the commencement of the MOD 3 construction works, the Proponent must prepare an updated Construction Environmental Management Plan (CEMP) for the Substrate Plant site to the satisfaction of the Secretary. The updated CEMP must:</p> <ul style="list-style-type: none"> (a) Be prepared in consultation with the requirements of Schedule 3, Condition 1 and Schedule 5, Condition 2 of this Approval; (b) Be prepared in consultation with Sydney Trains (c) Detail the measures that are to be implemented to minimise the impacts associated with MOD 3 construction works and (d) Include: <ul style="list-style-type: none"> (I) Plans which confirm the stormwater management system will not result in ponding or stormwater impacts to the Rail Corridor and (II) Certification from a suitably qualified and experienced geotechnical or structural engineer which confirms the construction of the noise barrier and filling of the open bale storage area will not impact upon the adjacent Rail Corridor. 	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.		Not triggered
1C	<p>The Proponent must:</p> <ul style="list-style-type: none"> (a) Not commence the MOD 3 construction until the updated CEMP is approved by the Secretary; and (b) Implemented the most recent version of the updated CEMP approved by the Secretary for the duration of the MOD 3 construction works. 	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.		Not triggered
Offensive Odours				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2	The Proponent must not cause or permit the emission of offensive odours from the Substrate Plant Site, as defined under Section 129 of the POEO Act.		<p>Documentation viewed:</p> <ul style="list-style-type: none"> • <i>Complaints Register</i> on the Elf Farm Supplies website. No complaints have been received by Elf Farm Supplies during this reporting period. • EPA email to Elf dated 6 September 2022, EPA received 2 reports alleging odour impacts from Elf Farms (31/8/22 and 5/9/22). Elf asked to investigate and provide EPA with information. • Letter from Elf to EPA dated 7 September 2022 – response to EPA email re alleged odour complaints. • Email from EPA to Elf dated 19 October 2022. 	Non-compliant
Air Quality - Odour Emissions Plant Design and Construction				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3	<p>Prior to the commencement of construction of the works associated with MOD1, the Proponent must 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 must:</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 must 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>		This condition related to previous IEA period.	Not triggered
3A	The Proponent must construct the odour emissions plant in accordance with the final design endorsed by the independent occur specialist required by Condition 3.		This condition related to previous IEA period (2019).	Not triggered
3B	<p>Prior to the commencement of operation of the odour emissions plant, the Proponent must 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.</p> <p>A copy of the certification is to be provided to the Secretary and the EPA within one week of its finalisation.</p>		This condition related to previous IEA period (2019).	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3C	The Proponent must implement all reasonable and feasible measures to ensure that all new structures are constructed to prevent corrosion from the atmosphere contained within those structures.		This condition related to previous IEA period (2019).	Not triggered
Odour Management Plan				
4	<p>The Proponent must prepare and implement an Odour 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 the EPA by a suitably independent, qualified and experienced expert whose appointment has been endorsed by the Secretary; (b) be submitted to the Secretary for approval within 3 months of the date of this approval; (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; (d) identify triggers for remedial and contingency action; and (e) include a program for monitoring the odour impacts of the Project. 		This condition related to previous IEA reporting period (2016).	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
4A	<p>The Proponent must 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 must:</p> <p>(a) be prepared a suitably independent, qualified and experienced expert whose appointment has been endorsed by the Secretary; (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; (c) identify of all major sources of odour; (d) include management measures to ensure no offensive odours from the Substrate Plant site; (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 must include, but not be limited to: i. results of the complaints handling system; and ii system and performance review for continuous improvement; (f) include odour management performance parameters that are consistent with the manufacturers' performance guarantees provided for the biofilter and scrubbers; (g) include measures to prevent and/or mitigate fugitive emissions; (h) include triggers for remedial and contingency action; (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 must 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>		This condition related to previous IEA reporting period (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), must be implemented for the life of the Project as soon as written endorsement by the Secretary is received.	Auditor sighted odour controls in place during the inspection – ducting, negative pressure in buildings, scrubbers, biofilter.		Compliant
Odour Emissions and Biofilter Control System Audit				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
5	<p>The Proponent must 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, must:</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>WHS/HR & Compliance Manager confirmed this Condition has not been triggered in this reporting period.</p>	<p>Note: the previous IEA (2019) addressed the Odour Emissions and Biofilter Control System Audit relating to the commissioning of the biofilter.</p> <p>Previous IEA period (2021), Elf Farm Supplies were seeking approval to increase production. Hence this audit will focus on the Odour Emissions and Biofilter Control System Audit prepared for this specific activity.</p> <p>Email from WHS/HR & Compliance Manager dated 9 August 2023 confirming no application has been made to increase tonnage again.</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 must 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.	WHS/HR & Compliance Manager confirmed this Condition has not been triggered in this reporting period.		Not triggered
6A	Two months after the completion of the audits required under Conditions 5 (a) and 5(b) of Schedule 3, the Proponent must submit to the satisfaction of the Secretary , a report verifying that any actions identified in the audit have been implemented.	WHS/HR & Compliance Manager confirmed this Condition has not been triggered in this reporting period.		Not triggered
Dust				
7	The Proponent must 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 in August 2023.	Documentation viewed: <ul style="list-style-type: none"> • <i>Complaints Register</i> on the Elf Farm Supplies website. No complaints have been received by Elf Farm Supplies or via NSW EPA for entire period of March 2021 and March 2023. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. 	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
8	<p>During the construction and operation of the project, the Proponent must 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 inspections: dust levels were low during the site audits in August 2023. No visible dirt was sighted on the public road network entering Elf Farm Supplies.</p>	<p>Documents viewed:</p> <ul style="list-style-type: none"> <i>Complaints Register</i> on the Elf Farm Supplies website. No complaints have been received by Elf Farm Supplies or via NSW EPA for entire period of March 2021 and March 2023. 	Compliant
Energy Efficiency Plan				

9	<p>The proponent must prepare and implement an Energy Efficiency Plan on the Substrate Plant site to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) Be submitted to the Secretary for approval prior to the commencement of operations on the site; (b) Describe the measures that would be implemented to minimise energy use on the site; (c) Explore the possibility of using renewable energy use to generate power and (d) Include a program to monitor the effectiveness of these measures and a protocol to periodically review the plan 	<p>WHS/HR & Compliance Manager confirmed that the 1.69 MW Solar panel system has now been installed (July 2023).</p> <p>Auditor sighted the solar panel system during site audit in August 2023.</p> <p>He also confirmed the changing of the biofilter media also reduced back pressures which has allowed fans to run at lower speeds for same output, saving energy.</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> • Energy Efficiency Plan • DPE letter to Elf dated 9 September 2022 – Updated Environmental Management Strategy for the Elf Farm and Substrata Plant Project (Schedule 5, Condition 1). In letter DPE approve updated EMS dated June 2022 issue V02.0 and Energy Efficiency Plan prepared by Elf Farm Supplies Pty Ltd, dated May 2022, issue 002. • Excel spreadsheet summarising Power, Gas and Water July 2021 to 28 February 2023. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. Sections 4.5 and 5. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. Sections 4.5 and 5. • <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, June 2022 Version 02.0</i>. Section 5.5 outlines designs features and management procedures in place to maximise energy efficiency. <p>The Environmental Management Strategy (including the Energy Efficiency Plan) was updated in June 2022 following audit and reviewed in October 2022 after AEMR</p>	Compliant
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			2022 report was complete (DPE approved September 2022).	
Fire Management				

10	<p>The proponent must;</p> <ul style="list-style-type: none"> a) Implement suitable measures to minimise the risk of fire on the Substrate Plant site; b) Ensure straw bales stored in the open bale storage area are: <ul style="list-style-type: none"> (i) Readily accessible by firefighting crews and (ii) Separated from buildings and other assets (excluding the noise barrier and northern perimeter wall) to prevent a fire spreading. c) Extinguish any fires on the Substrate Plant site promptly; and d) Maintain adequate fire-fighting capacity on the Substrate Plant site. 		<p>Documentation viewed:</p> <ul style="list-style-type: none"> • Fire Essential Services Group Service Reports for Monthly Test of Fire Panel and EWS: Report ID 44833 (17 March 2021), Report ID 46538 (20 May 2021), Report ID 48057 (15 July 2021), Report ID 49013 (19 August 2021), Report ID 51074 (28 October 2021), Report No. 52467 (16 December 2021), Report ID 53903 (17 February 2022), Report ID 57018 (16 June 2022), Report No. 59960 (23 September 2022), Report No. 61524 (17 November 2022) • Fire Essential Services Group Service Reports for Monthly Test of Fire Panel and EWS, Monthly Testing of Fire Pumps & Tanks: Report ID 53105 (20 January 2022), Report ID 56185 (19 May 2022), Report ID 59960 (29 September 2022), Report ID 61524 (17 November 2022) • Fire Essential Services Group Service Report for Annual Fire Trip and Interface Test Report ID 51122 (30 October 2021) • Fire Essential Services Group Service Report for 6 monthly Fire Door Inspection, 6 Monthly Testing of Hose Reels, 6 Monthly Testing of Hydrants, 6 Monthly Test of Portable Fire Equipment Report ID 55802 (5 May 2022) • Fire Essential Services Group Service Report for Annual Inspection of Paths of Travel, Annual EWS Test, Annual Fire Detection & Alarm System Test Report ID 51124 (1 November 2021) • Fire Essential Services Group Service Report for Annual Inspection of Water Storage Tanks, Annual Service of Fire 	Compliant
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<p>Pumps and Annual Hydrant Flow Test, Report ID 51153 (2 November 2021) & Report ID 62189 (9 December 2022)</p> <ul style="list-style-type: none"> Fire Essential Services Group Service Report for Annual Testing of Hose Reel, Annual Hydrant System Test, Annual Fire Doors Inspection, Annual Test of Portable Fire Equipment, Report ID 51625 (18 November 2021) & Report ID 62242 (9 December 2022) <i>Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Report 134R2, June 2022 Version 02.0.</i> Section 5.9.2 outlines designs features and management procedures in place to minimise the risk of fire and refers to fire management strategy for the site. Training records from Fire 7 Safety Australia – Statement of Attainments sighted for the following employees in relation to Operate as part of an emergency control organisation - Scott Gray (Certificate No. 00134605), Shane Zaccazan (Certificate No. 00134604), Thomas Hunt (Certificate No. 0013602), David Camilleri (Certificate No. 00134610), Nicholas Fittock (Certificate No. 00134606). The following employees complete the above as well as trained as Lead an emergency control organisation – Blake Edwards (Certificate No. 00134613), Alan Tyler (Certificate No. 00134612) 	

