



Independent Audit No.1

Ravensworth Composting Facility

SSD-9418

September 2024



Audit Details

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Inherent Limitations

*This Report has been prepared at the request of Bettergrow Pty Ltd (**Bettergrow**), in the Scope Section of KPMG's engagement letter dated 12th August 2024.*

The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirety and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by Bettergrow employees consulted as part of the process.

KPMG has indicated within this Report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the Report.

KPMG is under no obligation in any circumstance to update this Report, in either oral or written form, for events occurring after the Report has been issued in final form.

The findings in this Report have been formed on the above basis.

Third Party Reliance

This Report is solely for the purpose set out in the Audit Objectives and Scope Section and for Bettergrow's information, and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This Report has been prepared at the request of Bettergrow, in accordance with the terms of KPMG's engagement letter dated 12th August 2024. Other than our responsibility to Bettergrow, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party. Any reliance placed is that party's sole responsibility.

Executive Summary

Background

KPMG has been engaged by Bettergrow Pty Ltd (Bettergrow) to undertake an Independent Environmental Audit (IEA) at the Ravensworth Composting Facility Expansion (RCFE) project (the Project) located at 74 Lemington Road, Ravensworth NSW (the Site). This IEA has been undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR) as required by the State Significant Development (SSD-9418) conditions of consent.

This is the first IEA to be undertaken at the site, which was required to be commissioned within 12 months of the commencement of operations. The audit period is defined from the commencement of construction activities (24 January 2023) to the date of the audit (21 August 2024).

The Project was approved by the Minister for Planning on 31 August 2022 and holds an SSD Consent (SSD-9418). The Project includes the expansion of an existing composting operation (previously approved by Local Council) including the construction of a new treatment pad and associated drainage and leachate collection infrastructure, and an increase in operational capacity to process up to 200,000 tonnes per annum (TPA) of organic material. The additional treatment pad and associated infrastructure (the Project) is also referred to as the 'Stage 2' works, while the initial treatment pad and infrastructure is referred to as 'Stage 1' works. Due to the increase in operational capacity, the Project was considered to be SSD in accordance with the State Environmental Planning Policy (SEPP).

Based on the evidence provided, the Project is considered to have demonstrated a strong environmental performance during the audit period. Three (3) non-compliances have been identified during this Audit, however they are considered administrative in nature and have not been associated with any actual environmental impacts. There has been one (1) notifiable incident at the site in relation to a mine subsidence event resulting in the release of water from a leachate dam. It is understood that the incident did not cause any actual environmental harm due to the leachate water being contained within the wider AGL site with no sensitive receivers impacted.

Based on the interviews and observations made during the audit, the Bettergrow site operations and management teams are considered to have demonstrated a strong awareness of their environmental obligations, including OEMP requirements and relevant SSD-9418 conditions of approval, with the following key strengths noted:

- The site presented well during the inspection with no evidence of dust, sediments or other pollutants observed to be escaping the boundaries. Only minor issues were identified during the site inspection.
- The site induction contained a comprehensive summary of environmental requirements, including the conditions of approval and management plans.
- Chemical storage was well managed, with the storage areas clean and tidy, bunding and spill kits provided and no evidence of spills or leaks occurring.
- Dust suppression was well managed via use of a dedicated water cart and a network of sprinklers to keep the compost windrows moist.

- Bettergrow management utilised an internal compliance tracking register to compile evidence against each condition of approval, making it readily available to the Auditor.
- Bettergrow utilised a platform 'Safe by Choice' to store plant and equipment and employee competency information..

Site Inspection

In addition to multiple positive observations, two (2) minor issues were identified, which do not constitute non-compliances or opportunity for improvements, as detailed below:

- Moderate amounts of shredded plastic litter had collected within the swale drains on site. The Auditor understands that plastic enters the site via the green waste streams and is predominately removed via mechanical screening processes. However, various amounts of plastic remain in the compost windrows. Routine housekeeping / maintenance activities are required on an ongoing basis to prevent plastic litter from building up in swale drains. This was considered by the Auditor to be a minor issue and a low risk.
- A moderate odour was observed when downwind of the compost stockpiles. Given the significant distance to the nearest receptor (>7kms), odour was not considered to present a major issue, nor would it meet the definition of an 'offensive odour' within the Protection of the Environment Operations Act 1997 (POEO Act). The auditor also notes that the process of composting, whereby the materials are constantly being mixed and aerated is in itself a practical odour management strategy. This was considered by the Auditor to be a minor issue and a low risk.

Audit Findings

Table E.1: Summary of Audit Findings

Reference	Requirement Details	Finding Details
Non-compliance RCF-01_NC-1	A2 Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent;	Considering the non-compliance raised against CoA A8 and A10, this triggers an additional non-compliance against CoA A2 Recommendation: Nil
Non-compliance RCF-01_NC-2	A8 Notification of Commencement The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month	KPMG sighted a letter from Bettergrow to DPHI Re: Notification of commencement of construction in accordance with A8(a), dated 24 January 2023. Ref: SSD-9418-PA-3.

Reference	Requirement Details	Finding Details
	<p>before that date, or as otherwise agreed with the Planning Secretary:</p> <p>a) construction.</p>	<p>The letter advised that construction in the form of minor excavation, consisting of the removal of topsoil only, had commenced on site.</p> <p>Based on the above, it has been determined that the Planning Secretary was not notified at least one month prior to commencement of construction.</p> <p>Recommendation: Nil</p>
<p>Non-compliance</p> <p>RCF-01_NC-3</p>	<p>A10 Surrender of Existing Consents or Approvals</p> <p>Within six 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 DA140/2016 in accordance with the EP&A Regulation.</p>	<p>KPMG sighted a letter from Bettergrow to Singleton Council Re: Notification of Surrender of Development Application No. 140/2016, dated 20 May 2024.</p> <p>Construction is noted to have commenced 24 January 2023.</p> <p>The development consent was not surrendered within the required 6-month timeframe, taken to have been from the date of commencement of construction activities.</p> <p>Recommendation: Nil</p>
<p>Opportunity for Improvement</p> <p>RCF-01_OFI-01</p>	<p>B5 Pests, Vermin and Priority Weed Management</p> <p>The Applicant must:</p> <p>a) implement suitable measures to manage pests, vermin and declared priority weeds on the site.</p>	<p>KPMG sighted a completed Workplace and Environmental Inspection Checklist, dated 1 July 2024. The sighted example did not include references to pest and vermin. It was observed that an updated version of the checklist had been created by the Environmental Manager which included a pest and vermin checklist section, however, site personnel were not utilizing the current version.</p> <p>Recommendation: It is recommended that the most current version of the Workplace and Environmental Inspection Checklist is provided to and utilised by all employees, including provision of training on any new sections, such as how to undertake pest and vermin checks.</p>
<p>Opportunity for Improvement</p> <p>RCF-01_OFI-02</p>	<p>C1 Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines.</p>	<p>It was observed that the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) had been 'Authored' and 'Approved' by the same individual.</p>

Reference	Requirement Details	Finding Details
		<p>Recommendation: In accordance with industry best practice, it is recommended that a second party review and/or approval of the management plan document is undertaken during future revisions.</p>
<p>Opportunity for Improvement</p> <p>RCF-01_OFI-03</p>	<p>C1 Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines.</p>	<p>Review of the OEMP against the requirements of the <i>Department of Planning, Industry and Environment (DPIE), Post Approval Guidance, Environmental Management Plan Guideline</i> found that Hold Points had not been considered in the OEMP.</p> <p>The environmental risk assessment included in the Pollution Incident Response Management Plan includes an item for "pollution of waterways from leachate". One of the preemptive control measures listed is "three 'chain of pond' basins on site." Following the leachate incident, the western leachate pond has been disconnected and all surface water is directed to the Stage 2 leachate dam meaning that this control measure has been compromised.</p> <p>Recommendation: In order to align with DPIE guidelines, there is an opportunity to revise the OEMP to include considerations of hold points, i.e., there may be a hold point prior to the discharge of water from the leachate pond, whereby sampling is to be undertaken and authorisation to discharge is provided by the Environment Manager.</p> <p>There is also an opportunity to update the risk register in the OEMP PIRMP to confirm that the listed control measures are appropriate.</p>

1 Introduction

1.1 Background

KPMG has been engaged by Bettergrow Pty Ltd (Bettergrow) to undertake an Independent Environmental Audit (IEA) at the Ravensworth Composting Facility Expansion (RCFE) project (the Project) located at 74 Lemington Road, Ravensworth NSW (the Site). This IEA has been undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR) as required by the State Significant Development (SSD-9418) conditions of consent.

This is the first IEA to be undertaken at the site, which was required to be commissioned within 12 months of the commencement of operations. The audit period is defined from the commencement of construction activities (24 January 2023) to the date of the audit (21 August 2024).

This IEA sought to assess and provide findings on compliance with SSD-9418 conditions of approval and to assess the implementation and effectiveness of the Project's environmental management plans in accordance with the methodology outlined within the IAPAR 2020.

Any references to 'audit', 'independent', 'review' and / or 'verification' in this report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance, or an audit opinion, have been expressed in this report.

The evidence used to test the compliance status with respect to each condition has been documented in Appendix A with a summary of audit findings and recommendations provided in Section 4.14.

1.2 Project Details

The Project was approved by the Minister for Planning on 31 August 2022 and holds an SSD Consent (SSD-9418). The Project includes the expansion of an existing composting operation (previously approved by Local Council) including the construction of a new treatment pad and associated drainage and leachate collection infrastructure, and an increase in operational capacity to process up to 200,000 tonnes per annum (TPA) of organic material. The additional treatment pad and associated infrastructure (the Project) is also referred to as the 'Stage 2' works, while the initial treatment pad and infrastructure is referred to as 'Stage 1' works. Due to the increase on operational capacity, the Project was considered to be SSD in accordance with the State Environmental Planning Policy (SEPP).

The Project includes both construction and operational phases. Construction works included the development of an additional pad for the receiving and processing of green waste and biosolids and construction of associated drainage infrastructure and a new leachate dam. Construction of the Stage 2 treatment pad commenced on 24 January 2023 and was completed by December 2023. Operations commenced on the 'Phase 2' portion of the site on 7 January 2024.

Operational activities generally include the receipt of shredded green waste from curbside green bins and biosolid waste from sewage treatment plants, which are blended via a series of machine

processes to remove oversized objects and plastic contamination. The mixed waste is stockpiled in windrows for a period of time to allow for pasteurization to occur, where temperatures reach 55-65°C and destroy organic contaminants, seeds and parasites. The finished compost product is used by the adjacent AGL coal mine, for rehabilitation purposes, and other third-party users.

1.3 Audit Team

In accordance with condition C16 of SSD-9418 and IAPAR 2020, Independent Auditors must be suitably qualified, experienced and independent of the Project, and endorsed by the Planning Secretary prior to each IEA. Details of the KPMG audit team, as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Table 1.1: Audit Team Details

Name	Company Title	Audit Position	Certifications
Dylan Jones	KPMG Director	Lead Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C-464532 M. Environmental Engineering Management B. Environmental Science & Management Certified Environmental Practitioner (CEnvP)
Gary Selwyn	KPMG Partner	Alternate Lead Auditor and Technical Peer reviewer	Principal Environmental Auditor – Institute of Environmental Management & Assessment (IEMA) MSc. Environmental Science BSc (Hons). Biological Sciences
Jack Hanigan	KPMG Consultant	Audit Team Member / Assistant	B. Environmental Management, Earth Science B. Science

Endorsement of the Audit Team was provided by DPHI on 6 August 2024 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

2 Audit Objectives and Scope

2.1 Audit Objectives

The objective of this audit was to satisfy SSD-9418 condition of approval C16 by undertaking an independent assessment of environmental performance and compliance against the Project's conditions of approval and environmental mitigation measures. Condition C16 states that *Audits must be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)*.

2.2 Audit Scope

The scope of the audit included undertaking an assessment of compliance against the project's conditions of approval of SSD-9418 Schedule 2, Parts A, B and C, including Advisory Notes and Appendices.

An overview of the audit scope undertaken by the KPMG audit team includes the following:

- Review the implementation of management plans, including:
 - Construction Environmental Management Plan, Rev 1, dated 17 November 2022.
 - Operational Environmental Management Plan, Rev 2, dated 20 December 2023 (including waste management, air quality, surface water and groundwater, traffic, emergency, pollution response, biosecurity management plans and procedures).
- Site inspection conducted on 21 August 2024:
 - A high-level assessment of the effectiveness of environmental management plans.
 - Assess general environmental performance.
 - Review of records.
 - Assess the physical extent of the project compared to the approved boundary.
 - Interviews with site personnel.
- Conduct audit interviews at the Bettergrow head office.

The audit scope did not include assessing compliance against the site's Environmental Protection Licence (EPL 7654), as this is not required by the IAPAR.

2.3 Audit Period

This is the first IEA undertaken on the Project and has been designed to cover all activities from commencement of construction to the date the IEA was conducted. The audit period is therefore defined as the period between **24 January 2023 to 21 August 2024**.

