

Independent Environmental Audit

Narrandera Poultry Production Complex

Prepared for:

ProTen Pty Ltd

Narrandera NSW 2700



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Integrated Environmental Management Australia Pty LTD

ABN 32 622 237 870

PO Box 3161, MEREWETHER NSW 2291 AUSTRALIA

E: admin@iema.com.au

T: 0409 288 909 | W: www.iema.com.au

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1. INTRODUCTION

1.1. Background

ProTen's Narrandera Poultry Production Complex (Narrandera) is located in the Riverina region of south-western NSW, within the Narrandera local government area, approximately 26 km west of the township of Narrandera. The complex is removed from any urban areas and there is a low density of surrounding residential dwellings with eleven privately-owned residences identified in the neighbouring and nearby properties. Under State Significant Development (SSD) 6882, Narrandera Farm comprises five poultry production units (PPU) or farms, where broiler birds are grown for human consumption. As seen in **Figure 1: Development Layout (sourced from Operational Environmental Management Plan, SLR 2021)**, each PPU comprises 16 tunnel-ventilated, fully enclosed climate-controlled poultry sheds, with associated support infrastructure and staff amenities. Each PPU has the capacity to house 49,000 birds. This equates to a PPU population of 784,000 birds and a total Development population of 3.92 million birds. The Complex has consent to operate 24 hours a day, seven days a week with majority of activities being carried out between 7:00 am and 7:00 pm.

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. IEMA was commissioned by ProTen and endorsed in advance by the NSW Department of Planning, Housing, and Infrastructure (DPHI), to conduct an Independent Environmental Audit of ProTen's compliance. This audit constitutes the third audit for the Complex. The following report presents the findings.