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Hazards				
11	The Proponent must 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	Site inspection: SLR sighted a double skinned tank was used for the above ground diesel fuel storage near the weighbridge. The other two diesel fuel tanks were below ground. Each diesel fuel area had spill kits located adjacent. Spill pallets also sighted during walk around.	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <i>POL0002.05, Company Policy and Commitment, Use of Hazardous Substances Policy, Revision No: 0, Date 08.05.2015</i> <i>Elf Farm Supplies Pty Ltd, EFS.OHS.053, Workplace Substances Procedure, reviewed date: 17.11.2016</i> <i>Environmental Property Services (EPS), December 2022, Pollution Incident Response Management Plan, prepared for Elf Farm Supplies, Reference No. 11586. Section 6 – Inventory of Pollutants and Appendix 1 – Hazardous Chemicals Manifest, Appendix 3 – Emergency Procedure, Appendix 4 – Chemical Spill Procedure, Appendix 12, Safety and Fire Equipment Location Map.</i> 	Compliant
Waste				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
12	The Proponent must 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.	Interview: WHS/HR & Compliance Manager confirmed that they only bring any waste generated outside the Plant site on site that is permitted under the Environment Protection Licence.	Not applicable.	Compliant
Bunding				
13	The Proponent must store all chemicals, fuels and oils used on the Substrate Plant site in appropriately banded 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 must 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> .	Site inspection: SLR sighted a double skinned tank was used for the above ground diesel fuel storage near the weighbridge. The other two diesel fuel tanks were below ground. Each diesel fuel area had spill kits located adjacent. Spill pallets also sighted during walk around.	Documentation viewed: <ul style="list-style-type: none"> <i>Environmental Property Services (EPS), December 2022, Pollution Incident Response Management Plan, prepared for Elf Farm Supplies, Reference No. 11586.</i> Section 6 – Inventory of Pollutants and Appendix 1 – Hazardous Chemicals Manifest, Appendix 3 – Emergency Procedure, Appendix 4 – Chemical Spill Procedure, Appendix 12, Safety and Fire Equipment Location Map. <i>POL0002.05, Company Policy and Commitment, Use of Hazardous Substances Policy, Revision No: 0, Date 08.05.2015</i> <i>Elf Farm Supplies Pty Ltd, EFS.OHS.053, Workplace Substances Procedure, reviewed date: 17.11.2016</i> 	Compliant
Soil and Waster - Discharge Limits				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
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.	WHS/HR & Compliance Manager confirmed no incidents that could cause environmental harm associated with the pollution of waters associated with MOD 1.	<p>Section 120 of the POEO states: A person who pollutes any waters is guilty of an offence.</p> <p>Documentation viewed:</p> <ul style="list-style-type: none"> EPA website – no water pollution penalty notices issued during this IEA period. <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. No water pollution incidents reported. <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. No water pollution incidents reported. 	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
15	The Proponent must ensure that only VENM and/or ENM or material approved by the EPA is used as a fill.		<p>Documentation viewed:</p> <ul style="list-style-type: none"> Supplementary Report to Elf Farm Supplies on Compaction Report for Biofilter Imported Fill Material at 108 Mulgrave Road, Mulgrave NSW, 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. Elf Farm Supplies, Staged Development of Mushroom Substrate Plant, Construction Environmental Management Plan, Revision 1, July 2016 Perram & Partners, Section 2.2.3 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.” 	Compliant
16	The Proponent must ensure that filling of the manoeuvring area must be undertaken in accordance with plans submitted with DA 0571/06.		This condition related to previous IEA reporting period (2016).	Not triggered
16A	The Proponent must ensure that the earthworks associated with the biofilter pad do not act as a source of sedimentation. The Proponent must stabilise the area of fill associated with the biofilter within one week of the approval of MOD 1.		This condition related to previous IEA reporting period (2016).	Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
16B	<p>Prior to the commencement of construction of the biofilter, the Proponent must submit to the Secretary, details demonstrating that the earthworks in the area of the biofilter have been:</p> <p>(a) undertaken in accordance with AS 3798; and</p> <p>(b) compacted to 98% Standard dry density ratio (AS1289 E4.1).</p>		This condition related to previous IEA reporting period (2016).	Not triggered
Soil and Water – Water Management Plan				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
17	The Proponent must 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 .		<p>Note: the preparation and submission aspects of this condition relate to previous IEA reporting period (2016). The only aspect to be audited is the implementation.</p> <p>Documentation viewed</p> <ul style="list-style-type: none"> EPA Licence Variation dated 17 December 2020. One of the changes was removal of old condition (R4.1) – <i>The licensee must notify the EPA in writing at least 24 hours prior to irrigating wastewater from the dam on the premises</i>. This condition has been changed to <i>The licensee must retain records detailing irrigation of waste water from the dam at the premises for four years. These records shall be made available to EPA officers upon request</i>. Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan, Issue 03 June 2020. Emails to DPE and EPA during 2021 and 2022 relating to the notification of the emergency use of the western dam and the flooding of the western dam from flood waters. <p>Elf is managing the water levels in the dam as per the WMP. Elf is notifying the EPA as per EPL condition of their plans to irrigate.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
17A	<p>The Proponent must 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 must 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 must not commence until the Proponent has received written approval of the plan. The approved Plan must be implemented for the life of the Project.</p>	<p>Site inspection: August 2023, the auditor sighted the discharge points as per the Catchment Plan in the updated Water management Plan, along with the sighting the western dam, basins and stormwater drainage points.</p>	<p>Note that preparation of an updated Water Management Plan and subsequent approval was covered in the previous IEA (2019). This IEA reporting period reviews compliance with the approved Plan's implementation.</p> <p>Documentation viewed:</p> <ul style="list-style-type: none"> • <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i>, Issue 03 June 2020. • Refer to evidence provided in Condition 17B relating to notification to DPE and EPA of use of Western Dam as per the Water Management Plan. 	Compliant

17B	<p>The Proponent must 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>Documentation viewed</p> <ul style="list-style-type: none"> • <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i>, Issue 03 prepared by Perram & Partners June 2020. • Water Management Incident Report, prepared by Elf Farm Supplies on 26 March 2021 relating to excess water from heavy rain and flood waters entering dam from flooded Hawkesbury river. Incident date 20 March 2021. Prepared by Blake Edwards, WHS/HR Manager, incident investigation by Mark Hengst. • Examples of other water management incidents reports were prepared for events on <ul style="list-style-type: none"> : 25-26 November 2021 – High rainfall (report dated 30 November 2021) : 12-13 January 2022 – High rainfall (report dated 17 January 2022) : 22-23 February 2022 – High rainfall (report dated 24 February 2022) : 3 March 2022 – Flood waters entered western dam (report dated 11 March 2022) : 4 July 2022 – flood waters entered western dam (report dated 8 July 2022) • Emails to EPA dated 17 January 2022 (re 12-13/1/2022), 30 November 2021 (re 25-26/11/2021), 2 March 2022 (re 2/3/2022), 24 February 2022 (re 22-23/2/22), 26 March 2021 (re 20/3/2021) • Email from Elf to EPA and DPE on 26 March 21 relating to emergency use of western dam and the flooding of western dam from flood waters on 20 March 2021. 	Compliant
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<ul style="list-style-type: none"> Email from DPE to Elf dated 21 January 2022 Emergency use of Western Dam 12012022, relates to 17B and 17C. Refers to Incident report that occurred on 12 January 2022. Email from DPE to Elf dated 1 December 2021 Emergency use of Western Dam, relates to 17C. Refers to Incident report that occurred on 25-26 November 2021. Email from DPE to Elf dated 4 March 2022 – acknowledging receipt of incident report – 2 March 2022. No comments. Email from DPE to Elf dated 22 July 2022 – acknowledging receipt of incident report – 4 March 2022. No comments. 	

17C	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 must be provided to the Secretary in writing within 7 days of the emergency.		<p>Documentation viewed</p> <ul style="list-style-type: none"> • <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i>, Issue 03 prepared by Perram & Partners June 2020. • Water Management Incident Report, prepared by Elf Farm Supplies on 26 March 2021 relating to excess water from heavy rain and flood waters entering dam from flooded Hawkesbury river. Incident date 20 March 2021. Prepared by Blake Edwards, WHS/HR Manager, incident investigation by Mark Hengst. • Examples of other water management incidents reports were prepared for events on <ul style="list-style-type: none"> : 25-26 November 2021 – High rainfall (report dated 30 November 2021) : 12-13 January 2022 – High rainfall (report dated 17 January 2022) : 22-23 February 2022 – High rainfall (report dated 24 February 2022) : 3 March 2022 – Flood waters entered western dam (report dated 11 March 2022) : 4 July 2022 – flood waters entered western dam (report dated 8 July 2022) • Emails to EPA dated 17 January 2022 (re 12-13/1/2022), 30 November 2021 (re 25-26/11/2021), 2 March 2022 (re 2/3/2022), 24 February 2022 (re 22-23/2/22), 26 March 2021 (re 20/3/2021) • Email from Elf to EPA and DPE on 26 March 21 relating to emergency use of western dam and the flooding of western dam from flood waters on 20 March 2021. 	Non-compliant
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			<ul style="list-style-type: none"> Email from DPE to Elf dated 21 January 2022 Emergency use of Western Dam 12012022, relates to 17B and 17C. Refers to Incident report that occurred on 12 January 2022. Email from DPE to Elf dated 1 December 2021 Emergency use of Western Dam, relates to 17C. Refers to Incident report that occurred on 25-26 November 2021. Email from DPE to Elf dated 4 March 2022 – acknowledging receipt of incident report – 2 March 2022. No comments. Email from DPE to Elf dated 22 July 2022 – acknowledging receipt of incident report – 4 March 2022. No comments. 	
17D	<p>Prior to the commencement of construction of stormwater management system approved under MOD 3, the Proponent must prepare an updated Water Management Plan (WMP) for the Substrate Plant site to the satisfaction of the Secretary. The updated WMP must:</p> <ul style="list-style-type: none"> (a) Be prepared in accordance with the requirements of Schedule 3, Conditions 17 to 17C of this approval; (b) Be prepared in accordance with the updated Stormwater Catchment Plan for the Substrate Plant site (see Appendix 2A of this Approval); and (c) Detail the measures that are to be implemented to manage stormwater impacts associated with the MOD 3 works. 	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
17E	<p>The Proponent must:</p> <ul style="list-style-type: none"> (a) Not commence operation of the MOD 3 stormwater management system until the updated WMP is approved by the Secretary; and (b) Implement the most recent version of the updated WMP approved by the Secretary. 	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.		Not triggered
17F	<p>The Proponent must ensure any structures approved under MOD 3 that are built below the 100-year ARI flood level, including the noise barrier and the northern perimeter wall, are constructed from compatible building components.</p> <p><i>Note: the 100-year ARI flood level at the Substrata Plant site is RL 17.3 metres AHD.</i></p>	WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status												
Noise – Construction Noise Criteria																
18	<p>The Proponent must ensure that the construction noise generated at the Substrate Plant site does not exceed the criteria in Table 1</p> <p><i>Table 1: Construction Noise impact assessment criteria dB A</i></p> <table><tr><td>Receiver/Location</td><td>Day LAeq(15 minute)</td></tr><tr><td>R1 - 46 Mulgrave Road, Mulgrave</td><td>52 65</td></tr><tr><td>R2- Mulgrave Industrial area</td><td>52</td></tr><tr><td>R3 - 2 Railway Road, Mulgrave</td><td>52</td></tr><tr><td>R4- 126 Mulgrave Road, Mulgrave</td><td>51</td></tr><tr><td>R5- Chisholm Place, South Windsor</td><td></td></tr></table> <p><i>Notes:</i> <i>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.</i></p>	Receiver/Location	Day LAeq(15 minute)	R1 - 46 Mulgrave Road, Mulgrave	52 65	R2- Mulgrave Industrial area	52	R3 - 2 Railway Road, Mulgrave	52	R4- 126 Mulgrave Road, Mulgrave	51	R5- Chisholm Place, South Windsor			No construction occurred during this reporting period.	Not triggered
Receiver/Location	Day LAeq(15 minute)															
R1 - 46 Mulgrave Road, Mulgrave	52 65															
R2- Mulgrave Industrial area	52															
R3 - 2 Railway Road, Mulgrave	52															
R4- 126 Mulgrave Road, Mulgrave	51															
R5- Chisholm Place, South Windsor																

