



Independent Environmental Audit

Boral Kooragang Recycling Facility

Boral Recycling (NSW/ACT) Pty Ltd

1 / 24 Egret Street, Kooragang, New South Wales

Prepared by:

SLR Consulting Australia

SLR Project No.: 630.032403.00001

29 September 2025

Revision: v1.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
Draft	22 September 2025	Stephen Shoesmith	Anna Cochrane Sean Wilson	N/A
Final	29 September 2025	Stephen Shoesmith	Sean Wilson	Boral

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Boral Recycling (NSW/ACT) 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.



1.0 Executive Summary

SLR Consulting Australia Pty Ltd (SLR) was commissioned to undertake an Independent Environmental Audit (IEA) for the Boral Kooragang Recycling Facility (Boral Kooragang) to meet the requirements of Conditions C18 and C19 of Development Consent (SSD-7038).

This IEA has been completed as per the Boral Kooragang Audit Program (2025), the AS/NZS ISO 19011-2018: *Guidelines for Auditing Management Systems* (Standards Australia, 2015) and with consideration to the *Independent Audit Post Approval Requirements, dated 2020* (Audit Guidelines).

The IEA has assessed compliance with the key approvals and documentation, including:

- Conditions of SSD 7038.
- Management Plans prepared under SSD 7038 (where applicable).
- Mitigation Measures detailed in Appendix 2 of SSD 7038.
- Environmental Protection Licence EPL 11968.

The site component of the IEA was undertaken on the 19 August 2025, with SLR being supplied additional documentation and information requested following the site inspection.

During the audit, it was evident that the operation of the site is being undertaken in a responsible manner generally in accordance with SSD 7038, EPL 11968, and the relevant environmental management plans.

The Boral Environmental Business Partner NNSW and Kooragang Site Manager interviewed demonstrated a thorough understanding of the systems and measures implemented to manage impacts during the construction phases of the project.

Overall, 220 conditions were identified, 70 (32%) were not triggered during the audit period, and seventeen (17) (8%) were a note for information. Of the assessable, triggered conditions, 125 (94%) were assessed as compliant and 8 (6%) were assessed as non-compliant with SSD 7038 and EPL 11968.



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Appendix D	Audit Declarations
Appendix E	Site Inspection Photographs



Acronyms and Abbreviations

CEMP	Construction Environmental Management Plan
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment
EPA	Environment Protection Authority
IEA	Independent Environmental Audit
OEMP	Operational Environmental Management
PIRMP	Pollution Incident Response Management Plan
SWMMP	Surface Water Mitigation and Monitoring Plan
SWCP	Surface Water Characterisation Plan
TfNSW	Transport for New South Wales



2.0 Introduction

2.1 Background

Boral Recycling (NSW/ACT) Pty Ltd operates a materials recycling facility (Facility) at Kooragang located at 1/24 Egret Street, Kooragang Island (See **Figure 1**). The Facility was approved in 2003 by Newcastle City Council to operate a mobile crushing plant to recycle slag and building waste.

In 2019 an expanded Facility was approved under SSD 7038, facilitating a two-stage expansion. Stage 1 permits the receipt and processing capacity at the facility of up to 350,000 tonnes per annum (tpa) of general solid waste (non-putrescible) and storage of up to 100,000 tonnes (t) of general solid waste (non-putrescible) at any one time. Stage 2 permits additional disturbance and increase waste storage capacity to 144,000 tonnes at any one time. Two infiltration basins would be installed to capture run-off.



Figure 1: Site Location

The Facility is established with separate areas for unloading, processing, storage and despatch (shown in Figure 2). Manoeuvring and stockpile areas are located on compacted base.

Incoming loads enter off Egret Street, proceed to the weighbridge and initial load inspection point, and then enter the internal road network. Incoming trucks proceed to the secondary load inspection point before unloading. Outgoing trucks utilise the internal road network and the wheel wash before existing through the single entrance/exit driveway off Egret Street.

Waste materials are temporarily stockpiled as raw feed before processing. Processing may consist of simple blending, crushing and screening, stabilisation or a combination of all processes, subject to product specification.





The Facility is currently in the process of constructing Stage 1 of the approval to increase production at the facility to 350,000 tonnes per annum. The current permitted production from the site is limited to 130,000 tonnes per annum until construction of Stage 1 is completed.

Commencement of Stage 1 Operations has not been triggered.



2.2 Audit Team

The audit was undertaken by the audit team presented in **Table 1**. The lead auditor, Stephen Shoesmith, is certified as a Lead Environmental Auditor by Exemplar Global (Certification No. C-428261, expires 23 July 2026), and was assisted by Anna Cochrane (Certification No. C-427136, expires 17 Mar 2026). Stephen and Anna were endorsed by the Department of Planning, Housing and Infrastructure as the independent audit team.

Table 1: Audit Team

Name/Role/Contact Details	Qualifications	Experience
Stephen Shoesmith Lead Auditor Project Manager Principal Consultant - Environmental Approvals, Closure & Management (02) 4037 3200 	Master of Integrated Environmental Management Bachelor of Environmental Science Lead Auditor (ISO 14001:2015 Environment; Certificate No. C-428261 expires 23 Jul 2026)	Stephen is a Principal Consultant in the SLR Environmental Approvals, Closure and Management team and has demonstrated compliance, assessment and policy experience. Stephen has significant industry experience (site and corporate experience) in environmental management, project management, extraction plans, environmental impact assessment, land restoration, decommissioning and closure planning, risk assessment as well as facilitation and preparation of Management Plans. Stephen has also worked as a regulator within the Department of Planning, Industry and Environment, which included post approval reviews, Policy reforms and Major Project Assessments.
Anna Cochrane Assistant Auditor QA / QC Principal Consultant - Environmental Approvals, Closure & Management (02) 4037 3200  	Master of Occupational Health, Safety & Environment, (50% complete) Certificate IV (Workplace Assessment & Training) Graduate Diploma in Soil Science Bachelor of Science (Geology) Lead Auditor (ISO 14001:2015 Environment; Certificate No. C-427136, expires 17 Mar 2026) Internal Auditor (ISO 9001 Quality), ISO 22000 Food Safety, ISO 31000 Risk, ISO 45001 OH&S, ISO 55001 Asset) Accredited Environmental Auditor (Victorian Desalination Project) Lead ICAM Incident Investigator) Level 1 Incident Controller – AIIMS	Anna is an environmental, safety and systems manager with over 25 years' experience in contaminated sites, industrial facilities, and waste management matters across a wide range of operational and green/brownfield facilities. Anna's experience includes environmental assessment, remediation, compliance, due diligence, licensing, incident response, Integrated Management Systems (IMS), auditing, and certification management. Multi-jurisdictional and multi-industry experience enables Anna to support clients wherever they are located. Anna is an experienced Auditor's Representative / Program Manager for statutory environmental risk (contaminated sites & industrial facilities) audits in a variety of jurisdictions, as well as range of third-party OHS and environmental compliance audits. Anna also has extensive experience for the design, implementation, management, and audit of complex Integrated Management Systems and compliance frameworks. This includes certification as Lead Auditor (ISO 14001 Environment); Internal Auditor (ISO 9001 Quality, ISO 45001 OH&S, ISO 55001 Asset), alignment of IMS to these and a variety of other requirements including ISO 22000 Food Safety, ISO 31000 Risk, regulatory and contractual overlays.

2.3 Audit Objectives

The purpose of this Independent Environmental Audit is to assess compliance with conditions of the Approval, the environmental performance of operations activities allowed by the approvals, and their effects on the surrounding environment.



Audit objectives align with Condition C18 and C19 of SSD 7038 and the Audit Guidelines, and include:

- Be carried out by a suitably qualified, experienced, and independent audit team.
- Include consultation with relevant agencies / stakeholders.
- Assess the environmental performance of the project, and its effects on the surrounding environment.
- Determine whether the project is complying with the relevant standards, performance measures and statutory requirements.
- Review the adequacy of Management Plans for the project, compliance with the requirements of the approvals, and any other licences and approvals.
- Recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.

2.4 Audit Scope

The scope of this audit includes the assessment of compliance with the following approvals:

- Conditions of SSD 7038.
- Management Plans prepared under SSD 7038 (where applicable).
- Mitigation Measures detailed in Appendix 2 of SSD 7038.
- Environmental Protection Licence EPL 11968.

The physical boundaries of the facility and the audit are the areas defined within Appendix 1 of SSD 7038 and specifically, Lot 12 DP 1032146 Egret Street, Kooragang Island.

2.5 Audit Period

The following audit period applies to this audit align with Condition C18 and C19 of SSD 7038, and the Boral Compliance Monitoring, Reporting and Independent Audit Programs submission to DPHI, dated 16 December 2024.

- Audit Period: 10 July 2019 to 19 August 2025.
- Audit Inspection: Before 31 August 2025.
- Audit Report: Before 30 September 2025.

2.6 Audit Report

This audit report has been prepared to document the audit methodology, findings, evaluation and recommendations. The audit report is supported by the following appendices:

- **Appendix A:** Independent Audit Table.
- **Appendix B:** Consultation.
- **Appendix C:** Audit Endorsement and Program.
- **Appendix D:** Audit Declarations.
- **Appendix E:** Site Visit Photographs.

It is understood by SLR, that Boral will prepare a response to the IEA and submit this report and the response by 30 September 2025.



3.0 Audit Methodology

3.1 Independent Audit Scope Development

The audit compliance tables presented in **Appendix A** were prepared to document all conditions to be assessed as part of this audit. Audit scope development included consultation with agencies and stakeholders (see **Section 3.5**).

3.2 Selection and Endorsement of Audit Team

The endorsed audit team is presented in **Section 2.2**. A copy of the endorsement, dated 10 June 2025 is provided in **Appendix C**.

No technical specialists were required by the Department in undertaking this IEA.

3.3 Compliance Evaluation

The IEA was undertaken on site by Stephen Shoesmith (Lead Auditor) with Anna Cochrane (Assistant Auditor) completed remote auditing and QA reviews.

Information was provided by Boral's representatives, prior to, during and following the audit site visit.

The methodology for the IEA consisted of the following key steps:

- Introductory and close out meetings.
- Reviewing key documents provided prior to the audit.
- Consultation with agencies as per the audit requirements prior to the site component.
- Site component of the audit on 19 August 2025 – including inspections and discussions with Boral representatives.
- Review of additional relevant documentation provided during and after the site inspection.
- Client review and comment on the draft audit report.

A large amount of evidence was viewed and collected as part of the audit, including reports and correspondence. While this key evidence has been referenced in the Independent Audit Table in **Appendix A**, it has not been attached to this audit report.

Collectively, the site inspections, interviews and evidence was used to complete the Compliance Evaluation.

3.4 Site Visit and Interviews

Introductory and close out meetings were held for the audit. At the opening meeting introductions were made by each of the meeting attendees and SLR explained the audit process. During the close-out meeting a general discussion about compliance and areas for improvement was undertaken. Site interviews were conducted during the site meetings and site inspections with the relevant Boral employees. **Table 2** lists those present during the audit.

Table 2: Site Audit Attendees

Name	Company	Position / Role	Audit Role
Stephen Shoesmith	SLR	Lead Auditor	Lead the Audit



Name	Company	Position / Role	Audit Role
Glenn Cook	Boral	Boral Environmental Business Partner NNSW	Attended throughout the audit. Coordinated provision of audit evidence.
Richard Haskett	Boral	Kooragang Site Manager	Attended audit site interviews and site inspection where required. Provided audit evidence as required.

Information obtained during the interviews conducted whilst on site at the facility, were directly recorded as evidence. The Audit Team also used the interviews as an opportunity to gain an appreciation of the extent to which the measures in place to manage environmental impacts from site operations were understood and implemented.

Site photos of the construction activities were taken to document the inspections, please refer to **Appendix E**.

3.5 Consultation

In accordance with the Audit Guidelines, SLR engaged with DPHI regarding agencies to be consulted during the IEA. DPHI concurred with SLR's proposal to consult with the following agencies:

- Department of Planning, Housing & Infrastructure (DPHI)
- Department of Water (Water).
- Newcastle City Council (Council).
- Environment Protection Authority (EPA).

Outcomes of the consultation and findings of the IEA are presented in **Section 4.9**.

3.6 Compliance Status Descriptors

The terms used in the audit to describe compliance of the site with the relevant approval documentation are outlined in **Table 3**

Table 3: Compliance Status Descriptors

Assessment status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all the elements of the requirement have been complied with within the scope of the audit.
Non-compliant	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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
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 3 as required by the Audit Guidelines.	



4.0 Audit Findings

4.1 Approval and Document List

The following approvals and documents have been assessed as part of this IEA;

- Conditions of SSD 7038.
- Mitigation Measures detailed in Appendix 2 of SSD 7038.
- Environmental Protection Licence EPL 11968.

Management Plans required under the above approvals include:

- Construction Environmental Management Plan dated January 2024.
- Operational Environmental Management Plan dated May 2025.
- Surface Water Mitigation and Monitoring Plan dated July 2024.
- Surface Water Characterisation Plan dated November 2019.
- Pollution Incident Response Management Plan dated November 2024.

A range of implementation records and reports were sighted and reviewed as part of the audit.

4.2 Compliance Performance

Table 4 and **Figure 2** summarise the findings of this audit relation to the conditions of SSD 7038 and EPL 11968.

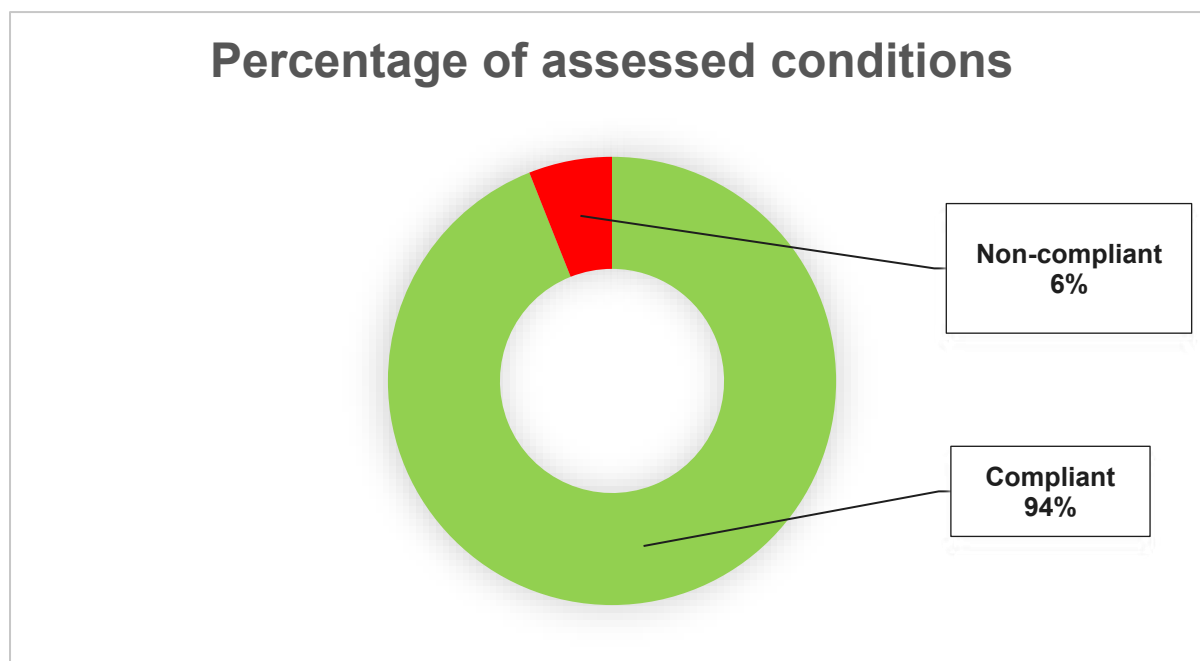
Overall, 220 conditions were identified, 70 (32%) were not triggered during the audit period, and seventeen (17) (8%) were a note for information. Of the assessable, triggered conditions, 125 (94%) were assessed as compliant and 8 (6%) were assessed as non-compliant with SSD 7038 and EPL 11968.

Table 4: Summary Table of Compliance

Compliance Status	SSD 7038	EPL 11968	Total	Percentage of total conditions	Percentage of assessed conditions
Compliant	83	42	125	56.8%	94%
Non-compliant	0	8	8	3.6%	6%
Not Triggered	45	25	70	31.8%	n/a
Note only	4	13	17	7.7%	n/a
Total conditions	132	88	220	100%	n/a
Total assessed conditions (excluding not triggered and notes)			133	60%	100%



Figure 2: Summary Chart showing Compliance



Appendix A presents the detailed Assessment of Compliance against conditions of SSD 7038 and EPL 11968.

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

During the audit period, Boral were issued a Planning Secretary's Direction to adopt the 2020 Compliance Reporting PARs and 2020 Independent Audit PARs (Conditions C15 and C18), dated 13 November 2024.

It is understood that the Direction was issued to clarify inconsistency in the Compliance Reporting and Independent Audit conditions in the consent.

Specific to the IEA, Condition C18 requires an Independent Audit Program no later than 4 weeks before the date notified for the commencement of Stage 1 operations, while Condition C19 requires IEAs to be carried out in accordance with the 2018 Independent Audit PARs. The 2018 Independent Audit PARs were superseded in May 2020 and required audits to be conducted during construction and operation.

Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024.

Boral completed the site component of this IEA on 19 August and is on track to submit the audit report and response by 30 September 2025 in accordance with the Audit Program.

4.4 Non-Compliances

Table 5 summarises the non-compliances identified against the assessed conditions along with relevant comments and recommendations.

4.5 Opportunities for Improvement

In determining compliance with the assessable, triggered Audit Criteria, 5 Opportunities for Improvement (OFI) were identified for audit criteria / sub-criteria where while compliance



may have been indicated, opportunity to improve and strengthen operational systems or processes was also identified during the audit assessment.

Observations and recommendations outlining these opportunities for improvement are summarised in **Table 5** and have been included in the independent audit table presented in **Appendix A** for Boral's optional consideration as part of continuous improvement review processes.

These opportunities for improvement were identified based on the audit team experience, engagement with agencies and audit participants, and observations related to environmental performance. The opportunities for improvement relate to updates that could be made to improve management plans, compliance reports and the development consent conditions.



Table 5: Summary of Audit Findings

Unique Finding Identifier	Schedule and Condition Number	Compliance Requirement	Audit Finding	Recommendation
AUDIT NON-COMPLIANCES				
NC1	EPL 11968 M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Refer to Condition M2.2	Refer to Condition M2.2
NC2	EPL 11968 M2.2	Point 2	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Sampling for metal analytes was not conducted in accordance with Condition M2.2 of EPL 11968 on 28 April 2025. During the first discharge event following the licence variation in October 2023, a sample of the discharge was collected, however, the sample was not analysed for any metal analytes and only pH and Electrical Conductivity results were assessed. Following the event, a review of the sampling processes was undertaken to rectify the error. The sampling laboratory was supplied with the updated licence requirements and the subsequent sampling event in May 2025 was in full compliance with the requirements of the licence.	Conduct a review of site systems documents, including the EPP and sampling processes to ensure that monitoring meets requirements of the recently revised EPL 11968.
		PollutantUnits of measureFrequencySampling Method		
		Aluminiummilligrams per litreDaily during any dischargeGrab sample		
		Chromium (total)milligrams per litreDaily during any dischargeGrab sample		
		Coppermilligrams per litreDaily during any dischargeGrab sample		
		Cyanidemilligrams per litreDaily during any dischargeGrab sample		
		Electrical conductivitymicrosiemens per centimetreDaily during any dischargeGrab sample		
		Nitrate + nitrite (oxidised nitrogen)milligrams per litreDaily during any dischargeGrab sample		
		Nitrogen (total)milligrams per litreDaily during any dischargeGrab sample		
		pHpHDaily during any dischargeGrab sample		
		Zincmilligrams per litreDaily during any dischargeGrab sample		
		NC3		
PollutantUnits of measureFrequencySampling Method				
Aluminiummilligrams per litre2 Times a yearGrab sample				
Chromium (total)milligrams per litre2 Times a yearGrab sample				
Coppermicrograms per litre2 Times a yearGrab sample				
Cyanidemilligrams per litre2 Times a yearGrab sample				
Depthmetres (Australian Height Datum)2 Times a yearGrab sample				
Electrical conductivitymicrosiemens per centimetre2 Times a yearGrab sample				
Nitrate + nitrite (oxidised nitrogen)milligrams per litre2 Times a yearGrab sample				
Nitrogen (total)milligrams per litre2 Times a yearGrab sample				
pHpH2 Times a yearGrab sample				
Zincmilligrams per litre2 Times a yearGrab sample				
NC4	EPL 11968 M4.2		The licensee must ensure that the meteorological station on the premises complies with the requirements in the latest version of the Approved Methods of Sampling of Air Pollutants in New South Wales.	The weather station was supplied and is maintained by VGT. No documentation was available to the time of the audit to confirm that the weather station complies with M4.2
NC5	EPL 11968 R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). POEO Website Annual Return for 2021/22 was not submitted within 60 days of 15 September.	Complete a review of the EPP and confirm the submission timing for the Annual Return is captured.