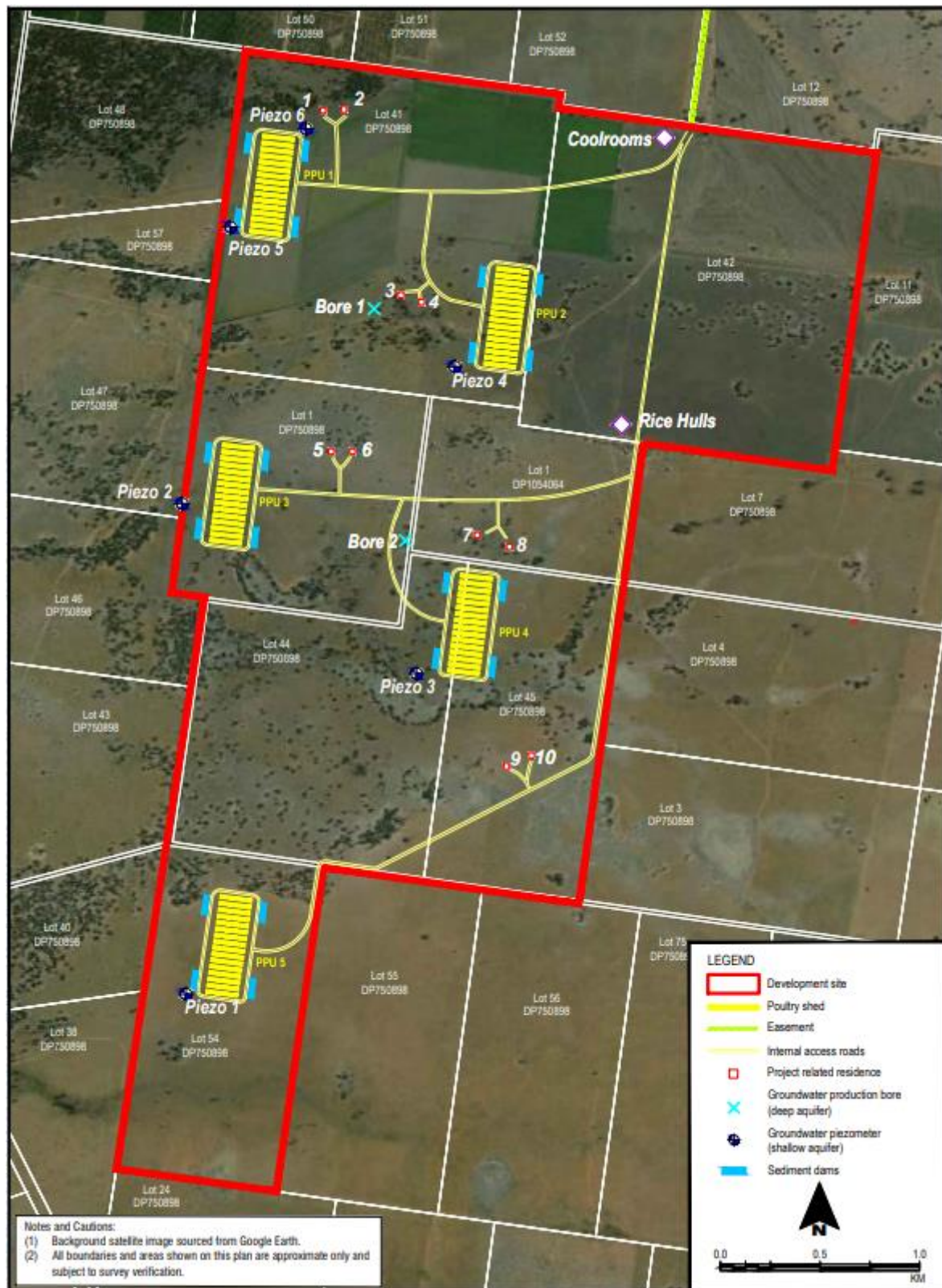


Figure 1: Development Layout (sourced from Operational Environmental Management Plan, SLR 2021)

1.2. Audit team

The DPHI (previously DPE) endorsed the IEA team in a letter dated 29/11/2023 (refer **Appendix A**). The experience and qualifications of each auditor are provided in **Table 1** below.

Table 1: Auditor Qualifications

Name and Position	Qualifications and Experience
Chris Jones Principal Environmental Consultant	Bachelor of Environmental Science, University of Newcastle Principal Environmental Auditor - Exemplar Global Accreditation 17 years of industry experience
Olivia O'Shannessy Environmental Consultant	Bachelor of Environmental Science and Management, University of Newcastle 3 years of industry experience

The main site contacts and their contact details for this IEA are provided in **Table 2**. Other site personnel who contributed to the IEA are included in **Section 2.4**.

Table 2: Key Site Contacts

Name and Position	Contact Details
Kathryn Singh National SHEQ Advisor	kates@proten.com.au

1.3. Audit objectives

The objectives of this IEA are to address the requirements of SSD 6882, as well as the Independent Audit Post Approval Requirements (PAR) (DPE, 2020). In accordance with the Independent Audit PAR the purpose of an Independent Audit is to obtain an independent and objective assessment of the environmental performance and compliance status of a project.

1.4. Audit scope

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 third audit for the Narrandera as required by Condition C12 of SSD 6882.

The audit scope included the following key approvals:

- SSD 6882 Consent, including Appendices.
- EPL 20748.
- Water Access Licences (WALs), volumes only.

The DPHI granted approval to extend the date for submission of this IEA Report.

1.5. Audit period

The IEA covers the period from 1 December 2020 to 12 December 2023. This period is based on the day following the final day of the previous audit period to the site inspection date of this IEA.

2. AUDIT METHODOLOGY

2.1. Selection and endorsement of audit team

As noted in **Section 1.1**, the DPHI endorsed the IEA team in a letter dated 29/11/2023 (refer to **Appendix A**). The IEA team are independent of ProTen as defined under Section 3.1.1 of the PAR (DPE, 2020). A Declaration of Independence is included as **Appendix D**.

2.2. Independent audit scope development

The scope of the IEA was developed in consultation with ProTen during the proposal phase and complies with the requirements of Condition C12 under SSD 6882, as well as the Independent Audit PAR (DPE, 2020).