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status																		
Noise – Operational Noise Criteria																						
19	<p>The Proponent must ensure that the operational noise generated by the Substrate Plant site does not exceed the criteria in Table 2</p> <p><i>Table 2: Operational Noise impact assessment criteria dB(A)</i></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: 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>Interview: WHS/HR & Compliance Manager advised no requests have been received from the EPA requesting any further noise monitoring since noise monitoring after completion of MOD1 works.</p> <p>Note: Elf carried out noise monitoring after completion MOD1 October 2018 as per their Operational Noise Management Plan. The plant has been operating in steady state since that time.</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none">EPA website – no noise pollution penalty notices issued during this IEA period.<i>Complaints Register</i> on the Elf Farm Supplies website. No complaints have been received by Elf Farm Supplies or via NSW EPA for entire period from 13 March 2021 to 12 March 2023.Acoustic Consulting Engineers, Operational Noise Compliance Measurement, Substrate Plant Mulgrave, Reference number 160787-01-03L-DD, date 5 November 2018.Acoustic Consulting Engineers, Substrate Plant Mulgrave, Operational Noise Management Plan, Report No. 160787-01-02R-DD Rev02, date 17 January 2019. No monitoring unless compliant received.EPL 6229. There is no specific noise monitoring specified as part of the Environment Protection Licence for the site.	Compliant
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 must comply with the operating hours in Table 3 at the Substrate Plant site, unless otherwise agreed to in writing by the Secretary.</p> <p><i>Table 3: Operating hours</i></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>Documentation viewed:</p> <p><i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021, prepared by Elf Farm Supplies Pty Ltd.</i></p> <p>No complaints received regarding operating hours.</p> <ul style="list-style-type: none"><i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022, prepared by Elf Farm Supplies Pty Ltd.</i> <p>No complaints received regarding operating hours.</p> <ul style="list-style-type: none">Review of Elf Farm Supplies Complaints Register	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																			
21	<p>The Proponent must ensure the noise barrier is constructed:</p> <p>(a) Prior to the importation of fill for the expansion of the open bale storage area; or</p> <p>(b) As otherwise agreed to in writing by the Secretary</p>	<p>WHS/HR & Compliance Manager advised in writing in April 2023 that this project has not commenced.</p>		Not triggered															
21A	<p>The Proponent must continue to implement the “other noise mitigation measures” approved by the Department in its letter dated 18 July 2016 until the noise barrier referred to in Schedule 3, Condition 21 of this approval is constructed.</p>	<p>Site inspection: the auditor sighted the use of straw bales as the noise mitigation measure.</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"><i>DPE letter dated 14 December 2022 – Warning Letter – breach of Schedule 3 Condition 21A – removal of hay bales from the temporary noise wall.</i>	Non-compliant															
Noise – Noise Management Plan																			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
22	The Proponent must 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		This condition related to previous IEA reporting period (2016).	Not triggered
22A	The Proponent must 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 must 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.		This condition related to previous IEA reporting period (2019).	Not triggered
22B	Operation of works associated with MOD 1 must 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), must be implemented for the life of the Project as soon as written endorsement by the Secretary is received.	<p>Site inspection: Auditor sighted the following noise mitigation measures being implemented:</p> <ul style="list-style-type: none"> Truck access arrangements to allow the forward travel throughout the site Inspection/maintenance/repair program for mobile mechanical plant New processing tunnels to be concrete construction 20 km/hour speed limit signs on internal roads. Doors into the various building being closed at all times 	<p>Note: The approval of the updated Operational Noise Management Plan was addressed in the previous IEA (2019). This IEA considers the implementation of the Plan.</p> <p>Documentation viewed:</p> <ul style="list-style-type: none"> Acoustic Consulting Engineers, Substrate Plant Mulgrave, Operational Noise Management Plan, Report No. 1607870-01-02R-DD, date 17 January 2019. 	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Biodiversity – Riparian Management Area				
23	The Proponent must 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 must 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 .	<p>Interview: WHS/HR Manager Manager advised that the MOD3 has now been approved however submission for MOD 3 retracted and Riparian Management Area has been established.</p> <p>Site inspection: Auditor sighted the 35 metre wide riparian corridor along the length of South Creek. Area was fenced off as per condition requirement.</p>	<p>This condition relates to the previous IEA reporting period (2016 and 2019). In 2016, 2019 and 2021 non-compliance was recorded against this condition.</p> <p>Documentation viewed:</p> <ul style="list-style-type: none"> • <i>Letter from Perram & Partners to Planning dated 18 January 2017 seeking modification to the development including deleting condition 23.</i> • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, 28 September 2020, prepared by Elf Farm Supplies Pty Ltd. Appendix D has photo of the riparian zone.</i> <p>Non-compliance was recorded as the area was not established within 12 months of commencement of Stage 1 – no further action required.</p> <ul style="list-style-type: none"> • <i>DPE letter dated 21 December 2021 – Warning Letter – breach of Schedule 3, Condition 23 – Failure to establish riparian corridor and Schedule 5, Condition 4(d) – failure to review EMS.</i> 	Non-compliant
Visual Amenity – Lighting				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
24	<p>The Proponent must ensure that all external lighting associated with the Substrate Plant site:</p> <ul style="list-style-type: none"> a) Does not create nuisance to surrounding properties or roadways and b) Complies with AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting. 	<p>WHS/HR & Compliance Manager confirmed no new external lighting was installed during this reporting period.</p>	<p>Documentation viewed:</p> <ul style="list-style-type: none"> • Elf Environmental Complaints Register – March 2021 to March 2023. No lighting complaints recorded. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. No lighting complaints received. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. No lighting complaints received. <p>Note the Auditor is not familiar with AS4282 and has not conducted an audit against this standard as part of this audit.</p>	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
24A	The Proponent must prepare a Landscape Management Plan for the Substrate Plant site. The plan must : (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.		This condition related to the previous IEA reporting period (2016).	Not triggered
24B	The landscaping around the site of the new biofilter required under MOD 1 must be installed within three months following the completion of the construction of the biofilter. All other landscaping must be installed prior to the commencement of operation of the works associated with MOD 1.		This condition was met during the previous IEA reporting period (2016).	Not triggered
Signage				
25	The Proponent must not install any advertising signs on the Substrate Plant site without the written approval of the Secretary .	WHS/HR & Compliance Manager confirmed in writing and again on site no advertising signs have been erected on the property.	Not applicable.	Compliant
Transport				
26	The Proponent must 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 visits and no parking on public roads was occurring.	Documentation viewed: <ul style="list-style-type: none"> Letter from Commercial Design Consolidated (NSW) Pty Limited, dated 12 January 2017 states in the conclusion section "The designs and details as presented on the documents supplied appear satisfactory and comply with the requirements of the relevant codes." 	Compliant
Protection of Public Infrastructure				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
27	<p>Before the commencement of MOD 3 construction works, the Proponent must:</p> <ul style="list-style-type: none"> (a) Consult with the relevant owner and provider of services that are likely to be affected by the MOD 3 construction works to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths) (c) Submit a copy of the dilapidation report to the Secretary and Council. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
28	<p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <ul style="list-style-type: none"> (a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the carrying out of MOD 3 construction works; (b) Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the MOD 3 construction works. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Works As Executed Plans				
29	<p>Before the issue of the final occupation certificates for the works associated with MOD 3, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the PCA and Sydney Trains.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Rail Corridor and Associated Easements				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
30	<p>The Proponent must ensure:</p> <ul style="list-style-type: none"> (a) No construction or maintenance works associated with MOD 3 occur within the Rail Corridor or is associated easements. (b) Stormwater drainage associated with MOD 3 is not discharged into the Rail Corridor; and (c) Fill is not spread or stockpiled within the Rail Corridor or its associated easements. <p>Except with the prior approval of Sydney Trains.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
31	The Proponent must ensure that straw bales stacked immediately adjoining the southern section of the noise barrier (adjacent to the Rail Corridor) do not exceed the height of the noise barrier.	Auditor sighted the hay bales being stacked as required. Note that section of the wall is open to allow emergency vehicle access to the site.		Compliant

SCHEDULE 4 – SPECIFIC ENVIROMENTAL CONDITIONS – MUSHROOM FARM SITE

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Construction Environmental Management Plan				
1	<p>The Proponent must prepare and implement a Construction Environmental Management Plan for the Mushroom Plant site to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with DPIE Water 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 15 below; - an air quality management plan; - a soil and water management plan, including details of the erosion and sediment control measures to be used on site; - a flora and fauna management plan; - a heritage management plan, including the programs/procedures to be implemented in the event that previously unidentified relics are discovered (Condition 21) - a waste management plan and - a construction traffic management plan which addresses haulage routes, traffic safety and the number of truck movements required to import the identified fill for the site. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
2	The Proponent must not cause or permit the emission of offensive odours from the Mushroom Farm site, as defined under Section 129 of the POEO Act.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
3	The Proponent must implement all reasonable and feasible measures to minimise dust generated at the Mushroom Farm site.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
4	During the construction and operation of the project, the Proponent must ensure that: (a) all trucks entering or leaving the Mushroom Farm site with loads have their loads covered; (b) the trucks associated with the Project do not track dirt onto the public road network; (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 .	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
5	The Proponent must prepare and implement an Energy Efficiency Plan on the Mushroom Farm site to the satisfaction of the Secretary . This plan must: (a) be submitted to the Secretary for approval prior to the commencement of operations on the site; (b) describe the measures that would be implemented to minimise energy use on the site; (c) explore the possibility of using renewable energy use to generate power; and (d) include a program to monitor the effectiveness of these measures, and a protocol to periodically review the plan.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
6	<p>The Proponent must:</p> <ul style="list-style-type: none"> (a) provide and manage a 24 25 metre wide APZ between the buildings on the Mushroom Farm site and any bushfire hazard; (b) implement suitable measures to minimise the risk of fire on the Mushroom Farm site; (c) extinguish any fires on the Mushroom Farm site promptly; (d) maintain adequate fire-fighting capacity on the Mushroom Farm site. (e) Construct the proposed office building in compliance with section 7 (BAL 29) Australian Standard AS3959 2009 Construction of buildings in bush fire prone areas and section A3.7 Addendum Appendix 3 of Planning for Bushfire Protection 2006. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
7	The Proponent must ensure that all dangerous goods and hazardous substances are stored and handled on the Mushroom Farm site in accordance with the Dangerous Goods Code and XS 1940-2004: <i>The storage and handling of flammable and combustible liquids</i> .	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
8	The Proponent must not cause, permit or allow any waste generated outside the Mushroom Farm site to be received at the site for storage, treatment, processing, reprocessing or disposal of at the site, except with the approval of the Secretary and as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> .	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
9	Except as may be expressly provided in an EPL for the Mushroom Farm site, the Proponent must comply with Section 120 of the POEO Act.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
10	The Proponent must store all chemicals, fuels and oils used on the Mushroom Farm 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 must 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> .	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
11	The Proponent must ensure that the use of chemicals (including pesticides and herbicides) on the Mushroom Farm site carried out in accordance with: (a) <i>Agricultural and Veterinary Chemicals Act 1 994</i> ; and (b) <i>Agricultural and Veterinary Chemicals (NSW) Regulation 2000</i>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
12	The Proponent must ensure that only VENM and/or ENM or material approved by the EPA is used as fill.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
13(1)	<p>The Proponent must prepare and implement an operational Water Management Plan for the Project on the Mushroom Farm site in consultation with EPA, Penrith City Council and NOW DPIE Water to the satisfaction of the Secretary. The plan must:</p> <p>(a) be submitted to the Secretary for approval prior to the commencement of operations:</p> <p>(b) include:</p> <ul style="list-style-type: none"> a detailed Stormwater Operation and Management Plan that includes the measures outlined in the Stormwater Management report prepared by Barker Ryan and Stewart reference 20070166 Revision G dated 1 1 April 2016 as supplemented by addendum Stormwater Management report prepared by Harris Environmental Consulting dated 15 March 2018: and a Recycled Water Management Plan <p>an effluent irrigation.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
13(ii)	<p>Prior to the commencement of construction, the proponent shall seek approval from Penrith Council under Section 68 of the Local Government Act to install and operate the Onsite Sewage Management System. The application shall include an Effluent Management Plan detailing monitoring and maintenance arrangements.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
NOISE				
Construction Noise Mitigation				
14.	<p>The Proponent must install the northern environmental bund prior to commencement of any other construction works at the Mushroom Farm site.</p> <p>Installation of the northern environmental bund must be completed within a period of not more than 3 months.</p>			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status										
15	<p>The Proponent must ensure that the construction noise generated at the Mushroom Farm site does not exceed the criteria in Table 4.</p> <p><i>Table 4: Construction noise criteria dB(A)</i></p> <table><tr><th>Receiver/Location</th><th>Day LAeq(15 minute)</th></tr><tr><td>Receiver 1 – 503 The Northern Road, Londonderry</td><td>49</td></tr><tr><td>Receiver 2 – 509 The Northern Road, Londonderry</td><td>54</td></tr><tr><td>Receivers – 1 Thomas Road, Londonderry</td><td>54</td></tr><tr><td>Receiver 4 6-16 Timothy Road, Londonderry</td><td>45</td></tr></table> <p><i>Notes:</i></p> <ul style="list-style-type: none">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 PolicyThe construction noise criteria do not apply to any works associated with tire installation of the northern environmental bund (Condition 14 above).	Receiver/Location	Day LAeq(15 minute)	Receiver 1 – 503 The Northern Road, Londonderry	49	Receiver 2 – 509 The Northern Road, Londonderry	54	Receivers – 1 Thomas Road, Londonderry	54	Receiver 4 6-16 Timothy Road, Londonderry	45	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Receiver/Location	Day LAeq(15 minute)													
Receiver 1 – 503 The Northern Road, Londonderry	49													
Receiver 2 – 509 The Northern Road, Londonderry	54													
Receivers – 1 Thomas Road, Londonderry	54													
Receiver 4 6-16 Timothy Road, Londonderry	45													

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status																																					
16	<p>The Proponent must ensure that the operational noise generated by the Mushroom Farm site does not exceed the criteria in Table 5.</p> <p>Table 5: <i>Project Noise Trigger Levels dB(A)</i></p> <table><tr><th rowspan="2">Receiver/ Location</th><th rowspan="2">Shoulder period* (5am – 7am) LAeq(15 minute)</th><th rowspan="2">Day LAeq(1 5 minute</th><th rowspan="2">Evening LAeq(1 5 minute</th><th rowspan="2">Night LAeq(1 5 minute</th><th colspan="2">Sleep Disturbance LAeq(15 minute</th></tr><tr><th>Night</th><th>Shoulder period (5am – 7am)</th></tr><tr><td>R1 – 503 The Northern Road</td><td>44</td><td>44</td><td>44</td><td>38</td><td>52</td><td>54</td></tr><tr><td>R2 – 509 The Northern Road</td><td>47</td><td>48</td><td>45</td><td>38</td><td>52</td><td>57</td></tr><tr><td>R3- 1 Thomas Road</td><td>47</td><td>48</td><td>45</td><td>38</td><td>52</td><td>57</td></tr><tr><td>R4 – 6-16 Timothy Road</td><td>40</td><td>40</td><td>40</td><td>38</td><td>52</td><td>52</td></tr></table> <p>Notes:</p> <ul style="list-style-type: none">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 for Industry. <p>*“Shoulder period” noise trigger level should not exceed Day or Evening noise trigger levels.</p>	Receiver/ Location	Shoulder period* (5am – 7am) LAeq(15 minute)	Day LAeq(1 5 minute	Evening LAeq(1 5 minute	Night LAeq(1 5 minute	Sleep Disturbance LAeq(15 minute		Night	Shoulder period (5am – 7am)	R1 – 503 The Northern Road	44	44	44	38	52	54	R2 – 509 The Northern Road	47	48	45	38	52	57	R3- 1 Thomas Road	47	48	45	38	52	57	R4 – 6-16 Timothy Road	40	40	40	38	52	52	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Receiver/ Location	Shoulder period* (5am – 7am) LAeq(15 minute)						Day LAeq(1 5 minute	Evening LAeq(1 5 minute	Night LAeq(1 5 minute	Sleep Disturbance LAeq(15 minute																															
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R1 – 503 The Northern Road	44	44	44	38	52	54																																			
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R3- 1 Thomas Road	47	48	45	38	52	57																																			
R4 – 6-16 Timothy Road	40	40	40	38	52	52																																			

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status													
17	<p>The Proponent must comply with the operating hours on the Mushroom Farm site in Table 6, unless otherwise agreed with the Secretary.</p> <p><i>Table 6: Operating Hours</i></p> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday – Friday</td><td>7am – 6pm</td></tr><tr><td>Saturday</td><td>8am – 1pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td>Operation</td><td>All days</td><td>Any time</td></tr></table>	Activity	Day	Hours	Construction	Monday – Friday	7am – 6pm	Saturday	8am – 1pm	Sunday & Public Holidays	Nil	Operation	All days	Any time	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Activity	Day	Hours															
Construction	Monday – Friday	7am – 6pm															
	Saturday	8am – 1pm															
	Sunday & Public Holidays	Nil															
Operation	All days	Any time															
Noise Management Plan																	