Unique Finding Identifier	Schedule and Condition Number	Compliance Requirement	Audit Finding	Recommendation
NC6	EPL 11968 E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential regulatory Authority (APRA) must be provided to the EPA. The financial assurance must be in favour of the EPA in the amount of five hundred thousand dollars (\$500,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The licensee must provide to the EPA the financial assurance of \$500,000 by no later than 5.00 p.m. on Tuesday 31 March 2020.	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. The Non-Compliance specifically relates to the requirement for Boral to provide the EPA a copy of the assurance by 5:00PM on Tuesday 31 March 2020. Evidence to demonstrate this correspondence had occurred was not available at the time of the audit.	Source evidence of providing the required information to the EPA, or formally issue a copy of the financial assurance to the EPA.
NC7	EPL 11968 E1.2	The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. However the non-compliance status of this Condition relates to the evidence of Boral providing the written confirmation to the EPA that the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	Source evidence of providing the required information to the EPA, or formally issue a confirmation of the Bank issuing the guarantee is subject to the supervision of APRA to the EPA.
NC8	EPL 11968 E1.7	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E1.1, and b) the adjusted financial assurance as required by condition E1.5 and E1.6.	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. However the non-compliance status of this Condition relates to the evidence of Boral providing the financial assurance in accordance with this Condition.	Source evidence of providing the required information to the EPA, or formally issue the original counterpart guarantee to the EPA.
OPPORTUNITIES FOR IMPROVEMENT				
OFI1	SSD 7038 A15	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	DPHI Approval Letter, dated 23 October 2023 noting consultation associated with the Surface Water Mitigation and Monitoring Plan. DPHI Approval Letter, dated 12 December 2023 noting consultation associated with the Surface Water Characterisation Plan. DPHI Approval Letter, dated 7 August 2024 noting consultation associated with the Surface Water Mitigation and Monitoring Plan. EPA Notice of Variation dated October 2023, June 2024, January 2025 and July 2025. Consultation has been undertaken. Specific details as to the A15 requires are inferred / assessed but are not explicitly detailed.	Consider as part of the next Management Plan revision, including a consultation summary table. If adopted, the table should reflect each specific element of Condition A15.
OFI2	SSD 7038 B6	The Applicant must ensure that the waste screening and inspection protocols operate in a manner which does not cause trucks to queue onto the carriageway except with the express consent of the PON.	SLR have sighted an Inspection and Screening Receivals Protocol dated 28 February 2025. While the protocol details screening and receivals, detail is missing information pertaining to queuing on the carriageway.	Consider reviewing and updating the Inspection and receivals Protocol to include information on queuing on the carriageway. As part of the update a document version control table should be included.
OFI3	SSD 7038 B55	The Applicant must ensure the lighting associated with the development: a) Complies with the latest version of AS 4282-1997 – 'Control of the Obtrusive Effects of Outdoor Lighting' (Standards Australia, 1997); and b) Is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	As part of personnel interviews, Boral confirmed that no construction works have been undertaken outside of hours stipulated by B48 (Daytime Only). For the operational times for the site. The Kooragang Site is permitted to operate 24 hours per day (Monday to Saturday). The site is only restricted to construction activities between 7 am and 6 pm.	Prior to the commencement of operations, consider undertaking a formal compliance review of AS4282 and determine requirements if night time operations were to be conducted.



Unique Finding Identifier	Schedule and Condition Number	Compliance Requirement	Audit Finding	Recommendation
			Although the facility is licenced for 24 hours operations, operations are restricted as per the website operating times (6:30 am start time, 16:00 Finish time Monday to Friday). Boral advised that there is no lighting currently in place at the Facility. On the basis of Boral's advice and the operating hours of the facility this Condition has been considered as Not Triggered with an Opportunity for Improvement prior to undertaking Operations.	
OFI4	SSD 7038 Appendix 2	Waste Management - Adhere to Boral Inspection and Receivals Protocol, 2018. - Conduct raw material testing in accordance with the NSW EPA's Recovered Aggregate Order 2014, which includes testing for 8 heavy metals, electrical conductivity, foreign material. - Maintain waste screening '2 point inspection' procedure. - Load weighing and docket procedure. - Product testing for asbestos contamination.	Sighted Boral Inspection and Receivals Protocol, 2018. Monthly Work Orders Sighted dated 12 August 2025. Sighted Tracking sheets for aggregate testing. EPP 2025 Action Sighted Lab Comms. Sighted Testing Plans for May 2025. It is noted that waste feedback adopts a report by exception. Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for today (records rego, customer, product, truck, source, weight). Asbestos - Hibbs and Associates. Report by exception. Sample Paper, dated 8 July 2025.	Consider establishing a feedback mechanism for sampling results so that compliance can be positively verified.
OFI5	EPL 11968 O4.1	A copy of the current version of the Pollution Incident Response Management plan (PIRMP) for the premises must be kept at the premises.	PIRMP, dated August 2025. Available at the following link. https://www.boral.com.au/sites/default/files/2025-08/Kooragang%20Recycling%20PIRMP%20-%20Aug%202025.pdf. Sighted PIRMP Test paperwork dated 19 December 2024. It is noted that the PIRMP references superseded Regulations.	Consider updating the PIRMP against 2022 Regulations and Guideline.



4.6 Previous Audit Recommendations

This audit is the first IEA undertaken for Condition C18. It is noted that at the time of the audit, Boral had not notified the Department of the commencement of Stage 1 Operations.

4.7 EMP, Sub-Plans and Compliance Documents

The management plans and programs required by SSD 7038 and EPL 11968 were assessed as part of this audit.

Assessment of the management plans has considered both the preparation of the documents in accordance with requirements and the effective implementation of the documented management and mitigation strategies.

The environmental management plans have generally been written in accordance with regulatory requirements and have been implemented adequately onsite. The compliance assessment is presented in the Independent Audit Table in **Appendix A** found that all management plans were assessed as Compliant.

4.8 Environmental Performance

Based on audit evidence reviewed, site observations and personnel interviews, a positive level of environmental performance is noted.

4.8.1 Management Commitment and Resourcing

Management representatives demonstrated environmental leadership and commitment to high standard of environmental performance throughout the audit process.

The Boral Environmental Business Partner NNSW and Kooragang Site Manager were knowledgeable of the environmental management systems, compliance requirements, environmental risks and risk controls relevant to the facility.

Training and Competence

A site induction system has been implemented for the site, which includes environmental requirements and responsibilities for facility employees, contractors, and visitors.

The facility induction process for employees and contractors includes training on environmental responsibilities that outlines environmental aspects of the operation, project approval requirements and environmental risk management controls that must be adhered to for work onsite.

A training and awareness program including toolbox talks, HSEQ Alerts and Environmental Training packages has been implemented to ensure that all personnel are trained to perform their work without risk of harm to the environment, and in a manner that complies with project requirements.

Environmental training is facilitated through a company online training and competency system. Training records were sighted during the audit process.

4.8.2 Inspections and Maintenance

Site inspections are undertaken monthly as a preventative maintenance site audit.

The monthly inspections notes a range of aspect to review (General Requirements, Water Management, Land, Waste, Noise, Air Quality, Hydrocarbon, Flora and Fauna and Heritage).

Inspection proformas also note key elements / performance expectations of the abovementioned aspects for personnel to consider in undertaking the inspection.



4.8.3 Environmental Monitoring and Measurement

Environmental monitoring and measurement programs have been implemented during the audit period.

Environmental monitoring activities include weather monitoring, groundwater monitoring, event-based surface water monitoring and integrity monitoring of the surface water management systems, yard pavement and infiltration.

Monitoring of waste management compliance was observed during the site inspection, including the two-stage inspection process and waste type segregation.

4.8.4 Compliance Management and Reporting

Boral has established compliance and data management methods to support ongoing compliance for the operation of the site, and monitoring and reporting where required.

The Boral Environment Permit Planner is an effective tool to identify and manage compliance requirements as well as to promptly track implementation. This tool was used by the Boral HSEQ function and operational teams.

Systems have been established to ensure that any environmental control measures and are tracked to completion, including regular review and reporting on progress.

With limited exceptions, project documentation was noted to be a generally high standard of completeness, accuracy, and timeliness.

4.8.5 Review and Continual Improvement

Environmental compliance is monitored and reviewed throughout the year through the implementation of the Environment Permit Planner as well as monitoring programs and the EPL Annual Return.

Informal reviews by Senior Managers are undertaken on an AdHoc and regular basis to assess implementation of the Environment Permit Planner.

4.9 Consultation Outcomes

Table 6 outlines the stakeholder consultation completed for development of the IEA scope. NSW Water provided detailed comments.

Table 6: Stakeholder Consultation for the Audit

Regulatory Authority	Contact details (name, phone, and email)	Consultation Details	Comment
Department of Planning, Housing & Infrastructure (DPHI)	Heidi Watters Team Leader – Compliance Phone: 02 6575 3401 compliance@planning.nsw.gov.au	Email request for feedback submitted to DPHI on 3 July 2025.	Email received from DPHI on 11 March 2024 stating that “.... <i>The department has no specific focus areas in addition to the consent requirements for this audit. The department concurs with the below agencies for consultation, in addition to any others referenced in the consent requirements.</i> ”
Newcastle City Council (Council)	Phone: 02 4974 2000 Via General Enquiry Form	Email request for feedback submitted to Council on 14 July 2025.	No response received regarding project consultation.



Regulatory Authority	Contact details (name, phone, and email)	Consultation Details	Comment
Environment Protection Authority (EPA)	cc: Steven James Unit Head info@epa.nsw.gov.au	Email request for feedback submitted to EPA on 14 July 2025.	Email received from EPA on 16 July 2024 stating that "...the EPA does not have any comments on the scope of the audit."
NSW Department of Water (Water)	DPIE Water Assessments Mailbox water.assessments@dpie.nsw.gov.au	Email request for feedback submitted to DPW Water on 14 July 2025.	NSW DCCEEW Water Group feedback received dated 15 July 2025 (ref OUT25/8937). Below (Table 7) is a summary of the comments provided and a response to the

Table 7 outlines audit findings in response to detailed comments from NSW Water.

Table 7 NSW Water - Detailed Comments

Regulatory Authority	Stakeholder Comment	Audit Finding
Management Plans	The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: - Water Management Plans, and related sub-plans e.g. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. - Extraction Plans and related sub-plans e.g. Water Management Plan, Subsidence Management Plan.	There is no specific requirement for Water Management Plans and Extraction Plans as noted within NSW Water' comments. As part of the Consent, other management plans related to Water are required include: - Construction Environmental Management Plan, incorporating Erosion and Sediment Control Plan. - Surface Water Characterisation Plan. - Surface Water Mitigation and Monitoring Plan. - Surface Water Quality Validation Report. These plans were approved by the Department. Implementation of key measures within each plan was completed during the audit period, evidenced by the completion of PRP within EPL 11968.
Trigger Action Response Plans	The requirement to prepare and implement trigger action response plan for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.	There is no specific TARP with the CEMP. Annual Report that may address the intent of this comment is Boral's Annual Water Quality and Discharge Report, dated July 2025. This report addresses the requirements of EPL Condition R4.1 and provides information related to surface water, groundwater, stormwater reuse, water balance model, annual pavement monitoring, infiltration monitoring.
Water Supply	Water supply availability is clearly defined for the project.	The Annual Report provides information related to capture and reuse of stormwater. The 2025 is the first Annual Report and the information included is qualitative. The Audit includes a recommendation to include a



Regulatory Authority	Stakeholder Comment	Audit Finding
		quantitative estimate of water capture and reuse in future Annual Reports.
Water Take	Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.	Boral advised that water take under a WAL is not triggered.
Water Metering	Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.	Boral advised that water metering is not triggered.
Licensing	Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.	Boral advised that water licensing is not triggered.
Annual Reporting	Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	Boral advised that annual water reporting is not triggered.

4.10 Complaints

Based on site communications and documentation provided during the audit process there were no complaints received during the audit period. The complaints register was maintained for the site and is available on the project website.

4.11 Incidents

Based on site communications and documentation provided during the audit process there were no reportable non-compliances or incidents during the audit period.

4.12 Actual verses Predicted Environmental Impacts

An assessment of the compliance between actual and predicted impacts documented in environmental impact statement (EIS) for the development (dated December 2015, ESP) is outlined in **Table 8**. The EIS assessed the impacts of proposed increases to stockpiling and production volumes, as well as operational hours at the facility.

Based on the findings of the audit, there is no evidence that actual impacts are greater than predicted as related to Stage 1 Construction activities.

Table 8 Comparison of Actual vs Predicted Impacts

Environmental Issue	Predicted Impacts	Actual Impacts
Stormwater and Groundwater	A Soil and Water Assessment Report was undertaken for the EIS. The focus of the report was to consider potential impacts associated with offsite discharge of surface water and groundwater. Outcomes outlined in the EIS include: Create a flood bund to increase flood storage.	No incidents occurred and no complaints were received relating to Stormwater / Groundwater. Water Management Plans were prepared and approved, including: Construction Environmental Management Plan, incorporating Erosion and Sediment Control Plan.



Environmental Issue	Predicted Impacts	Actual Impacts
	- Retain flood water onsite with floodwater to drain away slowly via the existing infiltration trench and concrete lined dam. - No uncontrolled discharges occurring for event to and including the 1:10 year storm event. - Pollutants conveyed in stormwater runoff would be discharged offsite in significant flood events and/or continue to infiltrate the ground surface.	- Surface Water Characterisation Plan. - Surface Water Mitigation and Monitoring Plan. - Surface Water Quality Validation Report. A number of Pollution Reduction Programs within EPL 11968 have been completed and acknowledged by the EPA through EPL Variations: - Pollution Reduction Study (PRS) 1 - Surface Water Discharge Characterisation Assessment was Completed in 2019 - PRS 2 - Surface Water Mitigation and Monitoring Report was completed in July 2023. - Pollution Reduction Program 3 - Water Pollution Mitigation and Monitoring Upgrades was completed in April 2025. The inaugural Annual Water Quality and Discharge Report noted that recent discharges following significant rainfall and water quality results align with Water Balance predictions and Surface Water Mitigation and Monitoring Plan quality ranges.
Traffic and Access	A Traffic Impact Assessment (TIA) was conducted for the EIS. Predictions associated with construction within the TIA are limited. Overall, the TIA concluded that the expansion would have no significant impacts in regard to the operation of the local and sub-regional road network and can provide appropriate on-site conditions to maximise staff and visitor safety and general operational efficiency.	No incidents occurred and no complaints were received relating to Traffic. Parking for employees and visitors has been implemented.
Air Quality	Potential air quality impacts were considered in a quantitative Air Quality Impact Assessment (AQIA). The AQIA did not consider potential emissions during construction on the basis that emissions during construction would be similar to existing operations. The Department agreed on this basis that dust mitigation measures were in place.	No incidents occurred and no complaints were received relating to Air Quality. During the site inspection, dust generation was noted as minimal, water suppression was observed on stockpiles and sealed roads were sighted. Boral confirmed that street sweeping occurs on a regular basis and that watercarts would be deployed as needed.
Contamination	Contamination was considered as part of the Department's assessment of the expansion proposal. The assessment noted that the proposed expansion had the potential to disturb soils potentially contaminated by previous land uses. A material handling protocol to manage potential contamination was requested by the EPA and included as a Condition.	No incidents occurred and no complaints were received relating to Contamination. A contaminated soil / spoil unexpected finds protocol was included in the approved CEMP. Boral advised no details of contamination observed during construction.
Noise	A Noise Impact Assessment (NIA) was conducted for the EIS. Noise predictions identify that construction noise as a result of the	No incidents occurred and no complaints were received relating to Noise.



Environmental Issue	Predicted Impacts	Actual Impacts
	works associated with the proposed facility would satisfy relevant criteria for all receivers. Results also noted that noise levels from the proposed construction works are anticipated to satisfy standard hours construction noise criteria at all assessed receivers.	No evidence of any additional noise impacts of concern noted to date due to construction activities and the continuation of approved operations. Boral advised that construction was undertaken between 7am and 4pm and that whilst operations are approved for 24-hour activities, operations are limited to 6:30 to 4:00PM.
Waste Throughput Prior to Stage 1 Construction and Operation	Waste production was considered as part of the Department's assessment of the expansion proposal. It was noted that the existing consent (DA 01/2716) did not include throughout limits. For continuing operations (during construction of Stage 1) throughput limits are set at 130,000tpy.	Waste throughput volumes were below the nominated limits. It is noted that Production is tracked and reported on an annual EPL Reporting basis (September to September)

4.13 Site Inspection

Evidence collected through site inspections undertaken during the audit is detailed in the Independent Audit Table in **Appendix A**.

In summary, site inspection observations included the following areas / issues:

- Staff carparking.
- Site fencing.
- Site entrances.
- Signage.
- Site housekeeping – bins, litter, chemical storage.
- Site drainage, sedimentation and erosion controls.
- Site roadways and pavements.
- Hydrocarbon storage area.
- Water management tanks and infrastructure.
- Boundary bunds and drains.
- Site amenity during working hours – noise, vibration, odour, dust.
- Training, awareness & communications with workers – noticeboards, availability of environmental management plans, site inductions, toolbox talks etc.

4.14 Site Interviews

Evidence to support compliance assessment provided by the Boral Environmental Business Partner NNSW and Kooragang Site Manager is detailed in the Independent Audit Table in **Appendix A**.

Information obtained during the interviews conducted with the Boral personnel listed in **Section 3.4** were directly recorded as evidence on site. The Auditor also used the interviews as an opportunity to gain an appreciation of the extent to which the measures in place to manage environmental impacts from site operations were understood and implemented.



4.15 Previous Annual Review or Compliance Report Recommendations

There are no existing recommendations:

- There is no requirements within the Consent for the preparation of an Annual Review.
- This audit is the first IEA undertaken for Condition C18. It is noted that at the time of the audit, Boral had not notified the Department of the commencement of Stage 1 Operations.
- Compliance Reporting undertaken for Condition C15 will commence in early 2026.

Compliance and performance of the development, including appraisal as to whether any opportunities for improvement are identified will be monitored during future audit cycles for in accordance with the approved Audit Plan.

4.16 Key Strengths

During the audit, it was evident that the development of the site is being undertaken in a responsible manner generally in accordance with SSD 7038, EPL 11968 and the CEMP.

The Boral personnel interviewed demonstrated a thorough appreciation of the environmental issues at the site and appropriate environmental management measures and detailed how they had mitigated environmental impacts with upgrades to plant and equipment.

The audit identified good environmental practices on site including:

- Development and implementation of the Environment Permit Planner.
- Governance checks by senior management of site implementation of the Environment Permit Planner
- No environmental incidents or complaints were recorded for the audit period.
- Implementation of key environmental control measures within the CEMP were observed.
- Training is facilitated through online training modules and toolbox talks.

4.17 Audit Reporting

A draft copy of the audit report, audit checklist and audit photos were provided to Boral for review on 22 September 2025. Boral provided some additional information and evidence related to project staging, expected finds and operating hours. The checklists were updated accordingly.

It is noted that Boral disagreed with findings related to the EPL and specifically the Financial Security. In this regard, SLR notes that Boral holds financial assurance (RECY00059) and a copy of the instrument was provided as part of the audit. The non-compliance status of the Conditions relates to the non-availability of evidence for time/date-based requirements of the respective Conditions. Following a further review of the evidence and Conditions, SLR did not change the compliance classification.



5.0 Recommendations

5.1 Non-Compliances

Generally, the identified non-compliances outlined in **Table 5** are considered to be administrative and related to reporting or the supply of information.

Recommendations to address the identified non-compliance includes:

- NC1, NC2 and NC3: Conduct a review of site systems documents, including the EPP and sampling processes to ensure that monitoring meets requirements of the recently revised EPL 11968.
- NC4: Complete a review of the meteorological station / sensors to ensure the meteorological station complies with requirements of M4.2 and establishing a regular maintenance inspection program.
- NC5: Complete a review of the EPP and confirm the submission timing for the Annual Return is captured.
- NC6: Source evidence of providing the required information to the EPA, or formally issue a copy of the financial assurance to the EPA.
- NC7: Source evidence of providing the required information to the EPA, or formally issue a confirmation of the Bank issuing the guarantee is subject to the supervision of APRA to the EPA.
- NC8: Source evidence of providing the required information to the EPA, or formally issue the original counterpart guarantee to the EPA.

5.2 Opportunities for Improvement

As detailed in Section 4.5 and in the compliance table within **Appendix A**, five opportunities for improvement are identified in the Recommendations column for Boral's optional consideration. Opportunities for improvement have been identified based on the audit team experience, engagement with agencies and observations related to environmental performance. The opportunities for improvement relate to improving processes and reporting associated with approval conditions.

These opportunities for improvement include:

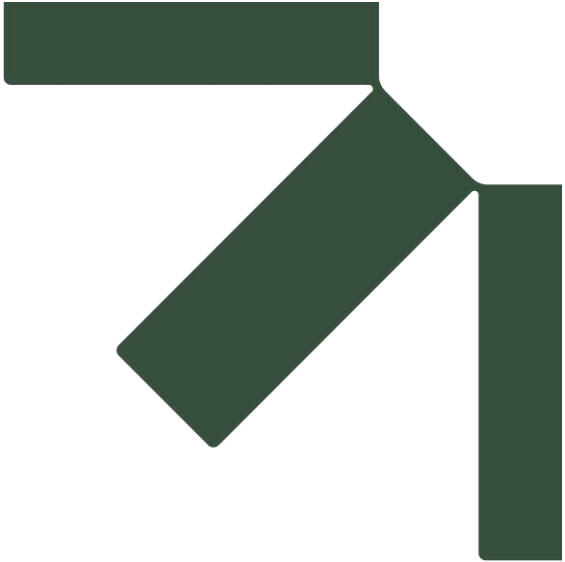
- OFI1: Consider as part of the next Management Plan revision, including a consultation summary table. If adopted, the table should reflect each specific element of Condition A15.
- OFI2: Consider reviewing and updating the Inspection and receivals Protocol to include information on queuing on the carriageway. As part of the update a document version control table should be included.
- OFI3: Prior to the commencement of operations, consider undertaking a formal compliance review of AS4282 and determine requirements if night time operations were to be conducted.
- OFI4: Consider establishing a feedback mechanism for sampling results so that compliance can be positively verified.
- OFI5: Consider updating the PIRMP against 2022 Regulations and Guideline.



6.0 Conclusion

The Auditors found the development to be largely compliant with the requirements of Development Consent SSD 7038 and EPL 11968. There were eight instances of non-compliance identified, affecting seven conditions. The non-compliance classification is viewed as administrative in nature and relate to reporting / agency correspondence and where evidence was not available at the time of the audit. Additionally, several opportunities for improvement were noted. Overall, the management systems, CEMP implementation, and environmental performance of the development were assessed as generally satisfactory for the construction phase."