3 Audit Methodology

3.1 Endorsement of the Audit Team

The KPMG Audit team includes:

- Dylan Jones – Lead Auditor
- Gary Selwyn - Alternate Lead Auditor
- Jack Hanigan – Audit Team Member

Endorsement of the Audit Team was provided by DPHI on 6 August 2024 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

3.2 Audit Process

The following sections describe the processes that comprised the IEA, with site inspection and personnel interview components completed on 21 August 2024, followed by additional document reviews and reporting. The IEA process was aligned with the principles of *ISO 19011:2018 Guidelines for Auditing Management Systems* and the *IAPAR* requirements.

3.2.1 Audit Preparation

Prior to commencement of the IEA, the Lead Auditor prepared an Audit Plan/Agenda and Request for Information documents, which were distributed to the Bettergrow team in preparation for the IEA. Refer to Appendix E for the Audit Agenda. Upon receipt of documents from Bettergrow and via review of documents available on the Bettergrow project website, document assessment (refer to Section 3.2.6) commenced prior to the day of audit.

3.2.2 Consultation

In accordance with Section 3.2 of the IAPAR, consultation was undertaken with DPHI in advance of the IEA, to request feedback on the Project including any focus areas or other matters that the Auditor should be made aware of.

Further to an email request for feedback from KPMG to DPHI on 5 August 2024, DPHI responded, via email on 8 August 2024, confirming that the IEA must be undertaken in accordance with the IAPAR guidelines, including but not limited to the requirements under Section 3.3 (Audit Scope). DPHI also stated "that the IEA must cover all activities on site from the commencement of construction – 24 January 2023."

KPMG Response: KPMG confirms that it has conducted the IEA in accordance with IAPAR guidelines and that the audit period covers from the commencement of construction to the date the IEA was conducted (i.e., 24 January 2023 to 21 August 2024)

Refer to Appendix C for consultation records.

3.2.3 Opening Meeting

An opening meeting was held on site on 21 August 2024 with representatives from the Bettergrow site operations and management teams, as per the Audit Attendance Sheet (refer to Appendix F). During the opening meeting the Auditor outlined the objective and the process of the IEA. Bettergrow provided the Auditor with a summary of current and historical site activities including an overview of the specific composting operation processes. Key matters such as any environmental incidents, non-compliances, environmental issues and risks and stakeholder interactions were discussed.

3.2.4 Site Inspection

A site inspection was undertaken on 21 August 2024 at the Ravensworth Composting Facility with representatives from the Bettergrow site operations and corporate management teams. The site inspection was used to understand the nature of the operations and the extent to which environmental controls are implemented and managed across the site. The Auditor was provided full access to all areas requested for inspection. Two (2) minor issues were identified, which do not constitute non-compliances or opportunity for improvements and which were associated with moderate quantities of plastic observed to be collecting in a swale drain and moderate odour arising from compost stockpiles. Refer to details of the inspection in Section 4.9 and photographs provided in Appendix D.

3.2.5 Interviews

Interviews were held with key personnel from the Bettergrow site operations and corporate management teams. These interviews were focused on the management of environmental aspects, and, where areas of concern may exist, what proposed means of risk control are undertaken and proposed to account for these concerns. Additionally, the interviews assisted the Auditor to understand the nature of the activities undertaken at the sites and to identify focus areas for the audit. Table 3.1 provides details of the personnel interviewed during the IEA.

Table 3.1: Interviewed Persons

Name	Organisation	Position
Jacqueline Blomberg	Borg	Environmental Manager
Mark Wardrow	Bettergrow	Operations Manager
Zac Rowlandson	Bettergrow	CEO
Todd Wurth	Bettergrow	Site Supervisor

3.2.6 Document Assessment

Documentation relevant to the audit scope was collected and assessed by the audit team as evidence of compliance with a Condition of Approval (CoA). This included, but was not limited to, management plans, site induction forms and presentations, monitoring and sampling records, correspondence, emergency response plans, plant and equipment maintenance registers and details of any incidents that have occurred. Refer to Appendix H for a full list of documents reviewed as part of the IEA.

3.2.7 Closing Meeting

A closing meeting was held on 21 August 2024 at 4:30pm at the Bettergrow head office in Somersby NSW. A number of the attendees to the closing meeting were present in person, whilst others joined online via MS Teams. During the closing meeting the Lead Auditor presented the preliminary audit findings, including any identified potential non-compliances and opportunities for improvement. Where identified, additional documentary evidence was requested by the Audit team following the closing meeting to enable further assessment of compliance.

3.3 Compliance Evaluation

Considering the evidence gathered during audit execution, the IEA assessed and tested the compliance status of each CoA in the Audit Table, through application of the compliance descriptors detailed in *Table 2* of the IAPAR, as listed in *Table 3.2*.

Table 3.2: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Where appropriate, the Auditor also identified opportunities for improvement, details of which are provided in Appendix A and Section 4.13

4 Audit Findings

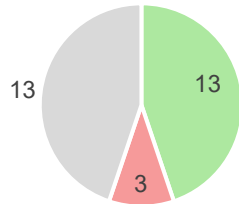
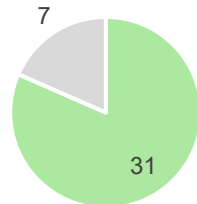
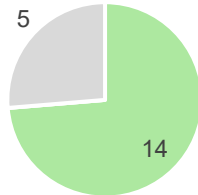
4.1 Approvals and Documents Audited

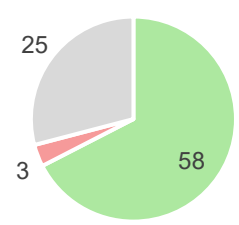
Refer to Appendix H for details of the primary documents assessed as part of the IEA.

4.2 Compliance Assessment Summary

A summary of the assessment of compliance is presented in *Table 4.1*. Findings against each CoA subject to the IEA are presented in Appendix A, with details of the non-compliance findings identified during the IEA also provided in Section 4.13.

Table 4.1: Compliance assessment summary

Part (total number of conditions)	Summary	
Part A - Administrative Conditions + Advisory Notes (29)	<ul style="list-style-type: none"> Compliant - 13 Non-compliant - 3 Not Triggered - 13 	
Part B (38)	<ul style="list-style-type: none"> Compliant - 30 Non-compliant - 0 Not Triggered - 8 	
Part C (19)	<ul style="list-style-type: none"> Compliant - 14 Non-compliant - 0 Not Triggered - 5 	

Part (total number of conditions)	Summary									
Total (86)	<ul style="list-style-type: none">Compliant - 58Non- compliant - 3Not Triggered - 25	 <table><caption>Summary Data</caption><thead><tr><th>Category</th><th>Count</th></tr></thead><tbody><tr><td>Compliant</td><td>58</td></tr><tr><td>Non-compliant</td><td>3</td></tr><tr><td>Not Triggered</td><td>25</td></tr></tbody></table>	Category	Count	Compliant	58	Non-compliant	3	Not Triggered	25
Category	Count									
Compliant	58									
Non-compliant	3									
Not Triggered	25									

4.3 Notices, Orders, Penalty Notices and Prosecutions

Based on the complaints management documentation assessed by the audit team, no formal notices, orders, penalty notices or prosecutions associated with SSD-9418 were issued by DPHI or from other regulators (e.g., NSW EPA, Council etc.) during the audit period.

4.4 Incidents

One (1) incident, which met the definition of incidents provided within SSD-9418, has been identified to have occurred within the audit period, triggering the requirements of CoA C10 and Appendix 3 of the conditions of consent. Details of this incident are provided as follows:

- On 18 June 2024 DPHI was notified by Bettergrow, via the planning portal, of an incident occurring at the site between Monday 17 and Tuesday 18 June 2024 (Ref: SSD-9418-PA-8). Attached to the notification was an initial incident notification which explained that *"at 7:30am on Tuesday 18 June 2024 it was identified that there had been a loss of containment of the western leachate water containment dam where approximately 7ML of water has discharged"*. Within the notification, Bettergrow advised that investigations were underway to ascertain the cause of the loss and rectification works required.

The EPA was notified of the incident, and attended the site on 19 June 2024. The Auditor sighted email correspondence from the EPA Operations Officer to Bettergrow, dated 19 June 2024, requesting to immediately ensure that no leachate enters the failed leachate dam until rectification works had occurred and that additional reporting is undertaken in accordance with EPL requirements. Preventative actions were undertaken by Bettergrow on 19 June 2024 in the form of creating an earth bund to redirect leachate to the second leachate dam, which was constructed under SSD-9418 Stage 2 works (Stage 2 leachate dam).

An incident notification report was provided to DPHI on 24 June 2024 to address parts 1 and 2 of Appendix 3 of the conditions of consent. A subsequent incident report was provided to DPHI on 17 July 2024 to address parts 3 and 4 of Appendix 3 of the conditions of consent.

The incident report attributed the cause of the incident to mine subsidence. The Ravensworth site is leased from AGL, which operates the adjacent coal mine. Spent coal is received from the nearby Bayswater Power Station in the form of ash, which is used to fill mine voids. The entire composting operation is constructed on a mining void, which had been filled with fly ash in the early 2000's. At the time of this audit AGL was undertaking geotechnical investigations to determine the corrective actions required.

The Auditor was advised by Bettergrow that the EPA did not consider the incident to have caused material harm to the receiving environment given the leachate water is understood to have been collected in the adjacent 'Void 4' pit, which is wholly contained within the AGL site boundary and which does not include any sensitive ecological receptors. The Auditor has not sighted correspondence from the EPA confirming this statement and it is understood that the EPA are yet to formally 'close out' the matter.

The Surface and Groundwater Management Plan, Rev 1, dated 6 July 2023, prepared by Senversa states that *"given that the site and surrounding areas have historically been used for open cut and underground mining, the groundwater in the area is not considered to be vulnerable"*.

The Auditor understands that the Stage 2 leachate dam will be used to collect leachate runoff from the entire site until such time that the western leachate dam is rectified. An opportunity for improvement has been raised against CoA C1 in relation to updating the OEMP risk register to capture the risk of subsidence reoccurring and the risk of the Stage 2 leachate dam not having sufficient capacity to store the entire site's runoff, which would then require active discharge to the EPL licensed discharge point.

Further details are provided in Appendix A.

4.5 Complaints

A Complaints Register is maintained monthly and is available on the Bettergrow website. Sighting of the Complaints Register identified that no complaints were received, or recorded, during the audit period. In addition, Bettergrow advised the Auditor that no complaints had been received during the audit period.

4.6 Non-compliances

The IEA identified three (3) non-compliances during the audit period. Details of the non-compliances identified during the IEA are listed in Section 4.13.

4.7 Previous Audit Findings

This is the first independent audit undertaken at the Ravensworth Composting Facility, as such there are no previous audit findings to review.

4.8 Suitability of Environmental Management Plans

The RCF is managed in accordance with the Operational Environmental Management Plan (OEMP) which is supported by Waste, Air Quality, Surface and Groundwater and Traffic Management Plans and a Biosecurity Protocol (attached as appendices to the OEMP). The OEMP and attached plans and protocol had been subject to DPHI review, with comments and requests for additional information provided. DPHI stated *"The Department has carefully reviewed the documentation and is satisfied that it meets the requirements of the relevant conditions in consent (SSD-9418)"* with approval of the OEMP provided 21 December 2023. The Auditor acknowledges that the Air Quality, Surface and Groundwater and Traffic Management Plans had been prepared by third party technical consultants.

When assessing the suitability of management plans, the Auditor undertook a high-level gap assessment of the OEMP against the Department of Planning, Industry and Environment, *Post Approval Guidance, Environmental Management Plan Guideline* requirements (April 2020). The high-level assessment found that the OEMP generally satisfied the guideline requirements with the following observation made:

- Section 3.5.6 of the guidelines require the consideration of 'hold points' to be included in EMPs. There is an opportunity to update the OEMP to include consideration of hold points, i.e., there may be a hold point prior to the discharge of water from the leachate pond, whereby sampling is to be undertaken and authorisation to discharge is provided by the Environment Manager (refer to Section 4.13 for further details).

The Auditor tested implementation of the OEMP via review of documentation and via the site inspection, with no major issues raised. However, following the leachate incident (refer to Section 4.4) there is an opportunity to review the risk register provided within the Pollution Incident Response Management Plan section of the OEMP, to check that the listed control measures are appropriate. Refer to Section 4.13 for further details.

In general, the Auditor considers that the OEMP and attached management plans and procedures have been prepared to a high quality and capture the relevant requirements of the SSD-9418 conditions of approval, the Environmental Impact Statement (EIS) and the Response to Submissions (RtS). The Auditor therefore considers that the management plans are suitable for the current phase of the Project.

4.9 Audit Site Inspection

A site inspection was undertaken on 21 August 2024, starting at approximately 10am. At the time of the inspection weather conditions were generally fine and sunny, with some moderate wind gusts observed. According to the Bureau of Meteorology, there had been no recorded rainfall at nearby Singleton in the previous five (5) days. The objective of the site inspection was to review the effectiveness of the environmental mitigation measures implemented at the Site and to assess environmental performance generally.

The Bettergrow Site Supervisor, Operations Manager, Environmental Manager and CEO accompanied the Auditor during the site inspection and were interviewed during the process. All areas were made accessible to the Auditor upon request.