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
18	<p>The Proponent must prepare and implement a Noise Management Plan for the Mushroom Farm site in consultation with EPA and property owner of 1 Thomas Road, Penrith (identified as location "R3") to the satisfaction of the Secretary. The Plan must be submitted to and approved by the Secretary for approval prior to commencement of operation construction, and include a noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in Conditions 15 and 16 of this approval.</p> <p>The Noise Management Plan must also include all mitigation measures for both the construction and operations identified in the acoustic reviews titled 'Acoustic Review Modified Operations Mushroom Farm Londonderry' dated 5 April 2016 prepared by Atkins Acoustics and Associates Pty Ltd and 'Acoustic Review (Amended Development Application) Modified Operations, Mushroom Farm, 521 The Northern Road, Londonderry' dated 5 February 2019 prepared by Acoustic Consulting Engineers Pty Ltd. Mitigation measures must be implemented at the commencement of construction or as identified in the reports.</p> <p>The Noise Management Plan must also include measures that restrict operations along the southern side of the building during night-time hours to mitigate intermittent noise impacts associated with truck movements and air brake release.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
BIODIVERSITY				
Vegetation Management Plan				
19	The Proponent must establish a Vegetation Management Area at the Mushroom Farm site (as shown in Appendix 5).	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Vegetation Management Plan				

20(i)	<p>The Proponent must prepare and implement a Plan for the Vegetation Management Area to the satisfaction of the Secretary. This plan must be prepared in consultation with EEH EESG by a suitably qualified and experienced expert/s whose appointment has been approved by the Secretary. The plan must:</p> <ul style="list-style-type: none"> (a) be submitted to and approved by the Secretary for approval prior to the commencement of construction on the Mushroom Farm site; (b) identify all vegetation that is present within the vegetation management area (as shown in Appendix 5); (c) include the recommendations of the 'Addendum Flora and Fauna Assessment 521 The Northern Road Londonderry' dated 7 July 2015 and prepared by Fraser Ecological Consulting; (d) include details of the mechanism that will be used to ensure that the vegetation within the area is protected in perpetuity; (e) describe the management measures that will be implemented to maintain and enhance the vegetation within the area over time, including fencing of <i>Dillwynia tenuifolia</i> and <i>Persoonia nutans</i>. This should also include management measures aimed at ensuring that the implementation and management of the APZ protects the <i>Dillwynia tenuifolia</i> and <i>Persoonia nutans</i>: (f) provide details of all trees scheduled for removal noting that trees to be felled with a Diameter at Breast Height (DBH) of 30cm or greater, once felled, are to be sawn into 2-6m lengths and relocated into the proposed conservation area identified in Appendix 5; and (g) include a detailed weed condition map as a baseline from which site rehabilitation/management can be measured. <p><i>Note: all vegetation rehabilitation work is to be supervised by an appropriately qualified and experienced person with minimum</i></p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
	<i>qualifications of TAPE Certificate III in Bush Regeneration or Conservation and Land Management – Natural Area Restoration and 4 years bush regeneration experience:</i>			
Fauna Inspection				
20(ii)	Prior to the commencement of works, including the removal of any trees associated with the approved development, an inspection for resident threatened fauna (including an inspection of hollows) must be undertaken by a qualified wildlife handler/expert and any fauna found relocated.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
HERITAGE				
21	<p>The Proponent must prepare and implement a Heritage Management Plan for the Project to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with OEH by a suitably qualified and experienced expert; (b) be submitted to the Secretary for approval prior to commencement of construction; (c) include programs/procedures for: <ul style="list-style-type: none"> - managing the discovery of previously unidentified heritage relics including halting of works in the vicinity, notification of OEH and the Department; - managing the discovery of human remains including the halting of works in the vicinity, - notification of the NSW Police, the Department, the OEH and Aboriginal stakeholders and not recommending any works in the area unless authorised to do so by the Department and/or the NSW Police (whichever is relevant); and heritage inductions for construction personnel (including procedures for keeping records of inductions). 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
VISUAL AMENITY				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
22	<p>Prior to commencement of construction works, the Proponent must prepare and implement a Landscape Management Plan for the Project to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Penrith City Council (b) be submitted to and approved by the Secretary prior to commencement of construction works; (c) where practicable, provide for the early planting of advanced plants along the northern, and southern boundaries to minimise the visual impacts of the Project; and (d) use predominantly endemic species, (e) where practicable, provide for the early planting of advanced plants along the northern, and southern boundaries to minimise the visual impacts of the Project; and (f) provide for the maintenance of landscaping on site and (g) provide for the early planting of advanced plants along the northern, southern and eastern boundaries to screen and soften the expanse of the main structure. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
22A	<p>Prior to the commencement of construction works of the main building, the Proponent shall prepare a schedule of materials and finishes. To reduce glare and minimise visual intrusiveness, the visible light reflectivity from the materials and finishes must not exceed 20% reflectivity. The schedule of materials and finishes and evidence that these are consistent with the 20% reflectivity must be submitted to and endorsed by the Secretary prior to the issue of the relevant Construction Certificate.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status								
23	<p>Prior to the commencement of construction on the Mushroom Farm site the Proponent must offer and implement (if the offer is accepted) landscaping treatments to the residences in Table 7 below. These measures must be reasonable and feasible, and directed toward minimising the visibility of the operations from the residences on the land.</p> <p><i>Table 7 - residences at which landscape treatment will be offered</i></p> <table><tr><td></td><td>Residences</td></tr><tr><td>Residence 1</td><td>493 The Northern Road Londonderry</td></tr><tr><td>Residence 2</td><td>509 The Northern Road Londonderry</td></tr><tr><td>Residence 3</td><td>1 Thomas Road Londonderry</td></tr></table> <p>If within 3 months of receiving the offer, the Proponent and the owner cannot agree on the landscaping treatment, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p>		Residences	Residence 1	493 The Northern Road Londonderry	Residence 2	509 The Northern Road Londonderry	Residence 3	1 Thomas Road Londonderry	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
	Residences											
Residence 1	493 The Northern Road Londonderry											
Residence 2	509 The Northern Road Londonderry											
Residence 3	1 Thomas Road Londonderry											
24	<p>Prior to installing any boundary fencing on Mushroom Farm site, the Proponent must submit detailed plans of this fencing to the Secretary for approval. These plans must be prepared in consultation with Penrith City Council. Following approval, the Proponent must ensure that the fencing is installed in accordance with the approved plans</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered								
Lighting												
25	<p>The Proponent must ensure that all external lighting associated with the Project on the Mushroom Farm site:</p> <p>(a) does not create a nuisance to surrounding properties or roadways; and</p> <p>(b) complies with AS 4282(INT) 1 995 - Control of Obtrusive Effects of Outdoor Lighting.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered								
Signage												

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
26	The Proponent must not install any advertising signs on the Mushroom Farm site without the written approval of the Secretary .	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
ACCESS ROAD WORKS				
27	<p>Prior to the commencement the operation of stage 1, the Proponent must design and construct the Mushroom Farm site access as a "Type CHR' Rural Intersection, in accordance with the RMS's Road Design Guide and relevant Austroads guidelines, to the satisfaction of the RMS. In finalising the design of the site access, the Proponent must:</p> <p>(a) ensure that the swept path of the largest vehicle entering/exiting the site and manoeuvrability through the site is in accordance with the relevant Australian Standard and to Penrith City Council's satisfaction: and (b) sign a <i>Works Authorisation Deed</i> with the RMS.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
TRANSPORT				
Car Parking				
28	<p>The Proponent must engage a suitably qualified and experienced expert to prepare a car parking study to re-evaluate parking requirements for stages 2 to 5 of the Project on the Mushroom Farm site. The study must:</p> <p>(a) be submitted to the satisfaction of the Secretary prior to commencement of construction works for stage 2; and (c) provide recommendations as to whether the car parking is sufficient.</p>	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
29	<p>The Proponent must ensure that:</p> <ul style="list-style-type: none"> (a) the layout of the proposed parking areas (including driveways, grades, turn paths, sight distances requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) must comply with AS 2890.1-2004, AS2890.6-2009 for cars and AS2890.2 for heavy vehicles; (b) vehicles associated with the Project do not park or queue on the public road network at any time; and (c) all vehicles enter and leave the site in a forward direction; and 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Operational Traffic Management Plan				
30	<p>Prior to the commencement of operation, the Proponent must prepare an Operational Traffic Management Plan (OTMP) for the development to the satisfaction of the Secretary.</p> <p>The Plan must be prepared by a suitably qualified and experienced person(s) as approved by the Secretary and must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council and RMS; (b) detail the measures to be implemented to ensure road safety and network efficiency; (c) detail heavy vehicle routes, access and parking arrangements; (d) detail measures aimed at minimising conflict between heavy vehicle and light vehicles accessing the site; (e) include a Driver Code of Conduct; (f) include onsite traffic control measures; and (g) include measures to minimise traffic noise in particular from reversing, loading and unloading and noise from exhaust brakes. 	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Bushfire Protection				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
31	At the commencement of building works and for the perpetuity of the development, a minimum 25 metre distance shall be maintained as an inner protection (IPA) as outlined in Section 4.1.3 and Appendix 5 of 'Planning for Bush Fire Protection 2006', and the NSW Rural Fire Services document 'Standards for asset protection zones'.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
32	All new construction shall comply with Sections 3 and 8 (BAL 40) of Australian Standard AS3959-2009 'Construction of buildings in bush fire prone areas' and section A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection'.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
33	The provision of water, electricity and gas is to comply with section 4.1.3 of Planning for Bush Fire Protection 2006'.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
34	Property access roads must comply with section 4.2.7 of 'Planning for Bushfire Protection 2006'.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
35	Emergency and evacuation arrangements must comply with section 4.2.7 of 'Planning for Bush Fire Protection 2006'.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered
Integrated Bushfire and Vegetation Management				
36	Prior to the commencement of construction works on the Mushroom Farm Site, the Proponent must demonstrate to the satisfaction of the Secretary that: (a) a minimum 25 metre wide APZ; and (b) appropriate landscaping to screen and soften the appearance of the structure can both be provided.	WHS/HR & Compliance Manager confirmed MOD3 construction has not commenced both in writing and again on-site.		Not triggered

SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT AND REPORTING CONDITIONS

Table 15 Environmental Management and Reporting Conditions

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Environmental Management Strategy				
1	<p>The Proponent must 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>Inspection: The following elements of the Environmental Management Strategy were sighted during the August 2023 inspection of the facility:</p> <ul style="list-style-type: none"> Traffic controls Odour controls Dust controls Chemical handling – spill kits, dangerous good register Water management – western dam, water recycling pit operations 	<p>Documentation viewed:</p> <ul style="list-style-type: none"> <i>Elf Farm Supplies Pty Ltd, Mushroom Substrate Plant, Mulgrave, Environmental Management Strategy, Issue 2.0 June 2022</i> DPE letter to Elf dated 9 September 2022 – Updated Environmental Management Strategy for the Elf Farm and Substrata Plant Project (Schedule 5, Condition 1). In letter DPE approve updated EMS dated June 2022 issue V02.0 and Energy Efficiency Plan prepared by Elf Farm Supplies Pty Ltd, dated May 2022, issue 002. 	Compliant

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
2	<p>The Proponent must 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/criteria; and <p>h) a protocol for periodic review of the plan</p>		<p>In the previous IEA reports the following original management plans were prepared and approved:</p> <ul style="list-style-type: none"> Odour Management Plan Operational Noise Management Plan Construction EMP Energy Management Plan Water Management Plan <p>For this reporting period the following plans were required to be updated:</p> <ul style="list-style-type: none"> Operational Noise Management Plan Water Management Plan <p>Documentation viewed:</p> <ul style="list-style-type: none"> <i>Substrate Plant Mulgrave Operational Noise Management Plan</i>, date 26 June 2018, prepared by Acoustic Consulting Engineers. This updated plan was not required to be approved. Letter from Planning dated 4 February 2019 approving the Operational Noise Management Plan. <i>Elf Farm Supplies Mushroom Substrate Plant, Mulgrave, Water Management Plan</i> Issue 02, May 2018, Perram & Partners. 	Compliant
Review				

3	<p>By the 30 September 2020, and annually thereafter, unless otherwise agreed by the Secretary, the Proponent must 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>Documentation viewed:</p> <ul style="list-style-type: none"> DPE letter to Elf, 26 October 2012 specifying requirements for future AEMRs. Non-compliance against several aspects – Items 5, 6 and 7 not complied with in both or one of the AEMRs reviewed for this reporting period. <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. DPE letter to Elf dated 30 September 2021 – Letter states the Department has reviewed the Annual Review (1 October 2020 to 30 September 2021) and considers it to be generally in accordance with the reporting requirements of the consent and letter. DPE letter to Elf dated 14 December 2022 – Letter – Appendix A – comments on the revised 2021-2022 AEMR as follows: Schedule 5, Condition 3b), c) and d) not adequately addressed. 	Non-compliant
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
Independent Environmental Audit				
3A	<p>By 31 March 2021, and every two years thereafter, unless otherwise agreed by the Secretary, the Proponent must 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 must submit a copy of the audit report to the Secretary , together with its response to any recommendations contained in the audit report.</p>		<p>Documentation viewed:</p> <ul style="list-style-type: none"> 610.18204-ELF IEA 2023 v1.0 20230220 – Offer of Services sighted from SLR Consulting Australia Pty Ltd Offer related to Schedule 5, Condition 3A. Sighted Elf Farm Supplies Pty Limited, signed agreement with SLR (Formal Instrument of Agreement) dated 29 March 2023, Purchase Order Number C24887. Signed by Blake Edwards WHS/HR Manager. This report: <ul style="list-style-type: none"> (a) Compliant - Letter dated 28 March 2023 from Planning to Elf Farm Supplies endorsing Ms Lonergan and Mr Mawaraha as independent environmental auditors. (b) Compliant – refer to Section 3.8 and Appendix D of this report. (c) Compliant - Appendix C of this report. (d) Compliant – Section 3.7 of this report. (e) Compliant – Section 3.6 of this report. (f) Compliant – Section 4 of this report. 	Compliant
Revision of Plans and Programs				

