



ProTen Holdings Pty Ltd
Narrandera Poultry Independent Environmental Audit 2020
Audit Report

February 2021

Executive summary

GHD Pty Ltd (GHD) was engaged by ProTen Holdings Pty Ltd (ProTen) to conduct an independent environmental audit of compliance of the Narrandera Poultry Production Complex at Euroley, NSW. The Narrandera Poultry Production Complex operates under Development Consent SSD 6882 and Environment Protection Licence (EPL) 20748.

ProTen's Narrandera Poultry Production Complex (the Complex) is located in the Riverina region of south-western NSW, within the Narrandera local government area, about 26 km west of the township of Narrandera. The Complex has been in operation since April 2016 growing poultry for human consumption. The Complex is made up of five poultry production units (PPUs) or farms and is approved to house 3.92 million birds at any one time.

Condition C12 of SSD 6882 requires an independent environmental audit to be undertaken within two years of the date of the consent and every three years thereafter. This audit constitutes the second audit for the Complex. This report presents the findings of the 2020 independent environmental audit.

At the time of audit, ProTen demonstrated a high level of compliance with the requirements of the Development Consent and EPL. A range of positive measures were observed during the audit that demonstrated compliance with many of the requirements of the Development Consent and EPL including:

- Engineered surface water management system for each farm designed to capture 170% of surface water runoff in a 1 in 100 year, 72 hour rainfall event.
- Centrally controlled system to manage the conditions inside each poultry shed for the birds. This system monitors and controls temperature, ventilation, light, humidity and atmospheric pressure.
- Protection of identified Aboriginal artefacts and sites.
- Industry best practice biosecurity measures.

An Operational Environmental Management Plan has been prepared for the operations of the Complex which has a number of other management plans appended to it which have been prepared in accordance with the Development Consent. The Water Management Plan was reviewed in detail as part of the audit as it was the only management plan which has been revised during the audit period. The Water Management Plan was found to be adequate for the type of operations at the Complex.

Environmental monitoring required by the EPL and Development Consent were being undertaken for the Complex.

Compliance and improvement opportunities were identified related to poultry population of the complex, chemical storage, notifying the public that the Freecall Environmental number is a complaints line, inspecting and rectifying erosion across the surface water infrastructure, maintaining vegetation buffers and maintaining records in accordance with the EPL.

This report is subject to, and must be read in conjunction with, the limitations set out in Section 1.4, and the assumptions and qualifications contained throughout this report.

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1. Introduction

1.1 Introduction

ProTen Holdings Pty Ltd (ProTen) owns and operates the Narrandera Poultry Production Complex (the Complex). The Complex comprises five poultry production units (PPU) or farms (75-79), where broiler birds are grown for human consumption. Each farm comprises 16 tunnel-ventilated fully enclosed climate-controlled poultry sheds, with associated support infrastructure and staff amenities. The Complex is located on approximately 1,160 hectares of rural land off the Sturt Highway approximately 26 km west of Narrandera in south-western NSW.

ProTen operate the Complex in accordance with the following approvals:

- Development Consent SSD 6882
- Environment Protection Licence (EPL) 20748
- Statement of Commitments

GHD Pty Ltd (GHD) was commissioned by ProTen, and approved in advance by the NSW Department of Planning, Industry and Environment (DPIE), to conduct an independent environmental audit of ProTen's compliance with the requirements of the abovementioned approvals.

This report response to the audit scope as outlined in Section 1.2.

1.2 Scope of the audit

The scope of the audit was defined by Condition C12 of the Development Consent as follows:

Within 2 years of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:

- a. be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b. include consultation with the relevant agencies;*
- c. assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);*
- d. review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and*
- e. recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.*

Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.

This audit constitutes the second audit for the Complex. The methodology of the audit is outlined in Section 2. The period of the audit is November 2017 to November 2019 (the audit period).

1.3 Audit team members

Demelza Scott and Grace Rogers of GHD undertook the audit at the request of ProTen. The audit team were approved by DPIE in a letter dated 21/10/2020 (Appendix A) to undertake this audit. The participants in the audit were:

- Demelza Scott (GHD) – Lead Auditor
- Grace Rogers (GHD) – Audit Assistant
- David Baxter (ProTen) – Regional Operations Manager – Narrandera
- Jade Sluggett (ProTen) – Farm 79 Manager
- Julian Johnson (ProTen) – Tamworth Regional Operations Manager
- Samantha Hayes (SLR Consulting) – Associate Environmental Assessment and Management

1.4 Limitations

This report has been prepared by GHD for ProTen Ltd and may only be used and relied on by ProTen Ltd for the purpose agreed between GHD and the ProTen Ltd as set out in section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than ProTen Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this Report are based on conditions encountered and information reviewed at the date of preparation of the Report. GHD has no responsibility or obligation to update this Report to account for events or changes occurring subsequent to the date that the Report was prepared. Specifically, this Report does not take into account the effects, implications and consequences of or responses to COVID-19, which is a highly dynamic situation and rapidly changing. These effects, implications, consequences of and responses to COVID-19 may have a material effect on the opinions, conclusions, recommendations, assumptions, qualifications and limitations in this Report, and the entire Report must be re-examined and revisited in light of COVID-19. Where this Report is relied on or used without obtaining this further advice from GHD, to the maximum extent permitted by law, GHD disclaims all liability and responsibility to any person in connection with, arising from or in respect of this Report whether such liability arises in contract, tort (including negligence) or under statute.

GHD has prepared this report on the basis of information provided by ProTen Ltd and others who provided information to GHD (including Government authorities)], which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

The opinions, conclusions and any recommendations in this report are based on information obtained from, and testing undertaken at or in connection with, specific sample points. Site conditions at other parts of the site may be different from the site conditions found at the specific sample points.

Investigations undertaken in respect of this report are constrained by the particular site conditions, such as the location of buildings, services and vegetation. As a result, not all relevant site features and conditions may have been identified in this report.

Site conditions (including the presence of hazardous substances and/or site contamination) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change.

2. Methodology

The audit was carried out in accordance with the requirements of AS/NZS ISO 19011:2019 'Guidelines for auditing management systems' and the DPE 'Independent Audit Guideline' (DPE, 2015). In particular, the GHD team conducted the audit considering the following:

- The key principles of auditing including the requirement of auditors to conduct themselves in an ethical manner, report truthfully and accurately, be diligent and have the appropriate competency to conduct the audit, be independent, and apply an evidence-based approach to conducting the audit.
- The audit objectives, scope and criteria were based on the Conditions of Consent. The scope of the audit was limited to compliance with the conditions of Development Consent SSD 6882, Statement of Commitments and EPL 20748, the environmental performance of the project, and the adequacy of strategies plans or programs under the approval.
- An appropriate audit team was selected with skills and experience in environmental auditing to ensure that an adequate assessment of compliance with the Conditions of Consent could be made.
- Relevant documentation (as detailed below) was reviewed prior to the audit to make an initial determination of conformity of the system to the requirements of the Conditions of Consent, and to prepare an audit checklist containing appropriate questions to address during the site audit.
- Audit opening and closing meetings were conducted with the auditee to explain the format of the audit upfront and to highlight preliminary audit findings at the conclusion of the site audit.
- During the site inspection, audit interviews were conducted with ProTen and SLR personnel and additional documentary evidence was collected. An inspection of the site was conducted to verify relevant compliance aspects of the audit.
- Verifiable evidence was collected and recorded throughout the audit and evaluated against the Conditions of Consent to determine conformity or non-conformity. All evidence was recorded on the Compliance Table (Appendix D).
- A complete and accurate report was prepared and distributed to provide a record of the audit and its findings.

2.1 Review of documentation

GHD reviewed documentation relevant to the operations of the Complex, this included:

- Management plans referenced in the Development Consent and other instruments
- Records for waste disposal and environmental monitoring
- Correspondence with relevant stakeholders including authorities
- Site procedures
- Training materials
- Reports prepared as required in the Development Consent and other instruments

The documentation sighted by the auditors is referenced throughout Appendix D.

2.2 Consultation with relevant agencies

As required by Condition C12 of the Development Consent, GHD consulted with the following agencies prior to the site audit:

- DPIE
- Environment Protection Authority (EPA)
- Department of Primary Industries (DPI) Agriculture
- Narrandera Shire Council (Council)

A letter was sent to each of the abovementioned agencies advising them of the upcoming audit, GHD's role in conducting the audit and invited comment on ProTen's performance with regards to the requirements of the approval that related to their agency. A sample letter is included in Appendix B.

GHD received comment from the DPIE, EPA, DPI Agriculture and Council as shown in Appendix B and Table 2-1.

Table 2-1 Agency feedback

Agency	Response Date	Response	Comment
DPIE	16 November 2020	<p>The DPIE advised they would like the audit to focus on:</p> <ol style="list-style-type: none"> 1. Water management 2. Groundwater quality 3. Waste management 4. Management of bird numbers i.e.: period of birds on site, time on site, amount of broilers per day 5. Odour/air management 6. Animal welfare, and 7. Management of vehicle movements 	<ol style="list-style-type: none"> 1. Refer to Section 3.2.1 and Appendix D, SSD 6882 Conditions B38-B42 and B45, and EPL 20748 Conditions L1.1 and O5.3. 2. Refer to Section 3.2.1 and Appendix D, SSD 6882 Conditions B41, B45, and EPL 20748 Conditions P1.2 and M2.2. 3. Refer to Appendix D, SSD 6882 Conditions B17-B21 and EPL 20748 Conditions L2 and O5. 4. Refer to Section 3.1.1 and Appendix D, SSD 6882 Conditions A6. 5. Refer to Appendix D, SSD 6882 Conditions B2 and B4 and EPL 20748 Condition E1. 6. Refer to Appendix D, SSD 6882 Conditions A6 and B8. 7. Refer to Appendix D, SSD 6882 Condition B13 and EPL 20748 Condition O3.

Agency	Response Date	Response	Comment
DPI - Agriculture	25 November 2020	<p>DPI Agriculture advised the audit would need to account for:</p> <ol style="list-style-type: none"> 1. Bird management: particularly in how and where dead birds are disposed of. 2. Stocking densities: noted the maximum permissible stocking densities are guided by guidelines which are soon to be superseded by a new guideline. Stocking densities may also be prescribed by further various accreditations, such as the RSPCA. 3. Biosecurity protocols, including details about workers/crew, vehicles, equipment etc, details on disinfection processes and procedures of pickup process should be well documented and measured. 	<ol style="list-style-type: none"> 1. Refer to Appendix D, SSD 6882 Conditions B17-B21 and EPL 20748 Conditions L2 and O5. 2. Refer to Section 3.1.1 and Appendix D, SSD 6882 Conditions A6. 3. Refer to Appendix D, SSD 6882 Conditions B8, B9 and B41 and Statement of Commitments 'Biosecurity and Poultry Disease'.
EPA	17 November 2020	<p>The EPA raised no concerns for the site. Their main environmental concerns in relation to broiler farms are air quality and good planning in regard to location and design.</p> <p>They noted ProTen are generally operating the farms and sheds in accordance with the requirements and in minimising potential off site impacts.</p>	Noted.
Narrandera Shire Council	24 November 2020	<p>In response to your email I can confirm that a Flooding Emergency and Evacuation Plan for the Narrandera Poultry Production Complex for Pro Ten Holdings at Sturt Highway Narrandera, prepared by SLR Global Environmental Solutions, was presented to Council in March 2016 and that this plan meets the terms of Condition of Consent B36 by addressing requirements a) through to g) of this condition.</p>	Noted. This is outside of the audit period for this independent environmental audit.

2.3 Site audit and inspection

The inspection was conducted by GHD auditors Demelza Scott and Grace Rogers on 20 November 2020 in the company of David Baxter (ProTen Regional Operations Manager – Narrandera). The audit team conducted interviews with relevant personnel and observations guided by the audit criteria which addressed the conditions of the Development Consent, EPL and Statement of Commitments.

The assessment of activities included inspection of the following:

- Farm 79 workshop, chemical storage shed, water tanks, vegetation buffers, surface water management system, poultry sheds and LPG storage.
- Drive around Farms 78-75.

ProTen and SLR personnel provided both soft and hard copies of documentary evidence to support compliance with the audit criteria including a selected cross-section of data, records, correspondence, procedures and management plans.

2.4 Reporting

This report presents the findings of the ProTen Narrandera Poultry Development Independent Environmental Audit required by Condition C12 of Development Consent SSD 6882. This report responds to the scope of the audit as outlined in Table 2-2.

Table 2-2 Audit scope requirements

Requirement	Reference
Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary	Section 1.3 and Appendix A
Consultation with the relevant agencies	Section 2.2 and Appendix B
Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals)	Section 3.1 and 3.4
Review the adequacy of any approved strategy, plan or program required under the abovementioned consents	Section 3.2
Recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents	Section 4

3. Key findings

ProTen's Development Consent required the audit to:

- Assess the environmental performance of the project.
- Assess whether the project is complying with the requirements in this consent, and any other relevant approvals, or licence.
- Review the adequacy of any strategy/plan/program required under this approval.

The following sections outline the audit's assessment of ProTen's environmental performance, compliance with the consent, EPL and Statement of Commitments, and the adequacy of strategies/plans/programs.

3.1 Environmental performance

A range of positive measures were observed during the audit that demonstrated compliance with many of the requirements of the Development Consent and EPL.

ProTen have designed and constructed the facility to incorporate a number of environmental controls including an engineered surface water management system for each PPU, centrally controlled system to manage the conditions inside each poultry shed (temperature, ventilation etc), permanent protection of identified Aboriginal artefacts/sites and industry best practice biosecurity measures.

Areas for improvement were identified with regards to the following aspects of the operations at the Complex:

1. Population of the Complex
2. Chemical storage

3.1.1 Population of the complex

The Annual Reviews over the audit period report production numbers for the five farms that were operational. The maximum number of birds housed during the audit period was in batch number 1903 where five of the PPUs were operational and populated with approximately 3.917 million birds. At no time did the population exceed the approved limit of 3.92 million birds. The highest populations as reported are:

- Batch number 1902 = 3.915 million
- Batch number 1903 = 3.917 million
- Batch number 1905 = 3.91 million
- Batch number 2002 = 3.908 million
- Batch number 2003 = 3.912 million

ProTen manage stocking densities in the iLeader software package. Baiada oversee ProTen's management of stocking densities. ProTen advised that RSPCA welfare standards are 34 kg/m². Birds are weighed 100 at a time and this is cross checked by automatic scales in the sheds. Birds are weighed and the density confirmed at pickup by Baiada contractors. ProTen engage a contractor, SQF, to check the calibration of the scales once a year and conduct an external audit.

The Complex is populated over several days. The Annual Reviews reports dates of placement of birds. During the audit period the longest time period for population of the complex is 14 days, with the average being 11.4 days. Batch number 1906 is reported to have been populated in nine days which breaches SSD 6882 Condition A6(e) for the whole complex to be populated in no less than 10 days. Throughout the audit period there were a number of batches which reported populating farms on consecutive days which has the potential to breach the 36 hours between commencing one farm and commencing the next as specified by SSD 6882 Condition A6(d) and EPL Condition O4.1. For the batch that was to be populated into the complex at the time of audit - Farm 79 was planned to commence populating at 1 am on 23/11/2020 and Farm 78 was planned to commence populating at 9.30 am on 24/11/2020 which is only a 32.5 hour gap. Batch number 1803 reported in the 2017/18 Annual Review populating farms 77 and 76 on the same day.

ProTen advised that drops and pickups of chickens from the Complex is determined by Baiada. Nonetheless this constitutes a breach of Condition A6 and EPL Condition O4.1. We understand that spreading the drops is designed to reduce odour and dust impacts from operation of the Complex. There were no complaints regarding operation of the complex during the audit period therefore the impact of the tighter schedule for populating the farms is considered low.

Refer to Corrective Action 1.

3.1.2 Chemical storage

Stored chemicals in the workshop/store and chemical storage shed, and bulk chemical storage facilities at Farm 79 were inspected during the audit.

ProTen maintain an online register of Safety Data Sheets (SDS) for chemicals used at the complex. Copies of the SDSs are available on site however this was not confirmed as part of the audit. The auditor sighted SDS for Twin oxide solution 75 dated 11/11/2019 and SDS for Clean oxide 75 dated 01/2015. SDS's are valid for five years and the Clean oxide SDS was out of date.

ProTen train at least one staff member on each farm in handling of chemicals. Sighted ChemCert training in ProTen training register, version 10.1 which showed staff at farms 75, 76, 77 and 79 with current ChemCert training. ProTen advised that COVID has stopped the classes for external training which had prevented the Farm Manager from Farm 78 from being trained. ProTen advised that the Groundsman, Mathew Cluff also has ChemCert training however this did not show in the training register. Sighted Chemical Standard Operating Procedure (SOP) allowing footbath refilling from a bottle, however does not permit decanting or mixing for herbicide use.

ProTen advised that PPE is available to staff within PPE cabinets on each farm and PPE was observed within the chemical storage shed. Spill kits are maintained in the chemical storage shed on each farm.

The aboveground bulk diesel storage tank is protected with a fire extinguisher and safety signage and is maintained in a permanent bund at each of the farms.

Bulk LPG tanks at each of the farms are maintained by ELGAS. ProTen own the manifold and barricade only.

Washed empty drums were stored in the chemical storage shed awaiting return to Griffith Feed and Grain.

From the inspection the following observations were made regarding non-compliance with the Dangerous Goods Code and the NSW Work Health Safety Regulations:

- Small quantities of liquid fuels and chemicals had been placed on the shed floor and not on a bund.
- Small quantities of flammable sprays were stored within the shed on open shelving.

Chlorine and other water treatment chemicals are stored on pallet bunding within the chemical storage shed. The pallet bunds are not designed for permanent storage and appeared overloaded with drums stored right against the edge of the bund and small water treatment containers stacked three high. Spills of these chemicals would not be contained by the pallet bund as evidenced by spills observed on the ground in the chemical storage shed.

- Safety signage and fire protection on the outside of the chemical storage shed were dangerous goods labelling rather than Global Harmonised Standard (GHS) compliant safety signage.
- The aboveground diesel tanks are elevated and the height of the tank compared with the height of the bund walls means that the tank is effectively unbunded as a puncture to the tank would spill outside and not be contained by the bund.
- Signage on the LPG tanks is dangerous goods signage and not compliant with GHS safety signage requirements.

Small quantities of flammable sprays can be stored in plastic tubs on the open shelving or ProTen could purchase flammable cabinets for storage of liquid and gaseous chemicals at each Farm's workshop/store.

ProTen should review the quantity of water treatment chemicals stored at each Farm. If the current volumes are required to be maintained then additional bunding should be provided in each chemical storage shed or workshop/store.

ProTen should update their safety signage across the Complex to be compliant with GHS requirements.