Observations:

- The main AGL site entrance was secured by an electric gate with CCTV installed.
- No mud tracking observed on public roads.
- A WHS noticeboard was installed within the site sheds, with policies, pollution response plan and the EPL displayed.
- A dedicated shipping container was used to store liquid chemicals and dangerous goods. Dedicated bunds and drip trays were provided for containers.
- Spill kits were available at point-of-use and were free of litter.
- A diesel storage tank was used for refueling plant. No visible hydrocarbon spill or leaks were observed to surrounding soils.
- Inspected plant and equipment was found to be well maintained with daily pre-start checks being utilised.
- A dedicated water cart was available on site and a network of sprinklers was connected to an onsite dam to be used to maintain moisture levels of the compost windrows. The water cart received water from pipework connected to the nearby Void 4 dam, operated by AGL.
- Waste bins used to collect screened debris were covered and not overfilled.
- Swale drains were collecting runoff from the composting pads and directing surface water to the Stage 2 leachate dam. The western-most 'original' leachate dam had been disconnected via an earth bund, with water directed to the Stage 2 dam.
- No dust issues were observed, with stockpiled materials and access roads generally kept moist.
- Riprap (i.e. rock armouring used for scour prevention within drainage channels) had been installed between the swale drains and the leachate dam to control sediment.

Issues identified:

- Moderate amounts of shredded plastic litter had collected within the swale drains on site. The Auditor understands that plastic enters the site via the green waste streams and is predominately removed via mechanical screening processes. However, various amounts of plastic remain in the compost windrows. Routine housekeeping / maintenance activities are required on an ongoing basis to prevent plastic litter from building up in swale drains. This was considered by the Auditor to be a minor issue and a low risk.
- A moderate odour was observed when downwind of the compost stockpiles. Given the significant distance to the nearest receptor (>7kms), odour was not considered to present a major issue, nor would it meet the definition of an 'offensive odour' within the Protection of the Environment Operations Act 1997 (POEO Act). The auditor also notes that the process of composting, whereby the materials are constantly being mixed and aerated is in itself a practical odour management strategy. This was considered by the Auditor to be a minor issue and a low risk.

Refer to Appendix D for photographs taken during the site inspection.

4.10 Actual versus Predicted Environmental Impacts

The Auditor has undertaken a qualitative assessment of the predicted impacts associated with the Project, as described within the following documentation, against the actual impacts observed during the audit process:

- Environmental Impact Statement, prepared by RPS Group, V3, dated 14 November 2019 (EIS);
- Greenspot Hunter Valley Nutrient Recycling Facility - Response to Submissions – SSD 9418, prepared by Space urban, dated 20 June 2022 (RtS);
- Greenspot Hunter Valley Nutrient Recycling Facility – Amendment Report, prepared by Space Urban, dated 28 June 2022 (Amendment Report); and,
- Ravensworth Composting Facility - Ravensworth Nutrient Recycling Facility Modification of SSD9418 – MOD 1, prepared by Space Urban, V2, dated 13 October 2023.

Section 8 of the EIS contains an environmental risk assessment for each of the key environmental impacts that were included in the Secretary's Environmental Assessment Request (SEARs), and therefore required further assessment within the EIS. A summary of the risk assessment from the EIS is provided in *Table 4.2*.

Table 4.2: Summary of Environmental Risk Assessment from EIS

Category	Issue
Extreme	None
Very High	None
High	None
Moderate	Traffic and Access Noise and Vibration Air Quality Surface Water Groundwater Waste Management Hazard and Offense Aboriginal Heritage Fire and Incident Management Biodiversity Socio-economic Cumulative Impacts
Low	Greenhouse Gas Historic Heritage Visual

Source: Environmental Impact Statement, prepared by RPS Group, V3, dated 14 November 2019

When assessing actual impacts the following factors have been considered:

- The occurrence of environmental incidents.
- Compliance history against the conditions of consent and adherence to the approved management plan requirements.

- Results of environmental monitoring data compared to predicted levels.
- Number of and frequency of internal actions raised during site inspections.
- The nature and frequency of complaints.
- Regulatory notices.
- The physical extent of the RCF operations compared to the approved boundaries.
- Consistency of designs with the EIS.
- Any planning approval modifications or consistency assessments.

Since the EIS and RtS assessments, there has been one (1) modification to the development consent (Mod-1). Mod-1 related to the removal of the requirement to construct a weighbridge at the RCF and to allow for the acceptance of materials that are subject to a general or specific resource recovery order and exemption issued by the EPA. The Mod-1 changes are not considered to have resulted in additional environmental impacts.

It is beyond the scope of this IEA to investigate each of the detailed studies and predictions undertaken as part of the EIS in order to make comparisons against actual measurements. As such, a qualitative and by-exception comparison has been undertaken.

When considering all the above factors, the Project is considered to have demonstrated a strong environmental performance during the audit period. Three (3) non-compliances have been identified during this Audit, however they are considered administrative in nature and have not been associated with any actual environmental impacts. There has been one (1) notifiable incident at the site in relation to a mine subsidence event resulting in the release of water from the leachate dam. It is understood that the incident did not cause any actual environmental harm due to the leachate water being contained within the wider AGL site with no sensitive receivers impacted.

Based on the assessment of the environmental impacts identified in the EIS, the Auditor considers that all current environmental impacts would be considered less than or equal to those anticipated within the EIS, with the following items to note:

- **Air Quality** – chapter 9.1.4.2 of the EIS includes a modelled odour impact assessment. The assessment found that the maximum odour impact was predicted to be less than 1 odour unit (OU) within close proximity to the site boundary and less than 0.1 OU at the nearest receptor (Camberwell). Note that the minimum perceptible level of odour is 1 OU.

The modelled odour assessment within the EIS aligned to the Auditors observations during the site inspection. There have been no identified dust issues at the site, with appropriate implementation of dust control measures observed during the Audit.

4.11 Previous Compliance Reporting Recommendations

There have been no compliance reports (as required by CoA C14) undertaken at the site to date. The Auditor understands that the first compliance report will be completed by Bettergrow in late 2024.

4.12 Key Strengths

Based on interviews and observations made during the audit, the Bettergrow site operations and management teams are considered to have demonstrated a strong awareness of their environmental obligations, including OEMP requirements and relevant SSD-9418 conditions of approval, with the following key strengths noted:

- The site presented well during the inspection with no evidence of dust, sediments or other pollutants observed to be escaping the boundaries. Only minor issues were identified during the site inspection.
- The site induction contained a comprehensive summary of environmental requirements, including the conditions of approval and management plans.
- Chemical storage was well managed, with the storage areas clean and tidy, bunding and spill kits provided and no evidence of spills or leaks occurring.
- Dust suppression was well managed via use of a dedicated water cart and a network of sprinklers to keep the compost windrows moist.
- Bettergrow management utilised an internal compliance tracking register to compile evidence against each condition of approval, making it readily available to the Auditor.
- Bettergrow utilised a platform 'Safe by Choice' to store plant and equipment and employee competency information.

4.13 Audit Findings and Recommendations

Independent Audit findings were based on evidence collected during the audit process, which included:

- Relevant records, documents and reports (refer to Appendix A and Appendix H).
- Interviews of relevant site personnel (refer to Section 3.2.5 and Appendix A).
- Photographs (refer to Appendix D).
- Figures and plans (refer to Appendix A and Appendix H).
- Site inspections of relevant locations, activities and processes (refer to Section 4.9).

The IEA found the Project to have demonstrated a high level of compliance, with the site operations and management teams generally demonstrating a strong awareness of their environmental obligations, including OEMP requirements and relevant SSD-9418 conditions of approval. A number of positive observations have been noted in this IEA report. The Auditor thanks the Bettergrow team for their cooperation during the IEA process.

A summary of Audit Findings is provided in *Table 4.3* below.

Table 4.3: Summary of Audit Findings

Reference	Requirement Details	Finding Details
Non-compliance RCF-01_NC-1	A2 Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent;	Considering the non-compliance raised against CoA A8 and A10, this triggers an additional non-compliance against CoA A2 Recommendation: Nil
Non-compliance RCF-01_NC-2	A8 Notification of Commencement The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: a) construction.	KPMG sighted a letter from Bettergrow to DPHI Re: Notification of commencement of construction in accordance with A8(a), dated 24 January 2023. Ref: SSD-9418-PA-3. The letter advised that construction in the form of minor excavation, consisting of the removal of topsoil only, had commenced on site. Based on the above, it has been determined that the Planning Secretary was not notified at least one month prior to commencement of construction. Recommendation: Nil
Non-compliance RCF-01_NC-3	A10 Surrender of Existing Consents or Approvals Within six 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 DA140/2016 in accordance with the EP&A Regulation.	KPMG sighted a letter from Bettergrow to Singleton Council Re: Notification of Surrender of Development Application No. 140/2016, dated 20 May 2024. Construction is noted to have commenced 24 January 2023. The development consent was not surrendered within the required 6-month timeframe, taken to have been from the date of commencement of construction activities. Recommendation: Nil
Opportunity for Improvement RCF-01_OFI-01	B5 Pests, Vermin and Priority Weed Management The Applicant must:	KPMG sighted a completed Workplace and Environmental Inspection Checklist, dated 1 July 2024. The sighted example did not include references to pest and vermin. It was observed that an updated version of the checklist had been created by the Environmental Manager which included a pest and vermin checklist

Reference	Requirement Details	Finding Details
	a) implement suitable measures to manage pests, vermin and declared priority weeds on the site.	<p>section, however, site personnel were not utilizing the current version.</p> <p>Recommendation: It is recommended that the most current version of the Workplace and Environmental Inspection Checklist is provided to and utilised by all employees, including provision of training on any new sections, such as how to undertake pest and vermin checks.</p>
<p>Opportunity for Improvement</p> <p>RCF-01_OFI-02</p>	<p>C1 Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines.</p>	<p>It was observed that the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) had been 'Authored' and 'Approved' by the same individual.</p> <p>Recommendation: In accordance with industry best practice, it is recommended that a second party review and/or approval of the management plan document is undertaken during future revisions.</p>
<p>Opportunity for Improvement</p> <p>RCF-01_OFI-03</p>	<p>C1 Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines.</p>	<p>Review of the OEMP against the requirements of the <i>Department of Planning, Industry and Environment (DPIE), Post Approval Guidance, Environmental Management Plan Guideline</i> found that Hold Points had not been considered in the OEMP.</p> <p>The environmental risk assessment included in the Pollution Incident Response Management Plan includes an item for "pollution of waterways from leachate". One of the preemptive control measures listed is "three 'chain of pond' basins on site." Following the leachate incident, the western leachate pond has been disconnected and all surface water is directed to the Stage 2 leachate dam meaning that this control measure has been compromised.</p> <p>Recommendation: In order to align with DPIE guidelines, there is an opportunity to revise the OEMP to include considerations of hold points, i.e., there may be a hold point prior to the discharge of water from the leachate pond, whereby sampling is to be undertaken and</p>

Reference	Requirement Details	Finding Details
		<p>authorisation to discharge is provided by the Environment Manager.</p> <p>There is also an opportunity to update the risk register in the OEMP PIRMP to confirm that the listed control measures are appropriate.</p>

Appendix A – Audit Compliance Table

Appendix A – Audit Compliance Table

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Part A: Administrative Conditions					
1.01	A1	Obligation To Minimise Harm to the Environment 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.	Based on the outcome of this audit, it is considered that all reasonable and feasible measures have been implemented to minimise material harm to the environment.		Compliant
1.02	A2	Terms Of Consent The development may only be carried out: <ul style="list-style-type: none"> (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, Amendment Report and Response to Submissions; (d) in accordance with the Development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in appendix 2; and (f) in accordance with Modification Assessments. 	<ul style="list-style-type: none"> (a) There were three (3) non-compliances to the conditions of consent identified during this audit, including a non-compliance with this condition. (b) Written directions received from the Secretary (refer to CoA A3) were adhered to. (c) The CEMP and OEMP reference the EIS and RtS and contain the mitigation measures outlined in Appendix 2. The audit did not identify any breaches to the commitments made within the CEMP or OEMP. (d) The site inspection confirmed the site layout in Appendix 1. (e) mitigation measures were referenced in the CEMP and OEMP (f) the OEMP had been updated in response to Mod 1. 	Non-compliance RCFE-01_NC-1 Considering the non-compliance raised against CoA A8 and A10, this triggers an additional non-compliance against CoA A2 Recommendation: Nil	Non-Compliant
1.03	A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <ul style="list-style-type: none"> (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). 	SSD-9418-PA-8 – DPHI Request for Information. On 24 June 2024 DPHI requested additional information in relation to the notification of a leachate dam incident that occurred on 18 June 2024. Bettergrow issued a response to the RFI on 13 August 2024. Ref: RFI-74469993, including copies of inspection reports during the four (4) weeks		Compliant