Appendix A Independent Audit Table

Independent Environmental Audit

Boral Kooragang Recycling Facility

Boral Recycling (NSW/ACT) Pty Ltd

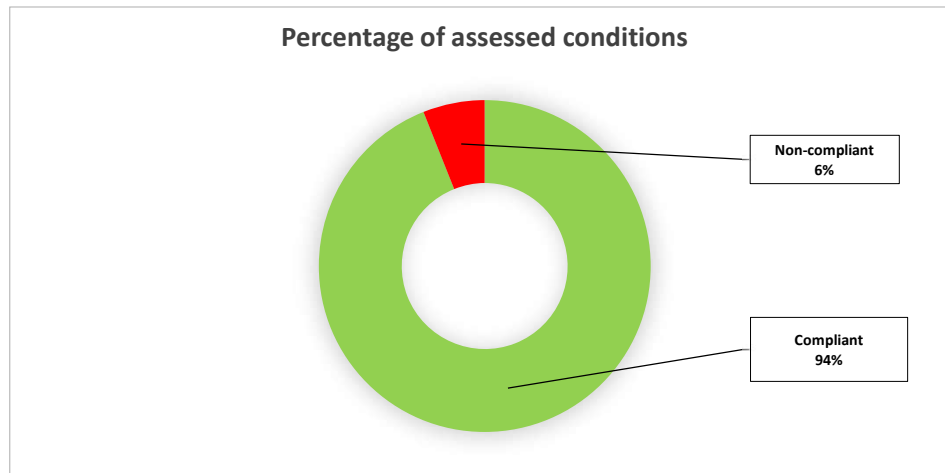
SLR Project No.: 630.032403.00001

29 September 2025

Independent Environmental Audit 2025

Proponent	Boral Recycling
Approval:	SSD 7038, EPL 11968
Project:	Boral Recycling Kooragang
Approval Authority	DPHI
Lead Auditor	Stephen Shoesmith (C 478261 Exp: July 2026)
Audit Team	Anna Cochrane (C 427136 Exp: 17Mar2026)
Audit Period	10 July 2019 to 19 August 2025
Site Visit Date	19 August 2025

Compliance Status	SSD 9394	EPL	Total	Percentage of total conditions	Percentage of assessed conditions
Compliant	83	42	125	56.8%	94%
Non-compliant	0	8	8	3.6%	6%
Not Triggered	45	25	70	31.8%	n/a
Note only	4	13	17	7.7%	n/a
Total conditions	132	88	220	100%	n/a
Total assessed conditions (excluding not triggered and notes)			133	60%	100%



Independent Environmental Audit 2025

Proponent	Boral Recycling	Proponent's Representatives:	Glenn Cook
Approval:	SSD 7038, EPL 11968		Richard Haskett
Project:	Boral Recycling Kooragang		
Approval Authority	DPHI		
Lead Auditor	Stephen Shoesmith (C 478261 Exp: July 2026)		
Audit Team	Anna Cochrane (C 427136 Exp: 17Mar2026)		
Audit Period	10 July 2019 to 19 August 2025		
Site Visit Date	19 August 2025		

COMPLIANCE STATUS LEGEND:
Compliant
Non-compliant
Not triggered
Note only

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
CONSOLIDATED CONSENT - SCHEDULE 2					
A - ADMINISTRATIVE CONDITIONS					
Obligation to Minimise Harm to the Environment					
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	No material harm incidents or complaints have been reported during the audit period, no complaints were received. Review of management plan implementation has found that measures to prevent and/or minimise material harm to the environment have generally been implemented. Implementation of studies and construction of water management infrastructure required to facilitate Stage 1 Operations have been completed. Systems developed, implemented and checked to manage compliance.	Compliant		
TERMS OF CONSENT					
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS and Response to Submissions; (d) in accordance with the Development Layout in Appendix 1; and (f) in accordance with the management and mitigation measures in Appendix 2.	Noted. This IEA has included revision of (a) - (f).	Compliant		
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	Following a site inspection on 7 November 2024, a Secretarial Direction was issued regarding the timing of Compliance Reporting. Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. Boral committed to undertaking Compliance Reports using the 2020 PARs, consistent with the Secretarial Direction.	Compliant		
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted	Compliant		
LIMITS OF CONSENT					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
A5	This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024 outlining commencement was to commence in March 24. Based on personnel interviews, SLR understands that construction commenced as planned. Planned commencement was within 5 Years of Determination.	Compliant		
A6	The only type of waste permitted to be received or processed on the premises is waste classified as general solid waste (non-putrescible).	Noted. Based on personnel interviews, SLR understands that no other waste has been received or processed. During the site visit waste segregation was observed on site, including defined stockpiles and waste bins. SLR discussed and observed the two point waste checking process to confirm waste types during the visit.	Compliant		
A7	The Applicant must not: a)Receive or process more than 350,000 tonnes of waste per year; and b)Store more than 144,000 tonnes of waste at any one time.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Kooragang Recycling - Waste and Production Data 2019 - Present (Spreadsheet). SLR has sighted production data and reviewed EPL Annual Returns indicating waste stored and received is within condition limits. Viewed Production Tacking System during site visit (QRS System). Emails sighted discussing production totals and tracking during site visit between Boral Employees. It is noted that Production is tracked and reported on an annual EPL Reporting basis (September to September)	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
A8	Despite Condition A7(a), the Applicant must not receive or process on-site more than 130,000 tonnes of waste per year until Stage 1 construction is complete and the Planning Secretary has approved the commencement of Stage 1 operations.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Kooragang Recycling - Waste and Production Data 2019 - Present (Spreadsheet). Viewed Production Tacking System during visit (QRS System). Emails sighted discussing production totals and tracking during site visit between Boral Employees. It is noted that Production is tracked and reported on an annual EPL Reporting basis (September to September)	Compliant		
A9	Despite Condition A7(b), the Applicant must not store more than 100,000 tonnes of waste at any one time until Stage 2 construction is complete and the Planning Secretary has approved the commencement of Stage 2 operations.	Not triggered	Not triggered		
A10	Stockpiles of processed and/or unprocessed waste on site must not be more than 15 metres in height when measured from the finished ground level of the site.	The site visit confirmed waste was not stored higher than 15m.	Compliant		
NOTIFICATION OF COMMENCEMENT					
A11	The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least one month before that date: a)Construction; b)Operation; c)Cessation of operations; and d)Decommissioning.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Based on personnel interviews, SLR understands that planned commencement of construction was 1 month following notification and that notification for the commencement of Stage 1 operations or Stage 2 Construction has not been provided to the Department. Boral advised that Start of physical construction works onsite was planned for 22/04/24 but actually started on 02/05/24 according to Rapid induct logs. Sighted KI - Project Schedule	Compliant		
A12	If the construction or operation or decommissioning of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Based on personnel interviews, SLR understands that planned commencement of construction was 1 month following notification and that notification for the commencement of Stage 1 operations or Stage 2 Construction has not been provided to the Department. Boral advised that Start of physical construction works onsite was planned for 22/04/24 but actually started on 02/05/24 according to Rapid induct logs. Sighted KI - Project Schedule	Compliant		
SURRENDER OF EXISTING CONSENTS OR APPROVALS					
A13	Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the existing development consent No. 01/2716 dated 20 February 2003 and issued by Newcastle City Council in accordance with the EP&A Regulation.	DA2001/2716 voluntary surrender of the development consent agreed by NCC, effective 19 September 2019.	Compliant		
A14	Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A13, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under the former Part 4A of the EP&A Act or Part 6 of the EP&A Act as applies from 1 September 2018. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.	DA01/2716 voluntary surrender of the development consent agreed by NCC, effective 19 September 2019. Annual Returns (2019/20) Kooragang Recycling - Waste and Production Data 2019 - Present (Spreadsheet). Based on personnel interviews, and production records below, SLR understands that operations continued in a consistent manner between July and September 2019. Of note is production totals, with waste received between July and September within production limits and below average volumes.	Compliant		
EVIDENCE OF CONSULTATION					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
A15	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	DPHI Approval Letter, dated 23 October 2023 noting consultation associated with the Surface Water Mitigation and Monitoring Plan. DPHI Approval Letter, dated 12 December 2023 noting consultation associated with the Surface Water Characterisation Plan. DPHI Approval Letter, dated 7 August 2024 noting consultation associated with the Surface Water Mitigation and Monitoring Plan. EPA Notice of Variation, dated October 2023, June 2024, January 2025 and July 2025. Consultation was undertaken for specific plans within the consent. It is noted, however that specific details as to the A15 requires are inferred / assessed but are not explicitly detailed. A recommendation has been included for future management plan consultation.	Compliant	OF1	Consider as part of the next Management Plan revision, including a consultation summary table. If adopted, the table should reflect each specific element of Condition A15.
REQUEST FOR INFORMATION					
A16.	The Applicant must retain all weighbridge records as requested by the POEO (Waste) Regulation and for the life of the Development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA.	Boral Inspection and Receipts Protocol, 2018. Monthly Work Orders Sighted dated 12 August 2025. Sighted Tracking sheets for aggregate testing. EPP 2025 Action Sighted Lab Comms. Sighted Testing Plans for May 2025. It is noted that waste feedback adopts a report by exception. Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). Asbestos - Hibbs and Associates. Report by exception. Sample Paper, dated 8 July 2025.	Compliant		
A17.	The Applicant must retain waste classification's records for all wastes received on the site and waste disposed from the site for the life of the Development. The waste classification records must be made immediately available on request by the EPA and/or Secretary.	Boral Inspection and Receipts Protocol, 2018. Monthly Work Orders Sighted dated 12 August 2025. Sighted Tracking sheets for aggregate testing. EPP 2025 Action Sighted Lab Comms. Sighted Testing Plans for May 2025. It is noted that waste feedback adopts a report by exception. Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). Asbestos - Hibbs and Associates. Report by exception. Sample Paper, dated 8 July 2025.	Compliant		
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
A18	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	The CEMP dated 22 January 2024 was approved by the Planning Secretary on 29 April 2024. A draft OEMP dated 12 May 2025, has been prepared based on scope of development stages (Stage 1), as per consent definitions. It is noted that the Project EIS and Consent clearly note the Stages of the Project (Stages 1 and 2). The intent of this condition has therefore been interpreted as staging of activities within each nominated Development stage (staging a within Stage 1 as an example). On this basis the condition is considered to be not triggered.	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
A19	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	As Above	Not triggered		
A20	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	As Above	Not triggered		
PROTECTION OF PUBLIC INFRASTRUCTURE					
A21	Before the commencement of construction, the Applicant must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	Boral confirmed that no construction has required consultation with the relevant owner or provider of services. The site is relatively consistent with the original site at the time of the consent being granted. This condition mainly relates to Stage 2 Construction works.	Not triggered		
A22	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: a)Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and b)Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Boral confirmed that no issues have been recorded relating to this consent condition.	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
DEMOLITION					
A23	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).	Boral confirmed as part of the site visit that no demolition has occurred.	Not triggered		
STRUCTURAL ADEQUACY					
A24	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: •Under Part 6 of the EP&A Act, the Applicant 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 development. •Under Section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District.	Certificates Provided. SLR sighted OC No. 677/2023.02, dated 20 March 2025 and CC No. 677/2023.01, dated 6 March 2025.	Compliant		
COMPLIANCE					
A25	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Boral addresses this requirement through its Environmental Absolutes, which includes operating in compliance with regulatory obligations. Boral Communicates this requirement through inductions to contractors. Tier 1 Contractors are required to complete the Boral HSE Induction every 2 years, Management Mineral Dust in Quarries every year and Boral Product Line Inductions - Quarries every 2 years. Boral Communicates this requirement to employees through ongoing toolbox talk communications. TBT dated 15 July 2025 notes Land Contamination Presentation. TBT dated 28 February 2025 notes Ground Disturbance requirements. TBT dated 28 February 2025 notes an EPA alert regarding fines issues by the EPA related to waste. TBT dated 4 November 2024 notes the site EPP Process for tracking and implementing compliance actions.	Compliant		
CONTRIBUTIONS TO COUNCIL					
A26	Prior to the commencement of Stage 2 construction a payment of a levy of 0.5% of the proposed cost of carrying out the development must be paid to Council under section 7.12 of the EP&A Act.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 2 construction did not occur during the audit period.	Not triggered		
OPERATION OF PLANT EQUIPMENT					
A27	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	During the site visit SLR sighted evidence of work orders in the Boral site management system. Sighted Work Orders with Maximo (Work Order System) for the site loader with. All maintenance – work order, PO, works completed. All equipment / operational elements (fuel tanks for example) are managed and maintained systematically via work orders.	Compliant		
EXTERNAL WALLS AND CLADDING					
A28	Before the issue of a Construction Certificate and an Occupation Certificate, the Applicant must provide the Certifying Authority with the documented evidence and that products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	SLR sighted OC No. 677/2023.02, dated 20 March 2025 and CC No. 677/2023.01, dated 6 March 2025.	Compliant		
A29	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	Sighted OC Portal Receipts, received 20 March 2025 Sighted Letter to DPHI, dated 21 March 2025 Post Consent Acceptance, dated 21 March 2025 Payment sighted, dated 31 March 2025	Compliant		
UTILITIES AND SERVICES					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
A30	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Not Triggered. No construction has required consultation with the relevant owner or provider of services. The site is relatively consistent with the original site at the time of the consent being granted.	Not triggered		
WORK AS EXECUTED PLANS					
A31	Prior to the commencement of Stage 2 operations, work-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 Certifying Authority.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Planned staging (Stage 1) was defined. Stage 2 construction did not occur during the audit period.	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations						
APPLICABILITY OF GUIDELINES											
A32	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Noted	Note only								
A33	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Refer to Condition C16 and C19.	Compliant								
MODIFICATION OF CONSENT											
A34	Prior to the commencement of Stage 2 construction, in order for the development to proceed in a coordinated and orderly manner and to avoid potential conflict with this consent, the Applicant must modify development consent 12/94 (described in Table 1) issued by Newcastle City Council, pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1997 and Clause 97 of the Environmental Planning and Assessment Regulation 2000. The modification of the consent to amend the approved development plans and provide for the necessary works to be carried out to ensure the LP gas storage and distribution terminal has sufficient manoeuvring area to enable heavy vehicles to enter and leave the site in a forward direction. <i>Table 1: Development Consent to be Modified</i> <table><tr><th>Determination Date</th><th>DA Number</th><th>Details</th></tr><tr><td>21 April 1994</td><td>DA12/94</td><td>Establish a LP Gas storage and distribution terminal</td></tr></table>	Determination Date	DA Number	Details	21 April 1994	DA12/94	Establish a LP Gas storage and distribution terminal	Noted, to be reviewed next audit.	Not triggered		
Determination Date	DA Number	Details									
21 April 1994	DA12/94	Establish a LP Gas storage and distribution terminal									
ADVISORY NOTES											
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Noted	Compliant								
PART B SPECIFIC ENVIRONMENTAL CONDITIONS											
WASTE MANAGEMENT											
STATUTORY REQUIREMENTS											
B1	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off-site in accordance with the latest version of EPA’s Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	During the site visit waste segregation was observed on site, including defined stockpiles and waste bins. SLR discussed and observed the two point waste checking process to confirm waste types during the inspection. SLR has no reason to believe effective waste segregation has not occurred during the audit period. Sighted Boral Inspection and Receivals Protocol, 2018. Observed individual stockpiles Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). During the personnel interviews, SLR have sighted a waste register noting loads were rejected. Two in August and one in July 2025.	Compliant								
B2	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	Noted. During the site visit SLR sighted waste classification records. Boral uses the EPA Waste and Resource Reporting Portal (WARRP) System. Sighted waste report examples during site visit. Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). During the personnel interviews, SLR have sighted a waste register noting loads were rejected. Two in August and one in July 2025.	Compliant								
WASTE MANAGEMENT PLAN											