ProTen should review the setup of the aboveground diesel tanks to ensure they are banded in accordance with AS 1940.

ProTen advised that a permanent chemical storage facility has been added to dead bird store however this was not inspected as part of the audit.

Refer to Appendix E for photo log, Corrective Actions 2, 3 and 4 and Recommendation 2.

3.1.3 Complaints and incident management

The following section provides a summary of incidents and complaints during the audit period.

Complaints

There have been no complaints recorded during the audit period.

Incidents

There have been no incidents recorded during the audit period.

3.2 Adequacy of strategies/plans/programs

The audit assessed the adequacy of strategies and management plans prepared for the Complex. Adequacy was determined based on inclusion of content in relevant conditions and the Guideline for Preparation of Environmental Management Plans (DIPNR, 2004), suitability of the plans for the site operations and effectiveness in management environmental impact of the Complex. The Water Management Plan was reviewed for adequacy as it was the only management plan that was revised in the audit period.

3.2.1 Water Management Plan

The Water Management Plan provides an overview of the baseline surface and groundwater conditions at the Complex, extraction and use of water for poultry production, generation of dirty water from operations, monitoring of surface and groundwater, response arrangements where surface or groundwater conditions are found to be outside approved parameters and a contingency plan for operating the facility during extreme conditions.

The driver for the revision of the Water Management Plan was a reduction in frequency of monitoring and inclusion of site-specific groundwater quality trigger values.

The Water Management Plan addresses the requirements of Condition B45 and the relevant aspects of DIPNR 2004 and is suitable for operations at the Complex.

The next revision of the Water Management Plan should include a holistic review of the plan to update references to guidelines, government agencies and the stage of operation at the Complex.

3.3 Implementation of 2017 IEA recommendations

The recommendations made in the 2017 Independent Environmental Audit of Narrandera Poultry Development (GHD, 2018) and the status of recommendations as at 20 November 2020 are provided in Table 3-1 below.

Table 3-1 Follow up on 2017 Audit Findings

Schedule/Condition Reference	Recommendation	2020 Audit Follow Up
Development Consent, Schedule 3, Condition B24(a)	Finalise FSS to the satisfaction of F&R NSW and submit it to the DPE.	Refer to Appendix D, SSD 6882 Condition B24.
Development Consent, Schedule 3, Condition B35	Confirm that the minimum floor levels for habitable buildings is based on protection from the 1 in 100 year flood event plus 500 mm freeboard.	Construction certificates and occupation certificates have been issued for the buildings which indicates the buildings have been designed and constructed in compliance with the guidelines. While the construction and occupation certificates did not specifically reference flooding, DPIE sought no further action by ProTen following the 2017 audit.
Development Consent, Schedule 4, Condition C13(b)	Ensure that delays between availability of updated documents/plans/results and upload onto the website is limited.	The 2017 independent audit report and ProTen's response to recommendations have been published on the ProTen website.
Statement of Commitments, Noise	Install traffic direction signage at all of the PPU's.	Refer Appendix D, Statement of Commitments, Noise.
Environmental performance	Investigate whether the change from scalar to vector averaging can be achieved by reprogramming the data logger.	In the response to recommendations from the 2017 audit, ProTen advised DPIE that the weather station installed on the site meets the AS/NZS 3580.14 requirements and the installed monitoring and sensing exceeds the levels dictated in the EPL therefore they felt that no changes to the station were necessary. DPIE sought no further action by ProTen following the 2017 audit.
Environmental performance	Identify additional options for maintaining capacity in sediment basins when full/nearing full e.g. use for irrigation of vegetation buffers or dust suppression using water cart.	ProTen advised that arrangements have been discussed with the neighbouring farmer to take excess water where sediment basins are nearing full, however this has yet to occur.

Schedule/Condition Reference	Recommendation	2020 Audit Follow Up
Environmental performance	Maintain the engineered surface water management system including earthworks to repair erosion, groundcover in table drains to stabilise and manage levels in sediment basins to ensure capacity to capture future inflows.	During the site inspection it was observed that erosion of surface water management infrastructure has improved since the 2017 audit. Rill erosion was present on some banks of sediment basins and in some table drains. ProTen should continue to monitor and manage erosion across the Complex. <i>Recommendation 1: Ensure that monthly inspections of the surface water management systems include identifying areas of erosion and that works are undertaken to rectify identified erosion.</i>
Development Consent, Schedule 3, Condition A16	Confirm with DPE that the creation of the easement through a transfer granting process meets the intent of the condition.	In the response to recommendations from the 2017 audit, ProTen stated that their solicitor advised that the intent of the condition had been fulfilled. DPIE sought no further action by ProTen following the 2017 audit.
Development Consent, Schedule 3, Condition B17	Remove construction waste from the Development site.	During the site inspection it was observed that waste from construction has been removed from the Complex. Other waste sources on site were observed to be well managed.
Development Consent, Schedule 3, Condition B34	Confirm that the rice hull storage shed has been constructed above the 1:100 year ARI flood level.	Refer to Appendix D, SSD 6882 Condition B34.
Development Consent, Schedule 3, Condition B39	Verify that the permeability of the basins are in accordance with the requirements of Condition B39.	Refer to Appendix D, SSD 6882 Condition B39.

Schedule/Condition Reference	Recommendation	2020 Audit Follow Up
Development Consent, Schedule 3, Condition B45	Develop site specific trigger values for the groundwater monitoring program once sufficient groundwater data is available.	A revised Water Management Plan was developed in 2020. The Water Management Plan includes site specific groundwater quality trigger values for ammonia and bicarbonate as these parameters consistently exceed the Australian Drinking Water Guidelines which were the basis for the original trigger values, and trigger values for change in groundwater level from baseline average.
Development Consent, Schedule 4, Condition C8	Ensure that the 2018 Annual Review addresses the feedback from DPE.	A review of the 2017/18 Annual Review identified that it addressed the feedback from DPIE. Refer to Appendix D, SSD 6882 Condition C14 for ProTen's maintenance of up-to-date information on their website.

3.4 Assessment of compliance

A summary of compliance with the conditions of Development Consent SSD 6882, EPL 20748 and Statement of Commitments is provided in Table 3-2.

Table 3-2 Summary of compliance

Compliance	Details	Compliance Status
Compliant	Full compliance with the requirements of the condition	102
Non-compliant	Does not meet the main requirements of the condition	5
Administrative non-compliance	Technical non-compliance with a regulatory approval that does not impact on performance and is considered minor in nature	1
Not verified	Compliance could not be determined at the time of audit due to lack of data, information or inaccessibility at the time of audit	4
Not triggered	Condition was not applicable at the time of audit	89
TOTAL number of conditions assessed		201

Table 3-3 Summary of non-compliances

Condition	Non-compliance	Risk rating
SSD 6882 Condition A6 and EPL 20748 Condition O4.1	Throughout the audit period there were instances reported in the Annual Reviews where the time between commencement of one farm and commencement of the next farm was less than 36 hours and one instance where the Complex was populated in less than 10 days.	Low
SSD 6882 Condition B22 and Condition B43	ProTen are not storing chemicals in accordance with the Dangerous Goods Code or the NSW Work Health Safety Regulations.	Low
EPL 20748 Condition M6.2	The website does not make it clear that the Free call Environmental number is a complaints line.	Low

4. Recommendations

Detailed audit findings are presented in Appendix D, Section 4.1 and 4.2 summarise the corrective actions and recommendations of the audit.

4.1 Corrective Actions

Corrective actions are required to correct matters of compliance identified by the audit. Corrective actions identified during the audit, as detailed in Appendix A, are summarised in Table 4-1.

Table 4-1 Summary of corrective actions

Reference No.	Condition	Corrective Action
CA1	Development consent, Condition A6	ProTen to engage with Baiada to review planning of population of the complex to maintain compliance with Condition A6.
CA2	Development consent, Condition B22	Reduce volume of water treatment chemicals maintained in storage sheds in line with capacity of pallet bunds.
CA3	Development consent, Condition B22	Review bunding of bulk diesel tanks on each farm to ensure the bunds would contain spills from the elevated tanks.
CA4	Development consent, Condition B22	Ensure that all personnel are included in the training register.
CA5	Development consent, Condition C14	Ensure that all information required by Condition C14 is published on the ProTen website.
CA6	EPL 20748, Condition M6.2	Notify the public that the Freecall Environmental number is a complaints line.

4.2 Recommendations

Recommendations seek to address matters of concern raised by agencies, matters that may lead to a non-compliance or where the elements of the proponents' systems and plans were not found to be effective. The recommendations identified during the audit are summarised in Table 4-2.

Table 4-2 Summary of recommendations

Reference No.	Condition	Recommendation
R1	Environmental performance	Ensure that monthly inspections of the surface water management systems include identifying areas of erosion and that works are undertaken to rectify identified erosion.
R2	Development consent, Condition B22	Provide flammable cabinet for storage of small quantities of flammable liquids and gases in the store/workshop.
R3	Development consent, Condition B47	Review vegetation buffers and schedule replanting in spring 2021 where vegetation plantings will not provide a 40 m buffer around each farm.
R4	Development consent, Condition C7	Maintain a record of reviews of management plans.
R5	EPL 20748, Condition M1.3	ARTL personnel conducting water quality sampling to include full name on COC.

Appendices

Appendix A - Approval of Audit Team



Ms Samantha Hayes
Senior Project Consultant
SLR Consulting Australia Pty Ltd
PO Box 447
New Lambton NSW 2305

21/10/2020

Dear Sam

**ProTen Narrandera Poultry Production Farm SSD 6882
Independent Environmental Audit**

I refer to your request SSD-6882-PA-1 (and subsequent documents) for the Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit for the ProTen Narrandera Poultry Production Farm (SSD 6882).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, in accordance with Schedule 4 Condition C12 of SSD 6882 (the 'Consent') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Ms Demelza Scott and
- Ms Joanna Stephens.

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

The audit is to be conducted in accordance with the condition of Consent and the AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may also wish to have regard to the Department's Independent Audit Post Approval Requirements (June 2018). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>.

In accordance with Schedule 4 Condition C13 of the Consent, within three months of commencing the audit, ProTen Limited is to submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Planning Secretary, it is recommended that ProTen Limited review the report to ensure it complies with the relevant consent condition.

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

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

If you wish to discuss the matter further, please contact me on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed in a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

Appendix B – Agency Consultation



9 November 2020

Wendy Goodburn
Resource Management Officer
NSW Department of Primary Industries – Agriculture
Locked Bag 21
Orange NSW 2800

Our ref: 12539749-71534-2

Email: wendy.goodburn@dpi.nsw.gov.au

Dear Wendy

Narrandera Poultry Independent Environmental Audit 2020 Request for Comment

GHD Pty Ltd has been engaged by ProTen Ltd (ProTen) to undertake an independent environmental audit of the Narrandera Poultry Development in accordance with its Development Consent granted by the Department of Planning, Industry and Environment. The scope of the Audit is to:

- Assess the environmental performance of the project
- Assess whether it is complying with the requirements in the consent, EPL or other (including any assessment, plan or program required under these approvals)
- Review the adequacy of strategies, plans or programs required under the abovementioned consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

ProTen have auditable obligations to the NSW DPI (attached). I am writing to you to invite comment from the NSW DPI in regard to these obligations.

It would be appreciated if you could provide your comments in regard to the performance of ProTen in meeting these obligations under the following headings:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken
- Adequacy of the requirements of the licence.

I also invite you to comment on ProTen's performance with other requirements, as you may deem appropriate.

The site visit for the audit is scheduled to be conducted on 20 November 2020. We wish to invite you to participate in a short teleconference prior to the audit in the week of 16 November 2020 to provide your

feedback on ProTen's compliance/performance so that we may adequately address any concerns during the audit.

Upon receipt of this letter, please advise GHD of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by COB Wednesday 18 November 2020.

All correspondence in relation to this matter should be directed to Demelza Scott, GHD Lead Auditor on 02 6393 6410 or demelza.scott@ghd.com

Kind regards



Demelza Scott

Lead Environmental Auditor
Senior Environmental Scientist
+61 2 63936410

Attachment: Development Consent conditions relevant to NSW DPI

Attachment – Development Consent conditions relevant to DPI Agriculture

Schedule 3	
Reference	Condition
B8	<p>The Applicant shall ensure that the Development complies with the relevant requirements for the welfare of the broilers, particularly health, housing, watering, feeding, handling and transport, including, but not limited to those contained within the:</p> <ul style="list-style-type: none"> a) National Animal Welfare Standards for the Chicken Meat Industry (Barnett et al. 2008) b) NSW DPI Best Practice Management for Meat Chicken Production in NSW – Manual 2 (2012); c) National Farm Biosecurity Manual for Chicken Growers (ACMF, 2000); d) Model Code of Practice for the Welfare of Animals – Domestic Poultry, 4th Edition (PISC, 2002); e) Model Code of Practice for the Welfare of Animals, Land Transport of Poultry (PISC, 2006), and f) Management and Mitigation Measures located at Appendix 1 (Development Consent).

From: [Katrina O'Reilly](#)
To: [Demelza Scott](#)
Cc: [Paul Rutherford](#)
Subject: RE: Request for consultation - Narrandera Poultry Development Independent Environmental Audit
Date: Monday, 16 November 2020 2:40:09 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Demelza,

Areas where the Department would like focus for the audit include:

water management,
groundwater quality,
waste management,
management of bird numbers ie: period of birds on site, time on site, amount of broilers per day
etc,
odour/air management,
animal welfare and
management of vehicle movements.

Regards
Katrina

Katrina O'Reilly
Team Leader Compliance

Energy, Industry & Compliance | Planning and Assessment
T 02 6229 7909 | M 0429 400261 | E katrina.oreilly@planning.nsw.gov.au
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620
www.dpie.nsw.gov.au



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

From: Demelza Scott [mailto:Demelza.Scott@ghd.com]
Sent: Monday, 9 November 2020 3:35 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Subject: Request for consultation - Narrandera Poultry Development Independent

Environmental Audit

Hi Katrina

As you are aware, GHD has been engaged to conduct the 2020 independent environmental audit for ProTen's Narrandera poultry development. Please see attached a request for your input into the preparation of the audit.

If you have any questions or would like to discuss your thoughts directly, please feel free to give me a call, my details are below.

Kind regards, Demelza

DEMELZA SCOTT
B.APP.SC(ENVSC)
Senior Environmental Consultant
Exemplar Global Certified Lead Environmental Auditor

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From: [Jason Price](#)
To: [Demelza Scott](#)
Cc: [Emily Kate Marsh](#)
Subject: RE: Request for consultation - Narrandera Poultry Development Independent Environmental Audit
Date: Tuesday, 17 November 2020 10:59:48 AM
Attachments: [image001.png](#)

G'day Demelza – I refer to your letter dated 9 November 2020 to the EPA about the independent environmental audit of ProTen Ltd's Narrandera Poultry Development.

The development in the view of the EPA is a good example of collaboration between government agencies and the applicant during an SSD process that has resulted, in environmental terms of the site, a development that has negligible off-site impacts.

In response to your specific information requests;

1. Compliance with requirements.

In relation to consultation during the development of management plans in the consent and operating conditions in the licence, to our knowledge all requirements have been met

2. Progress to meeting requirements.

We are not aware of any not met.

3. Details of non-compliances.

In the Annual Return reporting requirements of EPL 20748 ProTen have reported no non-compliances over the last three reporting periods and an inspection on 18 July 2018 did not identify any licence non-compliances.

4. Adequacy of actions taken.

N/A

5. Adequacy of the requirements of the licence.

It appears that the licence conditions are adequate. We have never received any complaints about the site operations and we have not identified any off-site impacts through the monitoring requirements of the licence.

In summary we do not have any concerns in relation to the site. Our main environmental concern in relation to broiler farms is air quality and good planning has located and designed this development so these potential impacts are minimised. ProTen are also generally good farm managers who operate their farms and sheds so as to further minimise the potential for off-site impacts.

Regards

Jason Price

Regional Operations Officer
Regulatory Operations Regional West
NSW Environment Protection Authority
D: 02 6969 0705 M: 0428 460 247



www.epa.nsw.gov.au [@NSW_EPA](#)

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

From: Emily Kate Marsh <EmilyKate.Marsh@ghd.com>
Sent: Monday, 16 November 2020 9:51 AM
To: Jason Price <Jason.Price@epa.nsw.gov.au>
Cc: Demelza Scott <Demelza.Scott@ghd.com>
Subject: Request for consultation - Narrandera Poultry Development Independent Environmental Audit

Hi Jason,

I am writing to follow up from Demelza's email from 9 November. The audit for Narrandera Poultry will commence this week. As ProTen have obligations to the EPA, it would be appreciated if you could provide comments on ProTen's performance by Wednesday 18 November.

I have attached the letter outlining these conditions. If you could please get back to Demelza Scott as soon as possible to assist with the audit that would be very appreciated. Demelza can be contacted on 02 6393 6410 or demelza.scott@ghd.com.

Emily Kate Marsh
Environmental Consultant

GHD

Proudly Employee Owned

T: +61 2 9239 7926 | V: 217926 | E: emilykate.marsh@ghd.com
Level 15 133 Castlereagh Street Sydney NSW 2000 Australia | www.ghd.com

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From: [Stoll, Garry](#)
To: [Demelza Scott](#)
Subject: RE: Request for consultation - Narrandera Poultry Development Independent Environmental Audit
Date: Tuesday, 24 November 2020 7:31:48 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Good morning Demelza

I apologise for not replying sooner.

In response to your email I can confirm that a Flooding Emergency and Evacuation Plan for the Narrandera Poultry Production Complex for Pro Ten Holdings at Sturt Highway Narrandera, prepared by SLR Global Environmental Solutions, was presented to Council in March 2016 and that this plan meets the terms of Condition of Consent B36 by addressing requirements a) through to g) of this condition.

Should you require any further information please do not hesitate to contact me on 69595552.

Regards

Garry Stoll

Manager Development & Environment

PH: (02) 6959 5552 | Fax: (02) 6959 1884 | Email: garry.stoll@narrandera.nsw.gov.au



Narrandera Shire Council acknowledges the traditional owners of the lands of Narrandera Shire, the Wiradjuri people.

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From: Demelza Scott <Demelza.Scott@ghd.com>
Sent: Monday, 9 November 2020 3:39 PM
To: Ryan, Helen <Helen.Ryan@Narrandera.nsw.gov.au>
Subject: Request for consultation - Narrandera Poultry Development Independent Environmental Audit

Hi Helen

GHD has been engaged to conduct the 2020 independent environmental audit for ProTen's Narrandera poultry development. Please see attached a request for your input into the preparation of the audit.

If you have any questions or would like to discuss your thoughts directly, please feel free to give me a call, my details are below.