Unique ID	Req No.	Compliance Requirement' / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.04	A4	<p>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) or A2(e).</p> <p>In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.</p>	<p>prior to the incident and copies of water sampling analysis from the leachate dam.</p> <p>No inconsistencies, ambiguities or conflicts between any of the planning documents has been raised during the audit period.</p>		Complaint
1.05	A5	<p>Limits Of Consent Lapsing</p> <p>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.</p>	<p>Construction works commenced 24 January 2023. Operations commenced 13 December 2023.</p>		Compliant
1.06	A6	<p>Waste</p> <p>The Applicant must not receive and process more than 200,000 tonnes per annum of waste, limited to:</p> <ul style="list-style-type: none"> (a) urban wood residues for composting (as defined in 'The compost order 2016'); (b) paper crumble for composting (defined as General or Specific Exempted Waste); (c) wastewater from Bayswater Power Station; (d) drill mud process water (as defined in 'The Treated Drill Mud Order 2014') (e) natural organic fibrous composting material (as defined in Schedule 1 of the POEO Act); (f) biosolids (as defined in 'The Biosolids Order 2014'); (g) garden waste (as defined in Schedule 1 of the POEO Act); and (h) animal waste (as defined in Schedule 1 of the POEO Act); and 	<p>Sighted:</p> <ul style="list-style-type: none"> • Waste receivals tracker – Excel document. <p>Review of the waste receivals tracker for 2023-2024 identified a total of:</p> <ul style="list-style-type: none"> a) Nil b) Nil – too much plastic. Stopped receiving. c) Nil d) Nil e) Nil f) 23,205.10 tonnes g) 19,414.34 tonnes h) Nil 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		(i) materials for the purpose of composting that are subject to a general or site specific resource recovery order and exemption as issued by the EPA from time to time.	i) Street sweeping – 612.70 tonnes Spent bleach clay – 3.06 tonnes Plasterboard – 719.54 tonnes Oversized organics – 11545.37 tonnes The total volumes of waste received was less than the 200,000 TPA allowance.		
1.07	A7	The Applicant must not receive or process food organic waste.	Sighted: <ul style="list-style-type: none"> Waste receivals tracker – Excel document. No food organic waste included in the tracker.		Compliant
1.08	A8	Notification Of Commencement The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.	a) Letter from Bettergrow to DPHI Re. Notification of commencement of construction in accordance with A8(a), dated 24 January 2023. SSD-9418-PA-3. The letter advised that construction in the form of minor excavation, consisting of the removal of topsoil only, had commenced on site. b) Letter from Bettergrow to DPHI Re. Notification of commencement of operations, dated 13 November 2023 in accordance with A8(b). SSD-9418-PA-5. Operations proposed to commence 13 December 2023. Operations actually commenced 1 month notice was provided.	Non-compliance RCF-01_NC-2 It has been determined that the Planning Secretary was not notified at least one month prior to commencement of construction. Recommendation: Nil	Non-Compliant
1.09	A9	If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.	Not applicable. No Staging proposed for the SSD.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.10	A10	Surrender of Existing Consents or Approvals Within six 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 DA140/2016 in accordance with the EP&A Regulation.	Sighted: <ul style="list-style-type: none"> Letter from Bettergrow to Singleton Council Re. Notification of Surrender of Development Application No. 140/2016, dated 20 May 2024. Response from Singleton Council to Bettergrow confirming that DA140/2016 had been surrendered, dated 29 May 2024. Construction is noted to have commenced 24 January 2023. Operations formally commenced on 13 December 2023.	Non-compliance RCFE-01_NC-3 The development consent was not surrendered within the required 6-month timeframe, taken to have been from the date of commencement of construction activities. Recommendation: Nil	Non-Compliant
1.11	A11	Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A10, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. Note: <i>This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 6 of the EP&A Act. 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.</i>	Noted		Compliant
1.12	A12	Evidence Of Consultation Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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 	No identified parties requiring consultation were listed in the consent.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Applicant has addressed the matters not resolved.			
1.13	A13	Staging, Combining and Updating Strategies, Plans Or Programs With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> (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). 	Not applicable. No Staging proposed for the SSD.		Not triggered
1.14	A14	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.	Not applicable. No Staging proposed for the SSD.		Not triggered
1.15	A15	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.	Mod-1 was approved on 6 December 2023. OEMP was updated to Rev 2 on 20 December 2023 in response to Mod-1. OEMP Rev 2 is currently being implemented.		Compliant
1.16	A16	Protection Of Public Infrastructure Before the commencement of construction of the development, the Applicant must consult with the relevant owner and provider of services that are likely to be	No disruption of services caused by the development. No consultation requirements triggered under this condition.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.17	A17	<p>affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.</p> <p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by 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. 	No damage to public infrastructure has been caused by the development		Not triggered
1.18	A18	<p>Demolition</p> <p>All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).</p>	No demolition works occurred as part of the development.		Not triggered
1.19	A19	<p>Structural Adequacy</p> <p>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:</p> <ul style="list-style-type: none"> (a) the relevant requirements of the BCA; and NSW Government 3 Ravensworth Composting Facility Expansion Department of Planning and Environment (SSD-9418) (b) any additional requirements of the SANSW where the building or structure is located on land within a declared Mine Subsidence District. <p>Note:</p> <ul style="list-style-type: none"> • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • The EP&A (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development. 	No building or structural works occurred as part of the SSD. Development works related to drainage and leachate works, hardstand areas and associated infrastructure.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.20	A20	<ul style="list-style-type: none"> 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. <p>Compliance</p> <p>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.</p>	<p>Sighted:</p> <ul style="list-style-type: none"> Toolbox Talk, dated 22 May 2024 – Subject: Environmental Incident Management. <p>The toolbox talk provided examples of environmental incidents, outlined employee responsibilities to avoid environmental incidents and steps to follow should an environmental incident occur.</p> <ul style="list-style-type: none"> Toolbox Talk, dated 9 March 2023 – Subject: Pasteurised Green Waste Deliveries. <p>The toolbox talk provided advice to employees when accepting green waste to avoid Phylloxera. This is a biosecurity mitigation measure.</p> <ul style="list-style-type: none"> Environmental requirements and awareness slide deck. Reference made to OEMP, EPL and SSD requirements. 		Compliant
1.21	A21	<p>Operation Of Plant and Equipment</p> <p>All plant and equipment used on site, or to monitor the performance of the development, must be:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<p>Sighted:</p> <p>a) External Site Maintenance Register</p> <p>The maintenance register is used to track when plant is due for service and when faults are identified.</p> <p>During the site inspection all plant and equipment was observed as being maintained in good working condition.</p> <p>Sighted - Plant No. PLT9244 front end loader – pre-start checklist, dated 21 August 2024.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.22	A22	External Walls And Cladding The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	b) Employee competency details for the site operator were reviewed using the online Data Station platform. No building works occurred as part of the SSD. Development works related to drainage and leachate works, hardstand areas and associated infrastructure.		Not triggered.
1.23	A23	Prior to the issuing of: (a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and (b) an Occupation Certificate, the Applicant must provide the Certifier with documented evidence that the 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.	No building works occurred as part of the SSD. Development works related to drainage and leachate works, hardstand areas and associated infrastructure.		Not triggered.
1.24	A24	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	No building works occurred as part of the SSD. Development works related to drainage and leachate works, hardstand areas and associated infrastructure.		Not triggered.
1.25	A25	Utilities And Services Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	No utility works as part of the SSD.		Not triggered
1.26	A26	Work As Executed Plans Before the issuing of the Occupation Certificate for the development, 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 Principal Certifier.	No Occupation Certificate required for the SSD as no building works occurred.		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
1.27	A27	Applicability Of Guidelines 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		Compliant
1.28	A28	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.	Noted		Compliant
1.29	AN1	Advisory Notes 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.	Sighted: <ul style="list-style-type: none"> Letter from DPE Water Re. Response to Submissions Advice. Ref: OUT22/11230, dated 3 August 2022. The DPE Water letter confirmed that there was no requirement to obtain a licence to take water from Void 4 of the nearby mine pit on the basis that water was being collected from the ash dams and tailings placements which were above the natural groundwater table. <ul style="list-style-type: none"> Environmental Protection Licence (EPL) #7654 This EPL is required due to the undertaking of a scheduled activity under the POEO Act, being 'Composting >50,000 annual capacity to receive organics.'		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Part B: Specific Environmental Conditions					
2.01	B1	Waste Management Waste Monitoring Program From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: <ul style="list-style-type: none"> (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: <ul style="list-style-type: none"> (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. 	Sighted: <ul style="list-style-type: none"> • Waste Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW. Rev 1, dated 10 November 2023. <ul style="list-style-type: none"> (a) The Waste Management Plan was prepared on 10/11/23 (prior to commencement of development) by J Blomberg, who is considered to be suitably skilled and experienced. (b) <ul style="list-style-type: none"> (i) Section 4.1-Characteristic sampling is required for waste being received on site to ensure approved types are received, with procedures for weighing receivals. Waste tracking register is used to record all incoming waste streams. (ii) Section 4.2-Outputs produced on site are sampled and analysed at NATA accredited laboratories to ensure compliance with <i>Biosolids Guidelines (NSW EPA)</i>, with procedures for measuring quantities. (c) <ul style="list-style-type: none"> (i) Section 4.1- Waste received on site are documented in 		Compliant

Unique ID	Req No.	Compliance Requirement' / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>accordance with clauses 27 to 30 and 32 of the <i>Protection of the Environment (Waste) Regulation 2014</i> and the <i>NSW EPA Waste Levy Guidelines</i>. Waste originated from within the Sydney Basin Area are accompanied by the original Plant Health Assurance Certificate (PHAC).</p> <p>Sighted 13/02/24 delivery docket, weighbridge document and a PHAC certificate (number 237088) from 09/02/24.</p> <p>(ii) Section 4.6,4.7- Details waste handling procedures including hazardous or other prohibited waste. Toolbox talk are used for staff awareness.</p>		
2.02	B2	<p>Waste Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with condition C5. The Plan must:</p> <ul style="list-style-type: none"> (a) detail the type and quantity of waste to be generated during operation of the development; (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Environment Protection Authority, 2014); (c) detail the materials to be reused or recycled, either on or off site; and 	<p>Sighted:</p> <ul style="list-style-type: none"> • Waste Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW. Rev 1, dated 10 November 2023. • SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. • Operations commenced 7 January 2024. <p>The DPHI approval letter references the Waste Management Plan, Rev 1.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		(d) include the Management and Mitigation Measures included in Appendix 2.	The following provides the details of the WMP in reference to the condition requirements: a) Section 4.2 of WMP refers to waste quantities b) Section 3 c) Section 3 d) Section 2 includes Mitigation measures.		
2.03	B3	The Applicant must: (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.	The OEMP and WMP was approved on 21 December 2023. Operations commenced on 7 January 2024. <ul style="list-style-type: none">SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. The DPHI approval letter references the Waste Management Plan, Rev 1. Implementation of WMP was evidenced by: <ul style="list-style-type: none">Observations made during the site inspection such as provision of separate skip bins and waste segregation processes.Waste tracking register showing imported material volumes.Sighted Toolbox talk dated 22/05/24 – Subject: Environmental Incident Management		Compliant
2.04	B4	Decommissioning and Closure Plan Five years prior to the commencement of decommissioning of the development, the Applicant must prepare a Decommissioning and Closure Plan for the development to the satisfaction of the Planning Secretary. The Plan must be prepared generally in accordance with section 3.13 of the EIS and in consultation with Council and the landowner.			Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.05	B5	<p>Pests, Vermin and Priority Weed Management</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared priority 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 priority weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area. <p>Note: For the purposes of this condition, priority weed has the same definition of the term in the Biosecurity Act 2015.</p>	<p>Ongoing maintenance is undertaken to reduce weeds on site.</p> <p>Waste Management Plan section 5.5- Details pest and weed management measures. Periodic weed management is undertaken via spraying.</p> <p>No priority weeds identified on the site.</p> <p>Sighted:</p> <ul style="list-style-type: none"> • Workplace and environmental checklists- Checklist condition 8.1.9 references pest and vermin. • Workplace and Environmental Inspection Checklist, dated 1 July 2024. The sighted example did not include references to pest and vermin. 	<p>Opportunity for Improvement RCF-01_OFI-01</p> <p>The sighted workplace inspection checklist example did not include reference to pest and vermin. An updated version has been created by the Environment Manager</p> <p>Recommendation</p> <p>It is recommended that the most current version of the Workplace and Environmental Inspection Checklist is provided to and utilised by all employees, including provision of training on any new sections, such as how to undertake pest and vermin checks</p>	Compliant
2.06	B6	<p>Statutory Requirements</p> <p>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 waste management facility or premises lawfully permitted to accept the waste.</p>	<p>Sighted JJ's Waste and Recycling liquid waste disposal records for oily water collected from diesel tank bund. Classified as 'oily water' and disposed of as trade waste.</p>		Compliant
2.07	B7	<p>The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.</p>	<p>Quarterly water sampling data is maintained on Borg server.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			Incoming waste data includes street sweepings, Biosolids, Spent Bleach Clay, Plasterboard, Oversized organics, Garden Organics Sighted 22/11/11 pathogen report by Sydney environmental and soil laboratory.		
2.08	B8	Air Quality Dust Minimisation The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	The AQMP details control measures and management practices. The following controls were identified onsite: <ul style="list-style-type: none"> • Dedicated watercart on site. • Sprinklers available for dust suppression. • Stockpiles well managed with appropriate gradients and heights. • Use of stabilised access roads and pads for composting operations. There have been no recorded complaints or incidents related to air quality.		Compliant
2.09	B9	During construction and operation of the development, the Applicant must ensure that: <ul style="list-style-type: none"> (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces. 	Dust control measures are included in Section 5.2 of the AQMP. During the inspection the Auditor noted provisions for regular watering of compost windrows, use of stabilised roads and did not observe dirt racking on public roads.		Compliant
2.10	B10	Air Quality Discharges	No air quality monitoring requirements in the EPL		Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		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 emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.			
2.11	B11	<p>Air Quality Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by condition C5. The AQMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) include the Management and Mitigation Measures included in Appendix 2; (c) identify potential emissions from all sources of the development; (d) identify the control measures that will be implemented for each emission source; and (e) describe the following: <ul style="list-style-type: none"> (i) record keeping; (ii) complaints register; and (iii) response procedures. 	<p>Sighted:</p> <ul style="list-style-type: none"> • Ravensworth Air Quality Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW. Dated 29 May 2023. • SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. <p>The following provides details of the AQMP in reference to the condition requirements:</p> <ul style="list-style-type: none"> (a) Prepared by consultant Todoroski Air Sciences (b) Section 5.2-Control measures in Air Quality Management Plan are include management and mitigation measures in Appendix 2 (c) Section 5.1 details air pollutant sources from the development (d) Section 5.2 details control measures for each emission source (e) <ul style="list-style-type: none"> (i) Record keeping measures are detailed in section 6.1.1 with a site visual dust log, section 6.5 with records of incidents and 6.6 with complaints kept for 4 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>years</p> <p>(ii) Detailed in section 6.6 with complaints kept for 4 years</p> <p>(iii) Detailed in section 5.3 with response procedures</p>		
2.12	B12	<p>The Applicant must:</p> <p>(a) not commence operation until the Air Quality Management Plan required by condition B11 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the development.</p>	<p>(a) The AQMP was approved by DPHI on 21 December 2023. Operations commenced on 7 January 2024.</p> <p>(b) Mitigation measures are included in Table 5-1 of the AQMP. Implementation of the mitigation measures was verified during the site inspection.</p>		Compliant
2.13	B13	<p>Odour Management</p> <p>The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).</p>	A moderate odour was observed when downwind of the compost stockpiles. Given the significant distance to the nearest receptor (>7kms), odour was not considered to present a major issue, nor would it meet the definition of an 'offensive odour' within the POEO Act. The auditor also notes that the process of composting, whereby the materials are constantly being mixed and aerated is in itself a practical odour management strategy		Compliant
2.14	B14	<p>Soils, Water Quality and Hydrology</p> <p>Imported Soil</p> <p>The Applicant must:</p> <p>(a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;</p> <p>(b) keep accurate records of the volume and type of fill to be used; and</p> <p>(c) make these records available to the Planning Secretary upon request.</p>	No spoil was imported to site during audit period, or at any stage during the construction phase.		Not triggered
2.15	B15	<p>Erosion and Sediment Control</p> <p>Prior to the commencement of any construction or other surface disturbance for the development, the Applicant must install and maintain suitable erosion and</p>	Sighted Construction Environmental Management Plan – Ravensworth Composting Facility		Compliant