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B3	Prior to the commencement of Stage 1 operations, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by condition C5 and be prepared in accordance with condition C1. The WMP must: a)Detail the type and quantity of waste to be generated during construction and operation of the development; b)Describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEP EPA's Waste Classification Guidelines Part 1: classifying Waste (EPA, 2014) c)Include details of the waste stockpiles limits in the raw feed and finished product storage areas; d)Include procedures for ensuring no build-up of waste will occur in the raw feed waste stockpile area during unexpected machinery breakdown; e)Detail the materials to be reused or recycled, either on or off-site; and f)Detail the requirements for non-conforming waste handling and removal.	Stage 1 Operations did not occur during the audit period. SLR have sighted a final OEMP dated May 2025. This plan will be submitted to the Planning Secretary for approval prior to commencement of Stage 1 operations. SLR notes the OEMP largely address the requirements of condition B3. With the exception of (f), where there is limited detail relating to non-conforming waste handling and removal. This could be updated prior to finalising the OEMP.	Compliant		
B4	The Applicant must: a)Not commence operations until the WMP is approved by the Planning Secretary; and b)Implement the most recent version of the WMP approved by the Planning Secretary.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
WASTE MONITORING PROGRAM					
B5	From the commencement of Stage 1 operations, the Applicant must implement a Waste Monitoring Program for the development. The program must: a)Be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; b)Include suitable provision to monitor the: i)Quantity, type and source of waste received on site; and ii)Quantity, type and quality of the outputs produced on site; c)Ensure that: i)All waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and ii)Staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
RECEIPT, STORAGE AND HANDLING OF WASTE					
B6	The Applicant must ensure that the waste screening and inspection protocols operate in a manner which does not cause trucks to queue onto the carriageway except with the express consent of the PON.	SLR have sighted an Inspection and Screening Receivals Protocol dated 28 February 2025. While the protocol details screening and receivals, detail is missing information pertaining to queuing on the carriageway.	Compliant	OFI2	Consider reviewing and updating the Inspection and Receivals Protocol to include information on queuing on the carriageway. As part of the update a document version control table should be included.
B7	Waste must be secured and maintained within designated waste storage areas at all times and must not leave that site onto neighbouring public or private properties.	During the site visit Waste was secured and maintained within designated storage areas.	Compliant		
B8	The Applicant must only receive waste on site that is authorised for receipt by an EPL.	The site visit confirmed waste inspection points are in effect.	Compliant		
B9	The Applicant must not process cardboard, plastic, garden and/or wood waste received at the site.	SLR has observed no evidence that waste types under B9 were processed during the audit period. Sighted Boral Inspection and Receivals Protocol, 2018. Observed individual stockpiles Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight).	Compliant		
B10	The Applicant must separate and store all cardboard, plastic and garden and/or wood waste received at the site in a skip bin(s) for removal off site.	Sighted Boral Inspection and Receivals Protocol, 2018. Observed individual stockpiles and waste skips Observed and discussed 2 Point Inspection controls. Based on personnel interviews, SLR understands Boral has engaged Cleanaway to collect and dispose of waste as needed.	Compliant		
B11	The Applicant must provide details of the allocated heavy vehicle and source of wastes received on the site to the EPA and the Planning Secretary when requested.	Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). During the personnel interviews, SLR have sighted a waste register noting loads were rejected. Two in August and one in July 2025.	Compliant		
PESTS, VERMIN AND NOXIOUS WEED MANAGEMENT					
B12	The Applicant must: a)Implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and b)Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests vermin or noxious weeds are not present on site in sufficient to pose an environmental hazard or cause the loss of amenity in the surrounding area. Note: for the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.	SLR have sighted periodic Environmental Inspection Checklist form (GPR-HSEQ-4-02-F04) which includes consideration of weeds and feral animals.	Compliant		
SOILS, WATER QUALITY AND HYDROLOGY					
SURFACE WATER CHARACTERISATION PLAN					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B13	Prior to the commencement of Stage 1 construction, the Applicant must prepare a Surface Water Characterisation Plan (SWCP) to the satisfaction of the Planning Secretary. The SWCP must: a) Be prepared by a suitably qualified and experienced person(s); b) Be prepared in consultation with the EPA; c) Identify all the potential pollutants of concern which may be present in the sediment basin and in surface water generated and/or discharged from the site; d) Water sampling and reference to all relevant existing data for all identified potential pollutants of concern in the sediment basin and in surface waters generated and/or discharged from the site, including but not limited to: i) A full suite of metals, polycyclic aromatic hydrocarbons (PAHs) and Total Recoverable Hydrocarbons (TRHs); and ii) Any other potential pollutants such as current or proposed treatment chemical residues. e) Sufficient sampling to capture the full variability of water quality at the site, including average or typical through to worst case scenarios, guided by protocols to ensure that sampling events are triggered by the full range of operational processes that would materially impact water quality, and be linked to ongoing implementation of mitigation measures; f) An assessment of the potential impact of discharges on receiving waters, based on the surface water characterisation and with reference to ANZECC (2000) assessment criteria for freshwater and marine ecosystems (the ANZECC (2000) toxicant decision tree can be used to refine the default trigger values (see Section 3.4.3.2 "Decision tree for applying the guideline trigger values"); g) Specify the analytical limits of reporting used for any existing and new data that is being assessed; and - Compare that limit of reporting to the relevant ANZECC (2000) assessment criteria for freshwater and marine ecosystems; and - Where the limit of reporting does not provide a suitable basis for assessing risk of water pollution, propose alternative options to characterise the risk, including more sensitive laboratory testing or risk mitigation options. h) Consider the human health risks associated with the proposed surface water reuse process at the site. Note: the level of reporting for concentrations of pollutants should be sensitive enough to detect pollutants at levels related to their environmental risk and ANZECC (2000) toxicant trigger value (where available) while having regard to the best available analytical practical quantification limits using available technology. Sampling and analysis for the characterisation must be in accordance with the Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (2004).	Surface Water Characterisation Assessment, dated 1 November 2019. DPHI Approval Letter, dated 12 December 2023 notes that the Surface Water Discharge Characterisation Plan was submitted on 19 October 2023.	Compliant		
B14	The Applicant must not commence Stage 1 construction until the SWCP required by condition B13 is approved by the Planning Secretary.	DPHI Approval Letter, dated 12 December 2023 of Surface Water Discharge Characterisation Assessment (prepared by EEM, dated November 2019, version V2.1). The approval letter confirms consultation with EPA, preparation in accordance with the Pollution Reduction Study and conditions of approval. Boral notified the Department of Planned Commencement on 1 March 2024. Boral confirmed that commencement of Construction occurred generally as per the notification of commencement.	Compliant		
SURFACE WATER MITIGATION AND MONITORING PLAN					
B15	Prior to the commencement of Stage 1 construction and Stage 2 construction, the Applicant must prepare a Surface Water Mitigation and Monitoring Plan (SWMMP) to the satisfaction of the Planning Secretary. The SWMMP must: a) Be prepared by a suitably qualified and experienced person(s); b) Be prepared in consultation with the EPA; c) Be based on the results of the SWCP identified in condition B13, and investigate all practical mitigation and management measures to prevent stormwater and groundwater contamination including covering or sealing of the waste stockpile storage and processing areas; d) Identify contingency options to account for any mitigations measures that do not adequately address the site water pollution risks; and e) Update the SWMMP to reflect any changes to the surface water management system.	SLR have sighted Department approval dated 23 October 2023, of the SWMMP (prepared by EEM, dated 24 July 2024, version V3). The approval letter notes a submission date of 11 October 2023.	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B16	The Applicant must: a)Not commence Stage 1 or Stage 2 construction until the SWMMP required by condition B15 is approved by the Planning Secretary; b)Not commence Stage 1 operation or Stage 2 operation until the approved management and mitigation measures have been installed and implemented; and c)Implement the most recent version of the SWMMP approved by the Planning Secretary for the duration of the development.	SLR have sighted Department approval dated 7 August 2024, of the SWMMP (prepared by EEM, dated 30 July 2024, version V4). SLR have sighted Department approval dated 23 October 2023, of the SWMMP (prepared by EEM, dated 24 July 2024, version V3). The approval letter confirms consultation with EPA, preparation in accordance with the Pollution Reduction Study and conditions of approval. Boral notified the Department of Planned Commencement on 1 March 2024. Boral confirmed that commencement of Construction occurred generally as per the notification of commencement. Boral confirmed the implementation status of key measures within the SWMMP (which were sighted as part of the site visit). - Yard Grading - Observed recent grading and depth monitors. - Lined drains and upgraded sediment forebay was sighted. - Boral confirmed the low-permeability layer has been installed. - New water storage tank observed - water sprays observed - Overflows occurred following recent significant rainfall events in the Hunter. The Annual Water Quality and Discharge Report, dated July2025 details Yard Pavement Surveys and Annual Infiltration Monitoring. EPL Variation, dated July 2025 removing PRP3 based on its completion.	Compliant		
SURFACE WATER QUALITY VALIDATION					
B17	Within six months of the commencement of Stage 1 operations and following the implementation of the management measures required by SWMMP (condition B15), the Applicant must provide a Surface Water Quality Validation Report (SWQVR) to the satisfaction of the Secretary. The SWQVR must: a)Be carried out by a suitably qualified and experienced person(s); b)Be prepared in consultation with the EPA; c)Collect a minimum of four surface water samples form the sediment basin and in surface water generated and/or discharged from the site; d)Characterise the surface water data (samples) in the sediment basin and in surface water generated and/or discharged from the site and detail the potential impact of discharges on receiving surface waters with reference to ANZECC (2000) assessment criteria; e)Compare the results with the surface water characterisation in the SWCP (condition B13); f)Ensure surface water is being managed in accordance with the EPL; g)Provide an assessment of the effectiveness of implemented mitigation measures; h)If necessary, provide additional mitigation measures to control and/or treat all pollutants to ensure the ANZECC (2000) assessment criteria can be met for further storage; and i)Update the SWMMP to reflect any changes to the surface water management system.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
B18	Any alterations to the surface water management system identified in the SWQVR required by condition B17 must be implemented within six months of submission of the SWQVR to the satisfaction of the Planning Secretary.	As Above	Not triggered		
GROUNDWATER MONITORING PROGRAM					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B19	Within three months of the commencement of Stage 1 operations, the Applicant must conduct a Groundwater Monitoring Program (GMP) to the satisfaction of the Planning Secretary. The program must: a)Be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; b)Be prepared in consultation with EPA and Department of Industry (DOI); c)Include, but not limited to: -Baseline data on groundwater levels and quality; -A program to monitor to groundwater levels and quality; -Consideration of the human health risks associated with the use of groundwater; -Impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and -A protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
B20	Within three months of the completion of the GMP, the Applicant must submit a copy of the GMP as identified in condition B19 to the Planning Secretary, the EPA and DOI.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
B21	The Applicant must not use groundwater at the site until: a)The necessary water licences for the Development under the Water Act 1912 and/or the Water management Act 2000 are obtained; b)The findings of the GMP as required by condition B19 has determined the groundwater is fit for purpose; and c)Written approval has been granted by the Planning Secretary. Note: Licences are required for groundwater bores, excavations that may intercept groundwater, dewatering activities and extraction or interception of surface water.	SLR understands groundwater is not presently used on site, hence a licences have not yet been obtained.	Compliant		
STORMWATER MANAGEMENT SYSTEM					
B22	Prior to the commencement of Stage 1 and Stage 2 construction works the Applicant must design, instal and operate a stormwater management system (SMS) for the development. The SMS must: a)Be designed by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; b)Be designed in accordance with the management and mitigation measures identified in condition B16; c)Be in accordance with the EIS and the plans at Appendix 1 of this consent; d)Be in accordance with applicable Australian Standards: and e)Ensure that the system capacity has been designed in accordance with Australian rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater Council Handbook (EPA, 1997) guidelines.	DPHI Letter, dated 20 October 2023 endorsing Warne Taylor to prepare the SMS. Boral confirmed that the appointment of Warne Taylor of Taylor Civil (Condition B22 a) was to design and construct the upgrades to the SMS in accordance with the SWMMP. These upgrades which included the stormwater tank, impervious layer, regrading etc (all requirements of Table 4.1 of SWMMP) were approved through the SWMMP (i.e. Condition B22 c) with the EPA and DPHI. They were in accordance with the EIS and Appendix 1 and Australian Standards (Condition B22 c and d). Regarding the SWMMP, refer to evidence for Condition B16	Compliant		
B23	Prior to the commencement of Stage 1 and Stage 2 operations, works-as-executed drawings signed by a registered surveyor must be submitted to the certifying authority demonstrating that the stormwater drainage and finished ground levels have been constructed as approved.	CC 677/2023.01 dated 6 May 2024 references Civil Plans and Other documents. The Certificate is issued by a certifying authority and If the work is completed in accordance with the documentation accompanying the application for the certificate (with such modifications verified by the certifying authority as may be shown on that documentation) will comply with the requirements of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation as are referred to in Section 6.33 of the Environmental Planning and Assessment Act 1979. CC 677/2023.02 references Civil Plans and Other documents. The Certificate is issued by a certifying authority (a council or a private certifier) and allows the applicant to occupy or use the building or part of the building as set out in the certificate. SLR sighted OC No. 677/2023.02, dated 20 March 2025	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B24	The surface water management system must be operated and maintained for the duration of the Development.	The site visit confirmed surface water management systems were in good working order. A newly constructed tank and associated pumping infrastructure was observed.	Compliant		
B25	The Applicant must maintain the vegetated bunds around the northern and western boundaries of the site to prevent runoff for the duration of the Development.	The site visit confirmed vegetation bunds are established on site.	Compliant		
DISCHARGE LIMITS					
B26	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	SLR has reviewed annual EPL returns required under licence No. 11962 and notes no exceedance of EPL limits have occurred.	Compliant		
EROSION AND SEDIMENT CONTROL					
B27	Prior to the commencement of any construction or other surface disturbance the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction – Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.	The site visit confirmed erosion and sediment controls were in good working order.	Compliant		
CONTAMINATION					
B28	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately manage. The procedure must form part of the of the off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	The approved CEMP dated 22 January 2024 contains an unexpected finds protocol for contamination.	Compliant		
TRAFFIC AND ACCESS					
PARKING					
B29	Prior to the commencement of Stage 1 operations, the Applicant must provide 11 parking spaces within the site (including one accessible space) for staff and visitors to ensure that the traffic associated within the Development does not utilise the carriageway and Egret Street. Parking areas must be constructed in accordance with the latest version of the Australian Standard 2890. All parking associated with the Development must be contained on site.	During the site visit adequate parking was observed on site.	Compliant		
B30	Parking is only permitted within designated parking spaces.	During the site visit all vehicles were parked in designated parking areas.	Compliant		
B31	The Applicant must update all site prior to the commencement of Stage 1 operations to include the 11 parking spaces.	Site visit confirmed compliance with condition.	Compliant		
OPERATING CONDITIONS					
B32	The Applicant must ensure: a)Internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1 Parking Facilities Off-street Car Parking and AS 2890.2 Parking Facilities Off-street Commercial Vehicle facilities; b)The swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; c)Vehicles no larger than 19.6m (truck and dog vehicle) are permitted to access the site; d)The development does not result in any vehicles queuing or parking on the carriageway and Egret Street; except with the express consent of the PON; e)Heavy vehicles and bins associated with the development are not parked on local roads or footpaths in vicinity of the site; f)All vehicles are wholly contained on site before being required to stop; g)All loading and unloading of waste is carried out on-site; h)All trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and l)The proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Boral have completed a Swept Path Analysis dated 7 August 2018 outlining truck and transport routes with the site. During the site visit transport routes and operations were in accordance with approved plans.	Compliant		
OPERATIONAL TRAFFIC MANAGEMENT PLAN					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B33	Prior to the commencement of Stage 1 operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary, The plan must form part of the OEMP required by condition C5 and be prepared in accordance with condition C1. The OTMP must: a)Be prepared by a suitably qualified and experienced person(s); b)Be prepared in consultation with Port Newcastle (PON); c)Detail in measures that are to be implemented to ensure road safety and network efficiency including: -Ensuring no queuing or parking of vehicles occur in the carriageway (except with the express consent of the PON), Egret Street or the surrounding road network; and -Redirecting incoming trucks to prevent traffic build-up and queuing in the carriageway (except with the express consent of the PON) and Egret Street; d)Detail heavy vehicle routes, access and parking arrangements; e)Including a Driver Code Conduct to: -Ensure truck drivers use specifies haul routes; -Ensure trucks drivers when exiting the site use Ravens Street and Curlew Street to access Cormorant Road; -Minimise the impacts on the local and regional road network; -Minimise conflicts with other road users; -Minimise road traffic noise; -Include a program to monitor the effectiveness of these measures.	The OEMP dated 12 May 2025 has been drafted and submitted to DPHI for Approval. Appendix B of the OEMP includes the TMP. Section 1 notes the authors experience. Section 2.4 and Annexure A includes details of correspondence with PoN. Section 5.3 and 5.9 notes measures relates to queuing management. Section 5 notes access routes. The OEMP is referenced to address the performance monitoring and review component. It is noted that the audit reviewed the contents of the AQMP against the conditions. The OEMP is currently under review by DPHI and may require updates to satisfy the Planning Secretary.	Compliant		
B34	The applicant must: a)Not commence Stage 1 operation until the OTMP required by condition B33 is approved by the Planning Secretary; and b)Implement the most recent version of the OTMP approved by the Planning Secretary for the operational life of the Development.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
AIR QUALITY					
DUST MINIMISATION					
B35	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	During the site visit dust generation was noted as minimal. Boral indicated dust suppression including watercarts would be deployed as needed.	Compliant		
B36	The Applicant must ensure that: a)All on-site car parking areas are sealed with concrete and asphalt; b)Water sprinklers at the stacker above the processed stockpile and transfer points must be utilised at all times when the plant is operational; c)Exposed surfaces and stockpiles are suppressed by regular watering; d)Sealed roads are swept regularly; e)Maintain the seal on the main access road from the wheel wash and weighbridge; f)A water cart will remain onsite for use on manoeuvring areas in hot and dry weather; g)All trucks entering or leaving the site with loads have their loads covered; h)Trucks associated with the development do not track dirt onto the public road network; i)Public roads used by these trucks are kept clean; and land stabilisation works are carried out progressively on site to minimise exposed surfaces.	The site visit confirmed site was generally compliant against condition B36. Boral indicated dust suppression including watercarts would be deployed as needed.	Compliant		
AIR QUALITY DISCHARGES					
B37	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emissions limits and air quality monitoring requirements as specified in the EPL applicable to the site.	The site visit observations and discussions with Boral have indicated air quality has remained compliant during construction and Stage 1.	Compliant		
AIR QUALITY MANAGEMENT PLAN					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B38	Prior to the commencement of Stage 1 and Stage 2 operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and be prepared in accordance with condition C1. The AQMP must: a) Be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; b) Detail and rank all emissions from all sources of the development, including particulate emissions; c) Describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; d) Identify the control measures that will be implemented for each emission source and nominate the following for each of the proposed controls: -Key performance indicator; -Monitoring method; -Location, frequency and duration of monitoring; -Record keeping; -Complaints register; -Response procedures; and -Compliance monitoring.	The OEMP dated 12 May 2025 has been drafted and submitted to DPHI for Approval. Appendix C of the OEMP includes the AQMP. DPHI Letter, dated 2 December 2024 endorsing Scott Fishwick to prepare the AQMP. Scott Fishwick is noted in the document control details as the preparer. Section 2.4 describes emissions sources and their contribution. Section 3 details performance management and evaluation. Section 2.5 notes measures for each source identified. The EIS notes that it is not considered that an air quality monitoring program operated by Boral would be required to be implemented. It is noted that the audit reviewed the contents of the AQMP against the conditions. The OEMP is currently under review by DPHI and may require updates to satisfy the Planning Secretary.	Compliant		
B39	The Applicant must: a) Not commence operation until the AQMP required by condition B38 is approved by the Planning Secretary; and b) Implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
ODOUR MANAGEMENT					
B40	The applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEP Act).	Operations were limited during the Audit period. However, SLR understands Boral have remained compliant with condition B40 during the audit period. No complaints relating to odour were received.	Compliant		
HAZARDS AND RISK					
B41	Prior to the commencement of Stage 2 construction, the Applicant must consult with Origin Energy with regards to the design, construction and operation of the proposed emergency egress structure for the Origin Energy site as shown in the plans at Appendix 1 of this consent. Structures include and are not limited to ramps, roads and gates and must be designed in accordance with all relevant standards and codes to ensure the integrity of any bund located under these structures is maintained.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Planned staging (Stage 1) was defined	Not triggered		
B42	Prior to the commencement of Stage 2 operations, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development. The plan must be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1 'Emergency Planning'. The plan must also be prepared in consultation with Origin Energy, ensuring that the plan and emergency procedures for the Development include but not limited to: A) Covering incidents or emergencies from the Origin Energy site which may pose impacts to the development; B) At Appendix 1 of this consent, while ensuring sufficient access within the development during incidents or emergencies from the Origin Energy site; and C) Consistency with the Origin Energy Facility Emergency Plan required under Chapter 9 of the Work Health and Safety regulation 2017.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Planned staging (Stage 1) was defined	Not triggered		
B43	The Applicant must ensure that the development area does not encroach into areas originating from the Origin Energy site which are classified as hazardous areas under AS 600079: 'Explosive Atmospheres' and the Work Health and Safety Regulation 2017 at all times.	The site visit did not indicate that the approved development area has encroached into the Origin energy site, nor has the development during the audit period.	Compliant		
B44	One month prior to the commencement of Stage 2 operation, the Applicant must submit to the Planning Secretary, a Compliance Report detailing compliance with conditions B41, B42 and B43. This report must also include the consultation outcomes with Origin Energy with regards to compliance with conditions B41, B42 and B43.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024. Planned staging (Stage 1) was defined	Not triggered		
DANGEROUS GOODS					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B45	The Applicant must ensure that dangerous goods quantities within the development or transported to and from the development is kept below the screening threshold qualities listed in the Development of Planning's "Hazardous and Offensive Development Guidelines Applying SEPP 33" (January 2012) at all times.	Sighted Diesel Tank and Oil Stores during site visit. The tank is a self bunded style and the oil store was within a shipping container. There was no evidence of spills around tank or oil store observed during the inspection. It is understood that the self bunded tank does not trigger SEPP 33 "an above-ground tank containing only combustible liquids (like diesel), when stored separately from flammable liquids, is not subject to the "Applying SEPP 33" guidelines in NSW".	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations													
B46	The Applicant must store all chemicals, fuels and oils used on-site in accordance with: a)The requirements of all relevant Australian Standards; and b)The NSW EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.	Sighted Diesel Tank and Oil Stores during site visit. The tank is a self bunded style and the oil store was within a shipping container. There was no evidence of spills around tank or oil store observed during the visit.	Compliant															
B47	In the event of an inconsistency between the requirements listed from B55 above, the most stringent requirement prevails to the extent of the inconsistency.	Noted	Note only															
NOISE																		
HOURS OF WORK																		
B48	The Applicant must comply with the hours details in Table 2, unless otherwise agreed in writing by the Planning Secretary. Table 2: Hours of Work <table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="2">Stage 1 and Stage 2 construction</td><td>Monday – Friday</td><td>7 am to 6 pm</td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td rowspan="2">Stage 1 and Stage 2 operation</td><td>Monday to Saturday</td><td>24 hours</td></tr><tr><td>Sunday</td><td>6 am to 6 pm Maintenance Only</td></tr></table>	Activity	Day	Time	Stage 1 and Stage 2 construction	Monday – Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Stage 1 and Stage 2 operation	Monday to Saturday	24 hours	Sunday	6 am to 6 pm Maintenance Only	Noted. Boral confirmed that no construction works have been undertaken outside of hours stipulated by B48. For the operational times for the site. The Kooragang Site is permitted to operate 24 hours per day (Monday to Saturday). The site is only restricted to construction activities between 7 am and 6 pm. Although the facility is licenced for 24 hours operations, operations are restricted as per the website operating times (6:30 am start time). Sighted shift toolbox talk records, dated 28/02/2025 and 15/07/2025 that note daytime shift and time of 06:00 to 16:00. Boral advised that, Construction contractors did not start until 7am and ran separate toolboxes. Operation shift starts at 6am with 15 minutes toolbox and 15 minutes prestarts, fuelling etc. Operations and trucks into site at 6.30.	Compliant		
Activity	Day	Time																
Stage 1 and Stage 2 construction	Monday – Friday	7 am to 6 pm																
	Saturday	8 am to 1 pm																
Stage 1 and Stage 2 operation	Monday to Saturday	24 hours																
	Sunday	6 am to 6 pm Maintenance Only																
B49	Works outside of the hours identified in condition B48 may be undertaken in the following circumstances: a)Works that are inaudible at the nearest sensitive receivers; b)For the delivery of materials required outside these hours by the NSW Police Force or other authorises for safety reasons; or c)Where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Noted. Boral confirmed that no works have been undertaken outside of hours stipulated by B48. Sighted shift toolbox talk records, dated 28/02/2025 and 15/07/2025 that note daytime shift and time of 06:00 to 16:00.	Compliant															
CONSTRUCTION NOISE LIMITS																		
B50	The Development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in Appendix 2.	Boral confirmed that no works have been undertaken outside of hours stipulated by B48. Boral confirmed that an equipment maintenance program is in place (see Condition A27). Boral confirmed that equipment is turned off whilst no operating and that reversing is minimised. No evidence has been identified indicating Boral have exceeded EPL limits, and no noise complaints have been received. Sighted shift toolbox talk records, dated 28/02/2025 and 15/07/2025 that note daytime shift and time of 06:00 to 16:00.	Compliant															
OPERATIONAL NOISE LIMITS																		
B51	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits as specified in the EPL for the site.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered															

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
B52	The Applicant must: a)Implement best practice, including all reasonable and feasible noise management and mitigation measures to minimise operational, low frequency and traffic noise generated by the Development; b)Minimise the noise impacts of the Development during adverse meteorological conditions; c)Maintains the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and d)Regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of the EPL.	Boral notified the Department of Planned Commencement (1 March 2024). Planned staging (Stage 1) was defined. Stage 1 Operations did not occur during the audit period.	Not triggered		
ABORIGINAL HERITAGE					
UNEXPECTED FINDS PROTOCOL					
B53	If any items or object of Aboriginal heritage significance is identified on site: a)All work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; b)A 10m wide buffer area around the suspected item or object must be corned off; and the OEH must be contacted immediately.	Boral confirmed that there were no unexpected finds during the audit period.	Not triggered		
B54	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.	Noted	Not triggered		
VISUAL AMENITY					
LIGHTING					
B55	The Applicant must ensure the lighting associated with the development: a)Complies with the latest version of AS 4282-1997 – ‘Control of the Obtrusive Effects of Outdoor Lighting’ (Standards Australia, 1997); and b)Is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	As part of personnel interviews, Boral confirmed that no construction works have been undertaken outside of hours stipulated by B48 (Daytime Only). For the operational times for the site. The Kooragang Site is permitted to operate 24 hours per day (Monday to Saturday). The site is only restricted to construction activities between 7 am and 6 pm. Although the facility is licenced for 24 hours operations, operations are restricted as per the website operating times (6:30 am start time, 16:00 Finish time Monday to Friday). Boral advised that there is no lighting currently in place at the Facility. On the basis of Boral's advice and the operating hours of the facility this Condition has been considered as Not Triggered with an Opportunity for Improvement prior to undertaking Operations.	Not triggered	OFI3	Prior to the commencement of operations, consider undertaking a formal compliance review of AS4282 and determine requirements if night time operations were to be conducted.
SIGNAGE AND FENCING					
B56	All signage and fencing must be erected in accordance with the development plans included in the EIS.	Signage and fencing applicable to stage 1 is compliant. However, additions / changes would be expected as the project progress to stage 2.	Compliant		
B57	The Applicant must maintain a fence line at the boundary of the Origin Energy site as shown in the plans at Appendix 1 of this consent. Note: this condition does not apply to temporary construction and safety related signage and fencing.	The site visit confirmed a fence line and the boundary of the Origin Energy site is consistent with Appendix 1 of this consent.	Compliant		
PART C - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT					
MANAGEMENT PLAN REQUIREMENTS					