Additionally, IEMA consulted with DPHI and various agencies during the early stages of the audit to seek input on any additional aspects that were requested to be included in the scope of the audit. This consultation is summarised in **Section 2.6** and **Section 3.7**.

2.3. Compliance evaluation

The methodology for evaluating compliance during the IEA consisted of the following key steps:

- Review of key documents from ProTen's website and provided by ProTen prior to the site visit.
- Consultation with relevant government agencies as per the PAR prior to the site visit.
- Meeting with key ProTen personnel and the site component of the IEA (site inspection).
- After the site visit, further review of the documentation outlined in **Section 3.1**.
- A round of client review of the draft IEA Report.

A large amount of evidence was viewed and collected as part of the IEA, including monitoring records, reports, and correspondence. While this key evidence has been referenced in this document, it has not been attached to this IEA report.

2.4. Site interviews

Site interviews were completed with Kate Singh during the site inspection. Outcomes from these interviews are included in **Section 3.12**. The auditor also spoke to each Farm Manager as well, visiting each PPU during the site inspection (refer to **Table 3**).

2.5. Site inspections

Olivia O'Shannessy (Assistant Auditor) visited the site on 12 December 2023 to complete the site inspection and verify field components of the audit. Findings from the site inspection are included in **Section 3.11**. Key site areas visited during the site inspection included:

- Site entrance, including gate with attached container with relevant compliance information;
- Each PPU, referred to as Farms 75-79 by ProTen staff;
- Former chiller area, now refuelling and storage;
- Rice hull storage shed;
- Meteorological station; and
- Fenced heritage sites.

Attendees at the site inspection are included in **Table 3**.

Table 3: Meeting Attendees

Name	Role and Company
Audit Meeting – 11 December 2023	
Kate Singh	SHEQ Manager, ProTen
Olivia O'Shannessy	Environmental Consultant as Assistant Auditor, IEMA
Site Inspection and Onsite Audit Meeting – 12 December 2023	
Kate Singh	SHEQ Manager, ProTen
Mohannad Suleimon	Farm Manager, Farm 75
Paul Hoffman	Farm Manager, Farm 76
Liza Hore	Farm Manager, Farm 77
Cory Hutchison	Farm Manager, Farm 78
Joshua Collier	Farm Manager, Farm 79
Matthew Clough	Grounds Maintenance
Olivia O'Shannessy	Assistant Auditor, IEMA

2.6. Consultation

In accordance with the PAR, IEMA sought confirmation from DPHI as to which agencies were required to be consulted with during the audit. As directed by DPHI, consultation was undertaken with the following agencies during the IEA:

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

The outcomes of this consultation are included in **Section 3.7**.

2.7. Compliance status descriptors

The terms used in the IEA to describe the status of compliance of the site with the relevant approval documentation are outlined in **Table 4**. These are requirements of the Independent Audit PAR (DPE, 2020).

Table 4: Compliance Assessment Criteria

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

3. AUDIT FINDINGS

3.1. Approvals and document list

Key approvals and documentation reviewed as part of the IEA included, but were not limited to, the following:

- Development Consent (SSD 6882) issued by DPE on 9 November 2015;
- Operational Environmental Management Plan (as per Condition C5);
- Waste Management Plan (Condition B21);
- Surface Water Management Plan (Condition B45);
- Groundwater Management Plan (Condition B45);
- Erosion and Sediment Control Plan (Condition B45);
- Flood Management Plan (Condition B36);
- Air Quality Management Plan (Condition B3);
- Traffic Management Plan (Condition B16);
- Emergency and Evacuation Plan (Condition B36);
- Landscape Management Plan (Condition B47);
- Annual Review reports;
- Environment Protection Licence (EPL 20748);
- Annual Returns;
- Water Access Licences;
- Euroley Poultry Production Complex SSD 6882 Environmental Impact Statement; and
- Environmental monitoring results, records, and reports.

3.2. Compliance performance

Non-compliances are outlined in **Section 3.4**. Refer to **Section 5** for overall performance. **Table 5** summarises the findings related to the SSD including the associated Management and Mitigation Measures.