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		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.	Expansion, 74 Lemington Road, Ravensthorpe NSW, Rev 1, dated 17/11/22. An erosion and sediment control plan is provided in Appendix C, with standard ERSER drawing provided in Appendix D. ERSER controls such as rip rap used at the entrance to the leachate dam were observed during the site inspection.		
2.16	B16	Discharge Limits 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.	Sighted Quarterly water quality monitoring reports from August 2020 to May 2024. Nil discharge to EPL licensed discharge points occurred. Nil exceedances. The leachate incident which occurred on 18 June 2024 resulted in the loss of 7ML of water from the leachate dam. Appropriate notifications and reporting has been undertaken in accordance with EPL and development consent requirements. Given that the loss of water is understood to have been wholly contained within the wider AGL site and was captured in the adjacent 'void 4' dam, it is considered that no pollution of water has occurred as a result of the incident. However, the Auditor understands that investigations are underway and the EPA and DPHI are reviewing information provided by Bettergrow.		Compliant
2.17	B17	Stormwater Management System Prior to the commencement of operation, the Applicant must install the 'Stage 2 Works' for the stormwater management system in accordance with the plans prepared by Tony Mexon & Associates, dated 23 February 2016 and ensure the system is operational.	Sighted: <ul style="list-style-type: none">Ravensthorpe Leachate Barrier Certification Report, prepared by RCA Australia, dated 20 October 2023.Ravensthorpe Composting Pad Leachate Detention Basin, Construction Report, prepared by Aurecon, dated 16 May 2017.		Compliant

Unique ID	Req No.	Compliance Requirement / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.18	B18	<p>Surface and Groundwater Water Management Plan</p> <p>Prior to the commencement of operation of the development, the Applicant prepare a Surface and Groundwater Management Plan to the satisfaction of the Planning Secretary. The Surface and Groundwater Management Plan must form part of the OEMP required by condition C5 and must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) Include the Management and Mitigation Measures included in Appendix 2; (c) provide details of: <ul style="list-style-type: none"> (i) water use and management on-site; (ii) the water licence requirements for the development, if any; (iii) the management of wastewater streams on-site; (d) contain a Surface Water Management Plan, including: <ul style="list-style-type: none"> (i) a program to monitor surface water flows, quality, storage and use; (ii) sediment and erosion control plans; (iii) surface water impact assessment criteria, including trigger levels for investigating any potential adverse surface water impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria; and 	<p>Review of the RCA and Aurecon reports confirm that the leachate detention basis was constructed in accordance with required plans. The 2023 RCA letter states that the Stage 2 dam leachate barrier satisfies conditions of EPA's "Environmental Guidelines for Composting and Related Organics Processing facilities", which included a 600mm compacted clay capping.</p> <p>Sighted:</p> <ul style="list-style-type: none"> • Surface and Groundwater Management Plan, Ravensthorpe Composting facility, 74 Lemington Road, Ravensthorpe NSW, Rev 1, dated 6 July 2023. <p>The SWGWMP forms part of the OEMP.</p> <ul style="list-style-type: none"> • SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. <p>Operations commenced on 7 January 2024.</p> <p>The following provides details of the SGWMP in reference to the condition requirements:</p> <ul style="list-style-type: none"> (a) Prepared by consultant Senversa (b) Management and Mitigation Measures are included in section 4.3,5.0, 6.0. (c) <ul style="list-style-type: none"> (i) Management of water is detailed in section 4.0 and water use is detailed in section 2.43. (ii) Section 2.54 highlights how the Department of Planning and Environment Water (DPEW) confirmed that the 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		(e) contain a Groundwater Management Plan ; (f) contain a Leachate Management Plan .	Ravensworth site under SSD-9418 does not require a water access licence to use the water from Void 4 (iii) Section 2.4.3 details the management of wastewater streams. (d) (i) Section 4.4 details surface water monitoring plans. (ii) Section 4.3.4 shows sediment and erosion controls. (iii) Section 4.3.1 details surface water and leachate management systems on site. (iv) Section 4.4.6 details surface water investigation and mitigation protocols. (e) Section 6.0 contains a Groundwater Management Plan. (f) Section 5.0 contains a Leachate Management Plan.		
2.19	B19	The Applicant must: (a) not commence operation until the Surface and Groundwater Management Plan required by condition B18 is approved by the Planning Secretary; and (b) implement the most recent version of the Surface and Groundwater Management Plan approved by the Planning Secretary for the duration of the development.	The SWGWMP, was approved by DPHI on 21 December 2023, operations commenced 7 January 2024. Evidence sighted to assess implementation of SWGWMP: <ul style="list-style-type: none"> Environmental Checklist inspections. Quarterly leachate monitoring records. 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.20	B20	Groundwater The Applicant must obtain relevant water access licence/s in accordance with the Water Management Act 2000, if the development will intercept groundwater.	<ul style="list-style-type: none"> Installation of a water level marker within leachate dam. Clean water diversion being implemented around the composting pads. Sighted letter from DPE Water Re. Response to Submissions Advice. Ref: OUT22/11230, dated 3 August 2022. The DPE Water letter confirmed that there was no requirement to obtain a licence to take water from Void 4 of the nearby mine pit on the basis that water was being collected from the ash dams and tailings placements which were above the natural groundwater table.		Compliant
2.21	B21	Traffic And Access Parking The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Detailed in section 5.0 of the Operational Traffic Management Plan. The Auditor considered that sufficient parking had been provided, in accordance with the OTMP requirements. There was no use of public or residential parking spaces.		Compliant
2.22	B22	Operational Traffic Management Plan Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the development to the satisfaction of the Planning Secretary. The OTMP must form part of the OEMP required by Condition C5 and must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) detail the measures that are to be implemented to ensure road safety and network efficiency; 	The following provides details of the Operational Traffic Management Plan in reference to the condition requirements: <ul style="list-style-type: none"> (a) Prepared by consultant Pavey Consulting Services by David Pavey who has been endorsed by the Secretary Department of Planning and Environment as suitably qualified and experienced person. (b) Measures to confirm road safety and network efficiency are detailed in section 7.0, 8.0, 9.0, 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> (c) detail heavy vehicle routes, access, and parking arrangements; (d) include a stockpile management plan to describe how waste and product stockpiles will be managed to avoid encroaching onto the haulage route and allow the safe loading and unloading of heavy vehicles; (e) include an Operational Driver Code of Conduct to: <ul style="list-style-type: none"> (i) minimise the impacts on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) inform truck drivers of the site access arrangements and use of specified haul routes; and (v) include a program to monitor the effectiveness of these measures. 	<p>10.0.</p> <ul style="list-style-type: none"> (c) Heavy vehicle routes, access and parking is detailed in section 5.0. (d) Detailed in section 10.0. (e) <ul style="list-style-type: none"> (i) Detailed in section 7.0. (ii) Detailed in section 7.0. (iii) Detailed in section 7.0. (iv) Detailed in section 13.0. (v) Detailed in section 9.0. 		
2.23	B23	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the OTMP required by condition B22 is approved by the Planning Secretary; And <p>implement the most recent version of the OTMP approved by the Planning Secretary for the duration of the development.</p>	<p>The Operational Traffic Management Plan, was approved by DPHI on 21 December 2023, operations commenced 7 January 2024.</p> <p>Sighted:</p> <p>Bettergrow Drivers Code of Conduct, completed by Bettergrow employee, dated 3 November 2023.</p>		Compliant
2.24	B24	<p>Operating Conditions</p> <p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (a) there is an appropriate area designated for parking; (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) the development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; 	<p>The following provides details of the Operational Traffic Management Plan in reference to the condition requirements:</p> <ul style="list-style-type: none"> (a) Detailed in section 5.0. (b) Detailed in section 10.0. (c) Detailed in section 10.0. (d) Detailed in section 5.0. (e) Detailed in section 10.0. (f) Detailed in section 5.0. (g) Detailed in section 8.0. (h) Detailed in section 10.0. 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status																										
		<p>(f) all loading and unloading of materials is carried out on-site;</p> <p>(g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and</p> <p>the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.</p>																													
2.25	B25	<p>Noise</p> <p>Hours of Work</p> <p>The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.</p> <p>Table 1 <i>Hours of Work</i></p> <table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="4">Construction</td><td>Monday – Friday</td><td>7 am to 5 pm</td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td>Sunday</td><td>Nil</td></tr><tr><td>Public Holidays</td><td>Nil</td></tr><tr><td rowspan="3">Operation</td><td>Monday – Saturday</td><td>6 am to 6 pm</td></tr><tr><td>Sunday</td><td>Nil</td></tr><tr><td>Public Holidays</td><td>Nil</td></tr><tr><td rowspan="3">Deliveries</td><td>Monday – Friday</td><td>6:30 am to 5 pm</td></tr><tr><td>Saturday – Sunday</td><td>Nil</td></tr><tr><td>Public Holidays</td><td>Nil</td></tr></table>	Activity	Day	Time	Construction	Monday – Friday	7 am to 5 pm	Saturday	8 am to 1 pm	Sunday	Nil	Public Holidays	Nil	Operation	Monday – Saturday	6 am to 6 pm	Sunday	Nil	Public Holidays	Nil	Deliveries	Monday – Friday	6:30 am to 5 pm	Saturday – Sunday	Nil	Public Holidays	Nil	All site activities have been undertaken during the nominated hours of work.		Compliant
Activity	Day	Time																													
Construction	Monday – Friday	7 am to 5 pm																													
	Saturday	8 am to 1 pm																													
	Sunday	Nil																													
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	Public Holidays	Nil																													
2.26	B26	<p>Works outside of the hours identified in condition B25 may be undertaken in the following circumstances:</p> <p>(a) works that are inaudible at the nearest sensitive receivers;</p> <p>(b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</p> <p>where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.</p>	No out of hours works were undertaken during the audit period.		Not triggered																										
2.27	B27	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	CEMP was implemented during the construction phase of the project. No noise related complaints were received during construction.		Complaint																										

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status								
		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 the Appendix 2.											
2.28	B28	<p>The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2</p> <p>Table 2 <i>Noise Limits (dB(A))</i></p> <table><tr><th>Location</th><th>Day LAeq(15 minute)</th><th>Evening LAeq(15 minute)</th><th>Night LAeq(15 minute)</th></tr><tr><td>Camberwell</td><td>40</td><td>35</td><td>35</td></tr></table> <p>Note <i>Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time).</i></p>	Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Camberwell	40	35	35	<p>Camberwell is 7km away from site.</p> <p>Low risk of exceeding criteria.</p>		Complaint
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)										
Camberwell	40	35	35										
2.29	B29	<p>Biosecurity</p> <p>Prior to the commencement of operation of the development, the Applicant must prepare a Biosecurity Protocol, detailing the procedures for a biosecurity emergency, to the satisfaction of the Planning Secretary. The protocol must form part of the OEMP required by condition C5. and must:</p> <ul style="list-style-type: none">(a) describe the notification procedures;(b) detail the measures to maintain quarantine control;(c) detail measures to prevent ground water contamination; and(d) detail the disposal procedures and options.	<p>Sighted:</p> <ul style="list-style-type: none">Operational Environmental Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW, Rev 2, dated 20/12/2023.SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. <p>Biosecurity Protocol found in Section 6 of the OEMP providing the following details in reference to the condition requirement:</p> <ul style="list-style-type: none">(a) Detailed in Section 6 of the OEMP.(b) Detailed in Section 6 of the OEMP		Complaint								