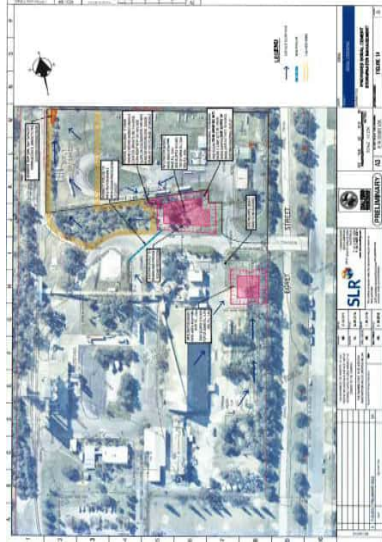
Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: a)Details of: -The relevant statutory requirements (inducing any relevant approval, licence or lease conditions); -Any relevant limits or performance measures and criteria; and -The specific performance indicators that are proposed to be used to judge the performance of, or guide the implantation of, the development or any management measures; b)A description of the measures to be implemented to comply with the relevant statutory requirements, limits or performance measures and criteria; c)A program to monitor and report on the: -Impacts and environmental performance not the development; and -Effectiveness of the management of measures set out pursuant to paragraph (b) above; d)A contingency plan to manage any unpredicted impacts and their and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; e)A program to investigate and implement ways to improve the environmental performance of the development over time; f)A protocol for managing and reporting any: -Incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); -Complaint; -Failure to comply with statutory requirements; and g)A protocol for periodic review of the plan. Note: the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	The CEMP dated 22 January 2024 and OEMP have been prepared to address Condition C1. The CEMP was approved by the Planning Secretary on 29 April 2024.	Compliant		
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN					
C2	The Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	CEMP dated 22 January 2024 was prepared in accordance with C1, B27 and B28 DPHI Approval Letter confirms satisfaction of the CEMP being prepared in accordance with the Consent.	Compliant		
C3	As part of the CEMP required under condition C2 of this consent. The Applicant must include the following a)Erosion and Sediment Control Plan (see condition B27) ; and b)Unexpected Find Protocol (see condition B28).	CEMP dated 22 January 2024 was prepared in accordance with C1, B27 and B28 B27 Addressed in Section 7.2. Controls to be implemented during construction are listed. B28. Addressed in Section 7.4. Details an unexpected protocol to be implemented during construction are listed.	Compliant		
C4	The Applicant must: a)Not commence construction of the development until the CEMP is approved by the Planning Secretary; and b)Carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	SLR have sighted Secretary approval dated 22 January of the CEMP.	Compliant		
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
C5	The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	The OEMP dated 12 May 2025 has been drafted and submitted to DPHI for Approval.	Compliant		
C6	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following: a)Describe the role, responsibility authority and accountability of all key personnel involved in the environmental management of the development; b)describe the procedures that would be implemented to: -keep the local community and relevant agencies informed about the operation and environmental performance of the development; -receive, handle, respond to, and record complaints; -resolve any disputes that may arise; respond to any non-compliance; -respond to emergencies; and c)include the following environmental management plans: -Waste Management Plan (see condition B3) -Operational Traffic Management Plan (see condition B33); and -Air Quality Management Plan (see condition B38).	The OEMP dated 12 May 2025 has been drafted and submitted to DPHI for Approval.	Compliant		
C7	The Applicant must: a)Not commence operation until the OEMP is approved by the Planning Secretary; and b)Operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	Section 1.4 of the OEMP includes a commitment "Operation of the facility will be in accordance with the OEMP and will not commence until the OEMP has been approved by the Planning Secretary.	Not triggered		
REVISION OF STRATEGIES, PLANS AND PROGRAMS					
C8	Within three months of: a)The submission of a Compliance Report under condition C16; b)The submission of an incident report under condition C11; c)The submission of an Independent Audit under condition C19; d)The approval of any modifications of the conditions of this consent; or e)The issue of a direction of the Planning Secretary under condition A2(b) which requires a review.	SLR reviewed the 2024 Site Incident Register, PIRMP dated August 2025, Letter correspondence, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. No revision triggers occurred during reporting period. The next revision trigger will be the submission of this IEA Report	Not triggered		
C9	The strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	As Above	Not triggered		
C10	If necessary to either improve the environmental performance of the Development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the Development.	As Above	Not triggered		
REPORTING AND AUDITING					
INCIDENT NOTIFICATION, REPORTING AND RESPONSE					
C11	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant become aware of an incident. The notification must identify the Development (including the Development application number and the name of the Development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be give, and reports submitted in accordance with the requirements set out in Appendix 3.	SLR have reviewed site incidents register and PRIMP dated August 2025, and confirm no reportable incidents occurred during the audit period.	Not triggered		
NON-COMPLIANCE NOTIFICATION					
C12	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	Boral confirmed that there were no non compliances occurred during the audit period.	Not triggered		
C13	A non-compliance notification must identify the Development and the application number for it, set out the condition of consent that the Development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Boral confirmed that there were no non compliances occurred during the audit period.	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
C14	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Boral confirmed that there were no non compliances occurred during the audit period.	Not triggered		
COMPLIANCE REPORTING					
C15	No later than six weeks before the date notified for the commencement of Stage 1 and Stage 2 operations a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department.	Following a site inspection on 7 November 2024, a Secretary Direction was issued regarding the timing of Compliance Reporting. Boral engaged with DPHI regarding wording of Condition C15, noting that Boral are required to submit to the DPHI no later than six weeks before the date for the commencement of Stage 1 and 2 Operations. Boral noted further that the site is currently in the Stage 1 Construction Phase Commencing Stage 1 Operations would occur in 2025. Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. Boral is expected to submit the first annual compliance report for the reporting period of 2025 (1 January 2025 – 31 December 2025) by 31 March 2026. Boral noted that notification for the commencement of Stage 1 operations has not been provided and this condition has not been Triggered.	Not triggered		
C16	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	Following a site inspection on 7 November 2024, a Secretary Direction was issued regarding the timing of Compliance Reporting. Boral engaged with DPHI regarding wording of Condition C15, noting that Boral are required to submit to the DPHI no later than six weeks before the date for the commencement of Stage 1 and 2 Operations. Boral noted further that the site is currently in the Stage 1 Construction Phase Commencing Stage 1 Operations would occur in 2025. Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. Boral committed to undertaking Compliance Reports using the 2020 PARs, consistent with the Secretary Direction. The first Compliance Report is due early 2026.	Not triggered		
C17	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Department and notify the Department in writing at least seven days before this is done.	Compliance Report not undertaken within Audit Period	Not triggered		
INDEPENDENT AUDIT					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
C18	No later than four weeks before the date notified for the commencement of Stage 1 and Stage 2 operation an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department.	Following a site inspection on 7 November 2024, a Secretary Direction was issued regarding the timing of IEAS. Boral engaged with DPHI regarding wording of Condition C18, noting that Boral are required to submit to the DPHI no later than six weeks before the date for the commencement of Stage 1 and 2 Operations. Boral noted further that the site is currently in the Stage 1 Construction Phase Commencing Stage 1 Operations would occur in 2025. Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. Boral noted that notification for the commencement of Stage 1 operations has not been provided and this condition has not been Triggered. Boral completed the site component of this IEA on 19 August and is on track to submit the audit report and response by 30 September 2025.	Not triggered		
C19	Independent Audits of the Development must be carried out in accordance with: a)The independent Audits Program submitted to the Department under condition C18 of this consent; and b)The requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	Following a site inspection on 7 November 2024, a Secretary Direction was issued regarding the timing of Compliance Reporting. Boral engaged with DPHI regarding wording of Condition C15, noting that Boral are required to submit to the DPHI no later than six weeks before the date for the commencement of Stage 1 and 2 Operations. Boral noted further that the site is currently in the Stage 1 Construction Phase Commencing Stage 1 Operations would occur in 2025. Engagement with DPHI resulted in the submission of the Letter, Compliance Monitoring, Reporting and Independent Audit Programs, dated 16 December 2024. Boral committed to undertaking Compliance Reports using the 2020 PARs, consistent with the Secretary Direction.	Compliant		
C20	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: a)Review and respond to each Independent Audit Report prepared under condition C19 of this consent; b)Submit the response to the Department; and c)Make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least seven days before this is done.	As at the time of the audit report, this condition was not triggered. Assessment of compliance for this condition will be via the next Compliance Report and IEA.	Not triggered		
MONITORING AND ENVIRONMENTAL AUDITS					
C21	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing. Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the Development, and an "environmental audit" is a periodic or particular documented evaluation of the Development to provide information on compliance with the consent or the environmental management or impact of the Development.	Noted	Note only		
ACCESS TO INFORMATION					

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
C22	At Least 48 hours before the commencement of construction until the completion of all works under this consent, the applicant must: a) Make the following information and documents (as they are obtained or approved) publicly available on its website: -The documents referred to in condition A2 of this consent; -All current statutory approvals for the Development; -All approved strategies, plans and programs required under the conditions of this consent; -The proposed staging plans for the Development if the construction, operation or decommissioning of the Development is to be staged; -Regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; -A comprehensive summary of the monitoring results of the Development, reported in accordance with the specification in any conditions of this consent, or any approved plans and programs; -A summary of the current stage and progress of the Development; -Contact details to enquire about the development or to make a complaint; -A complaints register, updated monthly; -The Compliance Report of the Development; -Audit report prepared as part of any Independent Audit of the Development and the Applicant's response to the recommendations in any audit report; -Any other matter required by the Planning Secretary; and b) Keep such information up to date, to the satisfaction of the Planning Secretary.	A review of the project website notes the following items are included on the webpage https://www.boral.com.au/boral-recycling-kooragang: -Statutory approvals and EIS; -CEMP, Surface Water Mitigation and Monitoring Plan, Surface water discharge characterisation assessment, Soil and Water Assessment, Site PIRMP -Regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; -A summary of the current stage and progress of the Development; -Contact details to enquire about the development or to make a complaint: - Complaints Summary (No complaints Received. - Project Staging Items not triggered -The Compliance Report of the Development; -Audit report prepared as part of any Independent Audit of the Development and the Applicant's response to the recommendations in any audit report; -Any other matter required by the Planning Secretary; and - A comprehensive summary of the monitoring results of the Development, reported in accordance with the specification in any conditions of this consent, or any approved plans and programs	Compliant		
APPENDIX 1 - DEVELOPMENT LAYOUT PLANS					
FIGURE 1	Site plan with staging 	Site Visit Observations CEMP and associated plans. Construction (Phase 1) has been undertaken generally in accordance with the general arrangement.	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
Figure 2	General arrangement with staging		Site Visit Observations CEMP and associated plans. Construction (Phase 1) has been undertaken generally in accordance with the general arrangement.	Compliant	
Figure 3	RRF stormwater Management		Site Visit Observations CEMP and associated plans. Construction (Phase 1) has been undertaken generally in accordance with the general arrangement. As per approved SMS, SWCP, SWMMP.	Compliant	
Figure 4	Boral Cement stormwater system		DPHI Letter, dated 20 October 2023 endorsing Warne Taylor to prepare the SMS. Boral confirmed that the appointment of Warne Taylor of Taylor Civil (Condition B22 a) was to design and construct the upgrades to the SMS in accordance with the SWMMP. These upgrades which included the stormwater tank, impervious layer, regrading etc (all requirements of Table 4.1 of SWMMP) were approved through the SWMMP (i.e. Condition B22 c) with the EPA and DPHI. They were in accordance with the EIS and Appendix 1 and Australian Standards (Condition B22 c and d). Regarding the SWMMP, refer to evidence for Condition B16	Compliant	

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
Figure 5	The fence line at the Origin Energy Site 	Site Visit Observations Fence line maintained. Boral noted regular inspections and alarming mechanisms associated with fence integrity.	Compliant		
APPENDIX 2 - APPLICANT'S MANAGEMENT AND MITIGATION MEASURES					
KOORAGANG RECYCLING FACILITY - SUMMARY OF MITIGATION MEASURES					
WASTE MANAGEMENT	•Adhere to Boral Inspection and Receivals Protocol, 2018. •Conduct raw material testing in accordance with the NSW EPA's Recovered Aggregate Order 2014, which includes testing for 8 heavy metals, electrical conductivity, foreign material. •Maintain waste screening '2 point inspection' procedure. •Load weighing and docket procedure. •Product testing for asbestos contamination.	Sighted Boral Inspection and Receivals Protocol, 2018. Monthly Work Orders Sighted dated 12 August 2025. Sighted Tracking sheets for aggregate testing. EPP 2025 Action Sighted Lab Comms. Sighted Testing Plans for May 2025. It is noted that waste feedback adopts a report by exception. Observed and discussed 2 Point Inspection controls. Tracked through APEX - tracking program. Sighted APEX. Sighted dockets for 19 August 2025 (records rego, customer, product, truck, source, weight). Asbestos - Hibbs and Associates. Report by exception. Sample Paper, dated 8 July 2025.	Compliant	OFI4	Consider establishing a feedback mechanism for sampling results so that compliance can be positively verified.
DUST	•Area water sprinklers will be activated in dry weather as required. •Stacker above processed stockpile and transfer points will be fitted with waster sprays. •Maintenance of compacted internal roadways and stockpile pads. •Maintenance of seal on the main access road from the wheel wash and weighbridge. •Sealed roads will be regularly swept. •A water cart will remain on site for use on manoeuvring areas in hot and dry weather.	Site Visit Observations Environmental Inspections. Work orders Monthly GSL monitoring - Environmental Inspection Checklists. Street sweeper used on site - twice a week and as needed. - Pers Comms No water cart onsite - use of sprays. Water Management System with extensive spray system.	Compliant		
TRAFFIC	•Staff car parks repainted compliant with AS 2890.1 and AS 2890.6.	Site Visit Observations Lines marked Reverse pump stops.	Compliant		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
WATER MANAGEMENT (SUBJECT TO OUTCOMES OF THE SWCA & SWMMP)	•Two new infiltration basins will be built to capture and treat runoff from 100 year ARI storms. •Ground levels near the weighbridge will be raised to 4.9 mAHD. •Northern and western perimeter bunds will be maintained. •Water quality in the concrete lined storage dam will be monitored against public health risk management criteria (DEC, 2006) and the adopted Ecological Groundwater Investigation Levels criteria. If the water quality exceeds these criteria, water of a suitable quality will be added for dilution. •A sediment trap will be built in the north of the site. •Spear point bore GW053226 will be re-licenced. •A process Water Management plan will be prepared post-approval to manage the safe use of groundwater in the process water circuit.	Superseded. Refer to SMS, SWCP, SWMMP.	Compliant		
SEPP 33	•No storage of hazardous materials as defined in the Australian Dangerous Goods Code or NSW Planning Storage and Handling of Dangerous Goods Code of Practice 2005. •Development of an Emergency Response Plan. •Mobile plant and vehicles to be fitted with fire extinguishes. •The existing Environment Protection Licence 11968 will be maintained and modified as required. •Securely fence the facility.	Emergency Response Plan. 18 11 24 Mobile equipment fire extinguisher and fire suppression. EPL varied several times. Sighted, alarms, inspections. Monthly work orders. Security. Sighted Diesel Tank and Oil Stores during inspection. The tank is a self bunded style and the oil store was within a shipping container. There was no evidence of spills around tank or oil store observed during the inspection.	Compliant		
GREENHOUSE GASSES	•Consider Green House Gas emissions when selecting diesel and electrically powered plant, machinery and lighting.	Boral confirmed that emissions and fuel efficiency is considered as part of procurement. The new Loader was noted as a recent purchase. Sighted company purchasing procedures attached including 1. Sustainable Procurement Policy 2. Environmental Policy 3. Boral Supplier Code of Conduct	Compliant		
VISUAL AMENITY	•Maintain shrubs along Egret Street •Silo painted in subdued colours. •Stockpiles maximum height of 15m above constructed ground level.	Site Visit Observations Trees along Egret street have been maintained and the new Tank is a Eucalypt green colour. Stockpiles were sighted as less than 15ms.	Compliant		
HERITAGE	•Apply chance find protocols. If any skeletal material is uncovered, cease work within 50m and contact the NSW Coroner's Office. If the remains prove to be Aboriginal, consult with a heritage consultant, relevant Aboriginal groups and relevant State Government Agency.	Boral confirmed that there were no unexpected finds during the audit period.	Not triggered		
SOCIO-ECONOMIC ENVIRONMENT	•No specific additional mitigation measures are required to manage socio-economic aspects of the Project. The proposed mitigation measures for waste management, greenhouse gas abatement, noise, traffic, air quality, visual amenity, heritage, and risk management will directly mitigate potential socio-economic aspects.	Noted	Note only		
APPENDIX 3 - INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS					
WRITTEN INCIDENT NOTIFICATION REQUIREMENTS					
1	A written incident notification addressing the requirements set out must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C11 or, having given such notification, subsequently forms the view that an incident has not occurred.	SLR have reviewed Boral site Incident Register and PIRMP dated August 2025 and confirms no reportable incidents occurred during reporting period	Not triggered		
2	Written notification of an incident must: a)Identify the Development and application number; b)Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c)Identify how the incident was detected; d)Identify when the applicant became aware of the incident; e)Identify any actual or potential non-compliance with conditions of consent; f)Describe what immediate steps were taken in relation to the incident; and g)Identify a project contact for further communication regarding the incident.	SLR have reviewed Boral site Incident Register and PIRMP dated August 2025 and confirms no reportable incidents occurred during reporting period	Not triggered		

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
INCIDENT REPORT REQUIREMENTS					
3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	SLR have reviewed Boral site Incident Register and PIRMP dated August 2025 and confirms no reportable incidents occurred during reporting period	Not triggered		
4	The Incident Report must include: a)A summary of the incident; b)Outcomes of an incident investigation, including identification of the cause of the incident; c)Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d)Detail of any communication with other stakeholders regarding the incident.	SLR have reviewed Boral site Incident Register and PIRMP dated August 2025 and confirms no reportable incidents occurred during reporting period	Not triggered		

Independent Environmental Audit 2025

Proponent

Approval:

Project:

Approval Authority

Lead Auditor

Audit Team

Audit Period

Site Visit Date

Boral Recycling

SSD 7038, EPL 11968

Boral Recycling Kooragang

DPHI

Stephen Shoesmith (C 478261 Exp: July 2026)

Anna Cochrane (C 427136 Exp: 17Mar2026)

10 July 2019 to 19 August 2025

19 August 2025

Proponent's Representatives:

Glenn Cook

Richard Haskett

COMPLIANCE STATUS LEGEND:
Compliant
Non-compliant
Not triggered
Note only

Condition of Consent Number	Compliance Requirement	IEA Comments and Evidence	Compliance Status	Unique Finding Identifier	Recommendations
1 - ADMINISTRATIVE CONDITIONS					
A.1 What the License Authorises and Regulates					
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Production Data Spreadsheet EPP 2025	Compliant		
A.2 Premises or Plant to Which This License Applies					
A2.1	The license applies to the following premises: Premises Details BORAL RECYCLING 1/24 EGRET STREET KOORAGANG NSW 2304 PART LOT 12 DP 1032146 LICENSED AREA IS SHOWN ON THE MAP TITLED "SITE PLAN - BORAL RECYCLING KOORAGANG" AS THE PROJECT FOOTPRINT - DOC19/803507.	Noted	Note only		
A.3 Other Activities					
A3.1	This license applies to all other activities carried on at the premises, including ancillary activities and concrete batching.	Noted	Note only		
A.4 Information Supplied to the EPA					
A4.1	Works and activities must be carried out in accordance with the proposal contained in the license application except as expressly provided by a condition of this license. In this condition the reference to "the licence application" includes reference to a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	Noted	Note only		
2 - DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND					
P1. Location of Monitoring					
P1.1	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).	Compliant		

	<table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>2</td><td>Discharge and Water Monitoring</td><td>Discharge and Water Monitoring</td><td>Basin overflow location as shown on the plan titled "Kooragang Recycling EPL 11968 - Water Monitoring Locations - September 2023" (EPA reference, DOC23/879417).</td></tr><tr><td>4</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore R1 as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr><tr><td>9</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore 101 as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr><tr><td>10</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore 102 as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr><tr><td>11</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore 103A as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr><tr><td>12</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore 104 as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr><tr><td>13</td><td>Groundwater monitoring</td><td></td><td>Groundwater Monitoring Bore 105 as shown on the plan titled "Well Location Plan (New and Existing) EPL Monitoring 1/24 Egret Street, Kooragang, NSW" dated 2 October 2024 (EPA reference, DOC24/1037144).</td></tr></table>	EPA Identification no.	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Douglas Partners Report, Dated 3 October 2024 (Ref 91452.01) details groundwater well construction. Douglas Partners Report, Dated 22 May 2025 (Ref 91452.02) details engagement and results of ongoing groundwater monitoring. Groundwater sampling was not undertaken at Monitoring Point 4 or Monitoring Point 7 as per the EPL requirements. Sampling of Monitoring Point 4 (Bore R1) was only undertaken once while sampling was not undertaken for Monitoring Point 7 (Bore R2) during the reporting period as Boral had commissioned Environmental Consultants Douglas Partners to review the existing bores and construct the required additional bores as part of the upgrade works for the site. Construction of the additional bores and assessment of the existing bores was completed in September 2024, with sampling undertaken in September following the commissioning phase. Monitoring Bore R1 was deemed suitable for sampling with the results reported in this annual return. Monitoring Bore R2 was deemed not suitable for sampling and a new Bore (Bore105) was subsequently constructed to replace Bore R2. All existing and new groundwater bores that will be used for future groundwater sampling were sampled in September 2024. Boral are in the process of engaging a monitoring consultant to undertake ongoing groundwater sampling of the bores in accordance with the EPL requirements.			
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																																		
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P1.2	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises. <table><tr><th colspan="3">Noise/Weather</th></tr><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>1</td><td>Meteorological Station</td><td>Weather station located on the western side of the weighbridge building (refer to DOC21/644869-1).</td></tr></table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location description	1	Meteorological Station	Weather station located on the western side of the weighbridge building (refer to DOC21/644869-1).	Boral have a weather station onsite that records all required information as per the EPL requirements. Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). 2025 Weather Data Records Boral confirmed that a weather station onsite that records all required information as per the EPL requirements. Note: No formal reference to Weather station within CEMP. However the 2025 EPP includes an action to confirm monitoring status of the weather station	Compliant																									
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1	Meteorological Station	Weather station located on the western side of the weighbridge building (refer to DOC21/644869-1).																																			
3 - LIMIT CONDITIONS																																					
L1 Pollution of Waters																																					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.		As below	Compliant																																	
L2 Waste																																					
L2.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.		Sighted Boral Inspection and Receivals Protocol, 2018. Monthly Work Orders Sighted dated 12 August 2025. Sighted Tracking sheets for aggregate testing. EPP 2025 Action Sighted Lab Comms. Sighted Testing Plans for May 2025. It is noted that waste feedback adopts a report by exception. Observed and discussed 2 Point Inspection controls.	Compliant																																	

