

19 February 2021

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Department of Planning, Industry and Environment

Attention: Team Leader - Compliance

Dear Katrina O'Reilly

**Narrandera Poultry Production Complex
Independent Environmental Audit 2020
Response to Recommendations**

In accordance with Condition C12 of SSD 6882, ProTen Holdings Pty Ltd (ProTen) commissioned and paid the full cost of an Independent Environmental Audit of the Narrandera Poultry Production Complex at Euroley, NSW.

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.

The Independent Environmental Audit was led by GHD Pty Ltd during November 2020, with final audit report completed in February 2021 (the Audit Report).

In accordance with Condition C13 of SSD 6882, please find attached ProTen's responses to recommendations in the Audit Report (**Attachment 1**).

Yours sincerely



Checked/
Authorised by:

ATTACHMENT 1 – RESPONSE TO RECOMMENDATIONS

Reference No.	Consent Condition/ Commitment	Non-compliance Risk Rating	Corrective Action	ProTen/SLR Response	Timing of Actions
CA1	Development consent, Condition A6	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 Risk Rating - Low	ProTen to engage with Baiada to review planning of population of the complex to maintain compliance with Condition A6.	ProTen to hold a meeting with Baiada to address the obligations under Condition A6 to have 36 hours in between commencement of placement of each successive farm on the complex and also to have placement of the complex over no less than 10 days.	Meeting to be held with Baiada February 2021. Ongoing monitoring of placement schedules to be completed by ProTen and discussion with Baiada where this condition may not be met.
CA2	Development consent, Condition B22	ProTen are not storing chemicals in accordance with the Dangerous Goods Code or the NSW Work Health Safety Regulations Risk Rating – Low	Reduce volume of water treatment chemicals maintained in storage sheds in line with capacity of pallet bunds.	The farm has a maximum number of drums that can be stocked on the farm listed in the Hazardous Substance Register. The volume of chemicals has been reduced. Further reduction to the overall volume of chemicals in this storage area will be undertaken by moving Sodium Hypochlorite to an external storage shed.	The reduction in the volume of chemicals has already been undertaken, and a maximum stocking density put in place. Weekly checking of storage areas to ensure ongoing compliance. Building of an external storage area for Sodium Hypochlorite requested in 21/22 budget for each PPU.
CA3	Development consent, Condition B22	ProTen are not storing chemicals in accordance with the Dangerous Goods Code or the NSW Work Health Safety Regulations Risk Rating – Low	Review bunding of bulk diesel tanks on each farm to ensure the bunds would contain spills from the elevated tanks.	ProTen to investigate modification options to the current bunding area to ensure spills from the elevated tanks are contained within the bund.	Investigation for modification options and costing to be undertaken by 30 March 2021. Completion of works to be budgeted for in 21/22 and completed by September 2021.

Reference No.	Consent Condition/ Commitment	Non-compliance Risk Rating	Corrective Action	ProTen/SLR Response	Timing of Actions
CA4	Development consent, Condition B22	ProTen are not storing chemicals in accordance with the Dangerous Goods Code or the NSW Work Health Safety Regulations Risk Rating - Low	Ensure that all personnel are included in the training register.	Matthew Clough was listed on the main training register but has not been listed on the external training register tab. Training register to be updated with Matthew Clough training details	Training register is to be updated with Matthew Cloughs external training records by 28 February 2021
CA5	Development consent, Condition C14	The OEMP on the website does not include the 2020 updated Water Management Plan. <ul style="list-style-type: none"> 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. Risk Rating - Low	Ensure that all information required by Condition C14 is published on the ProTen website.	The OEMP is updated with the 2020 updated Water Management Plan. Monitoring results for the Complex are to be updated to January 2021 and uploaded onto the website. This is to be completed monthly. The complaints register is to be uploaded onto the website and updated monthly.	OEMP updated with 2020 Water Management plan and uploaded to the ProTen website. SLR in process of updating monitoring results from Aitkin Rowe onto website February 2021. Complaints register to be updated and placed on website by March 2021.
CA6	EPL 20748, Condition M6.2	The website does not make it clear that the Free call Environmental number is a complaints line. Risk Rating - low	Notify the public that the Freecall Environmental number is a complaints line.	The freecall environmental number is to be displayed at the entrance to the farms and listed as a Environmental hotline	Sign to be quoted and ordered from Janets Design and Signs and be put in place by end of March 2021.