Kind regards, Demelza

DEMELZA SCOTT
B.APP.SC(ENVSC)
Senior Environmental Consultant
Exemplar Global Certified Lead Environmental Auditor

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From: [Byron Stein](#)
To: [Demelza Scott](#)
Cc: [Wendy Goodburn](#); [Emily Kate Marsh](#)
Subject: RE: Narrandera poultry farm
Date: Thursday, 26 November 2020 9:20:24 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Poultry Model Code Welfare.pdf](#)

Hi Demelza,

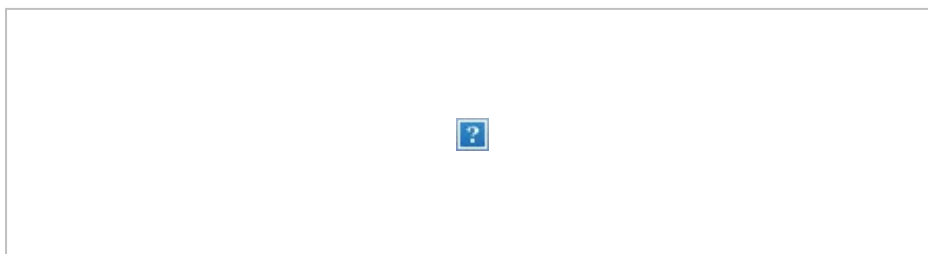
No worries.

With regard to:

1. Stocking densities: maximum permissible stocking densities are 'guided' by the Model Code of Practice for the Welfare of Animals, Domestic Poultry 4th edition (attached). Note this is soon to be superseded by new Welfare Standards and Guidelines. Note however that the stocking densities may be further prescribed by various accreditations, for example RSPCA which typically set lower stocking densities than those outlined in the Model Code.
2. Biosecurity for pickup crews: pickup crews which harvest or thinout birds during batches are a significant biosecurity risk given the nature of their work (visits to multiple farms, occasionally on the same day). Biosecurity protocols for pickup crews should be clearly defined, monitored, reported and audited. This includes both workers/crews as well as vehicles and equipment (trucks, trailers, forklifts, catching crates etc.). Details about the disinfection processes and procedures of all elements of the pickup process should be well documented and measured.

Kind regards

Byron Stein, MSc.Agr | Development Officer, Poultry Meat
Intensive Livestock
NSW Department of Primary Industries | Agriculture
Level 2, 159 Auburn Street | Goulburn | NSW 2580
T: +61 2 4824 3734 | M: 0428 259 628 | E: byron.stein@dpi.nsw.gov.au



From: Demelza Scott <Demelza.Scott@ghd.com>
Sent: Wednesday, 25 November 2020 5:34 PM
To: Byron Stein <byron.stein@dpi.nsw.gov.au>
Cc: Wendy Goodburn <wendy.goodburn@dpi.nsw.gov.au>; Emily Kate Marsh

<EmilyKate.Marsh@ghd.com>

Subject: RE: Narrandera poultry farm

Hi Byron,

Thanks for your call today. Apologies for the poor connection, it was probably at my end.

Thanks for the links below. The other items I had in my notes from our discussion was stocking densities and biosecurity protocols for Baiada contractors conducting bird collection.

Regards, Demelza

DEMELZA SCOTT

B.APP.SC(ENVSC)

Senior Environmental Consultant

Exemplar Global Certified Lead Environmental Auditor

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From: Byron Stein <byron.stein@dpi.nsw.gov.au>

Sent: Wednesday, 25 November 2020 5:11 PM

To: Demelza Scott <Demelza.Scott@ghd.com>

Cc: Wendy Goodburn <wendy.goodburn@dpi.nsw.gov.au>

Subject: FW: Narrandera poultry farm

Hi Demelza,

As just discussed on the phone, please find attached:

1. Spent Litter Supply Agreement Form
2. Link to the Salmonella Enteritidis (SE) Control Order which is mandatory for all poultry farms in NSW.
 - a. General SE information: <https://www.dpi.nsw.gov.au/animals-and-livestock/poultry-and-birds/health-disease/salmonella-enteritidis>
 - b. Compliance with the Control Order:
https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0006/1252482/16334-Salmonella-Control-Order-Guide_FINAL-10082020-2039.pdf

3. Audit also needs to account for dead bird management – how and where are dead birds disposed of?

Cheers

Byron Stein, MSc.Agr | Development Officer, Poultry Meat
Intensive Livestock
NSW Department of Primary Industries | Agriculture
Level 2, 159 Auburn Street | Goulburn | NSW 2580
T: +61 2 4824 3734 | M: 0428 259 628 | E: byron.stein@dpi.nsw.gov.au



From: Wendy Goodburn <wendy.goodburn@dpi.nsw.gov.au>
Sent: Wednesday, 25 November 2020 3:25 PM
To: Byron Stein <byron.stein@dpi.nsw.gov.au>
Subject: Fw: Narrandera poultry farm

Hi Byron,
Are you able to give Demelza a call based on her email below?

Cheers
Wendy

Wendy Goodburn | Agriculture Land Use Planner
Agriculture Land Use Planning | Agriculture Resources
NSW Department of Primary Industries | Agriculture
Level 2 | 159 Auburn Street | Goulburn | NSW 2580 | PO Box 389, Goulburn NSW 2580
M: 0402 069 605 | E: wendy.goodburn@dpi.nsw.gov.au



From: Demelza Scott <Demelza.Scott@ghd.com>
Sent: Wednesday, 25 November 2020 2:16 PM
To: Wendy Goodburn <wendy.goodburn@dpi.nsw.gov.au>
Cc: Emily Kate Marsh <EmilyKate.Marsh@ghd.com>

Subject: RE: Narrandera poultry farm

Hi Wendy

Thanks for your email. We have completed the site component of the audit and there were no poultry on site at the time of the audit as it was in between production cycles. We'd still be happy for Byron's input however our ability to respond to his questions may be limited by the fact that we have already been to site.

I'd also be happy for him to give me a call if he would prefer.

Regards, Demelza

DEMELZA SCOTT

B.APP.SC(ENVSC)

Senior Environmental Consultant

Exemplar Global Certified Lead Environmental Auditor

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From: Wendy Goodburn <wendy.goodburn@dpi.nsw.gov.au>

Sent: Wednesday, 25 November 2020 9:21 AM

To: Demelza Scott <Demelza.Scott@ghd.com>

Subject: Narrandera poultry farm

Hi Demelza,

I forwarded your correspondence about the poultry farm audit in Narranderra to Byron Stein who is our poultry Officer. He has just come back from leave and is able to respond to your request for input to the audit if it is still required. Please advise if it is not too late to respond.

Cheers

Wendy

Wendy Goodburn | Agriculture Land Use Planner

Agriculture Land Use Planning | Agriculture Resources

NSW Department of Primary Industries | Agriculture

Level 2 | 159 Auburn Street | Goulburn | NSW 2580 | PO Box 389, Goulburn NSW 2580

M: 0402 069 605 | E: wendy.goodburn@dpi.nsw.gov.au



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Appendix C – Independent Audit Submission Form

Independent Audit Declaration Form	
Project name	Narrandera Poultry Production Development
Consent Number	SSD 6882 and EPL 20748
Description of project	Refer to Section 1.1
Project address	Sturt Highway, Euroley NSW 2700
Proponent	ProTen Holdings Pty Ltd
Title of audit	Narrandera Poultry Production Development Independent Environmental Audit 2020
Date	02-02-2021

I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:

- The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2019 and Post Approval Guidelines – Independent Audits
- The findings of the audit are reported truthfully, accurately and completely
- I have exercised due diligence and professional judgement in conducting the audit
- I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit
- I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child
- I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family)
- Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.

b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).

Name of Lead auditor: Demelza Scott

Signature: 

Qualification	Demelza Scott – Environmental Management Systems Lead Auditor
Email address	Demelza.Scott@ghd.com
Company and address	GHD Pty Ltd (GHD) 270 Summer St Orange NSW 2800 Australia
Date	02-02-2021

Appendix D – Audit Compliance Tables

Table D-1 Development Consent Conditions – Schedule 2

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
Obligation to minimise harm to the environment				
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the Development.	Compliant	Refer throughout this report	ProTen are generally implementing reasonable and feasible measures to prevent and minimise harm to the environment resulting from operation of the complex. Refer below.
Terms of consent				
A2	The Applicant shall carry out the Development in accordance with:	Compliant	Refer throughout this report	ProTen are generally carrying out the operations at the complex in accordance with the documents listed in Condition A2.
(a)	State Significant Development Application SSD 6882;			
(b)	Environmental Impact Statement, titled “ <i>Euroley Poultry Production Complex – SSD 6882</i> ” volumes one to three, prepared by SLR Consulting Australia Pty Ltd, dated 20 May 2015;			
(c)	Response to Submissions report, titled “ <i>Euroley Poultry Production Complex (SSD 6882), Response to Submissions</i> ” prepared by SLR Consulting Australia Pty Ltd dated 1 September 2015;			
(d)	the Management and Mitigation Measures located at Appendix 1; and			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
(e)	the plans and drawings located at Appendix 2.			
A3	If there is any inconsistency between the plans and documentation referred to in Condition A2 above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency.	Not triggered		ProTen advised that no inconsistencies had been identified during the audit period.
A4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of:	Not triggered		ProTen advised that they have not received any written direction from DPIE during the audit period.
(a)	any reports, plans or correspondence that are submitted in accordance with this consent; and			
(b)	the implementation of any actions or measures contained within these documents.			
Limits of consent				
A5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	Not triggered		Assessed as part of previous audit.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
Farm Operations				
A6	The Applicant shall ensure that:			
(a)	the Development does not exceed a maximum population of 3.92 million broilers at any one time;	Non-compliant	Annual Review 2017/18, 2018/19, 2019/20	<p>While ProTen are generally compliant with the requirements of Condition A6 there have been breaches of parts (d) and (e) in Annual Reviews for the audit period.</p> <p>ProTen have housed a maximum of 3.917 million birds during the audit period. The Annual Reviews over the audit period report production numbers for the five farms that were operational. The maximum number of birds housed during the audit period was in batch number 1903 where five of the PPUs were operational and populated with approximately 3.917 million birds. At no time did the population exceed the approved limit of 3.92 million birds. The highest populations as reported are:</p> <ul style="list-style-type: none"> • Batch number 1902 = 3.915 million • Batch number 1903 = 3.917 million • Batch number 1905 = 3.91 million • Batch number 2002 = 3.908 million • Batch number 2003 = 3.912 million <p>ProTen manage stocking densities in the iLeader software package. Baiada oversee ProTen’s management of this. ProTen advised that RSPCA welfare standards are 34 kg/m².</p>
(b)	the stocking densities of the Development comply at all times with the standards detailed in <i>National Animal Welfare Standards for the Chicken Meat Industry</i> (Barnett et al, 2008), as amended;			
(c)	the Development is not populated with 3.92 million broilers in one day at the commencement of each production cycle;			
(d)	the commencement of broiler population for each PPU is separated by a minimum of 36 hours; and			
(e)	the time period for the population of the entire farm (all five PPUs) shall be a minimum of 10 days.			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
				<p>Birds are weighed 100 at a time and this is cross checked by automatic scales in the sheds. Birds are weighed and the density confirmed at pickup by Baiada contractors. ProTen engage a contractor, SQF, to check the calibration of the scales once a year and conduct an external audit. This was not verified as part of the audit.</p> <p>The Complex is populated over several days. The Annual Reviews report dates of placement of birds. During the audit period the longest time period for population of the complex is 14 days, with the average being 11.4 days. Batch number 1906 is reported to have been populated in nine days which breaches Condition A6(e). Throughout the audit period there were a number of batches which reported populating farms on consecutive days which has the potential to breach the 36 hours between commencing one farm and commencing the next as specified by Condition A6(d). For the batch that was to be populated into the complex at the time of audit Farm 79 was planned to commence populating at 1 am on 23/11/2020 and Farm 78 was planned to commence populating at 9.30 am on 24/11/2020 which is only a 32.5 hour gap. Batch number 1803 reported in the 2017/18 Annual review populating farms 77 and 76 on the same day.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
				<p>ProTen advised that drops and pickups of chickens from the complex is determined by Baiada. Nonetheless this constitutes a breach of Condition A6 and EPL Condition O4.1. We understand that spreading the drops is designed to reduce odour and dust impacts from operation of the Complex. There were no complaints regarding operation of the complex during the audit period therefore the impact of the tighter schedule for populating the farms is considered low.</p> <p>Corrective Action 1: ProTen to engage with Baiada to review planning of population of the complex to maintain compliance with Condition A6.</p>
Farm Manager Accommodation				
A7	The ten residential dwellings for farm manager's accommodation as described in the EIS are only to be occupied by persons employed by the Applicant, their spouse and dependants for the operational life of the Development to manage poultry operations on-site and shall not be occupied or let for any other purpose.	Compliant	<p>Tenancy agreement Farm 78 Andrew Simpson</p> <p>Tenancy agreement Farm 77 Georgie Marshall</p>	<p>ProTen have established Tenancy Agreements for each of the residences on the complex. Only Farm Managers and Farm Assistants have rights to occupy residences with their family.</p> <p>Sighted tenancy agreement for house 8 on farm 78 for Andrew Simpson, and tenancy agreement for house 6 on Farm 77 for Georgie Marshall which states that no one other than their immediate family can reside in the residence.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
Statutory requirements				
A8	The Applicant shall ensure that all licences, permits and approvals are obtained and kept up to date as required throughout the life of the Development. No condition of this consent removes the obligation the Applicant to obtain, renew or comply with such licences, permits or approvals.	Compliant	SSD 6882 EPL 20748 WAL 11788	ProTen maintain the following approvals for the Narrandera complex: <ul style="list-style-type: none"> • Development consent 6882 • EPL 20748 and, • Water access licence 11799 ProTen advised that there have been no changes to the approvals since the 2017 independent environmental audit. These were all found to be current at time of audit.
Structural adequacy				
A9	The Applicant shall ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the Building Code of Australia (BCA). <i>Notes:</i> <ul style="list-style-type: none"> • <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i> • <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.</i> 	Not triggered		ProTen advised that they did not construct any new buildings or structures on the site during the audit period.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
Residential works				
A10	The Applicant shall ensure that any residential work must be carried out:	Not triggered		ProTen advised that no residential work was undertaken in the audit period.
(a)	in accordance with the requirements of the BCA; and			
(b)	in accordance with Part 6, Division 8A of the Regulation.			
Staged submission of plans and programs				
A11	With the approval of the Secretary, the Applicant may:	Not triggered		Assessed as part of previous audit.
(a)	submit any strategy, plan or program required by this consent on a progressive basis; and/or			
(b)	combine any strategy, plan or program required by this consent.			
Dispute resolution				
A12	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the Development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	Not triggered		ProTen advised that they had not had any disputes with a public authority.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
Section 94A Contributions				
A13	<p>In accordance with Division 6 of Part 4 of the EP&A Act, the Applicant shall pay Narrandera Shire Council Section 94A contributions to the sum 0.5% of construction cost in the form of cash of bank cheque made out to Narrandera Shire Council. Evidence of payment to Council shall be submitted to the Certifying Authority prior to the issue of a Construction Certificate.</p> <p><i>Note: The contributions shall be adjusted in accordance with the requirements of the current Narrandera Shire Council s94A Contributions Plan, February 2014, as amended.</i></p>	Not triggered		Assessed as part of previous audit.
Utilities and services				
A14	<p>Utilities, services and other infrastructure potentially affected by the construction and operation of the Development shall be identified prior to construction to determine requirements for access to, diversion, protection, and/or support.</p>	Not triggered		Assessed as part of previous audit.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
	<p>Consultation with the relevant owner and/or provider of services that are likely to be affected by the Development shall be undertaken to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure as required.</p> <p>The cost of any such arrangements shall be borne by the Applicant.</p>			
Easements				
A15	An easement for access to the Development site shall be created through the privately owned land described as lots 12 and 15 in Deposited Plan 750898 and Lot 39 in Deposited Plan 750876 between the Development site and the intersection with the Sturt Highway.	Not triggered		Assessed as part of previous audit.
A16	A section 88B restriction as to user shall be created so that the owner of the Development site shall be responsible for the construction and maintenance of the access road and any associated services such as drainage, within the easement for the life of the Development. The restriction as to user shall detail the required standard for maintenance including 50 m seal extending from the Sturt Highway intersection and all weather gravel construction for the remainder in accordance with Austroads Guidelines.	Compliant	<p>Memo from SLR Consulting to DPE dated 9/04/2019</p> <p>Letter from DPE to ProTen dated 26/03/2018</p>	<p>This condition previously recorded an administrative non-compliance result due to the creation of the easement occurring through a Transfer Granting process rather than a s88B restriction. It was unclear in the previous audit if the Transfer Granting process adhered to the Austroads Guidelines and fulfilled the requirements of the condition.</p> <p>Consultation with DPIE confirmed the transfer granting process meets the intent of the condition.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 2 – Administrative Conditions				
A17	Narrandera Shire Council shall be prescribed within the s88B instrument as an authority whose consent is required to release, vary or modify the burden/benefits.	Not triggered		This condition is no longer applicable as ProTen did not obtain a s88B restriction for the easement. Assessed as part of previous audit.
Boundary adjustment				
A18	The Applicant is required to undertake boundary adjustments to ensure that each Poultry Production Unit and the associated ancillary manager's accommodation are wholly contained within its own allotment. Evidence of lodgement with the Lands Title Office to be submitted to the Certifying Authority prior to the issue of any Occupation Certificate for the development.	Not triggered		Assessed as part of previous audit.