4	<p>Within three months:</p> <p>(a) the submission of an incident report under condition 5 of schedule 5;</p> <p>(b) the submission of an annual review condition 3 of schedule 5, and</p> <p>(c) the submission of an independent environmental audit under condition 3A of Schedule 5; and</p> <p>(d) the approval of any modification of the Conditions of this approval,</p> <p>The strategies, plans and programs required under this approval must be reviewed.</p>		<p>Note MOD 3 was approved on 16 March 2020.</p> <p>Documentation reviewed:</p> <ul style="list-style-type: none"> • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 0, September 24 2021</i>, prepared by Elf Farm Supplies Pty Ltd. No incidents to report – Notifications were made of use of emergency dam but no incident reports. • SLR report 610.18201.00200-R02-V2.0 IEA_2021_R1_20210924 Independent Environmental Audit Elf Farm Supplies. • Emails between Elf and Perram & Partners re annual review of 2021 of plans. Compliance with Condition. • Invoice from Perram & Partners – Invoice No 971, dated 30 November 2021. Full revision of EMS following audit (Nov 21). Compliance with Condition. • <i>Elf Farm Supplies Mushroom Substrate Facility – Annual Environmental Management Review, Mulgrave, NSW, Revision 1, October 11 2022</i>, prepared by Elf Farm Supplies Pty Ltd. No incidents to report – Notifications were made of use of emergency dam but no incident reports. • Review of Management Plans and Strategies – reviewed in October 2022 (this relates to the AEMR covering 2021-2022). Compliance with Condition. • DPE letter to Elf dated 9 September 2022 – Updated Environmental Management Strategy for the Elf Farm and Substrata Plant Project (Schedule 5, Condition 1). In letter DPE approve updated EMS dated June 2022 issue V02.0 and Energy Efficiency Plan prepared by Elf Farm 	Complaint
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Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
			Supplies Pty Ltd, dated May 2022, issue 002. The auditor notes that some plans are required to be updated in relation to MOD 3 activities, however as MOD 3 has not commenced these are not relevant to this condition.	
4A	If necessary to improve the environmental performance of the project or cater for a modification, the strategies, plans and programs required under this approval must be revised, to the satisfaction of the Secretary. Where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review required by Condition 4 of Schedule 5. <i>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.</i>		<ul style="list-style-type: none"> DPE letter to Elf dated 9 September 2022 – Updated Environmental Management Strategy for the Elf Farm and Substrata Plant Project (Schedule 5, Condition 1). In letter DPE approve updated EMS dated June 2022 issue V02.0 and Energy Efficiency Plan prepared by Elf Farm Supplies Pty Ltd, dated May 2022, issue 002. 	Compliant
Incident				
5	The Proponent must 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 must provide the Secretary and any relevant agencies with a detailed report on the incident.	Interview: WHS/HR & Compliance Manager advised no reportable incidents. The Incident reports prepared for 17C are notification reports as no environmental harm reported.		Not triggered
Access to Information				

Condition	Requirement	Interviews and Inspections	Documentation Viewed / Assessment Status	Compliance Status
6	<p>The Proponent must 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 must:</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>This condition related to the previous IEA period (2016).</p>	Not triggered

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), must be implemented for the life of the Project as soon as written endorsement by the Secretary is received	WHS & HR Manager showed the website which has stated MOD 1 completed March 2016.	<p>Documentation viewed:</p> <ul style="list-style-type: none"> Community Consultation Strategy Elf Farm Supplies, 17 May 2016, Revision 1, prepared by Straight Talk. <p>Section 6.2.3 Media release issued on completion of the construction works. This has still not been completed.</p> <p>Reviewed Elf website and sighted online complaints form under Contact Us, as per Section 6.2.5 of the Community Consultation Strategy.</p>	Non-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 3 the Proponent must 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; MOD 2 and MOD 3 and</p> <p>(g) any other material as required by the Secretary</p>		<p>In relation to progressively maintaining the site</p> <p>a) Compliance – sighted current approvals on the website (link to Planning website);</p> <p>b) Compliance –Environmental Management Strategy was sighted main strategy compliance (June 2022). Compliance – the Odour Management Plan, Water Management Plan (June 2020) and Operational Noise Management Plan were located on the website under Approved management plans.</p> <p>c) Non-compliance – the Odour reports were located in the AEMRs for reports prepared during this reporting period for example Appendix E – Monitoring Reports in AEMR 2021 and Appendix E in AEMR 2022, auditor did not deem to be freely available</p> <p>d) Compliance – Complaints Register located under Environmental Reporting;</p> <p>e) Compliance – AEMRs for 2021 and 2022 were uploaded to the website.</p> <p>f) Not applicable – no construction activities occurred during this reporting period.</p>	Non-compliant

APPENDIX B

Photographs from Site Inspections

Photo 1 Solar Power Panels and Odour Control Ducting



Photo 2 Solar Power Panels, Odour Control Ducting and General Site



Photo 3 Biofilter – Lower Section



Photo 4 Biofilter – Upper Section



Photo 5 Surface Aerator and Vegetation Screening/Landscaping



Photo 6 Enclosed Wastewater Pit



Photo 7 Control Room



Photo 8 Control Room

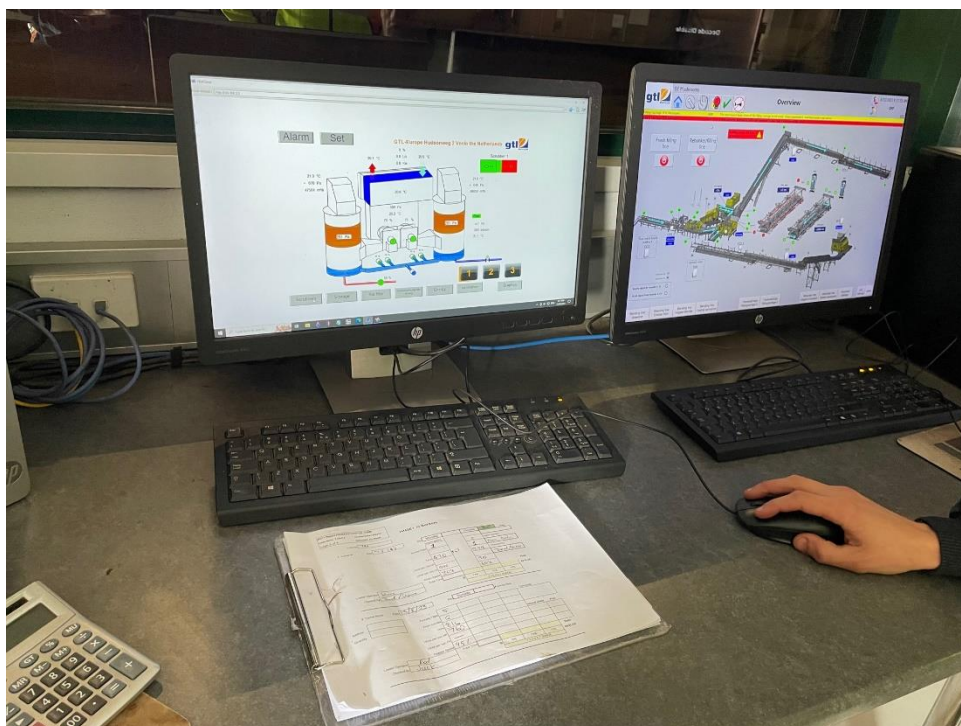


Photo 9 Control Room – Camera Panel – Site



Photo 10 Internal Photo – Phase 1



Photo 11 Scrubber area and Ducting to Biofilter



Photo 12 Double Skin Storage and Spill Kit



Photo 13 Temporary Noise Barrier – Note Emergency Exit Clear for Use



Photo 14 Temporary Noise Barrier



Photo 15 Temporary Noise Barrier

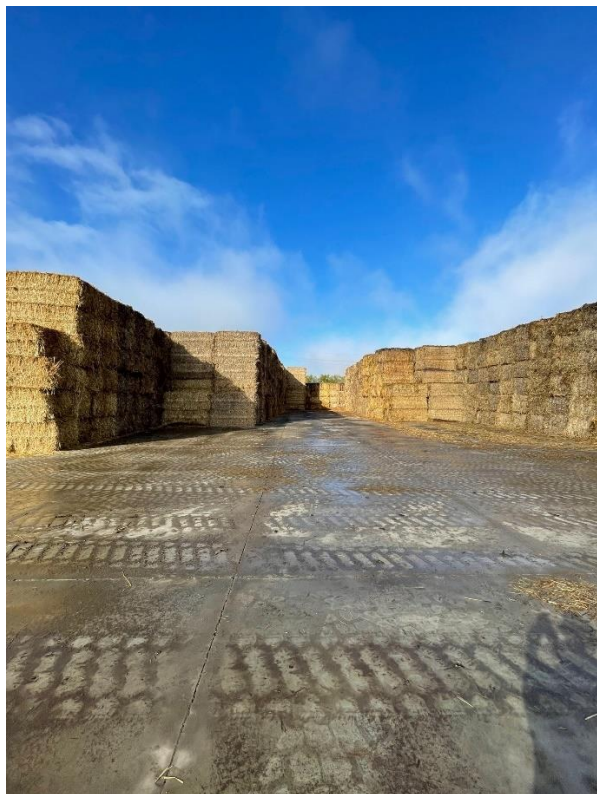


Photo 16 Example of Storage



Photo 17 Example of Bund Usage



Photo 18 Dust and Weed Control



Photo 19 No Queuing At Front Entrance



APPENDIX C

Odour Audit

Odour Audit

Introduction

This section of the report addresses the odour audit of the Project (MOD 1).

SLR has utilised two odour related reports which were prepared during this IEA reporting period by independent teams (two from SLR). SLR was engaged by Elf Farm Supplies to conduct annual odour emission testing in 2021 and 2022 on the Biofilter control system serving the Substrate facility in Mulgrave.

As outlined in the reports, the purpose of the annual odour emission testing was to measure the odour concentration, odour emission rate and odour removal efficiency of the biofilter and compare these against measurements taken in 2018 and those adopted by the Odour Impact Assessment prepared by The Odour Unit dated 28 August 2015.

The IEA audit team have incorporated the results and findings of the reports prepared by SLR required under the IEA. The audit included:

- Site visit to determine compliance with the design features and process management actions to minimise odour emissions as outlined in the revised Odour Management Plan.
- Review of documentation to determine if odour concentrations and mass emission rates used in the Odour Impact Assessment were being achieved once the facility was built and operational.
- Review of documentation to determine if facility achieving the desired odour reduction outcomes.

Documentation Reviewed

The following relevant technical guidelines were reviewed and considered in the odour audit:

- Department of Environment and Conservation NSW – Technical Framework – Assessment and management of odour from stationary sources in NSW, November 2006
- Department of Environment and Conservation NSW – Technical Notes – Assessment and management of odour from stationary sources in NSW, November 2006

The following Elf documents were reviewed and considered in the odour audit:

- SLR Consulting Australia Pty Ltd, *Elf Farm Supplies Biofilter Testing*, September 2021. SLR Ref: 610.30446-R01, Version No. v1.0.
- SLR Consulting Australia Pty Ltd, *Elf Farm Supplies Biofilter Testing*, August 2022. SLR Ref: 610.30900-R01, Version No. v1.0.
- *EPA Environmental Risk Assessment -Assessment No. 4014836* Total Calculated Risk Score – 40 Overall Regulatory Priority – Low
- *EPA Management Category, Assessment No. 4018173, Assessment Period 20/5/2019 to 19/05/2022*
- Environment Protection Authority *EPA Licensing guideline – Environmental risks levels*, March 2022.
- Todoroski Air Sciences, *Odour Management Plan Elf Farm Supplies Substrate Facility*, Prepared for Elf Farm Supplies Pty Ltd, January 2023.

- The Odour Unit, *Elf Farm Supplies Pty Ltd, Mushroom Substrate Plant – Modification to Approved Expansion, Odour Impact Assessment, Mulgrave, NSW*. Final Report. 08.01.2015.
- *Air Quality Assessment, Expansion of Substrate Facility, Mulgrave, Elf Farm Supplies*, 9 December 2010, PAE Holmes.

Audit Findings

Site Visit – Implementation of Odour Controls

The auditor observed no offensive odour at the boundary of the property when arriving for the site visit. During the site visit on 15 August 2023, the auditor reviewed the existing design features and management practices in place against what was specified in the Odour Management Plan (2023).