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.30	B30	The Applicant must: (a) not commence operation until the Biosecurity Protocol required by condition B29 is approved by the Planning Secretary; and implement the most recent version of the Biosecurity Protocol approved by the Planning Secretary for the duration of the development.	(c) Detailed in Section 6.3 of the Surface and Groundwater Management Plan Detailed in Appendix I Biosecurity Protocol Documents Sighted: (a) SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. (b) Biosecurity Protocol found in Section 6 of the OEMP. The primary biosecurity risk related to the importation of green waste containing phylloxera. The Auditor sighted evidence of completed Plant Health Assurance Certificates.		Complaint
2.31	B31	Aboriginal Heritage Unexpected Finds Protocol If any item 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 10 m wide buffer area around the suspected item or object must be cordoned off; and Heritage NSW must be contacted immediately	The following provides details of the OEMP in reference to the condition requirements: (a) Detailed in section 5.6 of the OEMP. (b) Detailed in section 5.6 of the OEMP. (c) Detailed in section 5.6 of the OEMP.		Not triggered
2.32	B32	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.	Detailed in section 5.6 of the OEMP.		Not triggered
2.33	B33	Hazards And Risk Dangerous Goods	Sighted dangerous goods register from 23/08/24. All dangerous goods are below limits in table 6 of the SEPP.		Complaint

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.			
2.34	B34	The Applicant must store all chemicals, fuels and oils used on site in accordance with: <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) for liquids, the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual. 	All dangerous goods appeared to be stored appropriately.		Complaint
2.35	B35	In the event of an inconsistency between the requirements of conditions B34(a) and B34(b), the most stringent requirement must prevail to the extent of the inconsistency.	Not triggered		Not triggered
2.36	B36	Bunding The Applicant must store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	All chemicals were observed to be stored appropriately within dedicated banded areas.		Complaint
2.37	B37	Contamination Unexpected Finds Prior to the commencement of construction, the Applicant must prepare an unexpected contamination finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated is disposed of in accordance with the POEO Act and its associated regulations. Details of the final disposal location and the results of any associated testing must be submitted to the Planning Secretary prior to removal of the contaminated material from the site.	Unexpected find procedure is included within the CEMP. No unexpected finds in audit period.		Compliant

Unique ID	Req No.	Compliance Requirement' / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
2.38	B38	Visual Amenity Lighting The Applicant must ensure the lighting associated with the development: <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019); and is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Not applicable. No lighting installed as part of the SSD.		Not triggered
Part C: Environmental Management, Reporting and Auditing					
3.01	C1	Environmental Management Management Plan Requirements Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: <ul style="list-style-type: none"> (a) detailed baseline data; (b) details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant 	Sighted: <ul style="list-style-type: none"> • Construction Environmental Management Plan – Ravensworth Composting Facility Expansion, 74 Lemington Road, Ravensworth NSW, Rev 1, dated 17/11/22. • Operational Environmental Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW, Rev 2, dated 20/12/2023. The CEMP and OEMP were found to include the information required by this condition. However, two (2) opportunities for improvement were identified.	Opportunity for Improvement RCF_IEA-01_OFI-02 It was observed that the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) had been 'Authored' and 'Approved' by the same individual. Recommendation In accordance with industry best practice, it is recommended that a second party review and/or approval of the management plan document is undertaken during future revisions. Opportunity for Improvement RCF_IEA-01_OFI-03 Review of the OEMP against the requirements of the <i>Department</i>	Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>to paragraph (c) above;</p> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p style="padding-left: 40px;">(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p style="padding-left: 40px;">(ii) complaint;</p> <p style="padding-left: 40px;">(iii) failure to comply with statutory requirements; and</p> <p>(h) a protocol for periodic review of the plan.</p> <p>Note: <i>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>		<p><i>of Planning, Industry and Environment, Post Approval Guidance, Environmental Management Plan Guideline</i> found that Hold Points had not been considered in the OEMP.</p> <p>The environmental risk assessment included in the Pollution Incident Response Management Plan includes an item for “pollution of waterways from leachate”. One of the preemptive control measures listed is “three ‘chain of pond’ basins on site.” Following the leachate incident, the western leachate pond has been disconnected and all surface water is directed to the Stage 2 leachate dam meaning that this control measure has been compromised..</p> <p>Recommendation</p> <p>In order to align to DPIE guidelines, there is an opportunity to revise the OEMP to include considerations of hold points, i.e., there may be a hold point prior to the discharge of water from the leachate pond, whereby sampling is to be undertaken and authorisation to discharge is</p>	

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
				provided by the Environment Manager. There is also an opportunity to update the risk register in the PIRP to confirm that the listed control measures are appropriate.	
3.02	C2	Construction Environmental Management Plan The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	Sighted: <ul style="list-style-type: none"> Construction Environmental Management Plan – Ravensworth Composting Facility Expansion, 74 Lemington Road, Ravensworth NSW, Rev 1, dated 17/11/22. SSD-9418-PA-2. DPHI Letter to Bettergrow Re. approval of CEMP, dated 6 December 2022. 		Complaint
3.03	C3	As part of the CEMP required under condition C2 of this consent, the Applicant must include the following: <ul style="list-style-type: none"> (a) Erosion and Sediment Control Plan; (b) Contamination Unexpected Finds Procedure (see condition B37); and (c) Community Consultation and Complaints Handling. 	The CEMP (Rev 1) was observed to contain the following information: <ul style="list-style-type: none"> a) An erosion and sediment control plan is provided in Appendix C, with standard ERSED drawing provided in Appendix D. b) An Unexpected Finds Procedure is included in Appendix E. c) Table 1 contains objectives and targets relating to management of community and complaints. Section 12 of the CEMP related to Complaints management. 		Complaint
3.04	C4	The Applicant must: <ul style="list-style-type: none"> (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 	a) Sighted: <ul style="list-style-type: none"> SSD-9418-PA-2. DPHI Letter to Bettergrow Re. approval of CEMP, dated 6 December 2022. Letter from Bettergrow to DPHI Re. 		Complaint

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	Notification of commencement of construction in accordance with A8(a), dated 24 January 2023. SSD-9418-PA-3. Construction did not commence until the CEMP was approved by the Secretary. b) Evidence of implementation of CEMP demonstrated by review of: i. Monitoring reporting ii. Inspection reporting iii. Toolbox meetings iv. Site induction		
3.05	C5	Operational Environmental Management Plan The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	Sighted: <ul style="list-style-type: none">Operational Environmental Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW, Rev 2, dated 20/12/2023.SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023.		Compliant
3.06	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: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	c) Roles and responsibilities found included in Section 4. d) Procedures included in below sections of the OEMP: i. Reference to Compliance tracking Register. Section 9 outlines roles and responsibilities for reporting non-compliances to relevant agencies. ii. Section 7 outlines Bettergrow's process of handling enquiries and complaints.		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and (c) include the following environmental management plans: <ul style="list-style-type: none"> (i) Waste (see condition B2); (ii) Air Quality (see condition B11); (iii) Surface and Groundwater (see condition B18); (iv) Traffic (see condition B22) and (v) Biosecurity (see condition B29). 	<ul style="list-style-type: none"> iii. Section 7.3 outlines the dispute resolution process. iv. Responses to non-compliances are outlined in Section 9.2. v. Emergency response procedures included in Appendix G. e) DPHI approval letter, dated 21 December 2023 referenced the below plans. <ul style="list-style-type: none"> i. Waste Management Plan, Rev 1, dated 10/11/23 ii. Air Quality Management Plan, dated 2905/23 iii. Surface and Groundwater Management Plan, Rev 1, dated 06/07/23 iv. Operational Traffic Management Plan, Rev 2, dated 20/12/23 v. Biosecurity Protocol found in Section 6 of the OEMP 		
3.07	C7	<p>The Applicant must:</p> <ul style="list-style-type: none"> (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). 	<ul style="list-style-type: none"> a) Sighted: <ul style="list-style-type: none"> • SSD-9418-PA-6. DPHI letter to Bettergrow Re. approval of OEMP Rev 2, dated 21 December 2023. • Letter from Bettergrow to DPHI Re. Notification of commencement of operations, dated 13 November 2023 in accordance with A8(b). SSD-9418-PA-5. Operations proposed to commence 13 December 2023 however operations did not actually commence until 7 January 2024, based on site diary records provided to the Auditor. 		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			b) Implementation of the OEMP was verified by the auditor during the site inspection and via evidence of environmental inspection checklist, monitoring data, toolbox talks etc.		
3.08	C8	Revision Of Strategies, Plans and Programs Within three months of: <ul style="list-style-type: none"> (a) the submission of a Compliance Report under condition C14; (b) the submission of an incident report under condition C10; (c) the submission of an Independent Audit under condition C16; (d) the approval of any modification 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, The strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.	Management plans are currently being reviewed and updated in response to the incident on 17 June. Will be provided before 18 September 2024.		Compliant
3.09	C9	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 required under condition C8, or such other timing as agreed by the Planning Secretary. Note: <i>This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	The OEMP was updated in response to Mod-1 and was provided to the Planning Secretary.		Compliant
3.10	C10	Reporting And Auditing Incident Notification, Reporting and Response	Details – Between Monday 17 and Tuesday 18 June 2024 it was identified that there was a loss of approximately 7ML of water from the western		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes 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 given, and reports submitted in accordance with the requirements set out in Appendix 3.	<p>leachate water containment dam. The loss was attributed to mine subsidence of the underlying fly ash material.</p> <p>An initial notification as made via the planning portal on 18 June 2024 (Ref: SSD-9418-PA-8) which satisfied the requirements of CoA C10.</p> <p>On 24 June 2024 DPHI requested that additional information be provided in relation to the incident.</p> <p>Bettergrow issued a response to the RFI on 13 August 2024. Ref: RFI-74469993, including copies of inspection reports during the four (4) weeks prior to the incident and copies of water sampling analysis from the leachate dam.</p> <p>An incident report was prepared and issued to DPHI on 24 June 2024 to address requirements Parts 1 and 2 of Appendix 3.</p> <p>A second incident report was prepared and submitted to DPHI on 17 July 2024 (within the 30-day required timeframe) to address requirements Parts 3 and 4 of Appendix 3.</p>		
3.11	C11	<p>Non-Compliance Notification</p> <p>The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.</p>	No non-compliances were self-reported during the audit period. The non-compliances identified during this IEA will trigger notification under CoA C11.		Not triggered
3.12	C12	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-			Not triggered

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.			
3.13	C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.			Not triggered
3.14	C14	Compliance Reporting Within the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: <ul style="list-style-type: none"> (a) identify any trends in the monitoring data over the life of the development; (b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the development. 	First annual compliance report is to be completed in October 2024.		Not triggered
3.15	C15	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.			Not triggered
3.16	C16	Independent Audit Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:	This is the first Independent Environmental Audit commissioned for the SSD project, This audit was commissioned in August 2024 which is within one year of commencement of operation (December 2023).		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and (c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary). 	<ul style="list-style-type: none"> a) This Audit has been prepared in accordance with the <i>Independent Audit Post Approval Requirements</i> (IAPAR 2020) with IAPAR 2020 b) the Lead Auditor and Audit Team have been endorsed by the Planning Secretary. Ref: SSD-9418-PA-10 Letter from DPHI to Bettergrow endorsing Dylan Jones, Gary Selwyn and Jack Hanigan, dated 6 August 2024. <p>It is understood that this report will be submitted by Bettergrow to DPHI within 3 months of commissioning the audit.</p>		
3.17	C17	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:</p> <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition C16 of this consent; (b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done. 	<p>The Auditor understand that Bettergrow will action CoA C17 requirements upon receipt of the final Audit Report.</p>		Compliant
3.18	C18	<p>Monitoring and Environmental Audits</p> <p>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</p>	<p>Environmental monitoring includes quarterly water sampling of the leachate pond, the spillway and the sediment basin. All samples were submitted to a NATA accredited laboratory for analysis and have been published on the Bettergrow website.</p>		Compliant

Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p> <p>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.</p>			
3.19	C19	<p>Access To Information</p> <p>At least 48 hours before the commencement of construction of the development and for the life of the development, the Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) the proposed staging plans for the development if the construction, operation or decommissioning if the development is to be staged; (v) 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; (vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; 	<p>Website URL: Environmental - Bettergrow.</p> <p>(a) The following documents were found to be accessible on the website:</p> <ul style="list-style-type: none"> (i) the EIS, amendment report and Rts. (ii) SSD-9418 Mod-a. (iii) OEMP, CEMP, PIRP. (iv) No staging report applicable. (v) No environmental performance monitoring reports required to date. (vi) Monitoring report from August 2020 to May 2024. (vii) No staging report applicable. (viii) Phone number and email address provided. (ix) A monthly complaints register is maintained on the website. (x) No compliance reports have been undertaken on the project to date. (xi) This is the first IEA report, which is intended to be published on the website. 		Compliant



Unique ID	Req No.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> (vii) a summary of the current stage and progress of the development; (viii) contact details to enquire about the development or to make a complaint; (ix) a complaints register, updated monthly; (x) the Compliance Report of the development; (xi) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; (xii) any other matter required by the Planning Secretary; and <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>(b) All information was considered to be up to date.</p>		



Appendix B – Planning Secretary Audit Team Endorsement

Appendix B – Planning Secretary Audit Team Endorsement

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-9418-PA-10

JACQUELINE BLOMBERG
ENVIRONMENTAL MANAGER
BETTERGROW RECYCLING PTY LTD
2 WELLA WAY
SOMERSBY
NEW SOUTH WALES 2250
06/08/2024

Sent via the Major Projects Portal only

Subject: Ravensworth Composting Facility Expansion - IEA Auditor Endorsement Request

Dear Ms Blomberg,

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct the first Independent Environmental Audit of the Ravensworth Composting Facility Expansion, submitted as required by Schedule 2, Condition C16 of SSD-9418 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 31 July 2024.