Table D-2 Development Consent Conditions – Schedule 3

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
PART B: ENVIRONMENTAL PERFORMANCE				
AIR QUALITY AND ODOUR				
Air Quality Discharges				
B1	The Applicant shall install and operate equipment in line with best practice to ensure that the Development complies with all load limits, air quality criteria and air quality monitoring requirements as specified in the EPL for the site.	Compliant	Audit interviews Site Visit Report ProTen Narrandera weather station (Euroley NSW) dated 7/06/2019, MEA Temperature and Relative Humidity Calibration Certificate (new sensor) – HMP155 dated 29/05/2019 MEA Temperature and Relative Humidity Calibration Certificate (old sensor) – HMP155 dated 7/06/2019 MEA Rain Gauge Calibration Certificate – RIMCO 8000 series dated 5/06/2019	ProTen maintain a weather station to ensure the Complex complies with air quality requirements specified in EPL 20748. ProTen engage a contractor to maintain and calibrate the weather station, previously this was Enviromet Meteorological Consultants however the Consultant is now MEA. The last inspection, service and calibration occurred on 5 June 2019, the auditor sighted Site Visit Report ProTen Narrandera weather station (Euroley NSW) dated 7/06/2019 and calibration certificates for the temperature and relative humidity sensors and the rain gauge. MEA advised that the requirements for calibration of the most sensitive component of the weather station, the temperature and humidity sensor, is every two years. This sensor was installed during the 2019 site visit. The weather station is due for its next inspection, service and calibration in June 2021.
Odour				
B2	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Compliant	Complaints register Site inspection	ProTen are not causing or permitting emission of offensive odour from the Complex. There have been no odour complaints during the audit period and no offensive odours were detected during the site inspection.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Air Quality Management Plan				
B3	Prior to the commencement of operation, the Applicant shall prepare an Air Quality Monitoring Program (AQMP) for the Development, to the satisfaction of the Secretary. The AQMP shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6 and any other requirements of the EPL for the site. The AQMP shall:	Not triggered		Assessed as part of previous audit.
(a)	be prepared in consultation with the EPA;			
(b)	detail and rank all emissions from all sources of the Development, including particulate emissions;			
(c)	describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;			
(d)	identify the control measures that that will be implemented for each emission source; and			
(e)	nominate the following for each of the proposed controls: i) key performance indicator ii) monitoring method iii) location, frequency and duration of monitoring iv) record keeping v) complaints register vi) response procedures; and vii) compliance monitoring			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Odour Validation Audit				
B4	When directed by the EPA, the Applicant must submit an Odour Validation Report (OVR) to the EPA. The OVR must:	Not triggered		This condition has not been triggered. ProTen have not received a request from the EPA to conduct an odour validation report.
(a)	be carried out by a suitably qualified independent expert experienced in the characterisation and treatment of odours from chicken broiler farms from the Development;			
(b)	include a summary of any odour complaints received and actions taken to reduce odour emissions where complaints are verified;			
(c)	where possible include a field odour survey that characterises the frequency, intensity, duration, offensiveness, location and extent of off-site odours;			
(d)	benchmark the design and management practices at the premises against industry best practice for minimising odour emissions, including investigation of newly developed and emerging control technology;			
(e)	within six (6) weeks after being directed by the EPA, present a report to the EPA that determines compliance with S129 of the POEO Act and recommend if additional odour mitigation measures are required;			
(f)	consider odour generation associated with stocking densities and rates and PPU population practices outlined in Condition A6;			
(g)	where additional odour measures are recommended or odour issues are identified as being from stocking densities, rates or PPU population practices, appropriate mitigation measures or management practices must be nominated to ensure that odour is minimised as far as practicable; and			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(h)	any odour mitigation measures nominated must include a timetable for implementation.			
Meteorological monitoring				
B5	During the operational life of the Development, the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> guideline. The meteorological station must be maintained so as to be capable of continuously monitoring the following parameters: air temperature, wind direction, wind speed, rainfall and relative humidity and any other requirements specified in the EPL.	Compliant		Refer to Condition B1 and EPL Condition M4.
Dust Management				
B6	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.	Compliant	Employee Induction Handbook (PRT-P&P-HR-023) Site inspection Complaints register	ProTen are implementing reasonable and feasible measures to minimise dust generated by the Complex including: <ul style="list-style-type: none"> • Sign posted site speed limits • Sealing of the main internal road • Covered loads These measures are incorporated into the Employee Induction Handbook (PRT-P&P-HR-023). Since the last audit ProTen are no longer running a water truck. There have not been any dust complaints in the audit period. Only localised traffic generated dust was observed during the site inspection.
B7	During construction and operation of the Development, the Applicant shall ensure that:	Compliant	Site inspection	ProTen are managing the Complex in accordance with the Condition B7.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(a)	all vehicles on-site do not exceed a speed limit of 60 kilometres per hour;		Audit interviews Traffic management plan PowerPoint slides version 1.0	<ul style="list-style-type: none"> Site speeds are limited to 60 km/hr. ProTen have drafted a revised traffic management procedure which would see site speed limits reduce to 40 km/hr on unsealed roads and 25 km/hr for roads within each farm. The site inspection saw rice hull delivery trucks with roll over covers closed whilst transporting full loads of bedding, and semi-trailer collecting spent litter with fully enclosed trailer. ProTen have constructed a sealed road up to the highway which reduces the risk of transporting materials onto public roads. ProTen advised that speeds required for engine brakes are not reached on site and this has not been an issue for the Complex.
(b)	all loaded vehicles entering or leaving the site have their loads covered;			
(c)	all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and			
(d)	all heavy vehicles do not use engine brakes.			
Animal Welfare and Best Practice				
B8	The Applicant shall ensure that the Development complies with the relevant requirements for the welfare of the broilers, particularly health, housing, watering, feeding, handling and transport, including, but not limited to those contained within the:	Compliant	Meat Chicken Assessment Report for Farm 76 dated 29/10/2020 Meat Chicken Assessment Report for Farm 77 dated 12/08/2020 Meat Chicken Assessment Report for Farm 78 dated 11/08/2020 Meat Chicken Assessment Report	The Complex is a RSPCA approved farming scheme. The RSPCA conduct biannual audits to determine compliance with the requirements of their scheme. There were no chickens on site at the time of the site audit as the complex was in between production cycles. ProTen are not responsible for the transport of chickens, this is managed by Baiada. Sighted Meat Chicken Assessment Report for Farm 76 dated 29/10/2020. RSPCA reported a maximum stocking density of 31.2 kg/m ² in shed 11.
(a)	<i>National Animal Welfare Standards for the Chicken Meat Industry</i> (Barnett et al. 2008)			
(b)	<i>NSW DPI Best Practice Management for Meat Chicken Production in NSW - Manual 2</i> (2012);			
(c)	National Farm Biosecurity Manual for Chicken Growers (ACMF, 2000);			
(d)	Model Code of Practice for the Welfare of Animals - Domestic Poultry, 4th Edition (PISC, 2002);			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(e)	Model Code of Practice for the Welfare of Animals, Land Transport of Poultry (PISC, 2006); and		for Farm 75 dated 10/08/2020	Sighted Meat Chicken Assessment Report for Farm 77 dated 12/08/2020. RSPCA reported a maximum stocking density of 7.8 kg/m ² in shed 8.
(f)	Management and Mitigation Measures, located at Appendix 1.			Sighted Meat Chicken Assessment Report for Farm 78 dated 11/08/2020. RSPCA reported a maximum stocking density of 8.3 kg/m ² in shed 12. Sighted Meat Chicken Assessment Report for Farm 75 dated 10/08/2020. RSPCA reported a maximum stocking density of 3.0 kg/m ² in shed 7. The assessments concluded that the requirements of the standards have been largely met and there were no conformance concerns.
Disease Management				
B9	Prior to the commencement of operation, the Applicant shall prepare an Emergency Disposal and Bio-security Protocol , detailing the disposal procedures for a mass mortality event, to the satisfaction of the Secretary. The protocol shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The protocol shall:	Not triggered		Assessed as part of previous audit.
(a)	be prepared in consultation with Council, DPI and other relevant government agencies;			
(b)	be consistent with the relevant AUSTVETPLAN manuals and supporting documents;			
(c)	describe the notification procedures;			
(d)	detail all transport routes to be used in a mass mortality event;			
(e)	detail any requirements to stage the mass disposal of dead broilers;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(f)	detail the burial location(s) for the disposal of dead broilers, including plans and drawings;			
(g)	detail the measures to maintain quarantine control; and			
(h)	detail the mass mortality disposal procedures and options, consistent with section 6.12.2 of the EIS and section 2.1.10 of the RTS.			
BIODIVERSITY				
Biodiversity Offset Strategy				
B10	The Applicant shall implement the strategy for offsetting impacts as described in the Biodiversity Offset Strategy at Appendix K of the RTS prepared by SLR (dated 31 August 2015) and developed in accordance with the <i>Framework for Biodiversity Assessment</i> (OEH 2014) and the <i>NSW Biodiversity Offsets Policy for Major Projects</i> (OEH 2014). The advertisement period for the Expression of Interest on the Office of Environment and Heritage's 'Credit Wanted' register will be 12 months.	Compliant	Narrandera Poultry Production Farm Annual Review 2018/19	The 2018/19 Annual Review for the complex reported that ProTen have not been able to identify any ecosystem credits despite submitting EOIs in the credit register, conducting searches for variation credits and consulting with BCD (formerly OEH) and DPIE. In the end it was determined that ProTen would make a deposit into the NSW Trust Fund in lieu of purchasing credits. The Annual Review reports that on 2/07/2018 OEH provided a certificate to ProTen confirming receipt of the payment and that their biodiversity credit obligations of Conditions B10 and B11 had been satisfied. Sighted Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 2/07/2018.
B11	Within three months of the conclusion of the advertisement period, or as otherwise agreed to by the Secretary, the Applicant shall demonstrate to the satisfaction of the Secretary that the offset strategy actions set out in Section 4.3 of the <i>Biodiversity Offset Strategy</i> at Appendix K of the RTS prepared by SLR (dated 31 August 2015) have been completed.	Compliant		Refer to Condition B11.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Biodiversity Management Plan				
B12	Prior to the commencement of operation, the Applicant shall prepare a Biodiversity Management Plan (BMP) for the Development to the satisfaction of the Secretary. The Biodiversity Management Plan shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6 and the Biodiversity Offset Strategy prepared by SLR, dated 31 August 2015 (Appendix K of the RTS) and in consultation with the OEH.	Not triggered		Assessed as part of previous audit
TRAFFIC AND TRANSPORT				
Site Access, Internal Roads and Parking				
B13	The Applicant shall ensure that:	Compliant	Site inspection Audit interviews Draft Traffic Management Procedure	<p>ProTen are managing the road network within the complex in accordance with Condition B13.</p> <p>During the site inspection the following was observed:</p> <ul style="list-style-type: none"> • One way traffic signage within each of the farms. • Sealed main internal access road. • Trucks transporting fresh bedding had their loads covered when full. <p>ProTen advised that in the draft Traffic Management Procedure they are proposing a reduction in speed limits across the complex for unsealed roads and within each farm.</p> <p>ProTen advised that there are plans to submit a modification to upgrade the intersection with the Sturt Highway to allow for larger trucks (B-triples) to enter and exit the site.</p>
(a)	internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2;			
(b)	the sweep path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS;			
(c)	the Development does not result in any vehicles queuing on the public road network;			
(d)	heavy vehicles and bins associated with the Development do not park or stand on local roads or footpaths in the vicinity of the site;			
(e)	all vehicles are wholly contained on site before being required to stop;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(f)	all loading and unloading of materials is carried out on site;			
(g)	the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.			
(h)	all trucks entering or leaving the site with loads have their loads covered;			
(i)	trucks associated with the Development do not track dirt onto the public road network; and			
(j)	vehicles larger than B-Double class do not enter the site.			
Road Works				
B14	Prior to the commencement of construction of any poultry shed, residential dwelling or structure on-site, the Applicant shall construct an intersection between the Sturt Highway and the proposed site access identified in the EIS to a Basic Right Turn (BAR) and Basic Left Turn (BAL) intersection treatment, in consultation with, and to the satisfaction of the RMS.	Not triggered		Assessed as part of previous audit.
B15	Any works associated with the proposed Development shall be at no cost to RMS.	Not triggered		Assessed as part of previous audit.
Traffic Management Plan				
B16	Prior to the commencement of construction, the Applicant shall prepare a Traffic Management Plan (TMP) for the Development in consultation with Council and the RMS, to the satisfaction of the Secretary. The plan shall form part of the CEMP required under Condition C1. The TMP shall:	Not triggered		Assessed as part of previous audit.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(a)	detail the measures that would be implemented to ensure road safety, network efficiency and access during construction;			
(b)	contain a drivers code of conduct to: (i) minimise the impacts of construction on the local and regional road network; and (ii) minimise conflicts with other road users.			
(c)	detail heavy vehicle routes, access and parking arrangements; and			
(d)	if necessary, detail procedures for notifying any nearby residents of any potential disruptions to routes.			
WASTE MANAGEMENT				
B17	All waste materials removed from the site shall only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Compliant	<p>Dead bird disposal record Farm 76 dated 19/11/2020</p> <p>Baiada Group of Companies Manure Delivery Docket Number 00357 dated 28/11/2020</p> <p>Kurrajong Recycling tax invoice dated 21/09/2018</p> <p>DrumMuster container receipts dated 19/06/2019</p> <p>MIA Quisksips tax invoice dated 18/11/2020</p> <p>Site inspection</p>	<p>A range of waste types are produced on the complex including dead birds, spent litter, chemical containers, scrap metal and general waste. Waste materials were observed to be well managed on site with adequate provision of waste receptacles.</p> <p>The waste types under the management of ProTen are chemical containers, scrap metal and general waste. Skips are maintained at each of the farmhouses and farms for general waste, washed chemical drums are stored within each chemical storage shed, and a scrap metal skip is provided near farm 78.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3			Audit interviews	<p>ProTen advised that chemical containers are taken recycled through Kurrajong Recycling and DrumMuster. Sighted tax invoices from Kurrajong Recycling dated 21/09/2018 for the collection of 113 and 86 drums, and container receipts from DrumMuster dated 19/06/2019 for 58 and 112 containers taken to Leeton Landfill. MIA Quisksips are the current contractor for general waste. Sighted tax invoice dated 18/11/2020 for collection of waste from a number of ProTen farms including those that make up the Narrandera Poultry Complex.</p> <p>The tax invoice stated that it was fortnightly collection of 4 skips from each farm, two 4.5m skips and two 1.5m skips.</p> <p>Baiada manage the removal of spent litter and dead birds. Spent litter is on-sold to farmers in the region as a soil ameliorant. Dead birds are sent to the Baiada rendering plant. ProTen advised that dead birds are no longer being sent to WormTech in Wagga. Sighted Dead Bird Disposal Record dated 19/11/2020 which reported that 39,477 birds were disposed of between 3/10/2020 and 21/11/2020. Sighted Manure Delivery Docket number 00357 which stated that 55 m³ manure (broiler litter) from Farm 76, Shed 9 went to Mick Grace at Coleambally on 28/11/2020.</p> <p>ProTen have not been provided Spent Litter Agreements between Baiada and farmers who receive spent litter from the complex.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
B18	Waste generated outside the site shall not be received at the site for storage, treatment, processing, reprocessing, or disposal on this site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> , if such a licence is required in relation to that waste.	Compliant		ProTen advised that they do not receive any wastes to site.
B19	The Applicant shall not stockpile, store or utilise spent bedding material in any way within the Development site.	Compliant	Site inspection Audit interviews Baiada Group of Companies Manure Delivery Docket Number 00357 dated 28/11/2020	ProTen do not stockpile, store or utilise spent bedding material on site. Baiada manage this waste product. During the site inspection of Farm 75 we observed a truck arriving to remove spent litter.
B20	Broiler mortalities shall not be disposed to land by burial or any other method at the premises for the life of the Development, unless otherwise permitted by a relevant authority during a bio-security emergency at the site (refer to Condition B9 for further requirements for broiler disposal).	Compliant	Audit interviews Dead bird disposal record Farm 76 dated 19/11/2020	ProTen have not disposed of any dead birds on site. Dead birds are managed as discussed in Condition B17.
Waste Management Plan				
B21	Prior to the commencement of operation, the Applicant shall prepare a Waste Management Plan for the Development to the satisfaction of the Secretary. The Waste Management Plan shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The WMP shall:	Not triggered		Assessed as part of previous audit
(a)	detail the type and quantity of waste to be generated during construction and operation of the Development;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(b)	describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997</i> , <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (Department of Environment, Climate Change and Water, 2009);			
(c)	detail the materials to be reused or recycled, either on or off site; and			
(d)	include the Management and Mitigation Measures included in Appendix 1.			
HAZARD AND RISK				
Dangerous goods				
B22	Dangerous goods, as defined by the <i>Australian Dangerous Goods Code</i> , shall be stored and handled strictly in accordance with:	Non-compliant	Site inspection Twin oxide solution SDS 75 dated 11/11/2019 Clean oxide 75 SDS dated 01/2015 Training register, version 10.1 Chemical SOP	ProTen are not storing chemicals in accordance with the Dangerous Goods Code or the NSW Work Health Safety Regulations. Stored chemicals in the workshop/store and chemical storage shed, and bulk chemical storage facilities at Farm 79 were inspected during the audit. Small quantities of liquid fuels and chemicals had been placed on the shed floor and not on a bund. Small quantities of flammable sprays were stored within the shed on open shelving. Small quantities of flammable sprays can be stored in plastic tubs on the open shelving or in a flammable cabinet. Washed empty drums were stored in the chemical storage shed awaiting return to Griffith Feed and Grain.
(a)	all relevant Australian Standards;			
(b)	for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and			
(c)	the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997). In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				<p>Chlorine and other water treatment chemicals are stored on pallet bunding within the chemical storage shed. The pallet bunds are not designed for permanent storage and appeared overloaded with drums stored right against the edge of the bund and small water treatment containers stacked three high. Spills of these chemicals would not be contained by the pallet bund as evidenced by spills observed on the ground in the chemical storage shed.</p> <p>Safety signage and fire protection were on the outside of the chemical storage shed however these signs were dangerous goods labelling rather than GHS compliant labelling.</p> <p>The aboveground bulk diesel storage tank is maintained in a permanent bund at each of the farms. Fire protection with safety signage is available at the diesel tank.</p> <p>The tank is elevated and the height of the tank compared with the height of the bund walls means that the tank is effectively unbunded as a puncture to the tank would spill outside and not be contained by the bund.</p> <p>Bulk LPG tanks at each of the farms are maintained by Elgas. ProTen own the manifold and barricade only. Signage on the LPG tanks is not compliant with GHS signage.</p> <p>ProTen advised that a permanent chemical storage facility has been added to dead bird store. This was not inspected as part of the audit.</p> <p>Refer to Appendix E for photo log.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				<p>ProTen maintain an online register of Safety Data Sheets (SDS) for chemicals used at the complex. Copies of the SDSs are available on site however this was not confirmed as part of the audit. Sighted SDS for Twin oxide solution 75 dated 11/11/2019 and SDS for Clean oxide 75 dated 01/2015. SDS's are valid for five years and the Clean oxide SDS was out of date.</p> <p>ProTen train at least one staff member on each farm in handling of chemicals. Sighted ChemCert training in ProTen training register, version 10.1 which showed staff at farms 75, 76, 77 and 79 with current ChemCert training. ProTen advised that COVID has stopped the classes for external training. ProTen advised that the Groundsman, Mathew Cluff also has ChemCert training however this did not show in the training register. Sighted Chemical Standard Operating Procedure (SOP) allowing footbath refilling from a bottle, however does not permit decanting or mixing for herbicide use.</p> <p>PPE is available to staff within PPE cabinets on each farm and within the chemical storage shed. Spill kits are maintained in the chemical shed on each farm.</p> <p>Recommendation 2: Provide flammable cabinet for storage of small quantities of flammable liquids and gases in the store/workshop.</p> <p>Corrective Action 2: Reduce volume of water treatment chemicals maintained in storage sheds in line with capacity of pallet bunds.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
				<p>Corrective Action 3: Review bunding of bulk diesel tanks on each farm to ensure the bunds would contain spills from the elevated tanks.</p> <p>Corrective Action 4: Ensure that all personnel are included in the training register.</p>
B23	The Applicant shall ensure that the storage and transport of LPG for the Development complies with AS/NZS 1596:2014 - The Storage and Handling of LP Gas.	Compliant	<p>Fire Safety Study Addendum Report, Revision 1, GHD 2020</p> <p>Narrandera Poultry Production Complex Fire Safety Study, Revision 2, SLR Consulting 2016</p> <p>Site inspection</p> <p>Audit interviews</p>	<p>Refer to Condition B22.</p> <p>The Fire Safety Study Addendum Report, Revision 1, GHD 2020 confirms that separation distances between the bulk LPG tank facilities and the poultry sheds comply with AS 1596.</p> <p>The Narrandera Poultry Production Complex Fire Safety Study, Revision 2, SLR Consulting 2016 includes a tank layout provided by Elgas and confirms that the LPG storage facilities conform to AS 1596, fire protection requirements of AS 1596.</p> <p>A detailed review of compliance of the storage and transport of LPG in accordance with AS 1596 was not conducted as part of the audit.</p>
Pre-construction				
B24	Prior to the commencement of construction of the Development, other than site preparation works, or as otherwise agreed by the Secretary, the following studies shall be prepared:	Compliant	<p>Fire Safety Study Addendum Report, Revision 1, GHD 2020</p>	<p>ProTen have finalised their Fire Safety Study in accordance with DPIE's guidelines to the satisfaction of F&R NSW and submitted the final Fire Safety Study to DPIE.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(a)	a Fire Safety Study for the Development, covering relevant aspects detailed in the <i>Department's publication Hazardous Industry Planning Advisory Paper No. 2 - Fire Safety Guidelines</i> and the New South Wales Government's Best Practice <i>Guidelines for Contaminated Water Retention and Treatment Systems</i> . The Study shall include a strict maintenance schedule for essential services and other safety measures. The Study shall meet the requirements of the NSW Fire Brigades; and		Emergency Plan Addendum Report, Revision 1, GHD 2020 Letter from F&R NSW to DPIE dated 24/02/2020 Letter from DPIE to ProTen dated 1/05/2020	Sighted Fire Safety Study Addendum Report, GHD 2020 which addresses a number of outstanding items from F&R NSW. Sighted letter from F&R NSW to DPIE dated 24/02/2020 confirming that F&R NSW are satisfied that the addendum adequately addresses their outstanding concerns. Sighted letter from DPIE to ProTen dated 1/05/2020 approving the Fire Safety Study Addendum Report and the Emergency Plan Addendum Report.
(b)	a Final Hazard Analysis prepared in accordance with the Department's <i>Hazardous Industry Advisory Paper No.6- Guidelines for Hazard Analysis</i> .	Not triggered		Assessed as part of previous audit.
Pre-commissioning				
B25	Prior to the commencement of commissioning of the Development, the Applicant shall prepare a comprehensive Emergency Plan and detailed emergency procedures for the Development. The Plan shall be prepared in accordance with the Department's publication <i>Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines</i> .	Not triggered	Emergency Plan Addendum Report, Revision 1, GHD 2020	This condition was assessed as part of the previous audit however as part of finalising the Fire Safety Study with F&R NSW, an addendum report was also prepared to address some concerns from F&R NSW regarding matters that were not previously included in the Emergency Plan.
Pre-Startup				
B26	The Applicant shall submit to the Secretary a report detailing compliance with Condition B24 and Condition B25 one month prior to the commencement of operation of the development.	Not triggered		Assessed as part of previous audit.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
NOISE				
Construction Noise				
B27	Construction activities associated with the Development shall be undertaken during the following construction hours:	Not triggered		Assessed as part of previous audit.
(a)	7:00 am to 6:00 pm Mondays to Fridays; inclusive; and			
(b)	8:00 am to 1 :00 pm Saturdays; and			
(c)	at no time on Sundays or public holidays.			
B28	Construction works outside of the standard construction hours identified in Condition B27 may be undertaken in the following circumstances:	Not triggered	Audit interviews.	ProTen advised that there was no construction work undertaken during the audit period.
(a)	construction works that generate noise that is: <ul style="list-style-type: none"> (i) no more than 5 dB(A) above rating background level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009); and (ii) no more than the noise management levels specified in Table 3 of <i>the Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009) at other sensitive receivers; or 			
(b)	for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or			
(c)	where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(d)	works approved through an EPL, or by the Secretary; and			
(e)	works as approved through the out-of-hours work protocol outlined in the CEMP			
B29	Except as expressly permitted by the EPL, activities resulting in impulsive or tonal noise emission (such as rock breaking, rock hammering, pile driving) shall only be undertaken:	Not triggered		Assessed as part of previous audit.
(a)	between the hours of 8:00 am to 5:00 pm Monday to Friday;			
(b)	between the hours of 8:00 am to 1 :00 pm Saturday; and			
(c)	in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block. For the purposes of this condition 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.			
B30	The Development shall be constructed with the aim of achieving the construction noise management levels detailed in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures shall be implemented and any activities that could exceed the construction noise management levels shall be identified and managed in accordance with the CEMP.	Not triggered		Assessed as part of previous audit.