The General Manager advised that the biofilter media has been changed. This occurred in two stages with the first stage completed in May 2022.

Sections 4.5 and 4.6 of the Odour Management Plan outline the design features for odour control and process management actions **post** MOD 1 completion. Refer to **Table 16**, **Table 17** and **Table 18** for audit findings regarding implementation of the features and actions.

Table 16 Audit Findings of Current Operational Features to Control and Manage Odour

	Evidence	2023 Finding
Fully enclosed processing areas for all major odour-generating processes and products, maintaining a slight negative pressure	Sighted	Compliant
Undertaking Phase 1 production in tunnels	Sighted	Compliant
Undertaking pre-wetting indoors		
Computer controlled fans to maintain optimum air supply and extraction in tunnels	Sighted fans operation and PLC	Compliant
Instrumentation to monitor compost processing variables	Sighted PLC system	Compliant
Enclosed conveyor transport system for material transfer from Phase 1 to Phase 2 tunnels	Sighted	Compliant
Extraction ductwork to extract air from various operating areas of the plant and deliver it to the emissions treatment plant	Sighted	Compliant
Ammonia scrubbers to remove ammonia from exhaust air from the plant prior to exhausting through the biofilter	Sighted	Compliant
A biofilter to accept air from all buildings, after treatment through the ammonia scrubbers	Sighted	Compliant
Site monitoring network consisting of trigger alarms on operational processes	Sighted PLC system	Compliant
Maintaining storage of critical spares for machinery equipment where possible	Elf Farm Supplies General Manager advised sufficient critical spares available.	Compliant

Table 17 Audit Findings of Current Process Management Activities to Minimise Odour

Process Management Actions	Evidence	Finding
Clean up any spillage in front of the ingredients store or elsewhere on a daily basis.	Discussions with Elf personnel advised this completed, no old material sighted during audit.	Compliant
Remove solid material from the collection pit screen regularly	Sighted records	Compliant
Desludge the collection pit (if sludge is present) at regular intervals (at least fortnightly/monthly)	Sighted records	Compliant
Enclosed processing areas for all potentially odour-generating activities	Sighted	Compliant
Keep external doors closed when not in use	Sighted	Compliant
Regular visual integrity checks of enclosures (buildings, conveyors ductwork) to identify potential leaks	Elf personnel conduct weekly walk around of the facility	Compliant
Maintain appropriate temperature and oxygen conditions during composting, consistent with the needs of the process, to minimise odour generation	Sighted PLC system within specifications	Compliant
Air-under system in Pre-Wet shed and in Phase 1 tunnels to improve aeration during composting process	Sighted	Compliant
Automatic control system for fans to maintain optimum air supply and extraction	Sighted PLC system within specifications	Compliant
Enclosed conveyor transport for tunnel loading, dispatch and transfer to Phase 2 tunnels	Sighted	Complaint
Operate the ammonia scrubbers and biofilter in a manner to maximise their efficiency at removing odorous substances and odour causing substances from the air stream	Sighted SLR Odour Emission and Biofilter Control System Audit report, Section 5.2, biofilter efficiency >95%	Compliant
Minimise as far as practicable the duration of any bypassing of the ammonia scrubbers and biofilter for maintenance; and	Biofilter was taken off line for as short of time as possible when changing media	Compliant
Schedule any necessary bypassing of the ammonia scrubber or biofilter to periods when hot substrate is not being turned and when weather conditions will assist dispersion	Not triggered	Not triggered
Monitoring system to detect any faults or operational anomalies and send alarms to the Duty Manager 24/7 and	Sighted PLC system within specifications	Compliant
Potential dam odour is managing by complying with Condition 17B of Schedule 3 of the Project Approval and the water management plan	Aerator sighted during audit	Compliant

Table 18 MOD1 – Odour Control Measures for Operation of the Ammonia Scrubbers

Process Management Actions	Evidence	Finding
Maintain the scrubber per the manufacturers specifications.	Sighted PLC system	Compliant
(i)Acid Scrubber <ul style="list-style-type: none"> Maintaining the pressure difference between the supply air to the scrubbers and the supply air to the biofilter pH value set point at 4.0-4.5 pH EC value (conductivity) set point at 200 mS/cm, max 225mS/cm Monthly inspection of Flow detection sensor and conductivity sensor Connection of the sulfuric acid supply line 	Sighted PLC system	Compliant
(ii)Water make-up system – Monthly Visual Inspection	Sighted inspection report	Compliant
(iii)Mist eliminator / fan of the supply air duct – six monthly visual inspection	Sighted inspection report	Compliant
(iv)Ammonia sulfate pump – Monthly visual inspection	Sighted inspection report	Compliant
(v)Recirculation pumps – Monthly visual inspection	Sighted inspection report	Compliant
(vi)Sulfuric acid pump cabinet - Monthly visual inspection	Sighted inspection report	Compliant
(vii)Sulfuric acid storage tank – Monthly visual inspection	Sighted inspection report	Compliant
(viii)Sulfuric acid filling station – Monthly visual inspection	Sighted inspection report	Compliant
(ix)Ammonium sulfate storage tank – Monthly visual inspection	Sighted inspection report	Compliant
(x)Ammonium sulfate drain station – Monthly visual inspection	Sighted inspection report	Compliant
(xi)Control cabinet – Monthly visual inspection	Sighted inspection report	Compliant

Predicted Odour Levels

A review of the Odour Impact Assessment (OIA) prepared by The Odour Unit (TOU) was undertaken. The findings of the review are summarised below:

- Odour sampling was undertaken for point sources using the “lung method” (Section 4.1) and using an isolation flux hood (IFH) for area sources. The IFH sampling was carried out according to the method prescribed in the United States Environment Protection Agency (US EPA) technical report ‘EPA/600/8-86/008. This method is also defined in Australian Standard AS/NZS4323.4.
- An Odour emission inventory was developed from the sampling and testing program and used in the modelling. Emission sources included in the inventory were:
 - Water Recycle Pit – 2,182 ou.m³/s
 - Bale Wetting Area – 20,909 ou.m³/s
 - Stable Bedding Area – 575 ou.m³/s
 - Biofilter – 20,833 ou.m³/s per section (six sections)

The biofilter emission rate was based on 0.045 m/s exit velocity and average odour concentration of 1,000 ou.

- Phase 2/3 building – Modelled using mean odour concentration testing results (Table 3.3 from OIA – refer to **Table 19**)

Table 19 Phase 2 Odour Concentration Testing Results (from Table 3.3 in OIA)

Process Stage – Phase 2	Cycle Time (hrs)	Mean Odour Concentration (ou)
Tunnel venting	0-2	2,900
Levelling	2-18	5,090
Warm up pasteurisation	18-26	2,390
Pasteurisation	26-34	2,440
Cool-down (conditioning)	34-42	470
Conditioning #1	42-90	332
Conditioning #2	90-114	91
Cool-down (spawn)	114-148	43

Measured Odour Levels - Annual Biofilter Testing

SLR completed the annual biofilter testing on

- 24 June 2021
- 29 and 30 June 2022

This involved measuring the biofilter inlet in parallel with the outlet.

The following is an extract from Section 3 of the report which is a summary of the results and comparison against the OIA and previous measurements.

Table 20 presents a comparison of odour concentrations and emission rates collected as part of this study and compares these against those assumed by the OIA and collected in 2018, 2020 and 2021. In summary:

- The measured biofilter outlet odour emissions are 78% lower than those assumed by the OIA.
- Peak biofilter outlet odour emissions (based on measured concentrations and maximum flow through the biofilter) are estimated to be 63% lower than those assumed by the OIA.
- The average biofilter outlet odour concentration measured is 183 ou which is 63% lower than the odour concentration assumed by the OIA.
- The biofilter odour removal efficiency is greater than 95%

Table 20 Summary of Biofilter results and Comparison against OIA and Previous Measurements

Year	Average Flow through Biofilter during Sampling (m ³ /hr)	Average Odour Concentration (wet) (ou)	Total Biofilter MOER (wet) (ou.m ³ /s)	Biofilter Efficiency	Maximum Flow through Biofilter (m ³ /hr)	Maximum Estimated Biofilter MOER (wet) (ou.m ³ /s)	Change Compared to OIA (%)
OIA		500			390,000	54,168	
2018	204,610	165	9,482	> 95%	390,000	18,073	-67%
2020	189,717	150	8,767	> 95%	402,000	18,576	-66%
2021	193,070	82	4,578	>95%	402,000	9,533	-82%
2022	233,506	183	11,752	>95%	402,000	20,231	-63%

Odour Complaints Review

SLR reviewed the odour complaints for the past 7 years. In order to assess the impact of the construction, commissioning and operation of MOD1, the following key dates are critical:

- Construction commenced in August 2016.
- Installation, connecting and testing of services, plant and equipment commenced in February 2018.
- Introduction of product took place in May 2018 to enable testing and commissioning of the odour management system.
- Works were complete for MOD1 on 30 June 2018.
- Operations commenced on 1 July 2018, commissioning and fine tuning of the new plant continued through until end of October 2018.

Table 21 summarises the odour complaints received by Elf Farm Supplies since September 2012.

Table 21 Summary of Odour Complaints since September 2012

Complaints Period	Number of Complaints	Number of Wind Direction - Confirmed	Number of Wind Direction - Uncertain	Number of No-Location of Complaint Given	Mushroom Substrate Process		
					Complaints when undertaking Transfer	Complaints when Blending Phase 1	Complaints when Blending PW
Sept-Dec 2012	2	1	1	1	n/a	n/a	n/a
2013	109	43	46	22	22	13	39
2014	68	30	30	9	9	13	17
2015	125	74	32	8	14	44	22
Jan-Sept 2016	35	20	15	-	9	22	8
Sept 2016 – Oct 2017	53	10	21	4	28	12	19
Sept 2017 – Aug 2018	18	0	16	2	0	11	1
Sept 2018 – Aug 2019	1	1	0	0	0	0	0
Sept 2019-Aug 2020	0	0	0	0	0	0	0

Complaints Period	Number of Complaints	Number of Wind Direction - Confirmed	Number of Wind Direction - Uncertain	Number of No-Location of Complaint Given	Mushroom Substrate Process		
					Complaints when undertaking Transfer	Complaints when Blending Phase 1	Complaints when Blending PW
Sept 2020-Aug-2021	0	0	0	0	0	0	0
Sept 2021-Aug-2022	0	0	0	0	0	0	0
Totals	411	179	161	46	82	115	106

Source: 2022 AEMR, Elf Farm Supplies (September 2022)

Three alleged odour complaints were received via the EPA on 31 August 2022 at 14:30, 5 September 2022 at 16:30 and 24 September 2023 at 11.19am. The first two complaints were conveyed to Elf on 6 September 2022. The complaints were investigated by Elf and report supplied to the EPA as requested. EPA carried out an inspection of the facility on 14 October 2022.

EPA advised via email the following on 19 October 2022

As discussed on the day, the EPA note that the main source of odour observed at the premises during the inspection was from the emergency dam water. The EPA understand that this dam was breached during recent flood events and the odours are likely a result of this flood water. This flood water may have been impacted by the nearby sewage treatment plant, and the dam has potentially become anaerobic due to the excessive nutrient load. It is also noted that leachate from the biofilter flows into the dam and is an ongoing operational source of inflow into the dam.

Elf engaged a third party to assist in odour management controls for the Western Dam and by 31 October 2022 they had implemented the recommendations of the third party and installed a surface aerator and applied Biostim powder. The details were emailed to the EPA on 31 October 2022. No further complaints have been received by Elf or the EPA.

The auditor sighted the aerator and was advised that the powder is being used.

A review of the Elf Farm Supplies Complaint Register showed that there have been no odour complaints recorded by the company since the middle of November 2017. The EPA have received complaints and advised Elf during the same period. **Table 22** summarises the number of complaints received by each party.

Table 22 Odour Complaints Since November 2017

Period	No. of Odour Complaints Received Directly by Elf	No. of Odour Complaints Received by the EPA and Elf advised of the Complaint
14 Nov 2017 to 13 Dec 2017	0	1
13 Dec 2017 to 14 Jan 2018	0	0
14 Jan 2018 to 31 Jan 2018	0	0
February 2018	0	2
March 2018	0	1
April 2018	0	1
May 2018	0	4
June 2018	0	0

Period	No. of Odour Complaints Received Directly by Elf	No. of Odour Complaints Received by the EPA and Elf advised of the Complaint
July 2018	0	4*
August 2018	0	2*
September 2018	0	0
October 2018	0	0
November 2018	0	1
December 2018	0	0
1 January 2019 to 31 December 2019	0	0
1 January 2020 to 31 December 2020	0	0
1 January 2021 to 28 February 2021	0	0
28 February 2021 to 31 December 2021	0	0
1 January 2022 to 31 December 2022	0	3
1 January 2023 to 12 March 2023	0	0

Odour Impact Assessment Review

The Odour Impact Assessment undertaken by The Odour Unit modelled three scenarios:

- *Scenario 1:* Proposed modification interim stage: Raw Materials Area and Recycled Water Handling Upgrade. The source groups modelled included emission from bale wetting area, stable bedding area and water recycled pit only. The raw materials area at this stage is contained, and that is set to zero emissions.
- *Scenario 2 – Biofilter system:* Modelled emissions from the biofilter system at 1,000 odour unit (ou) mean target concentration performance with containment of all other emission areas and sources. This scenario does not include the initial stages of Phase 2, refer to Scenario 3; and
- *Scenario 3 – Phase 2 and 3 Upgrade conditions.* Includes emission from the later stages of Phase 2 and all of Phase 3 from the roof exhaust vents from the extended and new Phase 2/3 Buildings. It is assumed emissions during the early stages of the Phase 2 process cycle are directed to the Emissions Plant and Biofilter System. The model scenario represents the exhaust emissions of the worst-case 24 hour snapshot, which was determined to be a total of 26,625 ou.m³/s (one hour average) running over a 24 hour period.