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.

Consequently, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Dylan Jones – Lead Auditor
- Mr Gary Selwyn – Alternate Lead Auditor
- Mr Jack Hanigan – Audit Team Member (to work under the guidance of the above Lead Auditors).

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

The Independent Audit 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.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au

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Department of Planning, Housing and Infrastructure



Please note, that this endorsement is not ongoing, and a new auditor nomination request will need to be submitted for the next IEA.

Should you wish to discuss the matter further, please contact Laura Gothard, (Position) on 0484269988 or email compliance@planning.nsw.gov.au

Yours sincerely



Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Appendix C – Consultation Records

Appendix C – Consultation Records

From: [Laura Gothard](#)
To: [Jones, Dylan](#)
Subject: [EXTERNAL] Re: Independent Environmental Audit - Ravensworth Composting Facility - SSD-9418
Date: Thursday, 8 August 2024 11:50:25 AM

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dylan,

I have endorsed you and Jack Hanigan to complete the Ravensworth 2024 IEA. (Gary Selway also if required).

The IEA must be carried out in accordance with the condition of consent SSD-9418 and the Independent Audit Post Approval Guidelines 2020 [here](#) including but not limited to the requirements under Section 3.3.

The IEA must cover all activities on site from commencement of construction - 24 January 2023.

Kind Regards,

Laura Gothard
Senior Compliance Officer

Development Assessment | Department of Planning, Housing and Infrastructure
T 02 6575 3403 | M 0484 269 988 | E laura.gothard@dpie.nsw.gov.au

From: Jones, Dylan <djones17@kpmg.com.au>
Sent: Monday, 5 August 2024 4:46 PM
To: Laura Gothard <laura.gothard@dpie.nsw.gov.au>
Cc: Hanigan, Jack <jhanigan@kpmg.com.au>
Subject: Independent Environmental Audit - Ravensworth Composting Facility - SSD-9418

Dear Laura,

I am writing to advise that KPMG is scheduled to undertake the first Independent Environmental Audit of the Ravensworth Composting Facility, as required by Conditions of Consent C16 of SSD-9418 (Mod-1). We note that the Department's approval of auditors is currently in progress.

The audit is planned for the 15 August 2024 and will review compliance with SSD-9418 Schedule 2: Parts A, B, C and appendices, as applicable.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements 2020, Section 3.2*, KPMG seeks your input into the scope of the audit and advice on any particular areas where you would like KPMG to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the

scope of the audit.

Regards,

Dylan Jones
Director
Exemplar Global Lead Environmental Auditor
ESG Advisory & Assurance
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Appendix D – Site Inspection Photographs

Appendix D – Site Inspection Photographs

Observations from the site inspection are provided in the following table. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.


Site Inspection Details	
Site Location:	74 Lemington Road, Ravensworth NSW
Inspection Date / Time Period:	21 August 2024 / 10am – 12pm
The Auditees:	Bettergrow Pty Ltd
	
Photo 1	AGL main site entry and shared (Bettergrow and AGL) emergency assembly area.



Photo 2 AGL 'void 4' used to supply operational water to Bettergrow

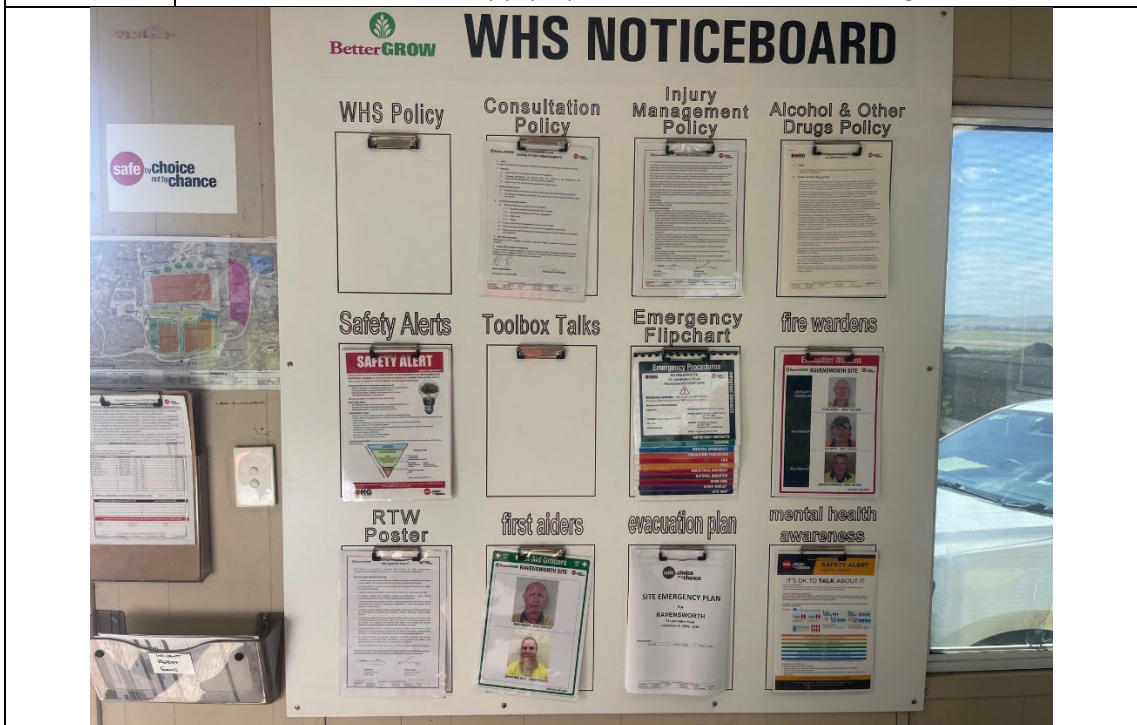


Photo 3 Bettergrow site office, noticeboard showing policies.

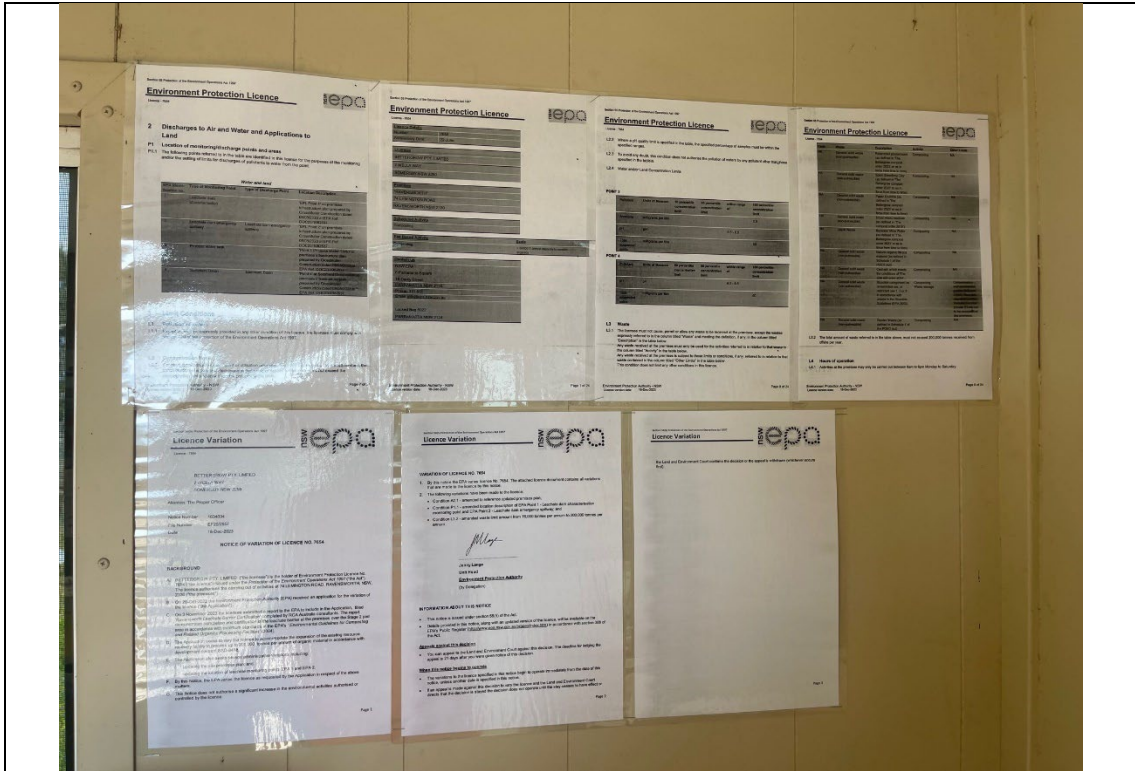


Photo 4 Bettergrow site office, EPL on display.

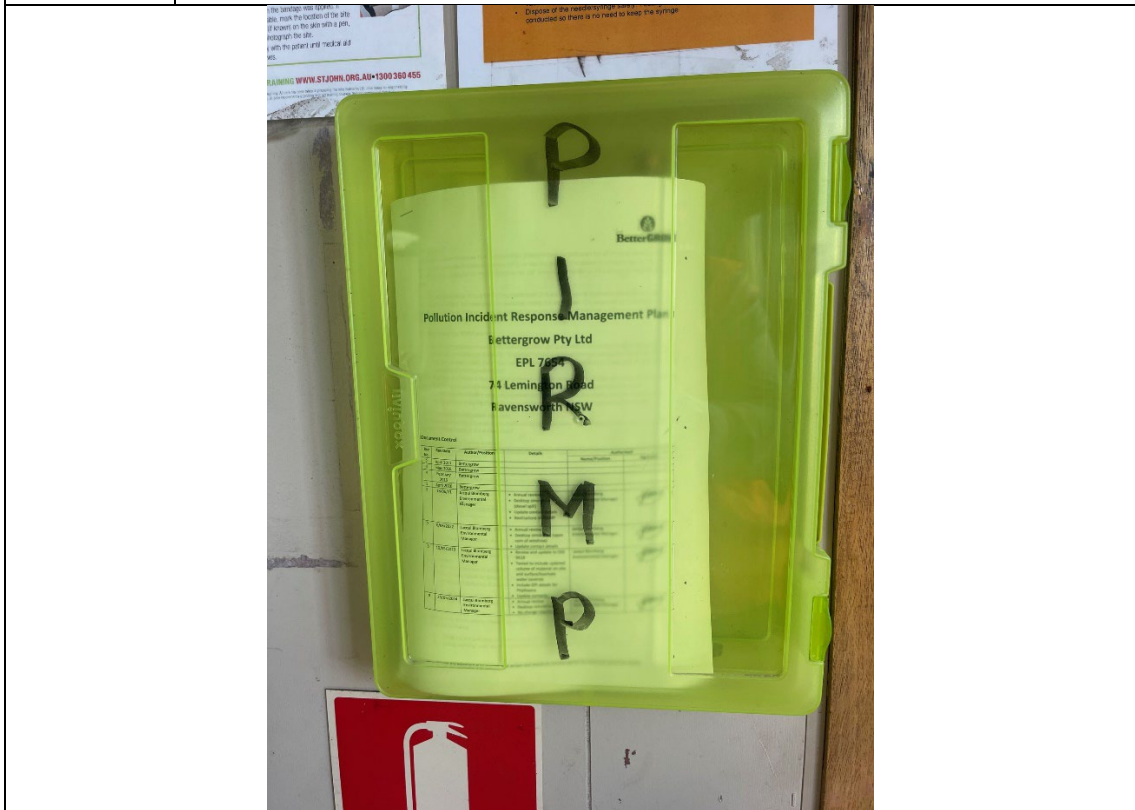


Photo 5 Bettergrow site office, Pollution Incident Response Management Plan



Photo 6

Ravensworth Composting Facility, compost windrows being pasteurised in preparation for supply to AGL. Initial pad in foreground and the Stage 2 expansion pad in background.



Photo 7

RCF composting pad, looking south.



Photo 8 Chemical storage within a dedicated shipping container utilising bunds.



Photo 9 Diesel above ground storage tank, drip trays covered in plastic to prevent rain water build. No visual evidence of spills or leaks.