Number	Condition	Compliance	Evidence	Audit Findings														
Schedule 3																		
	<i>Note: The Interim Construction Noise Guideline identifies 'particularly annoying' activities that require the addition of 5dB(A) to the predicted level before comparing to the construction NML.</i>																	
B31	Where Feasible and Reasonable, operation noise mitigation measures shall be implemented at the start of Construction (or at other times during Construction) to minimise Construction noise impacts.	Not triggered		Assessed as part of previous audit.														
Operational Noise Limits																		
B32	<p>The Applicant shall ensure that noise from the operation does not exceed the limits in Table 1 below.</p> <table border="1"> <caption>Table 1 – Noise Limits dB(A)</caption> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{avg}(15 minute)</th> <th>L_{avg}(15 minute)</th> <th>L_{avg}(15 minute)</th> <th>L_{A1} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>All privately owned residential premises</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p><i>Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the INP. Appendix 9 of the INP sets out the meteorological conditions under which this criterion applies.</i></p>	Location	Day	Evening	Night		L _{avg} (15 minute)	L _{avg} (15 minute)	L _{avg} (15 minute)	L _{A1} (1 minute)	All privately owned residential premises	35	35	35	45	Compliant	Audit interviews Regulator consultation with the EPA	It was determined as part of the 2017 audit that noise monitoring is only required in response to complaints. The complex has not received any complaints in the audit period nor any requests for monitoring by the EPA.
Location	Day		Evening	Night														
	L _{avg} (15 minute)	L _{avg} (15 minute)	L _{avg} (15 minute)	L _{A1} (1 minute)														
All privately owned residential premises	35	35	35	45														

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
B33	<p>If noise from an activity is substantially tonal, intermittent or impulsive in nature or contains major components within the low frequency range (as described in Chapter 4 of the NSW Industrial Noise Policy (Environment Protection Authority, 2000)), 5 dB(A) shall be added to the measured noise level when comparing the measured noise with the limits specified in Table 4.1 of the INP.</p> <p><i>Note: Low frequency noise is currently under review by the Environment Protection Authority and the Department of Planning and Environment.</i></p>	Not triggered		Noises generated from the complex are not considered to meet the specifications of Condition B33. There have not been any changes to noise sources since the 2017 audit.
SOIL, WATER QUALITY AND HYDROLOGY				
Flooding				
B34	The design of the rice hull storage structures must incorporate flood proofing to ensure that broiler feed remains dry in the event of a 1 in 100 year flood event.	Compliant	<p>Construction Certificate 125/15 dated 9/11/2015 by Dartnell Building Certifiers.</p> <p>SLR Consulting Response to 2017 Independent Environmental Audit Recommendations dated 9/04/2018.</p>	<p>The rice hull storage shed stores bedding material, not broiler feed.</p> <p>In their response to the 2017 audit recommendations, SLR Consulting stated that a construction certificate was issued for the shed, no further action was proposed to close out the recommendation. DPIE did not require ProTen to undertake further work to close out this item.</p> <p>ProTen provided a copy of the construction certificate for the structure, sighted Construction Certificate 125/15 dated 9/11/2015 by Dartnell Building Certifiers. The audit did not sight an Occupation Certificate for the rice hull storage shed.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3 B35	Minimum floor levels for habitable buildings should be based on protection from the 1 in 100 year flood event plus 500 mm freeboard.	Compliant	<p>SLR Consulting Response to 2017 Independent Environmental Audit Recommendations dated 9/04/2018</p> <p>Construction Certificate Number 30/16 dated 28/03/2016</p> <p>Construction Certificate Number 31/2016 dated 27/04/2016</p> <p>Occupation Certificates referencing CC 20/2016 dated 8/06/2016 and 5/05/2016</p> <p>Occupation Certificates referencing CC 31/2016 dated 10/11/2016</p> <p>Occupation Certificates referencing CC 32/2016 dated 26/07/2016</p>	<p>In their response to the 2017 audit recommendations, SLR Consulting stated that a construction certificate was issued for the farm managers residences, no further action was proposed to close out the recommendation. DPIE did not require ProTen to undertake further work to close out this item.</p> <p>ProTen provided copies of the following construction and occupation certificates:</p> <ul style="list-style-type: none"> • Construction Certificate Number 30/16 dated 28/03/2016 for 2 x detached dwellings with attached garages • Construction Certificate Number 31/2016 dated 27/04/2016 for 2 x detached dwellings with attached garages • Occupation Certificates referencing CC 20/2016 dated 8/06/2016 for House 9 and 5/05/2016 for House 10 • Occupation Certificates referencing CC 31/2016 dated 10/11/2016 for House 5 and House 6 • Occupation Certificates referencing CC 32/2016 dated 26/07/2016 for House 7 and House 8

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
B36	Prior to the commencement of operation, the Applicant shall prepare an Emergency and Evacuation Plan to the satisfaction of the Secretary. The Emergency and Evacuation Plan shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The Emergency and Evacuation Plan shall:	Not triggered		Assessed as part of previous audit.
(a)	be prepared in consultation with Narrandera Shire Council and the NSW State Emergency Service;			
(b)	describe all reasonable flood recovery measures;			
(c)	detail assembly and evacuation points;			
(d)	detail transportation routes and procedures in a flood event;			
(e)	incorporate the Flood Management Plan at Section 6.5.6 of the EIS;			
(f)	detail the procedures for managing flood risks during construction and operation of the development, including procedures for the protection of infrastructure, staff and broilers; and			
(g)	detail the management measures for the supply of feed in a flood event.			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Construction Soil and Water Management				
B37	Soil and water management measures consistent with <i>Managing Urban Stormwater - Soils and Construction Vol. 1</i> (Landcom, 2004) (the Blue Book) shall be employed during the construction of the Development to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	Not triggered		Assessed as part of previous audit
Surface Water Discharge Limits				
B38	The Applicant shall ensure that all licensed surface water discharges from the site comply with the discharge limits (volume and quality) set for the Development in any EPL or relevant provisions of the POEO Act.	Not triggered		There are no licensed surface water discharge points specified in EPL 20748 and no discharge limits.
Stormwater				
B39	The Applicant must design, construct, operate and maintain all stormwater and water storage facilities on site with the internal surfaces equivalent to, or better than, a clay liner of a minimum permeability of 1×10^{-9} metres per second and a clay liner thickness of no less than 600 mm, or an equivalent alternative.	Compliant	Geotechnical Investigation, Existing Sediment Ponds, Existing Poultry Farms 75-79, Sturt Highway Euroley NSW dated 28/05/2018, Aitken Rowe Geotechnical Engineering Annual Review 2017/18	ProTen engaged Aitken Rowe to conduct a geotechnical investigation of the existing sediment basins at the complex to determine compliance with Condition B39 in response to Recommendation 7 from the 2017 audit. The investigation found that, in some areas, in-situ material does not satisfy the permeability requirements and compaction or lining would have been required during construction of the sediment basins to achieve the required permeability. The Annual Review 2017/18 reported on the geotechnical investigation and that the ProTen Construction Supervisor confirmed that Optimum Moisture Content (OMC) conditioning and compaction was undertaken during the construction process. No further design or construction documentation to confirm this was available at the time of audit.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
				The shallow groundwater piezometers at the complex have not recorded any groundwater since their installation. There is a low risk of the surface water management system contaminating groundwater.
Groundwater				
B40	The groundwater bores for the Development shall be constructed in accordance with the <i>Minimum Construction Requirements for Water Bores in Australia, Third Edition, February 2012</i> , (National Uniform Drillers Licensing Committee, 2012).	Not triggered.	Audit interviews	This condition was assessed as part of the previous audit. No new bores have been constructed in the audit period.
B41	Groundwater extracted from the bores shall be treated in accordance with the standards contained within the <i>National Water Biosecurity Manual - Poultry Production</i> (DAFF, 2009).	Compliant	Narrandera Poultry Production Farm Water Management Plan, Version 3.0, May 2020, SLR Consulting	<p>The Water Management Plan includes the requirement to treat groundwater in accordance with the <i>National Water Biosecurity Manual – Poultry Production</i> including:</p> <ul style="list-style-type: none"> • pH correction • Dosing water tanks with sodium hypochlorite • Dosing water supply lines to poultry sheds with chlorine dioxide <p>There has been no change to the water treatment protocols from the 2017 audit.</p>

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
B42	Groundwater extraction for the purposes of the Development shall be limited to the provisions of any water access licence(s) issued by the DPI.	Compliant	Annual Reviews 2017/18, 2018/19 and 2019/20	ProTen's Water Access Licence 11788 permits the extraction of 488 ML per annum. The Annual Reviews for the audit period report total water extraction during their reporting periods as: <ul style="list-style-type: none"> • 2017/18 286 ML • 2018/19 428 ML • 2019/20 421 ML As per annual review, the total extraction is under the licenced volume.
Bunding				
B43	The Applicant shall 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 Liquids: Environmental Protection - Participants Handbook.	Non-compliant		Refer to Condition B22.
Domestic Effluent				
B44	The Applicant shall obtain the relevant license/approval from Council under section 68 of the <i>Local Government Act 1996</i> prior to the commencement of construction for all domestic effluent disposal and management systems on-site.	Not triggered		Assessed as part of previous audit
Water Management Plan				
B45	Prior to the commencement of operation, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The Water Management Plan shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The WMP shall:	Not triggered	Narrandera Poultry Production Farm Water Management Plan, Version 3.0, May 2020, SLR Consulting	This condition was assessed as part of the previous audit in 2017.
(a)	be prepared in consultation with the DPI;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
(b)	detail water use, metering, disposal and management on-site;		Letter DPIE to ProTen dated 4/06/2020	During the audit period, a revised Water Management Plan was developed, sighted version 3.0 dated May 2020 prepared by SLR Consulting. The key change to the Water Management Plan is a reduction in the frequency of water monitoring from quarterly to biannual. The Water Management Plan includes a summary of the consultation undertaken with the Natural Resources Access Regulator and their endorsement of the changes. The letter of approval of the revised Water Management Plan refers to consultation that DPIE completed with the Natural Resources Access Regulator to confirm their acceptance of the plan.
(c)	detail the number and location of piezometers on-site;			
(d)	detail the water licence requirements for the Development;			
(e)	detail the management of wastewater streams on-site;			
(f)	contain a Surface Water Management Plan, including: <ul style="list-style-type: none"> (i) a program to monitor: <ul style="list-style-type: none"> • surface water flows and quality; • surface water storage and use; and • sediment basin operation; (ii) sediment and erosion control plans; (iii) surface water impact assessment criteria, including trigger levels for investigating any potentially adverse surface water impacts; (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria; and 			
(g)	contain a Groundwater Management Plan, including: <ul style="list-style-type: none"> (i) baseline data on groundwater levels and quality; (ii) a program to monitor groundwater levels and quality; 			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
	(iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria			
(h)	contain a Contingency plan for the operation of the facility during extreme weather events such as heat wave or drought. Examples of contingency options may include (but are not limited to) securing sufficient additional water access licences to service the facility during inclement conditions, or adjusting the scale of the operation to meet the available water supply.			
LANDSCAPE				
External Lighting				
B46	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS4282 1997 - Control of the Obtrusive Effects of Outdoor Lighting.	Compliant	Audit interviews	The initial design and installation of external lighting for the complex was assessed as part of the previous audit. ProTen advised that no new external lighting been installed in the audit period, and external lighting is only used where works are conducted at night and there is a potential safety issue.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Landscape Management Plan				
B47	Prior to the commencement of operation, the Applicant shall prepare a Landscape Management Plan (LMP) to manage the revegetation and landscaping works on-site, to the satisfaction of the Secretary. The LMP shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The LMP shall:	Not triggered	Site inspection	<p>Assessed as part of previous audit.</p> <p>The site inspection identified that, while all farms have had vegetation buffers planted, some buffers have had better success than others. ProTen advised that replanting is likely to occur at Farm 76 where large losses of trees in the vegetation buffer have occurred.</p> <p>Recommendation 3: Review vegetation buffers and schedule replanting in spring 2021 where vegetation plantings will not provide a 40 m buffer around each farm.</p>
(a)	detail the species to be planted on-site to achieve a vegetation buffer of 40 metres around each PPU;			
(b)	describe the monitoring and maintenance measures to manage revegetation and landscaping works; and			
(c)	be consistent with the Management and Mitigation Measures at Appendix 1.			
GREENHOUSE GAS				
B48	The Applicant shall implement all reasonable, and feasible measures to minimise energy use on site and greenhouse gas emissions produced on-site.	Compliant	Site inspection Audit interviews	<p>As per the 2017 audit, ProTen have implemented a number of energy efficiency measures for the complex including:</p> <ul style="list-style-type: none"> • External lighting only used where there is a potential safety incident • LED lighting installed throughout all buildings on the complex • Two banks of solar arrays installed at each farm • Utilising heat in the roof space for heating shed to reduce gas consumption • Bore pumps operate in the day to utilise solar power. Only emergency override on pumps would cause them to come on at night.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
HERITAGE				
Protection of Aboriginal Heritage Items				
B49	Prior to the commencement of construction of any poultry shed, residential dwelling or structure on-site, the Applicant shall undertake a pre-clearance pedestrian archaeological survey for linear alignments. Representatives from relevant Registered Aboriginal Parties are to be included in this assessment.	Not triggered		Assessed as part of previous audit. There has not been any structures constructed on site during the audit period to trigger this condition.
B50	Prior to the commencement of construction of any poultry shed, residential dwelling or structure on-site, the Applicant shall undertake a pre-clearance archaeological survey for the internal road alignment and impact area associated with the revised location of PPU5. Representatives from relevant Registered Aboriginal Parties should be included in this assessment.	Not triggered		Assessed as part of previous audit. There has not been any structures constructed on site during the audit period to trigger this condition.
B51	Any subsequent alterations to the Development footprint that are outside the study areas of the Aboriginal Heritage Impact assessment (prepared by OzArk, dated April 2015 at Appendix J of the EIS) and pre-clearance surveys, should be assessed in accordance with the <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (OEH, 2010) as amended.	Not triggered		There were no changes to the footprint of the Complex from the Aboriginal Heritage Impact Assessment during the audit period.
B52	The three known Aboriginal sites (EPPC-ST1, EPPC-ST2 and EPPC-H 1) shall be fenced during construction and operation of the Development to exclude vehicles, pedestrians and animals from the sites.	Compliant	Site inspection	This condition was assessed as part of the previous audit. During the site inspection, fencing and signage of AH site EPPC-ST2 was observed. Refer to Appendix E for photo log of the site inspection.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 3				
Unexpected Finds Protocol				
B53	If any archaeological relics are uncovered during the course of construction of the Development, then all works shall stop immediately in that area and the OEH Heritage Branch contacted. Depending on the possible significance of the relics, an archaeological assessment and an excavation permit under the <i>NSW Heritage Act 1977</i> may be required before further work can continue in that area.	Compliant		The only earthworks that occurred during the audit period were minor earthworks undertaken at Farm 75. There were no archaeological relics uncovered during the earthworks.
B54	If any Aboriginal objects are uncovered during work, excavation or disturbance of the work area, work must stop immediately and the Regional Operations Group of the OEH is to be contacted. If Aboriginal objects/places are known to be directly or indirectly adversely affected, the Applicant will need to apply for, and be issued, an Aboriginal Heritage Impact Permit (AHIP) by OEH to comply with the <i>National Parks and Wildlife Act 1974</i> .	Compliant		The only earthworks that occurred during the audit period were minor earthworks undertaken at Farm 75. There were no Aboriginal objects uncovered during the earthworks.
Aboriginal Cultural Heritage Management Plan				
B55	Prior to the commencement of operation, the Applicant shall prepare an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. The plan shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6 and shall:	Not triggered		Assessed as part of previous audit.
(a)	describe the management actions, including fencing, for the three known Aboriginal sites (EPPC-ST1, EPPC-ST2 and EPPC-H·I) during construction and operation; and			
(b)	incorporate any additional sites found during pre-clearance surveys.			