The results of the dispersion modelling for the three scenarios were:

- *Scenario 1:* Odour modelling showed exceedance of the 2 ou odour performance criterion for the urban areas to the south-west, west, northwest and northeast of the Facility. There is also an exceedance of the 4 ou to 7 ou criteria for the semi-rural and industrial areas to the east and south-east.
- *Scenario 2:* Odour modelling showed compliance with the 2 ou odour performance criterion *for most of the urban areas* (southwest, west, northwest and northeast) and compliance was achieved with the 4 ou to 7 ou odour performance criteria for the semi-rural and industrial areas to the east and south-east of the facility. It was noted that an urban area to the northwest is within the 2 ou contour. TOU stated the “exceedance shown in part of the urban area to the northwest is not considered to be problematical”.
- *Scenario 3:* Odour modelling showed compliance with the 2 ou for all urban areas and with the 4 ou to 7 ou criteria for the semi-rural and industrial areas.

Conclusions & Recommendations

Based on the site observations, review of the odour monitoring data, annual biofilter testing, odour complaints, odour impact assessment report and the EPA letters, SLR deems the MOD1 to be achieving the desired objective to minimise odour emissions from the site and achieving the predictions in the Odour Impact Assessment.

The SLR IEA audit team recommends that the biofilter testing be changed to every 18 months or when media is changed instead of annual as the system has been performing for the past 5 years.

APPENDIX D

Consultation with Key Stakeholders

DPE

Hi Sandy,

Thank you for your email. Laura has recently changed teams, therefore, I will be the Compliance Officer managing Elf Mushroom Farm and Substrate Plant MP08_0255.

From our records, I have identified two separate Warning Letters which were issued to the project between March 2021 and March 2023. I have also identified several incident reports, submitted following the 2022 flooding events. One of the incident reports resulted in a record breach for the delayed notification of the incident (9 days after the incident occurred).

I have attached a copy of the Warning Letters and the record breach correspondence for your information.

I request that you please focus on the project's implementation of noise mitigation measures, such as the acoustic wall, and the project's remediation of the emergency dam.

The department also requests you conduct the Independent Environmental Audit (IEA) in accordance with Schedule 5, Condition 3A (Mod 1), with the Independent Audit Post Approval Requirements (IAPAR's) and with the feedback provided following the 2021 IEA report, with correspondence submitted 28 September 2021 (attached). For your information, the IAPAR's can be found here: <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>

Please feel free to give me a call to discuss the matter using the details below.

Kind regards,
Astrid Christensen
Compliance Officer

EPA

Good afternoon Sandy,

Thank you for your email dated 8 August 2023 inviting comment from the Environment Protection Authority (EPA) in regard to Elf Farm Supplies - Independent Environmental Audit - 2021 to 2023.

The EPA encourages the undertaking of independent audits as a useful tool for industry to ensure it is meeting its environmental objectives and environment protection licences requirements.

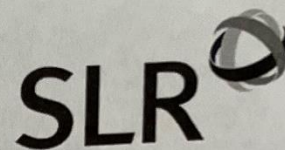
The EPA does not provide specific input to independent audits and I thank you for your request.

Kind Regards,
Evan

Evan Guyatt
Operations Assistant
Regulatory Operations – Metropolitan West
NSW Environment Protection Authority
D 02 9995 6220

APPENDIX E

Attendance Registers



ELF FARM SUPPLIES PTY LTD - Independent Environmental Audit

REGISTER OF ATTENDANCE

15 August 2023

Elf Farm Supplies – Office – 108
Mulgrave, Mulgrave NSW

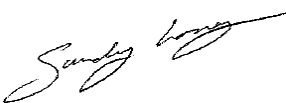
OPENING MEETING		
Name	Position	
BLAKE EDWARDS	WHS/HR Manager.	
DAVID TOLSON	GM	

CLOSING MEETING		
Name	Position	
BLAKE EDWARDS	WHS/HR Manager.	

Filename: Register of Attendance - August 2023.docx

APPENDIX F

Independent Auditor Form

Independent Audit Report Declaration Form	
Project Name	Elf Farm Supplies Pty Ltd
Consent Number	MP 08_0255 (MOD 1)
Description of Project	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.
Project Address	108 Mulgrave Road, Mulgrave New South Wales
Proponent	As above
Title of Audit	Independent Environmental Audit
Date	20 September 2023
<p>I declare that I 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 the <i>Independent Audit Post Compliance Requirements (Department 2019)</i>; 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, objectively and in an unbiased manner; I am not related to any proponent, owner or operator of the project neither as employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent or child. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent or child; neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and I have not accepted, not intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the 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"> Under Section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and The Crimes Act 1900 contains other offences relating to false and misleading information; section 307B (giving false or misleading information - maximum penalty 2 years imprisonment or 200 penalty units, or both). 	
Signature	
Name of Lead / Principal Auditor	Sandy Lonergan
Address	120 High Street North Sydney
Email Address	slonergan@slrconsulting.com
Date	September 2023

APPENDIX G

Auditors CV and Approval Letter

Blake Edwards – Compliance Manager
Elf Farm Supplies
ACN 131 333 830
108 Mulgrave Road
Mulgrave NSW 2756

22 March 2023

BY EMAIL ONLY: blake@elffarm.com.au

Dear Mr Edwards

**Auditor Endorsement Request – Elf Mushroom Substrate Plant (MP08_0255)
Independent Environmental Audit 2023**

I refer to your request (MP08_0255-PA-25) for the Secretary's endorsement of suitably qualified, experienced and independent persons to prepare the 2023 Independent Environmental Audit (IEA) for the Elf Mushroom Substrate Plant (MP08_0255), as modified (**approval**).

The Department of Planning and Environment (**department**) has reviewed the nominations and information you have provided and has endorsed the following audit team from SLR Consulting Australia Pty Ltd:

- Ms Sandy Lonergan as lead auditor;
- Mr Varun Marwaha as odour technical specialist; and
- Mr Michael Brecko as odour technical specialist.

The IEA must be prepared, undertaken and finalised in accordance with Condition 3A of the approval. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Laura Papoulias on 02 8289 6879, or email compliance@planning.nsw.gov.au.

Yours sincerely

Julia Pope – Team Leader Compliance/Metro

As nominee of the Planning Secretary

CURRICULUM VITAE



SANDY LONERGAN

TECHNICAL DIRECTOR

Acoustics & Vibration, Asia-Pacific

QUALIFICATIONS

BAppSC 1993

Dip PM

Bachelor of Applied Science – Environmental Assessment and Management (University of Newcastle)

Diploma in Project Management

Qualified Lead Auditor for Management Systems Team Audits

Qualified Lead Auditor for Quality Audits (ISO9001)

Qualified Lead Auditor of Occupational Health and Safety Management Systems

Qualified Lead Auditor for Environmental Management Systems (ISO14001)

Certificate of Wastewater Treatment, Meadowbank TAFE (1994)

EXPERTISE

- Project management
- Environmental compliance audits
- Development and auditing of environmental management systems to ISO/IEC14001
- Quality, health and safety and ISO17025 auditing
- System development and management to ISO/IEC17025, ISO/IEC9001 and ISO18001
- Due diligence audits
- Environmental management plans
- Environmental monitoring programs

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. She has developed into a diligent and effective Project Manager.

Between 2006 and 2011 she was the Operational and Environmental Manager of an emissions testing company. Her primary responsibility was to run the company (project manage), which included but not limited to planning (quoting – price, time, resources), contract management, scheduling, ensuring client requirements were met, communicating with internal and external stakeholders, customer feedback (complaint management).

Her role included developing in-house systems to improve the efficiency of the business whilst at the same time as reducing risk to the business. Sandy also developed, implemented and maintained the company's NATA accreditation to ISO/IEC17025 for the company.

Sandy has experience over 25 years experience in project managing a range of projects across a variety of industries. She has experience across a range of industries, including but not limited to road, rail, coal seam gas, coal, petroleum (refineries), meat industry, food manufacturers and glass manufacturing.

Sandy is a qualified quality, health & safety, environmental auditor to the relevant international standards. She has been previously engaged by NCSI to conduct EMS certification audits on their behalf.

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

Since joining SLR she was the Project Director of all Air Quality projects and more recently transferred into the Acoustic team to be the Project Manager on key Transport for NSW projects.

Due to her expertise in management systems and auditing skills she was SLR Quality and NATA manager for 8 years, which included conducting and managing the company's internal and external audits in relation to ISO9001 & ISO/IEC17025.

PROJECTS	
	Environmental Audits
Development Consent of Allied Mills (2022)	Independent Environmental Audit of Allied Pinnacle facility at Picton for NSW Department of Planning and Environment
Development Consent of Allied Mills (2022)	Independent Environmental Audit of Allied Pinnacle facility at Kingsgrove for NSW Department of Planning and Environment
Development Consent of Allied Mills (2020)	Independent Environmental Audit of Allied Pinnacle facility at Picton for NSW Department of Planning and Environment
Development Consent of Allied Mills (2019)	Independent Environmental Audit of Allied Pinnacle facility at Kingsgrove for NSW Department of Planning and Environment
Mayfield Concept Plan Concept Approval	Independent Environmental Audit for Port of Newcastle
Elf Farm Supplies Project Approval (2021)	Two yearly Independent Environmental Audit for NSW Department of Planning and Environment
Mayfield No. 4 Berth Development Consent	Independent Environmental Audit for Port of Newcastle for NSW Department of Planning and Environment
Development Consent of Allied Mills (2017)	Independent Environmental Audit of Allied Mills facility at Picton for NSW Department of Planning and Environment
Elf Farm Supplies Project Approval	Independent Environmental Audit for NSW Department of Planning and Environment
Fairview and Arcadia Valley Project Areas of Coal Seam Gas	Third Party Compliance Environmental Audit for Santos
Coal Seam Gas Project Development	Environment Protection and biodiversity Conservation Act (EPBC) Audit for Santos for Commonwealth Government
Fairview Project Area	Third Party Compliance Environmental Audit for Santos
Fairview and Arcadia Project Areas	Third Party Compliance Environmental Audit for Santos
Shoalhaven Starches	Annual Environmental Compliance Audits for Department of Planning
NSCI	ISO/IEC 14001 Certification audits on behalf of NSCI including Rockdale Beef, Baiada Poultry, Tetra Pak, Panasonic, BlueScope Steel
	HSE Audits
LNG Development Project in PNG	Internal HSE Gap Audit against client specifications for ERIAS

	Project Management
Warringah Freeway Upgrade – Noise Treatment Program - Transport for NSW	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$7,000,000
Brenic Constructions – Freight Noise Abatement Program	Project Manager for Brenic Constructions Freight Noise Abatement Program which SLR conducts site visits and prepares Scope of Work reports – budget for this project is approximately \$100,000
Sydney Metro – Noise Abatement Program	Project Manager for Sydney Metro for SLR Consulting – budget for the project is approximately \$200,000
M6 Stage 1 – Noise Treatment Program – Transport for NSW	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$250,000
WestConnex – Noise Treatment Program – Transport for NSW	Project Manager for Transport for NSW for SLR Consulting – budget for the project is approximately \$300,000
Freight Noise Abatement Program (FNAP) (2017 – 2018)	Project Manager for Transport for NSW for SLR Consulting – budget for 2017 \$750,000-\$1,000,000
At Property Treatment Program (FY 2017)	Project Manager for Sydney Metro for Transport for NSW – budget \$500,000
Department of Defence Asbestos Management and Dust Monitoring Program	Project Manager for Department of Defence – 12 months – budget \$200,000
Background Ambient Air Monitoring Study, Coal Seam Gas Field, Qld	Project Manager for Santos – 12 months – budget \$250,000
Fairview and Arcadia Valley Project Areas of Coal Seam Gas – Third Party Audit	Project Manager for Santos – budget - \$130,000
MEMBERSHIPS	
Professional membership	Environment Institute of Australia

CURRICULUM VITAE



VARUN MARWAHA

PRINCIPAL

Air Quality, Asia-Pacific

QUALIFICATIONS

BEng	2006
Cert IV	2020

Bachelor of Engineering - Chemical, University of Sydney
Certificate IV in Government Investigations (NSW EPA)

EXPERTISE

- Project Management
- Air Quality Impact Assessments (AQIA)
- Air Quality Management Plans (AQMP)
- Air Quality Audits
- Technical Peer Reviews
- Emissions Estimation
- Dispersion Modelling
- Field Odour Surveys
- Ambient Air Quality Monitoring
- Odour Sampling and Analysis in accordance Australia Standard (AS) 4323.3

Varun is a Principal Air Quality Consultant working within the Air Quality team with over 15 years of air quality and process engineering experience.