Photo 10 Bettergrow machinery mixing greenwaste with biosolid waste to form compost.



Photo 11 Onsite weather station with finished compost product in background.



Photo 12 Dedicated water cart available on site. Water is pumped from the nearby AGL 'void 4'.

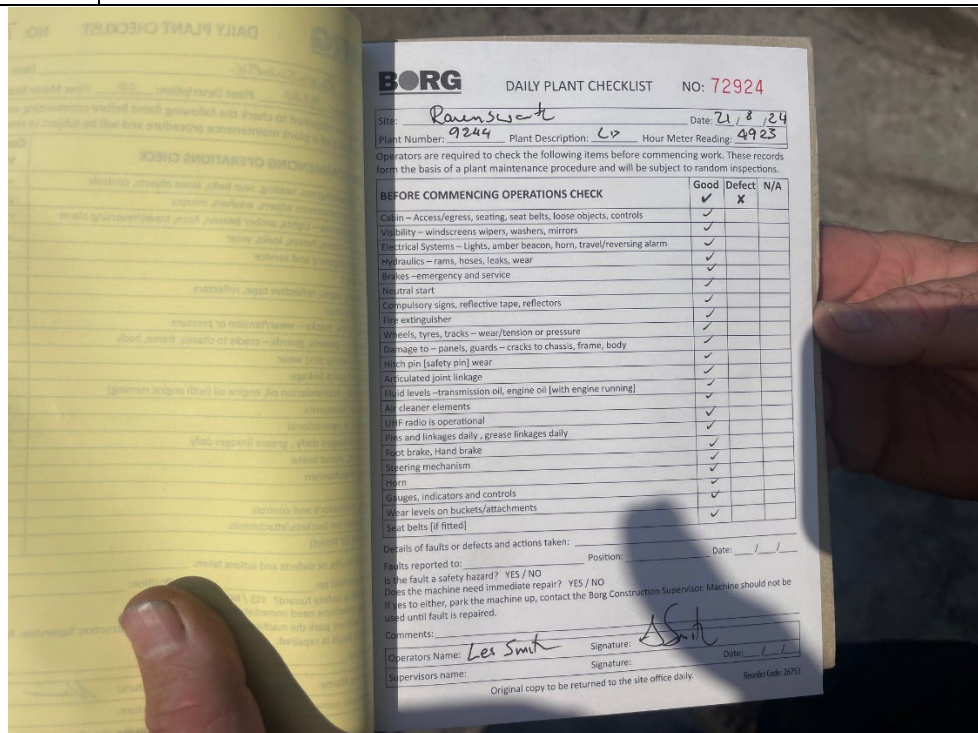


Photo 13 Daily plant checklist.



Photo 14 Screening process used to remove over-sized and plastic objects from the incoming green waste.



Photo 15 Green bins containing screened plastic litter. These were not overfilled and were appropriately covered.



		
Photo 16	Swale drain surrounding composting pads. Note the sprinkler installed adjacent to the swale drain used to maintain moisture levels of the windrows.	
		
Photo 17	Moderate amounts of plastic litter accumulated in swale drains, requiring ongoing housekeeping.	



Photo 18

Earth bund formed to divert surface water away from western (Stage 1) leachate dam to Stage 2 leachate dam.



Photo 19

Decommissioned western (Stage 1) leachate dam following subsidence incident.



Photo 20 Riprap used at surface water spillway to Stage 2 leachate dam



Photo 21 Stage 2 leachate dam, showing water level marker and EPL discharge point to the left side, identified via rip rap on bank.



Appendix E – Audit Agenda

Appendix E – Audit Agenda

Independent Environmental Audit – Ravensworth Composting Facility	
Project	Ravensworth Composting Facility
Planning Approval	SSD-9418
Proponent	Bettergrow Pty Ltd
Location of Audit	Ravensworth Composting Facility (Ravensworth) and Bettergrow head office (Somersby)
Date of Audit	21 August 2024
Audit Team	Dylan Jones (Lead Auditor) Jack Hanigan (Auditor Assistant)
Site Contact	Jacqueline Blomberg, Environmental Manager
Audit Criteria	Conditions of consent SSD-9418 Schedule 2: Parts A, B, C and appendices in accordance with Independent Audit Post Approval Requirements 2020
Audit Period	24 January 2023 (commencement of construction) to 15 August 2024
Audit Objectives	Assess compliance with SSD-9418 conditions of approval.

Agenda		
Item	Time	Location
Opening Meeting <ul style="list-style-type: none"> Introduce the auditor and auditee team members. Confirm audit scope, audit period, objectives and outline the methodology and resources required. 	9:30 AM - 9:45 AM	Ravensworth Composting Facility
Site Inspection <ul style="list-style-type: none"> Auditee to provide an overview of site processes and facilitate site access. Auditor to sight current site activities and assess the implementation of mitigation measures and effectiveness of management plan requirements. Identify environmental aspects, impacts, controls and onsite documentation. 	9:45 AM - 10:45 AM	
Site Inspection Debrief / Coffee Break / Travel from Site to Office	10:45 AM - 12:30 PM	N/A
Review Compliance to Consent Conditions		
<ul style="list-style-type: none"> PART A – Administrative Conditions 	1:00 PM – 1:45 PM	Bettergrow Office, Somersby / MS Teams
<ul style="list-style-type: none"> PART B – Specific Environmental Conditions 	1:45 PM – 2:45 PM	
Coffee Break	2:45 PM – 3:00 PM	

<ul style="list-style-type: none"> PART C – Environmental Management, Reporting and Auditing 	3:00 PM – 3:45 PM	
Auditor Consolidation / Internal Meeting	3:45 PM – 4:00 PM	
Closing Meeting <ul style="list-style-type: none"> Discuss preliminary outcomes of the audit including details of any non-compliances and opportunities for improvement. Confirm next steps including additional requests for information and timelines 	4:00 PM – 4:15 PM	

Responsibilities		
Roles	Name	Responsibilities
Lead Auditor	Dylan Jones	<ul style="list-style-type: none"> Schedule audit, prepare audit materials and manage resources Provide Audit Agenda to Bettergrow, including confirmation on a scope and timeframes Attend the site visits Lead interviews with key personnel Lead the Opening and Closing Meetings Prepare the Independent Audit Report
Auditor Assistant	Jack Hanigan	<ul style="list-style-type: none"> Support the lead auditor by preparing audit materials such as Audit Plan, schedules, interview questions and report drafting. Attend the site visits, document site and interview observations. Support preparation of the Independent Audit Report
Audit Specialists	N/A	N/A
Auditee	Jacqueline Blomberg	<ul style="list-style-type: none"> Liaise with Bettergrow personnel to attend site inspection and audit interviews, as required Provide WH&S supervision to KPMG staff while on site Provide meeting rooms for audit interviews Respond to request for information prior to, during and following the day of the audit, as required.

Notes

- The audit will cover both the construction and operational requirements in accordance with Conditions of Consent SSD-9418 Schedule 2, Part A, B and C.
- The audit will cover a sampling of records relevant to the scope. KPMG auditors will apply their professional judgment based on the information made available during the audit.
- KPMG will conduct the audit in accordance with the Independent Auditing Post Approval Requirements (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.
- KPMG will issue a Request for Information (RFI) document separately to this agenda.





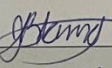
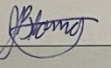
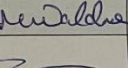

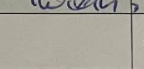
Appendix F – Audit Attendance Sheet

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Audit Attendance Sheet

Project	Ravensworth Composting Facility	Audit Ref.	RCFE-01
Auditee	Bettergrow Pty Ltd	Lead Auditor	Dylan Jones
Location	74 Lemington Road, Ravensworth NSW (site) 2 Wells Way, Somersby NSW (office)		
Opening Meeting Date / Time	21 August 2024 10:15am		(site)
Closing Meeting Date / Time	21 August 2024 4:30pm		(office)

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
Dylan Jones	KPMG	Lead Auditor		
Jacqui Blomberg	Borg	Env. Manager		
Mark Windsor	Bettergrow	Ops Manager		
Zac Parkinson	Bettergrow	CEO		
Edith Wirth	Bettergrow	Service/Finance		
Jack Hanigan	KPMG	Audit Team		online



Appendix G – Independent Audit Declarations

Appendix G – Independent Audit Declarations

Independent Audit Report Declaration Form	
Project Name	Ravensworth Composting Facility Expansion
Consent Number	SSD-9418
Description of Project	Expansion of an existing resource recovery facility to process up to 200,000 tonnes per annum of organic material, including water drainage and leachate works, hardstand areas and associated infrastructure.
Project Address	74 Lemington Road, Ravensworth NSW 2330
Proponent	Bettergrow Pty Ltd
Title of Audit	Independent Audit No.1
Date	13 September 2024

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


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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection

with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor	Dylan Jones
Signature	
Qualification	Lead Auditor B. Env. Sci. & Mgt., M. Env. Eng. Mgt. Exemplar Global Lead Auditor Environmental Management Systems
Company	KPMG

Independent Audit Report Declaration Form	
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- iv I have acted professionally, objectively and in an unbiased manner;
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- 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;
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Name of Auditor	Gary Selwyn
Signature	<i>Gary Selwyn</i>
Qualification	Alternate Lead Auditor BSc (Hons), MSc Institute of Environmental Management and Assessment (IEMA) Registered Principal Environmental Auditor
Company	KPMG

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- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Jack Hanigan
Signature	<u>Jack Hanigan</u>
Qualification	Audit Team Member B. Env. Mgmt. EarthSci, BSc. (Hons) Geol.
Company	KPMG



Appendix H – Documents Reviewed

Appendix H – Documents Reviewed

The primary documents assessed prior to and after the site visit are as follows:

- Operational Environmental Management Plan – Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW, Rev 2, dated 20 December 2023
- Ravensworth Waste Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW. Rev 1, dated 10 November 2023.
- Ravensworth Air Quality Management Plan, Bettergrow Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW. Dated 29 May 2023.
- Construction Environmental Management Plan – Ravensworth Composting Facility Expansion, 74 Lemington Road, Ravensworth NSW, Rev 1, dated 17/11/22.
- Ravensworth Leachate Barrier Certification Report, prepared by RCA Australia, dated 20 October 2023
- Ravensworth Composting Pad Leachate Detention Basin, Construction Report, prepared by Aurecon, dated 16 May 2017
- Surface and Groundwater Management Plan, Ravensworth Composting Facility, 74 Lemington Road, Ravensworth NSW, Rev 1, dated 6 July 2023.
- Letter from DPE Water Re. Response to Submissions Advice. Ref: OUT22/11230, dated 3 August 2022
- Operational Traffic Management Plan, Rev 2, prepared by Pavey Consulting Services, dated 20 December 2023
- NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual
- Waste receipts tracker
- Letter from Bettergrow to DPHI Re. Notification of commencement of construction in accordance with A8(a), dated 24 January 2023. SSD-9418-PA-3.
- Letter from Bettergrow to DPHI Re. Notification of commencement of operations, dated 13 November 2023 in accordance with A8(b). SSD-9418-PA-5. Operations proposed to commence 13 December 2023.
- Letter from Bettergrow to Singleton Council Re. Notification of Surrender of Development Application No. 140/2016, dated 20 May 2024.
- Response from Singleton Council to Bettergrow confirming that DA140/2016 had been surrendered, dated 29 May 2024.

- Toolbox Talk, dated 22 May 2024 – Subject: Environmental Incident Management
- Toolbox Talk, dated 9 March 2023 – Subject: Pasteurised Green Waste Deliveries
- Environmental requirements and awareness slide deck
- External Site Maintenance Register
- Plant No. PLT9244 front end loader – prestart checklist dated 21 August 2024
- Letter from DPE Water Re. Response to Submissions Advice. Ref: OUT22/11230, dated 3 August 2022.
- Environmental Protection Licence (EPL) #7654
- Dangerous goods register, dated 23 August 2024
- Applying SEPP 33 report, dated January 2023
- SSD-9418-PA-2. DPHI Letter to Bettergrow Re. Approval of Construction Environmental Management Plan, dated 6 December 2022.
- SSD-9418-PA-8: DPHI letter to Bettergrow Re. Approval Operational Management Plan, dated 21 December 2023
- Letter from Bettergrow to DPHI. Re. Ravensworth Composting Facility Expansion (SSD 9418) Notification of Incident, dated 18 June 2024
- Bettergrow Incident Report 1, dated 24 June 2024
- Bettergrow Incident Report 2, dated 17 July 2024
- SSD-9418-PA-10 Letter from DPHI to Bettergrow endorsing Dylan Jones, Gary Selwyn and Jack Hanigan, dated 6 August 2024.
- Email from NSW EPA to Bettergrow Ref: 30811 Water Ravensworth – EPL 7654 loss of leachate, dated 19 June 2024
- Environmental Impact Statement, prepared by RPS Group, V3, dated 14 November 2019 (EIS)
- Greenspot Hunter Valley Nutrient Recycling Facility - Response to Submissions – SSD 9418, prepared by Space urban, dated 20 June 2022 (RtS)
- Letter from Bettergrow to DPHI, dated 13 August 2024 Re. RFI-74469993.
- Greenspot Hunter Valley Nutrient Recycling Facility – Amendment Report, prepared by Space Urban, dated 28 June 2022 (Amendment Report).