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Note:	Waste received at the premises that meets the chemical and physical contamination requirements of any of the above Resource Recovery Orders are classified as general solid waste.	Note only	Note only																																						
L2.2	The premises may accept up to 130,000 tonnes of general solid waste (non-putrescible) per annum.	Production Data Spreadsheet Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Production volumes did not exceed 130,000 tonnes annually or 100,000 at any one time.	Compliant																																						
Authorised Amount																																									
L2.3	Notwithstanding any limit specified in the above table, the licensee shall not exceed the authorised amount specified in this licence. Where the authorised amount is less than the total of all wastes listed above, the authorised amount will take precedent.	Production Data Spreadsheet Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Production volumes did not exceed 130,000 tonnes annually or 100,000 at any one time.	Compliant																																						
L2.4	The authorised amount of waste permitted on the premises cannot exceed 100,000 tonnes at any one time.	Maximum volume held at any time was 47,000 tonnes (Production Data Spreadsheet - Closing stock). Boral advised at 100,000 tonnes would not likely be possible due to area limitations.	Compliant																																						
L2.5	Stockpiles of processed and/or unprocessed waste at the premises must not be more than 15 metres in height when measured from the finished ground level of the site.	Site Visit Observations Stockpiles were sighted as less than 15ms.	Compliant																																						
L3 Hours of Operation																																									
L3.1 Hours of Oper	<table><tr><th>ACTIVITY</th><th>DAY</th><th>TIME</th></tr><tr><td>Construction</td><td>Monday - Friday</td><td>7 a.m. to 6 p.m.</td></tr><tr><td>Construction</td><td>Saturday</td><td>8 a.m. to 1 p.m.</td></tr><tr><td>Operation</td><td>Monday - Saturday</td><td>24 hours</td></tr><tr><td>Operation</td><td>Sunday</td><td>6 a.m. to 6 p.m. Maintenance Only</td></tr></table>	ACTIVITY	DAY	TIME	Construction	Monday - Friday	7 a.m. to 6 p.m.	Construction	Saturday	8 a.m. to 1 p.m.	Operation	Monday - Saturday	24 hours	Operation	Sunday	6 a.m. to 6 p.m. Maintenance Only	Environment Permit Planner 2025 Boral confirmed that construction occurred during approved hours during the audit period.	Compliant																							
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L3.2	Works outside the hours identified in condition L3.1 may be undertaken in the following circumstances: a) the works are inaudible at the nearest sensitive receivers; or b) for delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or c) where it is required in an emergency to avoid the loss of lives, property or to prevent environment harm.	Boral confirmed that there were no out of hours events occurred during the audit period.	Not triggered		
L4 Potentially Offensive Odour					
L4.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	No odour observed during site visit. Complaints Register Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).	Compliant		
Note	Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.		Note only		
4 - OPERATING CONDITIONS					
O1	Activities must be carried out in a competent manner				
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Boral Production Data Spreadsheet. Viewed Production Tracking System during inspection (QRS System). SLR have sighted an Inspection and Screening Receivals Protocol dated 28 February 2025. No material harm incidents or complaints have been reported during the audit period, no complaints were received. Review of management plan implementation has found that measures to prevent and/or minimise material harm to the environment have generally been implemented. Implementation of studies and construction of water management infrastructure required to facilitate Stage 1 Operations have been completed. Systems developed, implemented and checked to manage compliance.	Compliant		
O2 Maintenance of plant and equipment					
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	During the site visit SLR sighted evidence of work orders in the Boral site management system. Sighted Work Orders with Maximo (Work Order System) for the site loader with. All maintenance – work order, PO, works completed. All equipment / operational elements (fuel tanks for example) are managed and maintained systematically via work orders.	Compliant		

O3 Dust					
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the generation of dust at the premises; and prevent the emission of dust from the premises.	The site visit confirmed site was compliant against condition B36. All on-site car parking areas are sealed with concrete and asphalt; Water sprinklers at the stacker above the processed stockpile and transfer points must be utilised at all times when the plant is operational; Exposed surfaces and stockpiles are suppressed by regular watering; Sealed roads are swept regularly; Maintain the seal on the main access road from the wheel wash and weighbridge; All trucks entering or leaving the site with loads have their loads covered; Trucks associated with the development do not track dirt onto the public road network; Public roads used by these trucks are kept clean; and land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Compliant		
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Sighted Trucks arriving and leaving during site visit. Boral confirmed that Requirement is included in in the Drivers Code of Conduct induction package	Compliant		
O3.3	No material, including sediment is permitted to be tracked from the premises.	Sighted Vehicle Wash during site visit. During wet weather, no tracking on roads was observed.	Compliant		
O4 Emergency Response					
O4.1	A copy of the current version of the Pollution Incident Response Management plan (PIRMP) for the premises must be kept at the premises.	PIRMP, dated August 2025. Available at the following link. https://www.boral.com.au/sites/default/files/2025-08/Kooragang%20Recycling%20PIRMP%20-%20Aug%202025.pdf . Sighted PIRMP Test paperwork, dated 19 December 2024 It is noted that the PIRMP references superseded Regulations.	Compliant	OFI5	Consider updating the PIRMP against 2022 Regulations and Guideline.
Note:	A PIRMP is required under Part 5.7A of the Protection of the Environment Operations Act 1997 and its regulations. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident.	Note only	Note only		
O5 Processes and Management (Bunding)					
O5.1	All above ground tanks or containers containing material capable of causing harm to the environment must be stored within a bund or within an alternative spill containment system that achieves the same outcome.	Sighted Diesel Tank Onsite. Tank is a self bunded tank, thereby uses an alternate spill containment system. No spills observed during site visit (note site visit occurred during rainfall, spills would have been easily observed).	Compliant		
O5.2	Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank or container (or 110% volume of the largest tank or container where a group of tanks or containers are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure.	Sighted Diesel Tank Onsite. Tank is a self bunded tank, thereby uses an alternate spill containment system. No spills observed during site visit (note site visit occurred during rainfall, spills would have been easily observed).	Compliant		
O6 Other Operating Conditions - Protective and Low Permeability Sub-base Layers to Prevent Groundwater Pollution					
Note:	Pollution Reduction Program 3 required the installation of a suitable low permeability sub-base across the premises to protect groundwater from pollution, which includes: 1) a low permeability geosynthetic clay liner (referred to in this licence as the "Low Permeability Geosynthetic Clay Liner"); and 2) a 500 mm deep "Protective Layer" of compacted cement stabilised pavement, that sits above the Stabilised Layer (referred to in this licence as the "Protective Layer").	Note only	Note only		

O6.1	The licensee must maintain the Protective Layer at the premises at a suitable thickness that ensures the integrity of the Low Permeability Geosynthetic Clay Liner at all times.	Annual Water Quality and Discharge Report, dated July 2025. This inaugural report generally notes that Boral completed in installation of the low permeability Geosynthetic Clay Liner (GCL) and stabilisation layers in late 2024 / early 2025. The GCL layer was certified By Stantec Australia Pty Ltd in a report dated 4 December 2024. This report has previously been provided to the EPA to address conditions of the PRP.	Compliant		
O6.2	The licensee must maintain the integrity of the Low Permeability Geosynthetic Clay Liner at the premises at all times.	Following completion of the works associated with the construction of the GCL and Protective Layer for the facility, Boral completed the final survey of the Kooragang Recycling facility in March 2025. The survey was undertaken by a registered surveyor and the results of the survey will be used as a baseline to assess the effectiveness of the stability layer in future surveys. The EPL requires Boral to complete 6 monthly surveys of the site to assess the effectiveness of the protective layer and identify areas where any repairs to the protective layer may be required. The first survey is currently planned for September 2025 and every 6 months following this. All results will be supplied to the EPA in accordance with Condition R4.1 and reported in this Report.	Compliant		
O6.3	The licensee must ensure that the Low Permeability Geosynthetic Clay Liner has a permeability of at least 1x10 ⁻⁹ m/s at all times.	Annual Water Quality and Discharge Report, dated July 2025. This inaugural report generally notes that Boral completed in installation of the low permeability Geosynthetic Clay Liner (GCL) and stabilisation layers in late 2024 / early 2025. The GCL layer was certified By Stantec Australia Pty Ltd in a report dated 4 December 2024. This report has previously been provided to the EPA to address conditions of the PRP.	Compliant		
O6.4	The Licensee must install and maintain an appropriate depth marker system in the Protective Layer that ensures that the integrity of the Low Permeability Geosynthetic Clay Liner is maintained at all times.	Depth markers were observed during the site visit. Maintenance profiling was observed and discussed during the site visit	Compliant		
	Fly ash and Slag Storage				
O6.5	The licensee must only store fly ash or slag (excluding blended slag) on a dedicated concrete hardstand.	Kooragang does not accept fly ash onto site.	Not triggered		
Note:	The requirements of Conditions O6.1, O6.2, O6.3, O6.4 and O6.5 do not come into effect until completion of works as specified in Table 4.1 and 4.4 of the SWMMP.	Note only	Note only		
	Reuse of Contaminated Stormwater				

O6.6	The licensee must reuse as much of the collected stormwater as possible within the adjacent concrete batch plant, so as to prevent discharges of polluted water from the premises.	SLR have sighted Department approval dated 7 August 2024, of the SWMMP (prepared by EEM, dated 30 July 2024, version V4). SLR have sighted Department approval dated 23 October 2023, of the SWMMP (prepared by EEM, dated 24 July 2024, version V3). The approval letter confirms consultation with EPA, preparation in accordance with the Pollution Reduction Study and conditions of approval. Boral notified the Department of Planned Commencement on 1 March 2024. Boral confirmed that commencement of Construction occurred generally as per the notification of commencement. Boral confirmed the implementation status of key measures within the SWMMP (which were sighted as part of the site visit). - Yard Grading - Observed recent grading and depth monitors. - Lined drains and upgraded sediment forebay was sighted. - Boral confirmed the low-permeability layer has been installed. - New water storage tank observed - water sprays observed - Overflows occurred following recent significant rainfall events in the Hunter. The Annual Water Quality and Discharge Report, dated July2025 details Yard Pavement Surveys and Annual Infiltration Monitoring. EPL Variation, dated July 2025 removing PRP3 based on its completion. - Overflows occurred following recent significant rainfall events in the Hunter River occurred during significant events during a period of prolonged rainfall period.	Compliant		
5 - MONITORING AND RECORDING CONDITIONS					
M1 Monitoring Records					
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Monitoring records, lab reports, and records held onsite in folders within the Site Manager Office were sighted during site visit and discussed by as part of Interviews. Sighted Lab Comms. Sighted Testing Plans for May 2025. Refer to Website for all monitoring data. HTTPs://www.boral.com.au/boral-recycling-kooragang	Compliant		
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Monitoring records, lab reports, and records held onsite in folders within the Site Manager Office were sighted during site visit and discussed by as part of Interviews. Sighted Lab Comms. Sighted Testing Plans for May 2025. Refer to Website for all monitoring data. HTTPs://www.boral.com.au/boral-recycling-kooragang	Compliant		
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Monitoring records, lab reports, and records held onsite in folders within the Site Manager Office were sighted during site visit and discussed by as part of Interviews. Sighted Lab Comms. Sighted Testing Plans for May 2025. Refer to Website for all monitoring data. HTTPs://www.boral.com.au/boral-recycling-kooragang	Compliant		
M2 Requirement to Monitor Concentration of Pollutants Discharged					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Refer to Condition M2.2	Non-compliant	NC1	Refer to Condition M2.2
M2.2	Water and/or Land Monitoring Requirements				

M2.2 Point 2	Pollutant	Units of measure	Frequency	Sampling Method	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Sampling for metal analytes was not conducted in accordance with Condition M2.2 of EPL 11968 on 28 April 2025. During the first discharge event following the licence variation in October 2023, a sample of the discharge was collected, however, the sample was not analysed for any metal analytes and only pH and Electrical Conductivity results were assessed. Following the event, a review of the sampling processes was undertaken to rectify the error. The sampling laboratory was supplied with the updated licence requirements and the subsequent sampling event in May 2025 was in full compliance with the requirements of the licence.	Non-compliant	NC2	Conduct a review of site systems documents, including the EPP and sampling processes to ensure that monitoring meets requirements of the recently revised EPL 11968. .					
	Aluminium	milligrams per litre	Daily during any discharge	Grab sample									
	Chromium (total)	milligrams per litre	Daily during any discharge	Grab sample									
	Copper	milligrams per litre	Daily during any discharge	Grab sample									
	Cyanide	milligrams per litre	Daily during any discharge	Grab sample									
	Electrical conductivity	microsiemens per centimetre	Daily during any discharge	Grab sample									
	Nitrate + nitrite (oxidised nitrogen)	milligrams per litre	Daily during any discharge	Grab sample									
	Nitrogen (total)	milligrams per litre	Daily during any discharge	Grab sample									
	pH	pH	Daily during any discharge	Grab sample									
	Zinc	milligrams per litre	Daily during any discharge	Grab sample									
M2.2 Point 3, 4, 5, 6, 7, 8.	Pollutant	Units of measure	Frequency	Sampling Method	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Groundwater sampling was not undertaken at Monitoring Point 4 or Monitoring Point 7 as per the EPL requirements. Sampling of Monitoring Point 4 (Bore R1) was only undertaken once while sampling was not undertaken for Monitoring Point 7 (Bore R2) during the reporting period as Boral had commissioned Environmental Consultants Douglas Partners to review the existing bores and construct the required additional bores as part of the upgrade works for the site. Construction of the additional bores and assessment of the existing bores was completed in September 2024, with sampling undertaken in September following the commissioning phase. Monitoring Bore R1 was deemed suitable for sampling with the results reported in this annual return. Monitoring Bore R2 was deemed not suitable for sampling and a new Bore (Bore105) was subsequently constructed to replace Bore R2. All existing and new groundwater bores that will be used for future groundwater sampling were sampled in September 2024. Boral are in the process of engaging a monitoring consultant to undertake ongoing groundwater sampling of the bores in accordance with the EPL requirements.	Non-compliant	NC3	Refer to Condition M2.2					
	Aluminium	milligrams per litre	2 Times a year	Grab sample									
	Chromium (total)	milligrams per litre	2 Times a year	Grab sample									
	Copper	micrograms per litre	2 Times a year	Grab sample									
	Cyanide	milligrams per litre	2 Times a year	Grab sample									
	Depth	metres (Australian Height Datum)	2 Times a year	Grab sample									
	Electrical conductivity	microsiemens per centimetre	2 Times a year	Grab sample									
	Nitrate + nitrite (oxidised nitrogen)	milligrams per litre	2 Times a year	Grab sample									
	Nitrogen (total)	milligrams per litre	2 Times a year	Grab sample									
	pH	pH	2 Times a year	Grab sample									
	Zinc	milligrams per litre	2 Times a year	Grab sample									
	M3 Testing Methods - Concentration Limits												
	M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.							Boral utilise specialist, fit for purpose suppliers to undertake monitoring.	Compliant			
									Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).				
EPL Variation, dated 21 January 2025 (Ref 1644902) noting Change to Condition P1 to included updated Groundwater Monitoring Locations.													
Douglas Partners Report, Dated 3 October 2024 (Ref 91452.01) details groundwater well construction.													
Douglas Partners Report, Dated 22 May 2025 (Ref 91452.02) details engagement and results of ongoing groundwater monitoring.													
					Boral utilise RCA consultants to preform all environmental discharge monitoring for the site, sighted Discharge reports for May discharge events.								
M4 Weather Monitoring													

M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Boral confirmed that a weather station onsite that records all required information as per the EPL requirements. Note: No formal reference to Weather station within CEMP. However the 2025 EPP includes an action to confirm monitoring status of the weather station Opportunity for improvement: Consider documenting the management and monitoring of the weather stations with Boral site processes,	Compliant																						
M4.1 Point 1	<table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>-</td><td>Continuous</td></tr><tr><td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>Degrees</td><td>-</td><td>Continuous</td></tr><tr><td>Temperature at 10 metres</td><td>AM-2 & AM-4</td><td>degrees Celsius</td><td>-</td><td>Continuous</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	-	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	-	Continuous	Temperature at 10 metres	AM-2 & AM-4	degrees Celsius	-	Continuous	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). Boral confirmed that a weather station onsite that records all required information as per the EPL requirements. Note: No formal reference to Weather station within CEMP. However the 2025 EPP includes an action to confirm monitoring status of the weather station Opportunity for improvement: Consider documenting the management and monitoring of the weather stations with Boral site processes,	Compliant		
Parameter	Sampling method	Units of measure	Averaging period	Frequency																					
Wind Speed at 10 metres	AM-2 & AM-4	metres per second	-	Continuous																					
Wind Direction at 10 metres	AM-2 & AM-4	Degrees	-	Continuous																					
Temperature at 10 metres	AM-2 & AM-4	degrees Celsius	-	Continuous																					
M4.2	The licensee must ensure that the meteorological station on the premises complies with the requirements in the latest version of the Approved Methods of Sampling of Air Pollutants in New South Wales.	The weather station was supplied and is maintained by VGT. No documentation was available to the time of the audit to confirm that the weather station complies with M4.2	Non-compliant	NC4	Complete a review of the meteorological station / sensors to ensure the meteorological station complies with requirements of M4.2. Consider establishing a regular maintenance inspection program.																				
M5 Recording of Pollution Complaints																									
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	No Complaints have been received during the audit period. Section 6.4 of the CEMP details complaint management process.	Not triggered																						
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	No Complaints have been received during the audit period. Section 6.4 of the CEMP details complaint management process. The phone number is included on the website. In the recent upgrade, the phone number appears to have disappeared. This has been rectified. The site entry signage has the phone number on the sign. The concrete and recycling site are the same. Refer to Photo in the additional information.	Not triggered																						
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	No Complaints have been received during the audit period. Section 6.4 of the CEMP details complaint management process.	Not triggered																						
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	No Complaints have been received during the audit period. Section 6.4 of the CEMP details complaint management process.	Not triggered																						
M6 Telephone Complaints Line																									
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	A community complaint email address is included on the webpage https://www.boral.com.au/boral-recycling-kooragang. Public notification on website Recent upgrade of website - to be updated shortly. Complaints Line - On Gate.	Compliant																						
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	A community complaint email address is included on the webpage https://www.boral.com.au/boral-recycling-kooragang. Public notification on website Recent upgrade of website - to be updated shortly. Complaints Line - On Gate.	Compliant																						
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Not triggered																						
M7 Other Monitoring and Recording Conditions																									

Pavement Monitoring and Survey					
M7.1	The licensee must undertake monthly monitoring of the Protective Layer that ensures that an adequate thickness is maintained to protect the integrity of the Stabilised Layer depth and permeability.	Boral provided Monthly monitoring inspection forms for viewing during the site inspection. Sighted Monitoring Indicators during site visit	Compliant		
M7.2	The licensee must conduct a yard pavement survey every 6 months. The survey levels must be compared to the originally installed finished pavement levels of the Protective Layer and underlying low permeability Stabilised Layer to identify areas where the Protective Layer depth may have been reduced. The survey must validate both the Protective Layer and low permeability Stabilised Layer depths at each survey round and make statements as to whether their respective required depths have been maintained. The surveys must be undertaken by a registered surveyor. A copy of each survey report must be provided to the EPA within three months of the survey being undertaken.	Annual Water Quality and Discharge Report, dated July 2025. This inaugural report generally notes that the first monitoring event is scheduled for September 2025.	Not triggered		
Annual Infiltration Monitoring					
M7.3	Annual infiltration tests of the low permeability Stabilised Layer must be undertaken at two representative positions within the yard and/or trafficable area's. The infiltration tests must be undertaken using a Double-Ring Infiltrometer and be undertaken in accordance with the Standard titled, "Standard Test Method for Field Measurement of Infiltration Rate Using a Double-Ring Infiltrometer with a Sealed Inner Ring" ASTM International (D 5093-02). The monitoring must determine the in-situ permeability of the Stabilised Layer in metres per second.	Annual Water Quality and Discharge Report, dated July 2025. This inaugural report generally notes that Boral completed in installation of the low permeability Geosynthetic Clay Liner (GCL) and stabilisation layers in late 2024 / early 2025. The GCL layer was certified By Stantec Australia Pty Ltd in a report dated 4 December 2024. This report has previously been provided to the EPA to address conditions of the PRP. The first infiltration monitoring assessment is currently planned for September to align with the Annual Requirements. Results of the testing will be reported in the 2025-2026 Annual Return.	Not triggered		
6 Reporting Conditions					
R1	Annual Return Documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).	Compliant		
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).	Compliant		
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	An EPL Licence Transfer did not occur in the audit period	Not triggered		
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	The EPL surrender or revocation did not occur in the audit period	Not triggered		

R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25). POEO Website Annual Return for 2021/22 was not submitted within 60 days of 15 September.	Non-compliant	NC5	Complete a review of the EPP and confirm the submission timing for the Annual Return is captured.
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Annual Returns (2019/20, 2020/21, 2021/22, 2022/23, 2023/24, 2024/25).	Compliant		
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Returns (2019/20, 2020/21, 2021/22) - company signatures sighted Annual Returns (2022/23, 2023/24, 2024/25) - EPA portal signing process not sighted during site visit	Compliant		
Note:	The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Note only	Note only		
Note:	An application to transfer a licence must be made in the approved form for this purpose.	Note only	Note only		
R2 Notifications of Environmental Harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		