Varun is experienced in air quality and odour impact assessments, emission inventories (including National Pollutant Inventory), air quality dispersion modelling (including Ausplume, CALPUFF and CAL3QHCR), air quality monitoring (including odour), meteorological monitoring, meteorological modelling (The Air Pollution Model [TAPM] & CALMET), greenhouse gas assessments (inc NGER) and overall project management.

Varun has extensive experience in emission inventory development and management using various modelling tools and software. This includes estimation of emissions from various sources including waste management facilities (inc landfills and MRFs), agricultural operations, industrial operations, power generation plants, roads and shipping.

Varun is experienced in designing and undertaking field our surveys to provide empirical data on odour impacts from existing sources such as poultry farms, composting operations, landfills and soil remediation projects.

He has exceptional communication skills and is experienced in presenting the results of air quality assessments and studies to both technical and non-technical audiences.

Varun is a a Certified Air Quality Professional (CAQP) and a Certified Practicing Project Manager (CPPM).

PROJECTS

Odour Impact Assessments

**ACT NoWaste
Landfill, Materials
Recycling Facility and
Green Waste processing
Facility
2017-ongoing**

This long term (4+ years) project involves ongoing odour monitoring at the landfill active face, and community odour surveys over 3 days. The report is prepared in response to ACT EPA's request to conduct regular monitoring and the effectiveness of ongoing mitigation measures such as use of different landfill cell covers including soil types and non-permeable tarpaulin.

The Project also involves real time monitoring of odorous gases at the three sites and use of telemetry to report any spikes and correlation with any community complaints.

**Riverstone East Precinct,
NSW, Australia (2020 –
Ongoing)**

Project Manager and Air Quality Consultant for the Riverstone East Precinct air quality assessment. The work has included peer review of air quality assessments previously prepared for the precinct and pet food manufacturing facilities located within the precinct, gap identification and provision of advice to the NSW DPIE in relation to the recommended path forward for comprehensively quantifying and assessing impacts from identified sources on the future residents of the precinct.

Proposed Residential Development, Tahmoor, NSW, Australia (2017)	Varun performed Ambient Odour Field Assessments (odour surveys) for a proposed residential development in western Sydney to inform an air quality impact assessment for the site. The surveys were performed to assess the likely impact zone associated with odours from an existing turkey farm and small animal abattoir in the area. Work included the completion of multiple surveys at various times of the day and under different meteorological conditions, and the preparation of a technical report summarising the findings, including maps showing the results of each survey.
Proposed Extension to Sewage Treatment Plant (STP), Kempsey, NSW, Australia	The aim of the project was to quantify and assess the odour impacts due to the proposed extension to the existing sewage treatment plant facility. The project included desktop research for odour emissions data from existing similar sewage treatment plants and optimising (using dispersion modelling) the location of new sewage treatment plant including the process equipment.
Proposed Grilled Chicken Shop, NSW, Australia	Assessment of odour impacts from the proposed grilled chicken shop based on the odour emissions from similar existing facilities.
Proposed Waste Water Treatment Plant (WWTP), QLD, Australia	Assessment of odour impacts due to proposed WWTP in order to service a proposed development for 1,500 EP based on odour emissions from similar existing facilities.
Proposed Extension to Sewage Treatment Plant (STP), NSW, Australia	Assessment of odour impacts due to proposed extension to the existing STP based on odour monitoring program conducted on site.
Opportunities and Constraints	
Opportunities and Constraints Assessment, Proposed North Ryde Station Precinct Project, NSW	<p>Commissioned to undertake air quality assessments (for construction and operational phases) in support of a rezoning application for the North Ryde Station Precinct.</p> <p>Operational - A dispersion modelling study was undertaken to determine the potential constraints for development associated with the operation of a nearby waste transfer station, a neighbouring crematorium, and road traffic exhaust emissions from the existing local road network and as a consequence of the operation of the Project.</p> <p>Construction – A risk-based assessment was undertaken to assess the potential for air quality impacts on nearby sensitive land uses (including residences, commercial and industrial land uses) due to site preparatory works for the Project.</p>
MEMBERSHIPS	
NSW/ACT Branch Committee Member	Clean Air Society of Australia and New Zealand (CASANZ)
ACCREDITATION	
Certified	Certified Air Quality Professional (CAQP), CASANZ
Certified	Certified Practicing Project Manager (CPPM), UNE

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New Plymouth 4310
New Zealand
T: +64 0800 757 695

CURRICULUM VITAE



MICHAEL BRECKO

ASSOCIATE

Air Quality/Acoustic and Vibration, Asia-Pacific

QUALIFICATIONS

BEng

2003

Bachelor of Engineering (Environmental) Honours Class II Division II, University of Western Sydney, NSW, Australia

EXPERTISE

- Project and Client Management.
- Detailed Knowledge of Legislative Requirements for Air Emission Testing.
- Odour Monitoring and Odour Surveys
- Operating and Managing NATA accredited odour lab.
- Operating and Managing NATA Accredited Gravimetric Lab.
- Vast Range of Ambient, Stack and Workplace Air Quality Monitoring and Assessment.
- Preparing State and National Regulatory Reports.
- Delivering High Quality NATA Internal Audits and Training Reports.

Michael is a Senior Consultant in the Air Quality team and has 15 years' experience in Environmental Consulting and Emission Monitoring. Michael is currently assisting the Acoustic Team in delivering the Noise Insulation Program for the Warringah Freeway Upgrade.

Michael has extensive experience in working in many industries including but not limited to petroleum (refineries), power and gas facilities, glass manufacturing, waste management facilities, paint manufacturers and food processing manufacturers.

Michael has developed a specialism in air quality monitoring and analysis of emissions to atmosphere – stack and ambient, workplace occupational health contaminants, odour – point sources, area sources and ambient sources, and environmental audits and reporting.

His main responsibilities include designing, servicing and maintaining, reporting and managing environmental monitoring projects, laboratory and equipment management, project and client management, provide adequate internal and client training, as well as hold approved field and laboratory NATA signatory prerequisites for a range of environmental monitoring and analysis activities.

Michael operated and managed a NATA accredited gravimetric and odour laboratory for nine years.

PROJECTS

Odour Emission Monitoring (incl. sampling, analysis, engineering calculations and reporting)

Regional Funds Management, Griffith, NSW Australia

Conduct suitable site specific odour measurements from a poultry facility to demonstrate legislative compliance and report results to supplement air quality models for proposed expansion.

The Ranch, Griffith, NSW Australia

Conduct suitable site specific odour measurements from a poultry facility to demonstrate legislative compliance and report results to supplement air quality models for proposed expansion.

Sanitarium, Berkley Vale, NSW, Australia

POEO compliance monitoring and reporting of food manufacturing facility for particulates, odours and acid suite to supplement clients proposed throughput increase and the impact at sensitive receptors.

Horney & Associates, Bourke, NSW, Australia	Conduct suitable site specific odour measurements from a goat facility and report results to supplement air quality models for proposed abattoir.
Elf Farm Supplies, NSW Australia	Conduct suitable site specific and boundary odour field surveys from a mushroom composting facility to demonstrate regulatory licence compliance and to supplement modification to operations for proposed expansion.
SUEZ, Kemps Creek, Eastern Creek and Rockdale Facilities, NSW, Australia	Conduct suitable source odour measurements and boundary field surveys from a waste facility to assess impact on receptors for proposed expansion.
Real Foods, St Peters and Erskine Park, NSW, Australia	Conduct suitable field odour surveys for a meat packing facility to assess compliance at sensitive receptors as well as conduct particulate and odour samples from point sources to supplement an air quality impact assessment for proposed new site.
West Connex, St Peters, NSW, Australia	Conduct suitable field odour surveys to assess impact on sensitive receptors during excavation works at the West Connex project site.
Child Care Facility, Leppington, NSW, Australia	Conduct suitable odour field surveys for proposed childcare facilities to assess air quality impact from neighbouring facilities.
ProTen, Henderson WA, Australia	Conduct annual site specific odour measurements from a poultry facility to demonstrate regulatory licence compliance.
GD Pork, WA, Australia	Implement odour mitigation measures into odour management plan for WA Piggery.
Advanced Pet Care, Kwinana, WA, Australia	Conduct suitable field odour measurements of a pet food facility to assist client in identifying odour sources to supplement design strategies to mitigate emissions on neighbouring facilities.
	Ambient Emission Monitoring (incl. sampling, analysis, engineering calculations and reporting)
RMS, Sydney Harbour Bridge, NSW, Australia	Bi weekly ambient dust monitoring at 3 monitoring locations and regulated areas lead monitoring during lead paint blasting at the Sydney Harbour Bridge. Dust and lead monitoring to address impact of falling dust on workers within a work area at the North Pylon on Sydney Harbour Bridge.
Centennial Coal, NSW, Australia	Conduct 12 months compliance monitoring and reporting for TSP, PM ₁₀ and PM _{2.5} , including continuous monitoring in accordance with regulatory licence requirements and meteorological monitoring at Centennial's Cooranbong, Lidsdale, Charbon, Newstan, Neubeck, Angus Place, Mandalong and Clarence sites.
U&D Mining Industry Australia, Broughton ,QLD Australia	Conduct 6 months compliance monitoring and reporting for continuous PM ₁₀ and dust deposition at 2 monitoring locations in accordance with legislative requirements to supplement air quality models to assess impact on receptors for proposed mining expansion.
Santos, Roma and Fairview, QLD Australia	Conduct 6 months background monitoring and reporting for continuous NO _x , CO and

	meteorological parameters at 2 monitoring locations in accordance with legislative requirements to supplement air quality models to assess impact on receptors for proposed mining expansion.
VHM Exploration, Goschen, VIC, Australia	Conduct 12 months of background monitoring at 4 monitoring locations including continuous monitoring in accordance with legislative requirements for PM ₁₀ and PM _{2.5} , Metals, Silica and dust deposition to supplement air quality models to assess impact on receptors for proposed mining activities.
Atlas Iron Limited, Wodgina, WA, Australia	Conduct a short term (1 month) compliance monitoring and reporting for continuous PM ₁₀ and dust deposition at 1 monitoring locations in accordance with legislative requirements to supplement air quality models to assess impact on receptors for proposed mining expansion.
Aurecon, RAAF Base, Darwin, NT, Australia	Conduct a series of short term (3 month) monitoring and reporting events for continuous PM ₁₀ and dust deposition at 3 monitoring locations in accordance with legislative requirements to pro-actively manage on-site stockpile dust concerns.
Vista Gold, Mt Todd Mine, NT, Australia	Conduct 12 months of pre-baseline dust deposition monitoring and reporting at 10 monitoring locations in accordance with legislative requirements to supplement air quality models to assess impact on receptors for proposed mining expansion.
BMD Constructions, Tiger Brennan Drive, Darwin, NT, Australia	Conduct a series of short term (3 month) monitoring and reporting events for dust deposition at 6 monitoring locations in accordance with legislative requirements to pro-actively manage construction earthworks dust concerns.
	Workplace Emission Monitoring (incl. sampling, analysis, engineering calculations and reporting)
RMS, Bradfield Tunnel, NSW, Australia	Dust and lead monitoring during cleaning and removal works on Bradfield Tunnel.
RMS, Sydney Harbour Bridge, NSW, Australia	Fresh air monitoring of supply lines for workers during lead paint blasting cleaning and removal works on Sydney Harbour Bridge.
Boral Plasterboard, NSW Australia	Conduct CO monitoring to assess impact on workers from forklift exhausts operations within the workplace environment.
Magic Poly, Wetherill Park, NSW, Australia	Conduct workplace monitoring and audit of spray booth facility for particulates, odours and volatile organic compounds.
Australian Refined Alloys, NSW, Australia	Quarterly workplace and Ambient dust - particulate & lead compliance monitoring, lead recovery facility.
DIC Australia , NSW, Australia	Workplace particulate and VOC compliance monitoring from paint manufacturing facility.

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	Stack Emission Monitoring (incl. sampling, analysis, engineering calculations and reporting)
ConocoPhillips, NT and QLD, Australia	Quarterly compliance emission testing of oil & gas facility for combustion gases, particulates and hydrogen sulphide.
Lend Lease, Sydney, NSW, Australia	Quarterly, six monthly and annual diesel generator compliance emissions monitoring for combustion gases and particulates at Sydney Exhibition Centre Glebe Island.
Qenos, Botany, NSW, Australia	Annual compliance emission testing of petrochemical facility for combustion gases, sulphur compounds, chlorine, hazardous substances and particulates.
Origin Energy, North Sydney, NSW, Australia	Annual compliance emission monitoring of gas engines for combustion gases and volatile organic compounds.
Superior Systems, Balgowlah, NSW, Australia	Diesel engine POEO and Euro 3 standards emission compliance monitoring for combustion gases and particulates.
TSF Engineering, NSW, Australia	Gas engine POEO compliance emission monitoring.
Aurizon Operations, Newcastle, NSW, Australia	Locomotive diesel engine POEO compliance monitoring for combustion gases, particulates and volatile organic compounds.
MacDow Geosea JV, North Queensland, Australia	Marine diesel engine IMO compliance monitoring for combustion gases and volatile organic compounds.
	Legislative Environmental Reporting (incl. engineering calculations and reporting)
Shoalhaven Starches, NSW, Australia	Annual NPI and LBL Annual Return reporting, food processing facility.
PPG Industries, NSW, Australia	Annual LBL Annual Return reporting, paint manufacturing facility.
Renewed Metals Technology, NSW, Australia	Annual NGER reporting, lead recovery facility.