Table D-3 Development Consent Conditions – Schedule 4

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C1	The Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:	Not triggered		Assessed as part of previous audit.
(a)	be approved by the Secretary prior to the commencement of construction;			
(b)	identify the statutory approvals that apply to the Development;			
(c)	outline all environmental management practices and procedures to be followed during construction works associated with the Development;			
(d)	describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;			
(e)	detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;			
(f)	describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and			
(g)	include the management plans under Condition C2 of this consent.			
C2	As part of the Construction Environmental Management Plan for the Development, required under condition C1 of this consent, the Applicant shall include the following:	Not triggered		Assessed as part of previous audit.
(a)	Dust Management (see Condition B6 and B7);			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
(b)	Traffic Management (see Condition B16);			
(c)	Construction Soil and Water Management (see Condition B37); and			
(d)	Community Consultation and Complaints Handling			
C3	The Applicant shall carry out the construction of the Development in accordance with the CEMP approved by the Secretary (and as revised .and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Not triggered		Assessed as part of previous audit.
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN				
C4	The Applicant shall prepare an Operational Environmental Management Plan (OEMP) the Development to the satisfaction of the Secretary. The OEMP must:	Not triggered		Assessed as part of previous audit.
(a)	be submitted to the Secretary for approval prior to the commencement of operation;			
(b)	be consistent with the NSW DPIs Best Practice Management for Meat Chicken Production in New South Wales - Manual 2 (Meat Chicken Growing Management);			
(c)	be prepared by a suitably qualified and experienced expert;			
(d)	provide the strategic framework for environmental management of the Development;			
(e)	identify the statutory approvals that apply to the Development;			
(f)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
(g)	<p>describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (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 6 and 9 app I and M 			
(h)	<p>include the following environmental management plans:</p> <ul style="list-style-type: none"> (i) Air quality (see Condition B3, B4 and BS); (ii) Emergency Disposal and Bio-security Protocol (see Condition B9); (iii) Biodiversity (see Condition B10 to Condition B12 inclusive); (iv) Waste (see Condition B21); (v) Emergency and evacuation (see Condition B36); (vi) Water (see Condition B45); (vii) Landscaping (see Condition B47); and 			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
	(viii) Aboriginal Cultural Heritage (see Condition B55).			
C5	The Applicant shall operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Compliant	Site inspection Narrandera Poultry Production Complex Operational Environmental Management Plan, version 4, 27/10/2020	ProTen are utilising the same OEMP as was in place at the 2017 IEA. The Water Management Plan which is an appendix to the OEMP has been updated to reduce the frequency of surface and groundwater monitoring across the complex. There were a number of things that were sighted as part of the audit that demonstrated implementation of the OEMP including: <ul style="list-style-type: none"> • Employee induction • Monitoring of conditions, equipment, bird health and bedding material in poultry sheds • Waste management • Vegetation buffers • Poultry shed clean out and setup procedures • Maintenance of plant and equipment • Traffic management • Chemical storage • Environmental monitoring • Reporting

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
	MANAGEMENT PLAN REQUIREMENTS			
C6	The Applicant shall ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:	Compliant	Narrandera Poultry Production Farm Water Management Plan, Version 3.0, May 2020, SLR Consulting	This condition was assessed as part of the previous audit. The only management plan to undergo revision during the audit period was the Water Management Plan. The Water Management Plan, Version 3.0, SLR Consulting, May 2020 was updated to amend the frequency of monitoring from quarterly to biannual. No other changes to the management plan occurred to impact on compliance with this condition.
(a)	detailed baseline data;			
(b)	a description 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/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 that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;			
(d)	a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures (see (c) above); 			
(e)	a contingency plan to manage any unpredicted impacts and their consequences;			
(f)	a program to investigate and implement ways to improve the environmental performance of the Development over time;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
(g)	a protocol for managing and reporting any: <ul style="list-style-type: none"> (i) incidents (ii) complaints (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria 			
(h)	a protocol for periodic review of the plan.			
Revision of Strategies, Plans and Programs				
C7	Within 3 months of the submission of an:	Not verified	<p>Narrandera Poultry Production Farm Water Management Plan, Version 3.0, May 2020, SLR Consulting</p> <p>Letter from DPIE to ProTen dated 4/06/2020</p> <p>Narrandera Poultry Production Complex Operational Environmental Management Plan, version 4, 27/10/2020, SLR Consulting</p>	<p>The Operational Environmental Management Plan includes triggers for review as required by this condition however ProTen have not provided any evidence to demonstrate that the review of strategies plans and programshas occurred.</p> <p>The management plans appended to the OEMP include triggers for review including:</p> <ul style="list-style-type: none"> • Modifications to the development consent • Where environmental performance is not meeting the objectives of the OEMP • Changes to conditions of SSD 6882 and EPL 20748 • At the request of DPIE or relevant regulatory authority <p>The only management plan that has been updated in the audit period is the Water Management Plan.</p>
(a)	annual review under Condition C8;			
(b)	incident report under Condition C10; or			
(c)	audit under Condition C12.			
	<p>The Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i></p>			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
				<p>Sighted letter from DPIE to ProTen dated 4/06/2020 approving the revised Water Management Plan.</p> <p>ProTen do not maintain any record of periodic review of management plans in accordance with the triggers specified in the individual plans and Condition C7.</p> <p>While there may have been reviews of management plans during the audit period that did not result in an update to a management plan, there is no evidence to support this.</p> <p>Recommendation 4: Maintain a record of reviews of management plans.</p>
ANNUAL REVIEW				
C8	Each year, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:	Compliant	Annual Reviews 2017/18, 2018/19 and 2019/20	ProTen have prepared Annual Reviews during the audit period and include the information required by Condition C8.
(a)	describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;			
(b)	include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS; 			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
(c)	identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;			
(d)	identify any trends in the monitoring data over the life of the Development;			
(e)	identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and			
(f)	describe what measures will be implemented over the next year to improve the environmental performance of the Development.			
REPORTING				
Incident Reporting				
C9	Within 24 hours of the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant shall notify the Secretary and any other relevant agencies of the incident.	Not triggered		ProTen advised that there have been no incidents associated with the complex that have caused or threatened to cause harm to the environment.
C10	Within seven (7) days of the detection of the, incident, the Applicant shall provide the Secretary and any relevant agencies with a detail report on the incident.	Not triggered		Refer to Condition C9.
Regular Reporting				
C11	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance, with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Compliant	ProTen website Annual Reviews 2017/18, 2018/19 and 2019/20 Website environmental reporting March 2020	ProTen have available on their website copies of all Annual Reviews and environmental monitoring results associated with EPL 20748. The most recent environmental reporting was published in March 2020. Refer to EPL Condition R1.

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
AUDITING				
Independent Environmental Audit				
C12	Within 2 years of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:	Compliant	Narrandera Poultry Development Independent Environmental Audit GHD 2018 SLR Consulting Response to 2017 Independent Environmental Audit Recommendations dated 9/04/2018 This report	<p>This audit constitutes the second Independent Environmental Audit required by this condition. The previous audit was undertaken by GHD in November 2017. DPIE endorsed the GHD audit team of Demelza Scott and Joanna Stephens in a letter from DPIE dated 21/10/2020. The audit includes the requirements of Condition C12:</p> <ul style="list-style-type: none"> • Consultation with relevant agencies, refer to Section 2.2 of the report • Assessment of environmental performance of the Complex, refer to Section 3.1 • Review of the adequacy of strategies, plans and programs, refer to Section 3.2 • Recommendations and corrective actions refer to Appendix D and Section 4
(a)	be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;			
(b)	include consultation with the relevant agencies;			
(c)	assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);			
(d)	review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and			
(e)	recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents. <i>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</i>			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
C13	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Compliant	Narrandera Poultry Development Independent Environmental Audit GHD 2018 SLR Consulting Response to 2017 Independent Environmental Audit Recommendations dated 9/04/2018	ProTen submitted the 2017 independent audit report and response to recommendations to DPIE in a letter dated 12/02/2018 which is within three months of commissioning the audit as required by Condition C13. These documents are available on the ProTen website.
ACCESS TO INFORMATION				
C14	Within 6 months of the date of this consent, the Applicant shall:	Administrative non-compliance	ProTen Website Narrandera Poultry Production Complex OEMP, version 2, 20/05/2016, SLR Consulting Website environmental reporting March 2020	At the time of audit, all of the information required by Condition C14a was available on ProTen's website however: <ul style="list-style-type: none"> The OEMP on the website does not include the 2020 updated Water Management Plan. Monitoring results for the Complex are only provided up to March 2020. There is no complaints register, and while the audit acknowledges that there haven't been any complaints, there should still be a register. GHD understands from the previous audit that a third-party provider updates the ProTen website and there is a delay between provision of updated information and it being uploaded to the website. Corrective Action 5: Ensure that all information required by Condition C14 is published on the ProTen website.
(a)	make copies of the following publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in Condition A2; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) 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; (v) a complaints register consistent with that provided in Appendix C of the EIS, updated on a monthly basis; (vi) the annual reviews of the Development; (vii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; 			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
	(viii) any other matter required by the Secretary; and			
(b)	keep this information up to date, to the satisfaction of the Secretary.			
ENVIRONMENTAL REPRESENTATIVE				
C15	Prior to the commencement of construction of the Development, or as otherwise agreed by the Secretary, the Applicant shall nominate for the approval of the Secretary a suitably qualified and experienced Environment Representative(s) that is independent of the design and construction personnel. The Applicant shall employ the Environmental Representative(s) for the duration of construction through the life of the Development, or as otherwise agreed by the Secretary. The Environment Representative(s) shall:	Not triggered		Assessed as part of previous audit. The Environmental Representative continues to be Nathan Archer from SLR Consulting.
(a)	be the principal point of advice in relation to the environmental performance of the Development;			
(b)	monitor the implementation of environmental management plans and monitoring programs required under this consent and advise the Applicant upon the achievement of these plans/ programs;			
(c)	have responsibility for considering and advising the Applicant on matters specified in the conditions of this consent, and other licences and approvals related to the environmental performance and impacts of the Development;			
(d)	be given the authority to approve / reject minor amendments to the OEMP. What constitutes a "minor" amendment :shall be clearly explained in the Construction Environment Management Plan required under condition C1;			

Number	Condition	Compliance	Evidence	Audit Findings
Schedule 4				
(e)	be given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur; and			
(f)	be consulted in responding to the community concerning the environmental performance of the Development where the resolution of points of conflict between the Applicant and the community is required.			

Table D-4 Statement of Commitments

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
General	ProTen will carry out the Development at Euroley generally in accordance with the Development application and this EIS report.	Compliant		Refer to Condition A2.
	The Development site will not accommodate more than 3.92 million birds at any one time.	Compliant		Refer to Condition A6.
	Construction will be undertaken within the hours of: <ul style="list-style-type: none"> a. Monday to Friday, 7.00 am to 6.00 pm b. Saturday, 8.00 am to 1.00 pm; and c. No construction work on Sunday and public holidays 	Not triggered		Assessed as part of previous audit
	The poultry Development will operate 24 hours a day, seven days a week, with the majority of activities carried out between 7.00 am and 7.00 pm.	Note		

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	The Complaints and Incident Management Strategy contained within Appendix C of the EIS will be implemented to ensure that all complaints and incidents relating to the poultry operation, if they occur, are promptly and effectively addressed.	Not triggered		Assessed as part of previous audit.
Air Quality and Odour	During Construction			
	No disturbance will occur outside of the nominated disturbance footprint, and disturbed areas will be promptly rehabilitated and revegetated to a stable landform to minimise dust emissions.	Not triggered		There was no disturbance outside approved areas during the audit period.
	Dust will be minimised by 'wetting' down surfaces being worked or carrying traffic in dry periods.	Not triggered		Assessed as part of previous audit.
	During Operation			
	A meteorological station will be installed within the Development site to collect on-going and up-to-date weather data.	Compliant		Refer to Condition B5.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	The poultry sheds and feed silos will be fully enclosed to reduce the level of moisture and to minimise emissions of dust/particulate matter.	Compliant	Site inspection	ProTen maintain poultry sheds and feed silos that are fully enclosed in compliance with this condition. Refer to Appendix E for a photo log of the audit.
	The insides of the poultry sheds and the surrounds will be maintained at all times to ensure a clean and sanitary environment, including regular monitoring and maintenance of the tunnel ventilation systems and bird drinkers to avoid spillage, leaks and uneven distribution.	Compliant	Site inspection Audit interviews Fan testing record for farm 76 dated 29/01/2020	ProTen maintain the insides of poultry sheds and surrounds in a clean and tidy state. At the time of audit the complex was in the processing of preparing for a new production cycle, sheds had been emptied of spent litter, cleaned, sanitised and were being restocked with new bedding and feed for the incoming chicks. During a production cycle, Farm Managers and Assistants conduct daily walk-throughs of the poultry sheds to identify any maintenance issues which are noted in the Farm Managers diaries. ProTen maintain and test the ventilation fans, unless specialist servicing required. Sighted fan testing record for farm 76 dated 29/01/2020. ProTen advised that the minimum acceptable RPM for the fans is 2100. All fans were reported as 2200 RPM or above.
	Stocking densities and bird health within each of the poultry sheds will be regularly checked and, if necessary, appropriate corrective measures will be implemented.	Compliant		Refer to Condition A6.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Daily monitoring and maintenance of the bedding material will be undertaken to identify, remove and replace any caked material beneath drinking lines and/or areas with excessive moisture content.	Compliant	Site inspection Audit interviews Emails of photos sent from ProTen to Baiada (no date recorded)	ProTen monitor the condition of bed and remove wet bedding from sheds and turn bedding where clumping is observed. ProTen advised that weekly photos of bedding from across the complex are sent to Baiada.
	Internal access roads will be appropriately maintained to minimise dust and noise emissions.	Compliant		Refer to Condition B6.
Noise	A 60 km/hr speed limit will be adopted on the site access road between the Development site and the Sturt Highway.	Compliant		Refer to Condition B7.
	Plant and equipment will be maintained in good repair and operators will be appropriately instructed on how to minimise noise generation at all times.	Compliant		Refer to EPL Condition O2.
	Noise generating equipment purchased by the operator will comply with relevant occupational health and safety requirements.	Not triggered		ProTen advised that they do not maintain any noisy equipment on-site.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Emergency standby diesel generators will only be used when power from the electricity grid is lost and they will be appropriately sited and housed to minimise noise emissions.	Not triggered		Assessed as part of previous audit.
	A unidirectional traffic movement system, via a one-way circulation road around each PPU site, will be established with appropriate signage to minimise the use of reversing alarms.	Compliant	Site inspection ProTen Employee Induction	<p>ProTen maintain a one-way road around each farm which is sign posted and communicated to drivers through the induction. It was noted during the site inspection that light vehicles do not comply with the unidirectional requirements due to practicalities of doing maintenance on the farms and time delays if you had to drive all the way around a farm to get to a particular shed, silo etc. ProTen confirmed that all heavy vehicles comply with the unidirectional requirement and this was sighted during the site inspection where a semi-trailer arrived to collect spent bedding.</p> <p>This approach to management of light vehicles is considered reasonable and within the intent of the condition.</p>