R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
Note:	The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
R3 Written Report					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Site Incident Register PIRMP, dated August 2025 Boral confirmed during site visit	Not triggered		
R4 Other Reporting Conditions - Annual Water Management Review Report					
R4.1	The licensee must prepare an annual Water Quality and Discharge Report that provides the following information for each Annual Return reporting period: a) the number of surface water overflows from the premises compared to the design overflow regime of around 2 overflows per year, as provided in the document titled "Kooragang RRF, Surface Water Mitigation and Monitoring Plan" prepared by EMM Consulting dated July 2023 (EPA reference DOC23/662105) (hereafter referred to as the (SWMMP); b) a summary of the rainfall data that preceded and contributed to each surface water discharge and where rainfall was less than the 120-170 mm predicted in the SWMMP to cause an overflow, reasons why such a discharge occurred; c) the volume of collected stormwater reused in the adjacent concrete batch plant on a monthly basis; d) a review of the water balance model provided in the SWMMP, including design rainfall, against actual site conditions; e) a review of any water quality data collected in accordance with the licence and the premises Water Management Plan as committed to in the SWMMP, including: a review of trends in water quality since monitoring began; and identification of any threshold exceedances of ANZECC (2018) criteria for further investigation; f) the results of the annual yard pavement survey and any actions taken in response to this survey; and g) the results of the annual infiltration monitoring, undertaken to check on the permeability of the Stabilised Layer. Included with this information must be a plan showing the testing locations of the current year's infiltration monitoring, plus all previous year's monitoring locations. The licensee must also document actions it has taken to address any situation where the in-situ permeability of the Stabilised Layer has fallen below 1 x 10 ⁻⁹ m/s.	Annual Water Quality and Discharge Report, dated July 2025. This inaugural report generally meets the requirements of R4.1. Further information may be required in future reports regarding monthly stormwater reuse volumes and monitoring trends.	Compliant		
7 - GENERAL CONDITIONS					
G1 Copy of License Kept at the Premises or Plant					

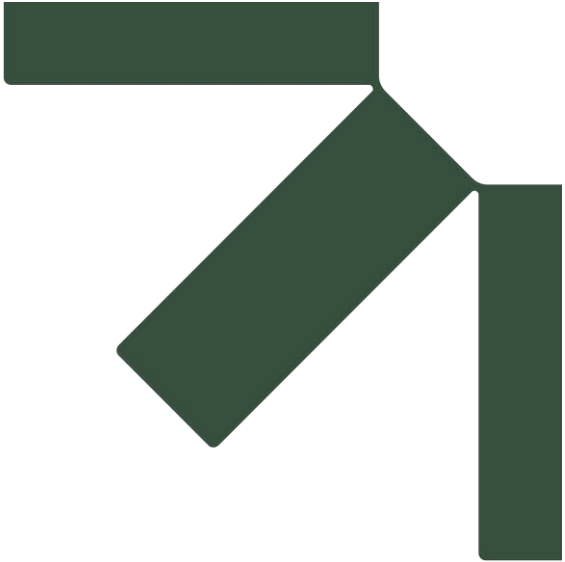
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	EPL is available on the Boral Website EPL is available in the site office	Compliant										
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	No requests from an EPA Officer have been received	Not triggered										
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	EPL is available on the Boral Website EPL is available in the site office	Compliant										
G2 Other General Conditions													
G2.1	Completed programs: <table><tr><td>Pollution Reduction Study (PRS) 1 - Surface Water Discharge Characterisation Assessment</td><td>The purpose of the Surface Water Discharge Characterisation Assessment is to inform the Licensee of the pollutants generated at the Premises so that appropriate mitigation measures to limit potential impacts on the receiving environment can be designed and implemented.</td><td>21-November-2019</td></tr><tr><td>PRS 2 - Surface Water Mitigation and Monitoring Report</td><td>The Surface Water Mitigation and Monitoring Plan (SWMMP) will be used to inform stage 1 and stage 2 construction at the Premises including identification of mitigation measures and monitoring requirements for the management of stormwater and groundwater at the premises. The SWMMP will be based on the results of the completed Surface Water Characterisation Plan.</td><td>26-July-2023</td></tr><tr><td>Pollution Reduction Program 3 - Water Pollution Mitigation and Monitoring Upgrades</td><td>Surface Water Management Upgrades in line with Surface Water Mitigation and Monitoring Plan, including upgraded storage capacity, low permeability pavements, concrete works to swale, re-use of water in the batch plant, additional surface and groundwater monitoring.</td><td>07-April-2025</td></tr></table>	Pollution Reduction Study (PRS) 1 - Surface Water Discharge Characterisation Assessment	The purpose of the Surface Water Discharge Characterisation Assessment is to inform the Licensee of the pollutants generated at the Premises so that appropriate mitigation measures to limit potential impacts on the receiving environment can be designed and implemented.	21-November-2019	PRS 2 - Surface Water Mitigation and Monitoring Report	The Surface Water Mitigation and Monitoring Plan (SWMMP) will be used to inform stage 1 and stage 2 construction at the Premises including identification of mitigation measures and monitoring requirements for the management of stormwater and groundwater at the premises. The SWMMP will be based on the results of the completed Surface Water Characterisation Plan.	26-July-2023	Pollution Reduction Program 3 - Water Pollution Mitigation and Monitoring Upgrades	Surface Water Management Upgrades in line with Surface Water Mitigation and Monitoring Plan, including upgraded storage capacity, low permeability pavements, concrete works to swale, re-use of water in the batch plant, additional surface and groundwater monitoring.	07-April-2025	Note only	Note only	
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8 - SPECIAL CONDITIONS													

Financial Assurance				
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as “Authorised Deposit-taking Institutions” under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential regulatory Authority (APRA) must be provided to the EPA. The financial assurance must be in favour of the EPA in the amount of five hundred thousand dollars (\$500,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The licensee must provide to the EPA the financial assurance of \$500,000 by no later than 5.00 p.m. on Tuesday 31 March 2020.	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. The Non-Compliance specifically relates to the requirement for Boral to provide the EPA a copy of the assurance by 5:00PM on Tuesday 31 March 2020. Evidence to demonstrate this correspondence had occurred was not available at the time of the audit.	Non-compliant	NC6 Source evidence of providing the required information to the EPA, or formally issue a copy of the financial assurance to the EPA.
E1.2	The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. However the non-compliance status of this Condition relates to the evidence of Boral providing the written confirmation to the EPA that the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	Non-compliant	NC7 Source evidence of providing the required information to the EPA, or formally issue a confirmation of the Bank issuing the guarantee is subject to the supervision of APRA to the EPA.
E1.3	The financial assurance must contain a term that provides that any money claimed can be paid to the EPA or, at the direction of the EPA, to any other person.	Guarantee Number BORAL RECY00059 effective 21 Feb 2020. No end date is specific 'Open Ended'. Item 6	Compliant	
E1.4	The financial assurance must be maintained during the operation of the facility, and thereafter, until such time as the EPA is satisfied the premises is environmentally secure.	Guarantee Number BORAL RECY00059 effective 21 Feb 2020. No end date is specific 'Open Ended'	Compliant	
E1.5	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried	Not Triggered	Not triggered	
E1.6	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises	Not Triggered	Not triggered	
E1.7	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E1.1, and b) the adjusted financial assurance as required by condition E1.5 and E1.6.	BORAL RECY00059 Held with Bank Operating in Australia. Effective Date is 21 February 2020 Sighted Signed Assurance Document. Importantly - Boral holds financial assurance (RECY00059), specifically to address Condition E1.1. However the non-compliance status of this Condition relates to the evidence of Boral providing the financial assurance in accordance with this Condition.	Non-compliant	NC8 Source evidence of providing the required information to the EPA, or formally issue the original counterpart guarantee to the EPA.
E1.8	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	Not Triggered	Not triggered	
E2 Environmental Obligations of Licensee				
E2.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents. b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. c) Provide all monitoring data as required by the conditions of this license or as directed by the EPA		Not triggered	

E2.2	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must: a) make all efforts to contain all firewater on the licensee’s premises, b) make all efforts to control air pollution from the licensee’s premises, c) make all efforts to contain any discharge, spill or run-off from the licensee’s premises, d) make all efforts to prevent flood water entering the licensee’s premises, e) remediate and rehabilitate any exposed areas of soil and/or waste, f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of, g) at the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee's premises, h) at the request of the EPA monitor surface water leaving the licensee’s premises; and i) ensure the licensee’s premises is secure.		Not triggered		
E2.3	After the licensee’s premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.	Boral provided DHPI with Notice of Commencement Letter, dated 1 February 2024. Outlining commencement is planned for 1 March 2024.	Not triggered		
Dictionary					
	Dictionary General Dictionary 3DGM (in relation to a concentration limit] Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples Act Means the Protection of the Environment Operations Act 1997 activity Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997 actual load Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009 AM Together with a number, means an ambient air monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i>. AMG Australian Map Grid anniversary date The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act. annual return Is defined in R1.1 Approved Methods Publication Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009 assessable pollutants Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009 BOD Means biochemical oxygen demand CEM Together with a number, means a continuous emission monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i>. COD Means chemical oxygen demand composite sample Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume. cond. Means conductivity environment Has the same meaning as in the Protection of the Environment Operations Act 1997 environment protection legislation Has the same meaning as in the Protection of the Environment Administration Act 1991 EPA Means Environment Protection Authority of New South Wales. fee-based activity classification Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009. general solid waste (non-putrescible) Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997 flow weighted composite sample Means a sample whose composites are sized in proportion to the flow at each composites time of collection. general solid waste (putrescible) Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997 grab sample Means a single sample taken at a point at a single time hazardous waste Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997 licensee Means the licence holder described at the front of this licence load calculation protocol Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009 local authority Has the same meaning as in the Protection of the Environment Operations Act 1997 material harm Has the same meaning as in section 147 Protection of the Environment Operations Act 1997 MBAS Means methylene blue active substances Minister Means the Minister administering the Protection of the Environment Operations Act 1997 mobile plant Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997 motor vehicle Has the same meaning as in the Protection of the Environment Operations Act 1997 O&G Means oil and grease percentile (in relation to a concentration limit of a sample] Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence. plant Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles. pollution of waters (or water pollution] Has the same meaning as in the Protection of the Environment Operations Act 1997 premises Means the premises described in condition A2.1 public authority Has the same meaning as in the Protection of the Environment Operations Act 1997. regional office Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence reporting period For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act. restricted solid waste Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997 scheduled activity Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997 special waste Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997 TM Together with a number, means a test method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i>. <td>Note only</td> <td></td> <td></td>	Note only			

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Note only



Appendix B Consultation

Independent Environmental Audit

Boral Kooragang Recycling Facility

Boral Recycling (NSW/ACT) Pty Ltd

SLR Project No.: 630.032403.00001

29 September 2025

Anna Cochrane

From: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Sent: Tuesday, 8 July 2025 5:09 PM
To: Anna Cochrane
Subject: RE: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024

You don't often get email from ann.hagerthy@planning.nsw.gov.au. [Learn why this is important](#)

Hi Anna,

Thanks for your email. The department has no specific focus areas in addition to the consent requirements for this audit. The department concurs with the below agencies for consultation, in addition to any others referenced in the consent requirements.

Thanks,

Ann Hagerthy

Senior Compliance Officer
Compliance | Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure

T (02) 6575 3407 E ann.hagerthy@planning.nsw.gov.au
516 High St, Maitland NSW 2320
dpie.nsw.gov.au



From: Anna Cochrane <acochrane@slrconsulting.com>
Sent: Thursday, 3 July 2025 4:14 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Stephen Shoesmith <sshoesmith@slrconsulting.com>
Subject: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024

Attention: Heidi Watters, Team Leader – Compliance

SLR Project Ref: 630.032403.00001

Dear Heidi,

Thank you for forwarding the Department's letter (attached), endorsing SLR's Audit Team to conduct the July 2025 Independent Environmental Audit (IEA) of the Kooragang Island Resource Recovery Facility (the Project), owned and operated by Boral Recycling (NSW/ACT) Pty Ltd (Boral) under SSD 7038 (the Consent).

We confirm that the IEA will be undertaken in accordance with Conditions C18 to C20 of SSD 7038 and the Independent Audit Post Approval Requirements (Department, May 2020, the IPARs). For your information,

SLR is developing an Audit Program in consultation with Boral to align with Condition C18 of the consent, which will be submitted to the Department via Boral.

As per part 3.2 Scope Development of the IPARs, we seek the Department's input to the scope of the audit, including any feedback on the Project and/or any key aspects that the Department would like reviewed within the scope of the IEA.

In addition to the above, we would also like to confirm any additional agencies that the Department would like consulted for input into the scope of this audit. In consideration of the Consent requirements, environmental context of the Project and consultation undertaken recently for similar IEAs, SLR proposes to consult with the following agencies:

- Department of Planning, Housing & Infrastructure (DPHI) – via this email request
- Department of Planning & Environment Water (DPE Water)
- Newcastle City Council (Council)
- Environment Protection Authority (EPA)

If the Department would like any other agencies included in the audit scope consultation, please advise as soon as possible to allow for adequate consideration prior to the audit site inspection, currently being planned for mid-late July.

If you would like to discuss the site or the IEA further, please do not hesitate to contact either Stephen Shoesmith (Lead Auditor), or myself as below.

Regards,
Anna Cochrane
Assistant Auditor

Anna Cochrane (*she/her/hers*)

BSc(Geol), GDip(SoilSci), Lead Auditor (EMS, C 427136 Exp: 17Mar2026)

Principal Consultant - Environmental Approvals, Closure & Management

[View my professional and personal accreditations](#)

D +61 7 4722 8028 **O** +61 7 4722 8000
M +61 408 052 844 **E** acochrane@slrconsulting.com

SLR Consulting Australia Pty Ltd
Level 1, 382 Sturt St, Townsville City, QLD, Australia 4810



SLR acknowledges the traditional custodians of Country and recognises their continuing stewardship and connection to land, water and community. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

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SLR is committed to the responsible and ethical use of relevant technologies including artificial intelligence (AI). If you have any questions or concerns, please contact us directly.

If you have received this e-mail in error, please notify the author and delete this message immediately.

Stephen Shoesmith

From: Patricia Borges <patricia.borges@dcceew.nsw.gov.au> on behalf of DPIE Water Assessments Mailbox <water.assessments@dpie.nsw.gov.au>
Sent: Tuesday, 15 July 2025 1:17 PM
To: Anna Cochrane
Subject: Re: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024
Attachments: DCCEEW Water - Kooragang Island Resource Recovery Facility - SSD 7038 - IEA.PDF

Hi Anna,

Thank you for your email.

Please find the NSW DCCEEW Water response attached.

Kind Regards,

Patricia Borges

Assistant Projects Officer

Knowledge Office | Department of Climate Change, Energy, the Environment and Water

[E patricia.borges@dpie.nsw.gov.au](mailto:patricia.borges@dpie.nsw.gov.au)

Level 17, 4 Parramatta Square, Parramatta NSW 2124

www.dcceew.nsw.gov.au

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Anna Cochrane <acochrane@slrconsulting.com>
Sent: Monday, 14 July 2025 4:42 PM
To: DPIE Water Assessments Mailbox <water.assessments@dpie.nsw.gov.au>
Cc: Stephen Shoesmith <sshoesmith@slrconsulting.com>
Subject: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024

SLR Project Ref: 630.032403.00001

Consultation: Department of Planning & Environment – Water (DPE Water)

To Whom it May Concern,

As per the attached letter, SLR's Audit Team have been endorsed by the Department of Planning, Housing, and Infrastructure (DPHI) to conduct the July 2025 Independent Environmental Audit (IEA) of the Kooragang Island Resource Recovery Facility (the Project), owned and operated by Boral Recycling (NSW/ACT) Pty Ltd (Boral) under SSD 7038 (the Consent).

The IEA will be undertaken in accordance with Conditions C18 to C20 of SSD 7038 and the Independent Audit Post Approval Requirements (Department, May 2020, the IPARs).

I am writing to request your organisation's feedback on the Project and/or any key aspects that you would like reviewed within the agreed scope of the IEA.

Feedback can be provided by responding to this email. To allow for adequate consideration within the IEA it is requested that feedback be provided as soon as possible, for consideration during the site inspection phase of the audit, proposed for mid-late July 2025.

If you would like to discuss the IEA for this Project further, please do not hesitate to contact either Stephen Shoesmith (Lead Auditor), or myself as below.

Regards,

Anna Cochrane
Assistant Auditor

Anna Cochrane (*she/her/hers*)

BSc(Geol), GDip(SoilSci), Lead Auditor (EMS, C 427136 Exp: 17Mar2026)

Principal Consultant - Environmental Approvals, Closure & Management

[View my professional and personal accreditations](#)

D +61 7 4722 8028 **O** +61 7 4722 8000
M +61 408 052 844 **E** acochrane@slrconsulting.com

SLR Consulting Australia Pty Ltd
Level 1, 382 Sturt St, Townsville City, QLD, Australia 4810



SLR acknowledges the traditional custodians of Country and recognises their continuing stewardship and connection to land, water and community. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

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Our ref: OUT25/8937

Anna Cochrane
SLR Consulting Australia PTY Ltd.
Email: acochrane@slrconsulting.com

15 July 2025

Subject: Kooragang Island Resource Recovery Facility - (SSD-7038) - IEA

Dear Anna Cochrane,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Z. Baker".

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

14 July 2025

SLR Ref No.: 630.032403.00001 NCC Consultation IEA 2025.docx

Newcastle City Council

Via website: <https://newcastle.nsw.gov.au/about-us/forms-and-publications/forms-and-permits/general-enquiry-form>

SLR Project No.: 630.032403.00001

**RE: Kooragang Island Resource Recovery Facility, SSD 7038:
Agency Consultation for Independent Environmental Audit July 2024**

To Whom it May Concern,

As per the attached letter, SLR's Audit Team have been endorsed by the Department of Planning, Housing, and Infrastructure (DPHI) to conduct the July 2025 Independent Environmental Audit (IEA) of the Kooragang Island Resource Recovery Facility (the Project), owned and operated by Boral Recycling (NSW/ACT) Pty Ltd (Boral) under SSD 7038 (the Consent).

The IEA will be undertaken in accordance with Conditions C18 to C20 of SSD 7038 and the Independent Audit Post Approval Requirements (Department, May 2020, the IPARs).

I am writing to request your organisation's feedback on the Project and/or any key aspects that you would like reviewed within the agreed scope of the IEA.

Feedback can be provided by responding to this email. To allow for adequate consideration within the IEA it is requested that feedback be provided as soon as possible, for consideration during the site inspection phase of the audit, proposed for mid-late July 2025.

If you would like to discuss the IEA for this Project further, please do not hesitate to contact me as below.

Regards,

SLR Consulting Australia Pty Ltd



Anna Cochrane, BSc G.Dip SoilSci

Principal Consultant – Environmental Assessment & Management;

Certified Lead Auditor - Environment

acochrane@slrconsulting.com

Ph: 0408052844

Attachments Appointment of Experts_10062025_052417.pdf

Stephen Shoemsmith

From: noreply@ncc.nsw.gov.au
Sent: Monday, 14 July 2025 4:56 PM
To: Anna Cochrane
Subject: City of Newcastle | Acknowledgement of your submission

You don't often get email from noreply@ncc.nsw.gov.au. [Learn why this is important](#)

Our Customer Service team aims to register submissions within two business days and allocate to the appropriate team for review.

Future requests: To assist with future requests, please refer to our comprehensive service catalogue available here: [Report an Issue or Request Assistance](#). By using these forms:

- your request will be automatically triaged to the appropriate team
- you will receive an automated confirmation email with reference number
- you will receive a notification when your request has been actioned or closed.

If you have any questions, call our friendly Customer Service team on [02 4974 2000](tel:0249742000), 8am to 5pm, Monday to Friday.

Note: For urgent issues, including public safety concerns, call us for immediate assistance. In an emergency or life-threatening situation, contact 000.

Your webform copy:

Title	Ms
First Name*	Anna
Last Name*	Cochrane
Email	acochrane@slrconsulting.com
Contact number	0408052844
Address*	SLR Consulting Pty Ltd
Suburb*	New Lambton NSW 2305
Exact location	Kooragang Island Resource Recovery Facility, SSD 7038 (Boral)
When did it occur	14/07/2025
Request Details*	Agency Consultation for Independent Environmental Audit July 2024. Details as per attached letter.

Customer Experience
City of Newcastle

Stephen Shoesmith

From: Adam Kalms <adam.kalms@epa.nsw.gov.au>
Sent: Wednesday, 16 July 2025 8:24 AM
To: Anna Cochrane
Cc: Stephen Shoesmith; Steve Clair
Subject: RE: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024 [ref:!00D7F06iTix.!500Mn0xev7F:ref]

You don't often get email from adam.kalms@epa.nsw.gov.au. [Learn why this is important](#)

Hi Anna,

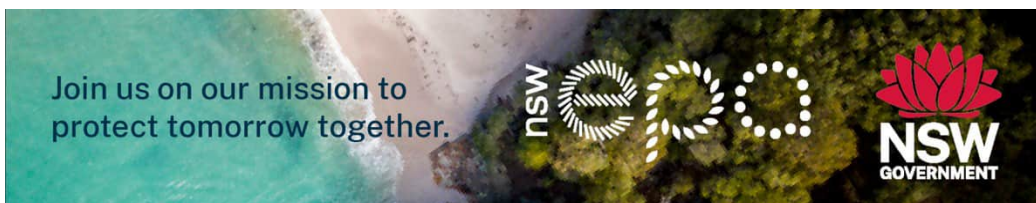
Thank you for your email, the EPA does not have any comments on the scope of the audit.

Thank you,

Adam Kalms

A/ Senior Operations Officer
Northern Sydney & Hunter
NSW Environment Protection Authority
T 02 4908 6881 | M 0461 558 327 | www.epa.nsw.gov.au

Working days: Monday to Friday



The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

I work on Awabakal Country.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

----- Forwarded Message -----

From: Anna Cochrane [acochrane@slrconsulting.com]
Sent: 14/07/2025 16:44
To: info@epa.nsw.gov.au
Cc: sshoesmith@slrconsulting.com
Subject: Kooragang Island Resource Recovery Facility, SSD 7038: Agency Consultation for Independent Environmental Audit July 2024

SLR Project Ref: 630.032403.00001

Consultation: NSW Environment Protection Authority

To Whom it May Concern,

As per the attached letter, SLR's Audit Team have been endorsed by the Department of Planning, Housing, and Infrastructure (DPHI) to conduct the July 2025 Independent Environmental Audit (IEA) of the Kooragang Island Resource Recovery Facility (the Project), owned and operated by Boral Recycling (NSW/ACT) Pty Ltd (Boral) under SSD 7038 (the Consent).