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
Traffic and Transport	An intersection between the Sturt Highway and the Development site access Section 6.4.4 road will be constructed at the location shown on Figure 1.2 (in the EIS), with a basic right turn treatment (BAR) and basic left turn treatment (BAL) intersection in accordance with <i>Austroads Guide to Road Design, Part 4A: Unsignalised and Signalised Intersections</i> .	Not triggered		Assessed as part of previous audit.
	The site access road from the Sturt Highway to the Development site will be constructed to a minimum width of 6.5 metres, with a pavement and road surface suitable for B-doubles.	Not triggered		Assessed as part of previous audit.
	The access road will be bitumen sealed for a minimum length of 50 metres from the Sturt Highway intersection.	Not triggered		Assessed as part of previous audit.
	Advance signposting on the approach to the Sturt Highway intersection will be erected in both directions warning of trucks turning. In addition, an intersection direction sign opposite the access will be erected to further help identify the access point.	Not triggered		Assessed as part of previous audit.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	The farm access will meet the minimum requirements of AS 2890.2, to accommodate the turning movements of the largest vehicles generated by the poultry Development.	Not triggered		Assessed as part of previous audit.
	The internal PPU access roads will be constructed as one-way circulation roads (ring roads) around the perimeter of each PPU to enable traffic to enter, exit and manoeuvre in a forward direction. The roads will be constructed as all-weather rural- type roads able to carry the anticipated heavy vehicle movements.	Not triggered		Assessed as part of previous audit. Refer above.
	Suitable signage will be erected indicating internal traffic direction and speed limits to ensure the orderly and safe use of the site, as well as to minimise the potential for traffic conflict and noise.	Compliant	Site inspection	ProTen have erected traffic signage for both speed limits and traffic direction around the complex and at each farm, this was sighted during the site inspection.
	All internal roads will be maintained clear of obstruction and used exclusively for the purposes of transport, loading-unloading and parking.	Compliant	Site inspection	During the site inspection it was observed that all internal roads were maintained clear of obstructions and were used exclusively for the purposes of doing work on each of the farms.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
Surface Water and Flooding	Temporary erosion and sediment control structures, such as hay bales and silt fencing, will be used during construction and regularly maintained to prevent soil loss and sediment-laden runoff.	Not triggered		Assessed as part of previous audit.
	All clean extraneous surface water from upslope will be diverted around areas of disturbance.	Not triggered		Assessed as part of previous audit.
	The stormwater management system described in Section 3.12 (of the EIS) will be constructed and appropriately maintained.	Compliant	Site inspection	Refer to Condition B39 and EPL Condition L4.3.
	Staff members will be instructed in the proper use and handling of all chemicals used on-site. If appropriate, this will include completion of training such as SMARTtrain or ChemCert (or similar).	Compliant		Refer to Condition B22.
	All chemical use will be undertaken in full compliance with the relevant statutory requirements, including the <i>Pesticides Act 1999</i> .	Not verified		The audit did not verify procedures for chemical application or observe any chemical handling to determine compliance with this condition.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Wastewater generated by the on-site staff amenities and accommodation will be appropriately treated and disposed of via on-site wastewater management systems installed and operated in accordance with the requirements of Council and relevant standards/guidelines.	Not verified	Audit interviews	Refer to Condition B44. ProTen advised that the onsite wastewater treatment systems were being maintained for treatment of sewage from amenities and farm managers residences and were being irrigated on site.
Flooding	Habitable finished floor levels within farm managers' accommodation will be set at a minimum of 500 mm above adjacent ground level to reduce the likelihood of floodwater ingress to buildings.	Compliant		Refer to Condition B35.
	Finished floor levels of the poultry sheds will be set at a minimum of 300 mm above adjacent ground level to reduce the likelihood of floodwater ingress to buildings.	Compliant		Refer to Condition B34.
	The flood management plan described in Section 6.5.6 (of the EIS) will be implemented where necessary.	Not triggered		ProTen advised that there have not been any flood events during the audit period.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
Groundwater	Groundwater wells will be designed by a suitably qualified engineer or hydrogeologist, and the design and construction will be undertaken in accordance with the <i>Minimum Construction Requirements for Water Bores in Australia</i> (National Uniform Drillers Licensing Committee, 2012). The installation of the wells should include normal Development practice, including a commissioning test on the well.	Not triggered		Refer to Condition B40.
	Monitoring of wells will comply with the existing WAL conditions.	Compliant		Refer to Condition B42. The Water Access Licence requires ProTen to monitor the volume extracted.
	There will be no on-site disposal of bird carcasses or associated waste in the event of a mass-mortality, unless directed to do so by the DPI.	Not triggered		ProTen advised that there have not been any mass-mortality events to trigger this condition.
Biodiversity	No disturbance will occur outside of the nominated disturbance footprint.	Not triggered	Audit interviews	There was no disturbance outside approved areas during the audit period.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Erosion and sediment control measures will be installed and maintained to prevent the erosion and sedimentation impact on any areas downstream supporting remnant vegetation.	Not triggered		Assessed as part of previous audit.
	Weed management practices will be implemented to minimise the spread of exotic species into natural areas within the site	Compliant	Site inspection Bedding delivery docket dated 23/09/2020 Training register, version 10.1	ProTen are managing the import and spread of weeds across the complex. Sighted bedding delivery docket dated 23/09/2020 which states the type of material, its source and which farm and shed it is delivered to. The form does not include a declaration that the material is weed free. ProTen advised that Farmers are responsible for maintenance of weeds on the leased areas. Farm Managers and Groundsman are responsible for weed control on site. Refer to Condition B22.
	A biodiversity offset strategy for the Project will be finalised in accordance with the actions detailed in Section 6.7.5 (of the EIS), in consultation with OEH and within 12 months of gaining Project Approval	Not triggered		Assessed as part of previous audit.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Landscape plantings will be established in accordance with the Landscaping Strategy contained in Section 3.13 of the EIS, which will increase the total area under vegetation within the locality, create habitat and increase the local biodiversity.	Not triggered		Assessed as part of previous audit. Refer to Condition B47.
Aboriginal Heritage	No disturbance will occur outside of the nominated disturbance footprint.	Not triggered		Refer to Conditions B49-B52.
	The three aboriginal sites identified on site will be fenced during construction activities. The hearth will remain fenced during operation of the poultry production complex.	Compliant		Refer to Condition B52.
	Should any Aboriginal artefact be uncovered all works will cease in that locale and the OEH will be notified. Works will only recommence when an appropriate and approved management strategy has been agreed to by all of the relevant stakeholders.	Compliant		Refer to Condition B54.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
Visual amenity	The luminaires on each poultry shed will be aimed downwards and only Section 6.10.3 switched on during loading-unloading and servicing activities outside of daylight hours and during heavy fog.	Compliant		Refer to Condition B46.
	The landscaping strategy described in Section 3.13 (of the EIS) will be implemented and maintained in order to improve the visual and environmental amenity of the poultry Development.	Not triggered		Assessed as part of previous audit. Refer to Condition B47.
Biosecurity and Poultry Disease	ProTen will meet all standards of care and management for animal health and welfare detailed in the <i>National Animal Welfare Standards for the Chicken Meat Industry</i> (Barnett et al, 2008).	Compliant		Refer to Condition B8.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	ProTen will implement a suite of biosecurity measures in accordance with the <i>National Farm Biosecurity Manual for Chicken Growers</i> (Australian Chicken Meat Federation 2010). A copy of this manual will be kept at the Development site and staff will be provided with training in the relevant parts of the Manual.	Compliant	Quarantine Risk Order By Area dated 27/11/2020 Baiada biosecurity declaration form Site inspection Audit interviews	Refer to Condition B8 and B41. ProTen implement a range of biosecurity protocols for staff, visitors and contractors including: <ul style="list-style-type: none"> • Baiada biosecurity declaration prior to arriving at site • Employee, contractor and visitor induction • Wheel wash and foot bath at the entrance to each farm • Small plant is sanitised before entering each farm • Baiada vet oversees operations at each of the ProTen farms, health of chickens and movements of contractors e.g. catch crews. Sighted Quarantine Risk Order By Area dated 27/11/2020 which identifies the date the first shed was placed, the age of birds at the date of the report and instructions for personnel movement to manage risk of disease spread.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	In the unlikely event of a major disease outbreak, the EPA and DPI will be contacted as soon as the breakout is suspended. Immediate measures will be implemented to isolate the infected PPU site(s), effect strict quarantine procedures to prevent the spread of the disease, and notify all relevant stakeholders. Where permitted, urgent ring vaccination of flocks within the controlled area will be organised.	Compliant	Audit interviews	<p>ProTen advised that there has not been a major disease outbreak during the audit period to trigger this condition. ProTen farms have been affected by Infectious Laryngotracheitis (ILT) and there was a minor outbreak at the complex in 2019, however there have been no cases for 12 months.</p> <p>The outbreak was reported to DPI by Baiada. Even with ILT, birds are grown through to production. ProTen strengthened their biosecurity practices as a result of the outbreak including staff get changed on farm before and after each shift, all uniforms are maintained on farm and washed on site to prevent cross contamination, and additional sanitation was undertaken between the infected and the next production cycle. Following the outbreak, the next production cycle of birds were vaccinated through the water lines.</p>
	Upon confirmation that it is an exotic disease outbreak and immediate slaughter of farm stock is necessary, slaughter will be managed by the DPI in co-ordination with the EPA and technical service units of the poultry industry. The birds will be slaughtered within the poultry sheds.	Not triggered	Audit interviews	ProTen advised that this condition has not been triggered as there has not been an exotic disease outbreak that required slaughter.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	If ProTen's preferred option of disposal of infected birds at Baiada's protein recovery plant cannot be realised for various reasons such as quarantine requirements, disposal of diseased poultry via in-shed composting, or offsite burial at Jeanella will be undertaken in consultation with the DPI and EPA.	Not triggered		All dead birds during the audit period have been transported to Baiada's rendering plant in Griffith for disposal.
Waste Management	No on-site stockpiling or disposal of waste materials will occur.	Compliant		Refer to Condition B19.
	Day to day general waste will be placed into enclosed skips and removed from each PPU site by a licensed contractor on a regular basis.	Compliant		Refer to Condition B17.
	Chemical Containers - a chemical supply company will be engaged to provide a chemical delivery and pickup service direct to the Development site. At each delivery of new chemical supplies, empty chemical containers will be retrieved by the chemical company for recycling or appropriate disposal.	Compliant		Refer to Conditions B17 and B22.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Poultry litter will be promptly removed from the sheds and transported off-site in covered trucks by an approved contractor at the end of each production cycle during the clean-out phase.	Compliant	Site inspection	Baiada manage the clean out of sheds at the end of each production cycle and remove spent poultry litter offsite. During the site audit a contractor arrived on one of the farms to remove spent litter from the sheds.
	Dead birds will be collected from the poultry sheds on a daily basis and stored in on-site chillers for daily removal to Baiada's rendering plant near Hanwood on Kidman Wav.	Compliant		Refer to Condition B17.
Greenhouse Gas and Energy Efficiency	Low lux internal shed lighting will be installed within the poultry sheds.	Compliant		Refer to Condition B48.
	External shed lighting will only be used when necessary during times of low light and/or heavy fog.	Compliant		Refer to Condition B46.
	The integrity of the poultry sheds will be regularly checked in order to identify and rectify any air leaks, which place additional load on ventilation fans.	Compliant	Audit interview Shed Clean Out Audit dated 21/07/2020	ProTen advised that reports are completed during clean out of sheds following a production cycle. The reports note condition of the sheds and any repairs required. Sighted Shed Clean Out Audit dated 21/07/2020 which noted that some pegs in the walls needed to be fixed.
	Ventilation fans and heaters will be regularly maintained and serviced to ensure optimal performance and efficiency.	Compliant		Refer above conditions re: Air Quality and Odour.

Aspect/Commitments				
Issue	Commitment	Compliance	Evidence	Audit Findings
	Automatic control systems will continuously monitor internal shed lighting, temperature, humidity and static pressure, and adjust the ventilation to suit conditions resulting in less energy to regulate the internal shed conditions.	Compliant	Site inspection Audit interviews	Refer to Condition B48. ProTen explained the controls located in each shed which monitor temperature, humidity, atmospheric pressure, ventilation and lighting to regulate conditions for the birds.

Table D-5 EPL 20748

EPL 20748										
Condition No.	Condition	Compliance	Evidence	Audit Findings						
A1.1	<p>What the licence authorises and regulates</p> <p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Livestock intensive activities</td> <td>Bird accommodation</td> <td>> 1000 T accommodation capacity</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Livestock intensive activities	Bird accommodation	> 1000 T accommodation capacity	Compliant	<p>Site inspection</p> <p>Audit interviews</p> <p>Annual Reviews 2017/18, 2018/19 and 2019/20</p>	<p>ProTen are conducting intensive poultry production at a scale of greater than 1000 tonnes. The ProTen Development Consent permits the house of 3.92 million birds which is in line with the scale of activity specified in EPL 20748. The five farms were inspected during the audit.</p>
Scheduled Activity	Fee Based Activity	Scale								
Livestock intensive activities	Bird accommodation	> 1000 T accommodation capacity								
A2	Premises or plant to which the licence applies									
A2.1	<p>The licence applies to the following premises:</p> <table border="1"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>NARRANDERA POULTRY PRODUCTION COMPLEX</td> </tr> <tr> <td>STURT HIGHWAY</td> </tr> <tr> <td>UROLY</td> </tr> <tr> <td>NSW 2700</td> </tr> <tr> <td>LOT 1 DP 750898, LOT 41 DP 750898, LOT 42 DP 750898, LOT 44 DP 750898, LOT 45 DP 750898, LOT 54 DP 750898</td> </tr> </tbody> </table>	Premises Details	NARRANDERA POULTRY PRODUCTION COMPLEX	STURT HIGHWAY	UROLY	NSW 2700	LOT 1 DP 750898, LOT 41 DP 750898, LOT 42 DP 750898, LOT 44 DP 750898, LOT 45 DP 750898, LOT 54 DP 750898	Compliant	Site inspection	<p>The ProTen Complex is located on the Sturt Highway, Euroley between Narrandera and Darlington Point. This is the site that the audit was undertaken on.</p>
Premises Details										
NARRANDERA POULTRY PRODUCTION COMPLEX										
STURT HIGHWAY										
UROLY										
NSW 2700										
LOT 1 DP 750898, LOT 41 DP 750898, LOT 42 DP 750898, LOT 44 DP 750898, LOT 45 DP 750898, LOT 54 DP 750898										
A3	Other activities									
A3.1	<p>The licence applies to all other activities carried on at the premises, including:</p> <table border="1"> <tbody> <tr> <td>Ancillary Activity</td> </tr> <tr> <td>Waste storage</td> </tr> </tbody> </table>	Ancillary Activity	Waste storage	Compliant		<p>Refer to Conditions B17-B21.</p>				
Ancillary Activity										
Waste storage										
A4	Information supplied to the EPA									

EPL 20748

Condition No.	Condition	Compliance	Evidence	Audit Findings
A4.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence. 	Compliant	<p>Site inspection</p> <p>Audit interviews</p>	<p>ProTen were carrying out the works and activities in accordance with the licence including intensive poultry production and waste storage.</p>
2	Discharges to air and water and applications to land			
P1	Location of monitoring/discharge points and areas			
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Compliant	<p>Annual Review 2017/18, 2018/19 and 2019/20</p>	<p>ProTen are conducting monitoring at the locations identified in Conditions P1.2 and P1.3.</p>
P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Note		

Condition No.	Condition	Compliance	Evidence	Audit Findings																								
	<table border="1"> <thead> <tr> <th colspan="4" data-bbox="405 312 1133 336"><i>Water and land</i></th> </tr> <tr> <th data-bbox="405 339 488 376">EPA Identification no.</th> <th data-bbox="499 339 685 376">Type of Monitoring Point</th> <th data-bbox="696 339 853 376">Type of Discharge Point</th> <th data-bbox="864 339 1133 376">Location Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="405 379 488 504">2</td> <td data-bbox="499 379 685 504">Surface water quality monitoring</td> <td data-bbox="696 379 853 504"></td> <td data-bbox="864 379 1133 504">Sediment dam No 1 at PPU 1 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520</td> </tr> <tr> <td data-bbox="405 507 488 632">3</td> <td data-bbox="499 507 685 632">Surface water quality monitoring</td> <td data-bbox="696 507 853 632"></td> <td data-bbox="864 507 1133 632">Sediment dam No 3 at PPU 2 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520</td> </tr> <tr> <td data-bbox="405 635 488 759">4</td> <td data-bbox="499 635 685 759">Surface water quality monitoring</td> <td data-bbox="696 635 853 759"></td> <td data-bbox="864 635 1133 759">Sediment dam No 1 at PPU 3 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520</td> </tr> <tr> <td data-bbox="405 762 488 887">5</td> <td data-bbox="499 762 685 887">Surface water quality monitoring</td> <td data-bbox="696 762 853 887"></td> <td data-bbox="864 762 1133 887">Sediment dam No 3 at PPU 4 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520</td> </tr> </tbody> </table>	<i>Water and land</i>				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	2	Surface water quality monitoring		Sediment dam No 1 at PPU 1 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520	3	Surface water quality monitoring		Sediment dam No 3 at PPU 2 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520	4	Surface water quality monitoring		Sediment dam No 1 at PPU 3 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520	5	Surface water quality monitoring		Sediment dam No 3 at PPU 4 identified in Figures 1 & 2 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520			
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12	Groundwater quality monitoring	Piezometer labelled 'Piezo 6' identified in Figure 1 of the document titled "Narrandera Poultry Production Complex - Water Management Plan" dated March 2016, kept on EPA file EF16/1645 at DOC16/59520																							
P1.3	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	Note																							

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Condition No.	Condition	Compliance	Evidence	Audit Findings						
	<table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Meteorological Station</td> <td>Meteorological Station is identified in Figure 2 of the Operational Environmental Management Plan dated 19 April 2016 prepared for the Narrandera Poultry Production Complex.</td> </tr> </tbody> </table>	EPA identification no.	Type of monitoring point	Location description	1	Meteorological Station	Meteorological Station is identified in Figure 2 of the Operational Environmental Management Plan dated 19 April 2016 prepared for the Narrandera Poultry Production Complex.			
EPA identification no.	Type of monitoring point	Location description								
1	Meteorological Station	Meteorological Station is identified in Figure 2 of the Operational Environmental Management Plan dated 19 April 2016 prepared for the Narrandera Poultry Production Complex.								
3	Limit conditions									
L1	Pollution of waters									
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Not triggered	Annual Review 2017/18, 2018/19 and 2019/20 Audit interviews	ProTen have not reported any pollution of waters during the audit period.						
L2	Waste									
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Compliant		Refer to Conditions B17 and B18.						
L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.	Note								
L3	Noise limits									
L3.1	Noise from the premises must not exceed an Leq (15 minute) noise emission criterion of 35dB(A), except as expressly provided by this licence.	Compliant		Refer to Condition B32.						
L3.2	Noise from the premises is to be measured at the nearest sensitive receptor not associated with the premises to determine compliance with this condition.	Not triggered		Refer to Condition B32.						
L3.3	The noise emission limits identified in this licence apply under all meteorological conditions except: a) during rain and wind speeds (at 10 m height) greater than 3 m/s; and b) under "non-significant weather conditions".	Note		Refer to Condition B32.						