The IEA will be undertaken in accordance with Conditions C18 to C20 of SSD 7038 and the Independent Audit Post Approval Requirements (Department, May 2020, the IPARs).

I am writing to request your organisation's feedback on the Project and/or any key aspects that you would like reviewed within the agreed scope of the IEA.

Feedback can be provided by responding to this email. To allow for adequate consideration within the IEA it is requested that feedback be provided as soon as possible, for consideration during the site inspection phase of the audit, proposed for mid-late July 2025.

If you would like to discuss the IEA for this Project further, please do not hesitate to contact either Stephen Shoesmith (Lead Auditor), or myself as below.

Regards,

Anna Cochrane

Assistant Auditor

Anna Cochrane *(she/her/hers)*

BSc(Geol), GDip(SoilSci), Lead Auditor (EMS, C 427136 Exp: 17Mar2026)

Principal Consultant?Environmental Approvals, Closure & Management

[View my professional and personal accreditations](#)

D +61 7 4722 8028 **O** +61 7 4722 8000

M +61 408 052 844 **E** acochrane@slrconsulting.com

SLR Consulting Australia Pty Ltd
Level 1, 382 Sturt St, Townsville City, QLD, Australia 4810



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If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Department of Climate Change, Energy, the Environment and Water.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



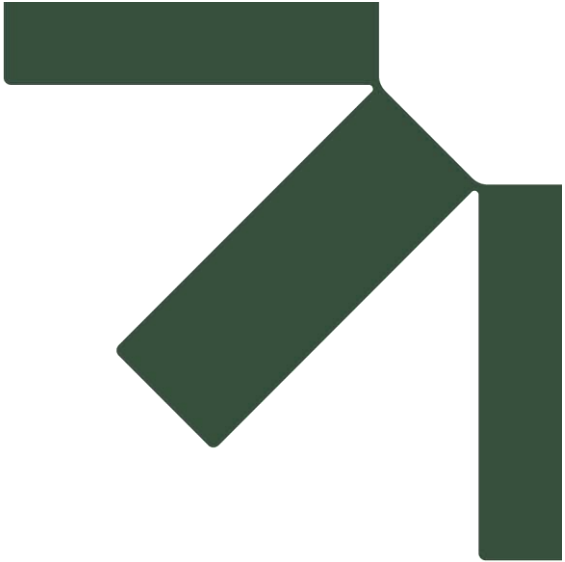
ref:!00D7F06iTix.!500Mn0xev7F:ref

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If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



Appendix C Audit Endorsement and Program

Independent Environmental Audit

Boral Kooragang Recycling Facility

Boral Recycling (NSW/ACT) Pty Ltd

SLR Project No.: 630.032403.00001

29 September 2025

NSW Planning ref: SSD-7038-PA-9

Glenn Cook
Environmental Business Partner
BORAL RECYCLING PTY LIMITED

10/06/2025

Sent via the Major Projects Portal only

Subject: Kooragang Island Resource Recovery Facility – Independent Environmental Audit Team
Endorsement - 2025

Dear Mr. Cook

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit (IEA) of the Kooragang Island Resource Recovery Facility, as required by development consent SSD-7038 (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 6 June 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with the consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Stephen Shoesmith – Lead Auditor
- Anna Cochrane – Assistant Auditor

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

Please note, the Lead Auditor must attend the site inspection.

Please ensure this correspondence is appended to the Independent Audit Report.

Should you wish to discuss the matter further, please contact me on 02 65753401 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Technical Memorandum



To: Glenn Cook
Environmental Business Partner

From: Stephen Shoesmith

Company: Boral

SLR Consulting Australia

cc:

Date: 19 August 2025

Project No. 630.032403.00001

RE: Kooragang Recycling Facility: Independent Environmental Audit - 2025

Confidentiality

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1.0 Audit Particulars

Table 1 Overview

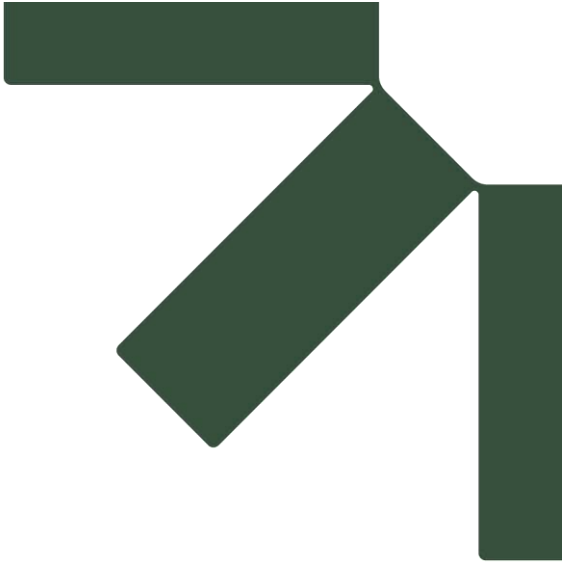
CLIENT SITE CONTACT	Glenn Cook. Environmental Business Partner NSW E: glenn.cook@boral.com.au M: 0458 155 337 Richard Haskett (Site Manager)
WEBSITES	Boral Environmental Assessments, Approvals & Reports: https://www.boral.com.au/boral-recycling-kooragang NSW Major Projects Website: https://www.planningportal.nsw.gov.au/major-projects/projects/kooragang-island-resource-recovery-facility
LEAD AUDITOR	Stephen Shoesmith M: 0488 153 499 E: sshoesmith@slrconsulting.com
AUDIT TEAM	Anna Cochrane M: 0408 052 844 E: acochrane@slrconsulting.com
AUDIT PERIOD	10 July 2019 to 19 August 2025
SITE VISIT	August 2025
REFERENCES	SSD 7038 <i>Independent Audit Post Approval Requirements (Department 2020)</i> <i>AS/NZS ISO 19011-2014: Guidelines for Auditing Management Systems (Standards Australia, 2014)</i>
AUDIT SCOPE	The IEA will assess the compliance of the Boral Kooragang Recycling Facility against the relevant conditions of Development Consent SSD 7038. As required by Condition C18 and C19 of SSD 7038, the audit program and scope has been prepared in accordance with Independent Audit Post Approval Requirements and is to be by the 31 August 2025. Submitted by 30 September 2025. The scope of the IEA is to assess the key approvals and documentation including: • Conditions of SSD 7038. • Management Plans prepared under SSD 7038. • Mitigation Measures detailed in Appendix 2 of SSD 7038. • Environmental Protection Licence 11968.

	The physical boundaries of the audit are defined by the Development Consent Approval area, which is outlined in Appendix 1 of SSD 7038.								
AUDIT CRITERIA	The audit criteria applied to the IEA includes: • Conditions of SSD 7038. • Management Plans prepared under SSD 7038. • Mitigation Measures detailed in Appendix 2 of SSD 7038. • The physical boundaries of the audit are defined by the Development Consent Approval area, which is outlined in Appendix 1 of SSD 7038. • Environmental Protection Licence 11968.								
AUDIT METHODOLOGY	The audit methodology will align with the Independent Audit Post Approval Requirements and will generally include the following: • Desktop audit. • Site verification. • Interviews with key personnel. • Site walkover inspection by audit team. • Assessment of compliance status of the project operations against the conditions of the SSD, other relevant environmental approvals and licences, for construction activities and operations carried out during the applicable audit period. • Audit report including a detailed evaluation of performance, summary of performance, and suggestions for continuous improvement. • Audit scoring to indicate compliance status for each of the respective projects to be audited. • All reports will detail the requirements outlined in Section 4 of the Independent Audit Post Approval Requirements								
COMPLIANCE STATUS DESCRIPTORS	The terms used in the audit to describe compliance of the site with the relevant approval documentation are outlined in the table below. Compliance Status Descriptors <table border="1"> <thead> <tr> <th>Assessment status</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Compliant</td><td>The auditor has collected sufficient verifiable evidence to demonstrate that all the elements of the requirement have been complied with within the scope of the audit.</td></tr> <tr> <td>Non-compliant</td><td>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.</td></tr> <tr> <td>Not Triggered</td><td>A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.</td></tr> </tbody> </table>	Assessment status	Description	Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all the elements of the requirement have been complied with within the scope of the audit.	Non-compliant	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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
Assessment status	Description								
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all the elements of the requirement have been complied with within the scope of the audit.								
Non-compliant	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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.								
CONSULTATION	Consultation Included: - Department of Planning, Housing and Infrastructure. - Department of Climate Change, Energy, the Environment and Water (DCCEEW). - Newcastle City Council (Council). - Environment Protection Authority (EPA). DCCEEW provided detailed comments, Newcastle Council provided no comments.								

2.0 Audit Timetable (Indicative)

Table 2 Timing

DAY / TIME	ACTIVITY	PERSONNEL
TUESDAY 19TH AUGUST 2025		
9:00am	Arrive at site Visitor inductions Work area orientation & set-up	Environmental Business Partner
9:15am	Opening Meeting • Introductions • Purpose & scope of site visit and audit • Logistics / Arrangements (site access, data collection methods – photographs, confidentiality, hygiene, quarantine / biosecurity, site inspection process & timing, Confirmation of proposed schedule & resources • Presentation by Boral (site overview, key activities during audit period, environmental resources, management systems)	Environmental Business Partner Site personnel as relevant
9:45am – 12:00pm	Site Walkover and Team Interviews • Operational / Processing areas • Workshop / Maintenance areas • Waste treatment / storage areas • Water management & treatment systems • Environmental monitoring locations • Site surroundings • Fuel and Oil Storage Facilities	Environmental Business Partner Other site personnel as relevant: • Recycling • Operations
12:00pm – 12:30pm	Lunch	
12:30pm – 2:30pm	Onsite Audit Data Collection & Validation • Conduct a rapid review of the compliance checklist and evidence required to identify the status of plant operations against the various project conditions / themes and to identify key information / evidence to follow up via RFI / remote auditing. Audit Closing Meeting • Overview of activities and findings from onsite activities • Confirmation of arrangements for remote audit & reporting	Environmental Business Partner
2:30pm	Leave site – End of Site Visit	



Appendix D Audit Declarations

Independent Environmental Audit

Boral Kooragang Recycling Facility

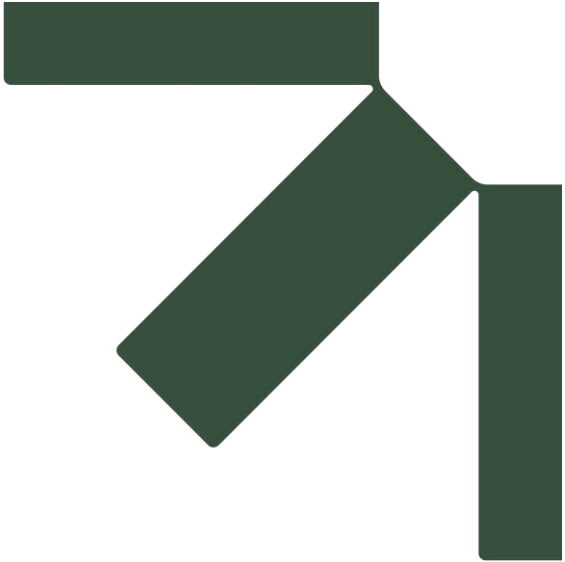
Boral Recycling (NSW/ACT) Pty Ltd

SLR Project No.: 630.032403.00001

29 September 2025

Independent Audit Declaration Form	
Project Name	Boral Kooragang Recycling Facility
Consent No.	SSD-7038
Description of Project	Construction and operation of a Resource Recovery Facility
Project Address	1 / 24 Egret Street, Kooragang, New South Wales
Proponent	Boral Recycling (NSW/ACT) Pty Ltd
Title of Audit	Independent Environmental Audit Boral Kooragang Recycling Facility SSD 7038
Date	29 September 2025
<i>I declare that I have undertaken the Independent Audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i> <i>i) The audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);</i> <i>ii) The findings of the audit are reported truthfully, accurately and completely;</i> <i>iii) I have exercised due diligence and professional judgement in conducting the audit;</i> <i>iv) I have acted professionally, objectively and in an unbiased manner;</i> <i>v) I am not related to any proponent, owner or operator of the project, neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;</i> <i>vi) I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;</i> <i>vii) Neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and</i> <i>viii) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> Notes: <i>a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</i> <i>b) The Crimes Act 1990 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).</i>	
Name of Auditor	Stephen Shoesmith
Signature	
Qualifications	Master of Integrated Environmental Management, University of Bath (2016). Bachelor of Environmental Science University of Newcastle (2007). Certified Exemplar Global Lead Auditor (Certificate No. C-478261, expires 23 July 2026)
Company	SLR Consulting Australia Pty Ltd
Company Address	Stephen Shoesmith

Independent Audit Declaration Form	
Project Name	Boral Kooragang Recycling Facility
Consent No.	SSD-7038
Description of Project	Construction and operation of a Resource Recovery Facility
Project Address	1 / 24 Egret Street, Kooragang, New South Wales
Proponent	Boral Recycling (NSW/ACT) Pty Ltd
Title of Audit	Independent Environmental Audit Boral Kooragang Recycling Facility SSD 7038
Date	29 September 2025
<i>I declare that I have undertaken the Independent Audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i> <i>ix) The audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);</i> <i>x) The findings of the audit are reported truthfully, accurately and completely;</i> <i>xi) I have exercised due diligence and professional judgement in conducting the audit;</i> <i>xii) I have acted professionally, objectively and in an unbiased manner;</i> <i>xiii) I am not related to any proponent, owner or operator of the project, neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;</i> <i>xiv) 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;</i> <i>xv) 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> <i>xvi) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> Notes: <i>c) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</i> <i>d) The Crimes Act 1990 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).</i>	
Name of Auditor	Anna Cochrane
Signature	
Qualifications	G.Dip (Soil Science) B.Sc (Geology) Certified Exemplar Global Lead Auditor (Certificate No. C-427136, expires 17 Mar 2026)
Company	SLR Consulting Australia Pty Ltd
Company Address	Suite 1, 382 Sturt Street, Townsville QLD 4810



Appendix E Site Inspection Photographs

Independent Environmental Audit

Boral Kooragang Recycling Facility

Boral Recycling (NSW/ACT) Pty Ltd

SLR Project No.: 630.032403.00001

29 September 2025

Photos – Site Observations

Photo 1: Water Treatment Pond (19 August 2025)

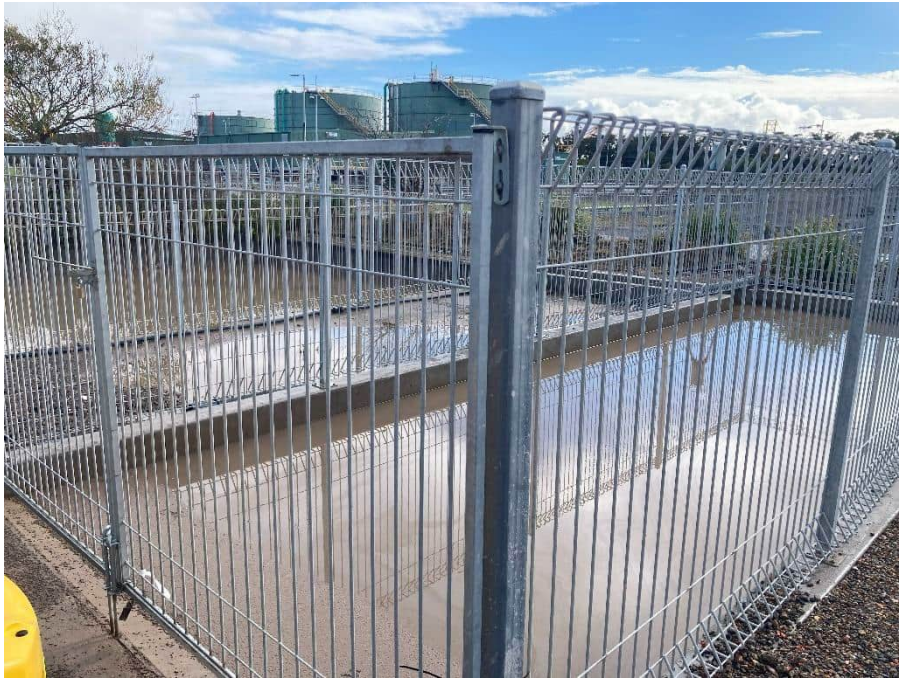


Photo 2: Tank, Machinery and Pumping Area (19 August 2025)



Photo 3: Pumping Area (19 August 2025)



Photo 4: Tank and Traffic Separation (19 August 2025)



Photo 5: Stockpiles and Machinery (19 August 2025)



Photo 6: Tank Storage and Pipework (19 August 2025)



Photo 7: Recycling Tip Area (19 August 2025)



Photo 8: Stockpiled Material (19 August 2025)



Photo 9: Impervious Layer Maintenance (19 August 2025)



Photo 10: Impervious Layer Maintenance (19 August 2025)



Photo 11: Concrete banded boundary (19 August 2025)



Photo 12: Concrete banded boundary (19 August 2025)



Photo 13: Aggregate (19 August 2025)



Photo 14: Refuelling Station (19 August 2025)



Photo 15: Spill Station (19 August 2025)



Photo 16: Diesel Storage (19 August 2025)



Photo 17: Fire Extinguisher (19 August 2025)



Photo 18: Chemical Storage/Laydown area (19 August 2025)

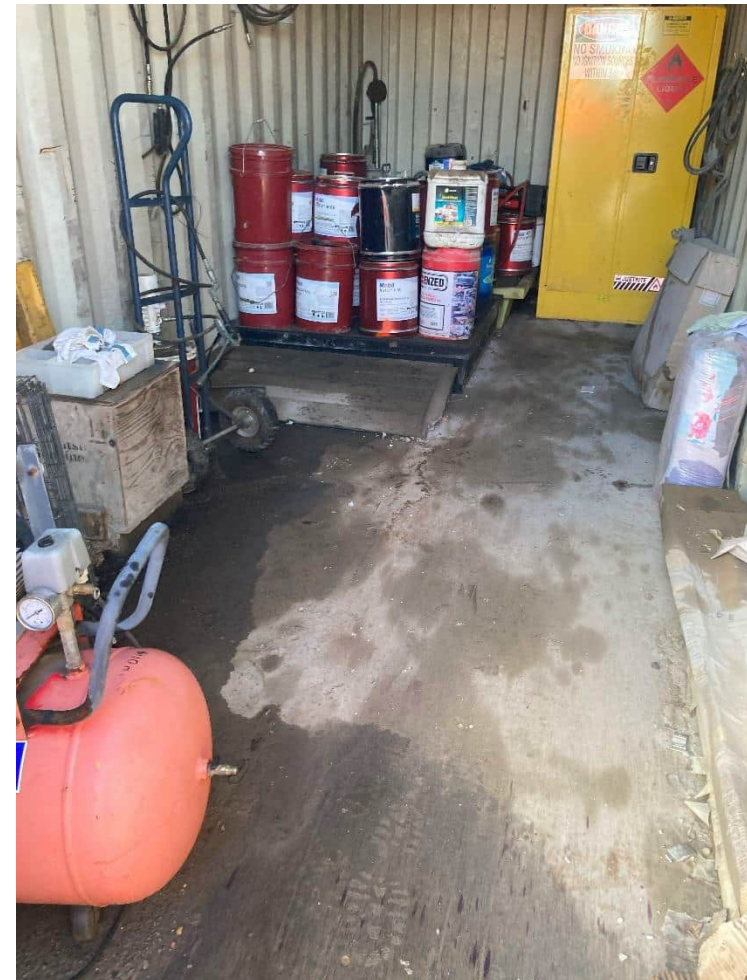


Photo 19: Chemical Storage Shed (19 August 2025)

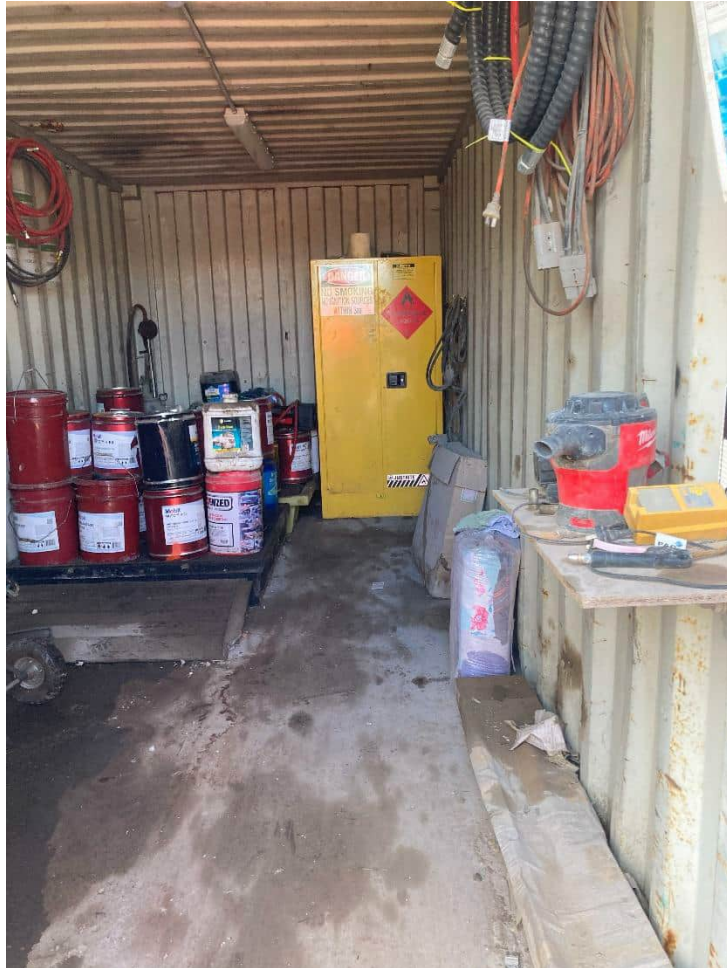


Photo 20: Vehicle Washdown Bay (19 August 2025)



Photo 21: Site Signage (19 August 2025)



Photo 22: Site Entrance – No Mud Tracking (19 August 2025)