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Condition No.	Condition	Compliance	Evidence	Audit Findings
	Note: Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.			
L4	Other limit conditions			
L4.1	The total number of birds accommodated at the premises, at any one time, must not exceed 3,920,000.	Compliant	Annual Review 2017/18, 2018/19 and 2019/20	Refer to Condition A6.
L4.2	All wastewater treatment, storage and terminal ponds must have a minimum pond base and wall permeability of 1x10 ⁻⁹ metres per second or be artificially lined with an impermeable high-density polyethylene liner.	Compliant		Refer to Condition B39.
L4.3	All wastewater collection ponds must be designed, constructed and maintained to accommodate the stormwater runoff volume generated in a 1 in 20 year, 24 hour rainfall event using a volumetric runoff coefficient of 0.8.	Compliant	Narrandera Poultry Production Farm Water Management Plan, Version 3.0, May 2020, SLR Consulting	The Water Management Plan reports that the surface water management systems across the Complex have a combined capacity of 28,000 m ³ which is equivalent to 170% of the capacity required to contain runoff from a 1 in 100 year 72 hour rainfall event. This exceeds the requirements of Condition L4.3.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
4	Operating conditions			
O1	Activities must be carried out in a competent manner			
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <ul style="list-style-type: none"> a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	Compliant	<p>Employee Induction Training register version 10.1 Site inspection</p>	<p>ProTen conduct their activities in a competent manner:</p> <ul style="list-style-type: none"> • All personnel working on site and contractors undergo Employee Induction • ProTen maintain a training register to identify training needs, record completed training and refresher dates. Training reviewed included ChemCert training for Farm Managers to manage water disinfection and weed control <p>There were some issues identified with regards to storage of chemicals at the farms for water treatment, refer to Condition B22.</p>
O2	Maintenance of plant and equipment			
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ul style="list-style-type: none"> a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner. 	Compliant	<p>Training register version 10.1 Generator Power invoice</p>	<p>ProTen maintain plant and equipment used at the premises. ProTen maintain all fixed and mobile plant on site while light vehicles are serviced offsite.</p>

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Condition No.	Condition	Compliance	Evidence	Audit Findings
			dated 19/11/2019 Codemo Machinery Services invoice dated 10/02/2020 Codemo Machinery Services invoice dated 28/04/2020 Codemo Machinery Services invoice dated 25/05/2020 Griffith Isuzu Ute invoice dated 1/09/2020 Risk Management Planner for Farm 76 Email to David Baxter to review Andrew Simpson's driver licence	Sighted service and repair records as follows: <ul style="list-style-type: none"> • Generator Power invoice dated 19/11/2019 for service on two Himoina HFW-160 T5 and two HFW-350 T5 • Codemo Machinery Services invoice dated 10/02/2020 for 1800 hour service on Kubota RTV • Codemo Machinery Services invoice dated 28/04/2020 for a Kubota Tractor to address noise issues • Codemo Machinery Services invoice dated 25/05/2020 for a Kubota RTV issue with the ignition switch • Griffith Isuzu Ute invoice dated 1/09/2020 for D-Max Ute for replacement key

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Condition No.	Condition	Compliance	Evidence	Audit Findings
				<p>Sighted Risk Management Planner for Farm 76 which is reported on every month. The planner lists all jobs required to be done and when they are scheduled for each Farm. This includes plant, property, maintenance schedules, inspections of plant.</p> <p>ProTen advised that they conduct daily pre-start for all vehicles.</p> <p>ProTen conduct Licence checks for all personnel. Regional Operations Manager receives automatic emails to review staff licences. Sighted email to David Baxter to review Andrew Simpson's driver licence.</p> <p>ProTen conduct competency assessments for a range of plant and activities. Competency is signed off by the Farm Manager. Records of competency are captured in the training register however records of competency assessments are kept at each farm.</p>

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Condition No.	Condition	Compliance	Evidence	Audit Findings
				Sighted training register version 10.1 which includes entry for Andrew Simpson, listing him as “under training”. Entry included competencies for “operating tractors” and “operating RTV”, the record includes the date of training completion.
O3	Dust			
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Compliant		Refer to Condition B6.
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Compliant	Site inspection	Refer to Condition B7. Trucks moving around the complex were observed to have loads covered at all times.
O4	Processes and management			
O4.1	There must be a minimum of 36 hours between the commencement of broiler accommodation in each Poultry Production Unit.	Non-compliant		Refer to Condition A6.
O5	Waste management			
O5.1	The premises must: a) Have sufficient on site chillers to store all general bird mortalities (~1% of birds on site at any time); b) Remove all mortalities found in the sheds immediately to the chillers; and c) Ensure that when chillers are in use they are kept at < 4 degrees Celsius.	Compliant	Audit interviews	ProTen maintain two freezers for the storage of dead birds although they advised that they normally only need one freezer to be operating. ProTen maintain the temperature in the freezers between -5 and -10 degrees Celsius.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
				The freezers were not inspected as part of the 2020 audit.
O5.2	Any bird mortalities generated at the premises are not permitted to be buried on site. Bird mortalities must be disposed or processed at a facility that can lawfully receive the waste Note: This condition does not apply if the applicant is directed by the NSW Department of Primary Industries to bury the birds on site.	Compliant		Refer to Condition B20.
O5.3	All waste water and contaminated stormwater must be captured in a waste water collection system and be prevented from leaving the premises. Note: This condition does not apply in rainfall events which create greater volumes of stormwater than an event with an average recurrence interval of a local 1 in 20 year, 24 hour rain event.	Compliant	Site inspection Audit interviews Annual Review 2017/18, 2018/19 and 2019/20	ProTen maintain surface water management systems at each of the farms to capture dirty water generated by the Complex and prevent it from leaving the site. There have been no instances of wastewater and contaminated stormwater leaving the site.
5	Monitoring and recording conditions			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Compliant	Aitken Rowe Testing Laboratories Pty Ltd Chain of Custody forms dated 5/06/2018, 7/06/2019 and 24/03/2020	ProTen maintain monitoring records as required by the EPL. Sighted monitoring records from the audit period. Sighted Aitken Rowe Testing Laboratories Pty Ltd Chain of Custody forms dated 5/06/2018, 7/06/2019 and 24/03/2020.

EPL 20748				
Condition No.	Condition	Compliance	Evidence	Audit Findings
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant	Aitken Rowe Testing Laboratories Pty Ltd Chain of Custody forms dated 5/06/2018, 7/06/2019 and 24/03/2020	ProTen provided copies of Aitken Rowe COCs from 2017-2020 to demonstrate maintenance of records for the required period in a legible form.
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Compliant	Aitken Rowe Testing Laboratories Pty Ltd Chain of Custody forms dated 5/06/2018, 7/06/2019 and 24/03/2020	The Aitken Rowe COCs include the information required by Condition M1.3 including date, time, sample point and initials of the sample collector. The COCs would benefit from the sampler including their full name for ease of reference. Recommendation 5: ARTL personnel conducting water quality sampling to include full name on COC.
M2	Requirement to monitor concentration of pollutants discharged			
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Compliant	Aitken Rowe Testing Laboratories Pty Ltd Chain of Custody forms dated 5/06/2018, 7/06/2019 and 24/03/2020	A review of the Aitken Rowe COCs showed that monitoring is being conducted for the parameters specified in Condition M2.1.

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Condition No.	Condition	Compliance	Evidence	Audit Findings																																																																																				
			Annual Returns 2017/18, 2018/19 and 2019/20	The annual returns for the audit period report that while annual monitoring is required, monitoring has been conducted quarterly.																																																																																				
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M3	Testing methods – concentration limits																																																																																							
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Compliant		Refer to M2.2. ProTen utilise Aitken Rowe Testing Laboratories Pty Ltd to conduct sampling and analyse samples.																																																																																				

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Condition No.	Condition	Compliance	Evidence	Audit Findings																																			
M4	Weather monitoring																																						
M4.1	<p>At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.</p> <table border="1"> <thead> <tr> <th colspan="5">POINT 1</th> </tr> <tr> <th>Parameter</th> <th>Sampling method</th> <th>Units of measure</th> <th>Averaging period</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Wind Speed at 10 metres</td> <td>AM-2 & AM-4</td> <td>metres per second</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Wind Direction at 10 metres</td> <td>AM-2 & AM-4</td> <td>Degrees</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Temperature at 10 metres</td> <td>AM-4</td> <td>degrees Celsius</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Temperature at 2 metres</td> <td>AM-4</td> <td>degrees Celsius</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Rainfall</td> <td>AM-4</td> <td>millimetres per hour</td> <td>15 minutes</td> <td>Continuous</td> </tr> </tbody> </table>	POINT 1					Parameter	Sampling method	Units of measure	Averaging period	Frequency	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	15 minutes	Continuous	Temperature at 10 metres	AM-4	degrees Celsius	15 minutes	Continuous	Temperature at 2 metres	AM-4	degrees Celsius	15 minutes	Continuous	Rainfall	AM-4	millimetres per hour	15 minutes	Continuous	Compliant	Audit interviews	Refer to Condition B1. The weather station at the complex monitors the parameters specified in Condition M4.1 in accordance with the specified sampling methods and units of measure.
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M5	Recording of pollution complaints																																						
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Not triggered		ProTen have not received any complaints during the audit period.																																			
M5.2	<p>The record must include details of the following:</p> <ol style="list-style-type: none"> the date and time of the complaint; the method by which the complaint was made; any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; the nature of the complaint; the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken. 	Not triggered		Refer to Condition M5.1.																																			
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Not triggered		Refer to Condition M5.1.																																			
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not triggered		Refer to Condition M5.1.																																			
M6	Telephone complaints line.																																						

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Condition No.	Condition	Compliance	Evidence	Audit Findings
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant	ProTen website	ProTen maintain a telephone complaints line for their operations. A Free call Environmental 1800 number is advertised on their website.
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Non-compliant	ProTen website	The website does not make it clear that the Freecall Environmental number is a complaints line. ProTen could either include a note under the phone number on the website to highlight that this is for complaints or they could advertise it in community newsletters if these are produced. Corrective Action 6: Notify the public that the Freecall Environmental number is a complaints line.
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Note		This condition is not relevant to the audit period as the licence was issued on 22/04/2016.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
6 Reporting conditions				
R1	Annual return documents			
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, 7. a Statement of Compliance - Environmental Management Systems and Practices; and 8. a Statement of Compliance - Environmental Improvement Works. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	Compliant	Annual Returns 2017/18, 2018/19 and 2019/20	ProTen have provided Annual Returns for each reporting period that makes up the audit period. The POEO public register reports that annual returns have been received for each year of operation in the required timeframes. The Annual Returns include all of the information required by this condition.
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	Compliant		Refer to Condition R1.1.
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. 	Not triggered		ProTen have not transferred the licence to a new licensee.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not triggered		ProTen have not surrendered or revoked the licence.
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant		Refer to Condition R1.1.
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Compliant	Annual Returns 2017/18, 2018/19 and 2019/20	ProTen maintain copies of the Annual Returns.
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	Annual Returns 2017/18, 2018/19 and 2019/20	The Annual Returns have been signed off by the licence holder, sighted Managing Director, Director, Company Secretary and Chief Financial Officer sign off in Annual Returns for the audit period.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
R2	Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not triggered		There have been no incidents that threatened or caused material harm to the environment during the audit period to trigger condition R2.
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Not triggered		Refer to Condition R2.1.
R3	Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not triggered		ProTen have not received any requests for a written report from the EPA.
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not triggered		Refer to Condition R3.1.
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event;	Not triggered		Refer to Condition R3.1.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
	<p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>			
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not triggered		Refer to Condition R3.1.
7	General conditions			
G1	Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant	Site inspection Audit interviews	A copy of the licence is kept at the premises.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not triggered		ProTen advised that they have not had a request for a copy of their licence from the EPA.
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Not triggered		ProTen advised that they have not had an employee or agent of the licensee request to see a copy of the licence.

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Condition No.	Condition	Compliance	Evidence	Audit Findings
8	Special conditions			
E1	Odour validation audit			
E1.1	<p>When directed by the EPA, the licensee must submit an Odour Validation Report (OVR) to the EPA. The OVR must:</p> <ul style="list-style-type: none"> • Be completed by a suitably qualified independent expert experienced in the characterisation and treatment of odours from chicken broiler farms; • Include a summary of any odour complaints received and actions taken to reduce odour emissions where complaints are verified; • Where possible include a field odour survey that characterises the frequency, intensity, duration, offensiveness, location and extent of off-site odours; • Benchmark the design and management practices at the premises against industry best practice for minimising odour emissions, including investigation of newly developed and emerging control technology; • Within six (6) weeks after being directed by the EPA, present a report to the EPA that determines compliance with Section 129 of the Protection of the Environment Operations Act 1997 and recommend if additional mitigation measures are required; • Consider odour generation associated with stocking densities, rates and PPU population practices outlined in condition A6 of the development consent; • Where additional odour control measures are recommended, or odour issues are identified as being from stocking density, rates or PPU population practices, appropriate mitigation measures or management practices must be nominated to ensure that odour is minimised as far as practicable; and • Any odour mitigation measures nominated must include a timetable for implementation. 	Not triggered		Refer to Development Consent Condition B4.

Appendix E – Photo Log

Audit Details

Project Number: 12539749

Project Name: Independent Environmental Audit 2020

Site Name: Narrandera Poultry Production Complex

Client: ProTen Holdings Pty Ltd

Start Date: November 20, 2020 **Start Time:** 09:28

End date: November 20, 2020 **End time:** 17:00

Lead Auditor: Demelza Scott

Audit Team: Grace Rogers David Baxter Jade Sluggett

Type of Audit: Environment

Audit Observations

Location: Workshop

[Photographs for this Observation](#)



Farm 79 – storeroom including unbanded liquid chemicals



Farm 79 - store at workshop containing unbanded liquid chemicals



Farm 79 – store at workshop containing paper currently being used for preparation of sheds

Location: Chemical storage

Photographs for this Observation



Farm 79 - empty washed chemical drums awaiting return to Griffith Feed and Grain



Farm 79 – Safety signage and fire protection on chemical storage shed



Farm 79 - Chlorine drums on banded pallet in chemical storage shed. Bunded is overloaded with chemical drums too close to the edge of the bund.



Farm 79 - Other water treatment chemicals on banded pallet in chemical storage shed. Spill kit in yellow bin. Red safety gloves next to spill kit. Evidence of spills on ground. Bund is overloaded with drums too close to the edge of the bund and stacked three high in places.



Farm 79 - Connection on water tanks for RFS to connect to for fire response

Location: Vegetation buffers

Photographs for this Observation



Farm 79 - Vegetation buffer



Farm 76 – Vegetation buffer

Location: Bulk chemical storage

Photographs for this Observation



Farm 79 – Bunded diesel storage with fire protection. Does not have GHS safety signage for diesel.



Farm 79 - LPG storage

Location: Surface water management system

Photographs for this Observation



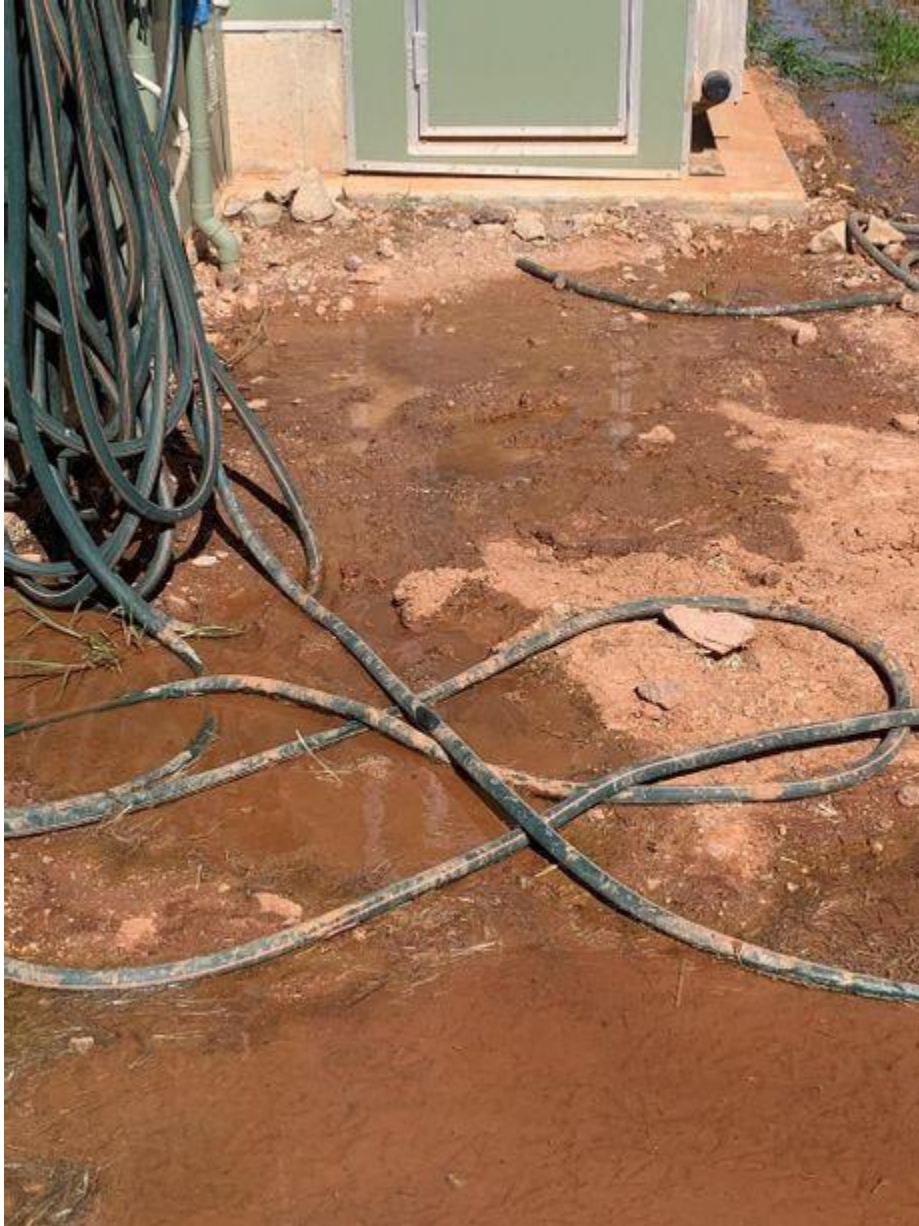
Farm 79 – Sediment basin full



Farm 78 – Sediment basin near empty with signs of erosion in background of photo.

Location: Poultry sheds

[Photographs for this Observation](#)



Farm 79 - Mains leak outside poultry sheds



Farm 79 - Spill of feed under silo while in process of setting up sheds.



Farm 79 – Delivery of bedding with covered load.

Location: Aboriginal heritage

[Photographs for this Observation](#)



Farm 78 – Scar tree site showing signage and fencing

GHD

270 Summer Street

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21/https://projectsportal.ghd.com/sites/pp01_01/narranderapoultryind/ProjectDocs/12539749-REP-ProTen Narrandera Poultry Development_Independent Environmental Audit Report 2020.docx

Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	D Scott	M Kiejda		M Kiejda		02/02/2021

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