Extraction volumes for WALs are reported in the Annual Review reports and were compliant inside this audit period.

Table 5: Summary Table of SSD Compliance

Compliance Status	SSD 8753	Percentage of total SSD conditions	SSD 8753 Appendix 1 – Management and Mitigation Measures	Percentage of total Appendix 1 conditions
Not Triggered	18	20%	6	10%
Compliant	56	64%	53	84%
Non-Compliant	14	16%	4	6%
Total	88		63	

3.3. Summary of Agency notices, Orders, Penalty Notices or Prosecutions

The following agency notices, orders, penalty notices or prosecutions were issued to during the audit period:

- Official Caution - Breach of Section 4.2(1)(B) of the Environmental Planning And Assessment Act 1979 from DPHI (at the time DPE) dated 26 August 2022.
 - Official Caution in response to failure to comply with the operational limits outlined in Condition A6, including subconditions a), d) and e), which was reported by ProTen in the Narrandera 2021-2022 Annual Review.
 - The Official Caution stated:

The department has assessed the breach in accordance with its Compliance Policy and the Attorney General's Caution Guidelines and determined to issue ProTen with an Official Caution for the breach. In reaching this decision, the department has considered the particulars of the breach set out above and the following matters:

 - *no known community complaints were received directly in relation to the breach;*
 - *no known impacts to the environment or human health occurred directly as a result of the breach; and*
 - *ProTen received no monetary benefit as a result of the breach.*
- Official Caution - Breach of Section 4.2(1)(B) of the Environmental Planning And Assessment Act 1979 from DPHI (at the time DPE) dated 22 September 2023.
 - Official Caution in response to failure to comply with the operational limits outlined in Condition A6, including subcondition a) and e), which was reported by ProTen in the Narrandera 2022-2023 Annual Review.

○ The Official Caution stated:

The breach has been assessed in accordance with the NSW Planning's Compliance Policy and the Attorney General's Caution Guidelines and it has been determined to issue ProTen with an Official Caution for the breach.

In reaching this decision, I have considered the particulars of the breach set out above and the following matters:

- no known community complaints were received directly in relation to the breach;*
- no known impacts to the environment or human health occurred directly as a result of the breach;*
- ProTen received no monetary benefit as a result of the breach; and*
- ProTen applied for a modification of placement limits, specified in Schedule 2, Condition A6.*

DPHI required no further actions regarding these non-compliances in this audit period. ProTen is expected to continue to consult with DPHI in the process of applying for a Modification as well as ProTen's broiler supplier/processor.

3.4. Non-compliances

A summary of non-compliances and recommendations identified during the audit is presented in **Table 6**. Note, the findings in the table below have been amended compared to the complete assessment findings in **Appendix D** to focus on the key non-compliant parts of the condition.

Table 6: Summary of Non-compliances

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
SSD 6882					
NC-1	A2	<p>The Applicant shall carry out the Development in accordance with:</p> <p>(a) State Significant Development Application SSD 6882;</p> <p>(b) Environmental Impact Statement, titled "Euroley Poultry Production Complex - SSD 6882" volumes one to three, prepared by SLR Consulting Australia Pty Ltd, dated 20 May 2015;</p> <p>(c) Response to Submissions report, titled "Euroley Poultry Production Complex (SSD 6882), Response to Submissions" prepared by SLR Consulting Australia Pty Ltd dated 1 September 2015;</p> <p>(d) the Management and Mitigation Measures located at Appendix 1; and</p> <p>(e) the plans and drawings located at Appendix 2.</p>	Non-Compliant	<ul style="list-style-type: none"> • Site inspection and discussions • Annual Review reports • Environmental monitoring (website and internal records) • Rice Hull Shed maintenance invoice dated 4/07/2023. • Bore metres upgrade including Telemetry to allow for remote access by WaterNSW. Invoice dated 2023. • Appendix J of the EIS (Aboriginal Heritage Impact Assessment OzArk 2015) • Appendix I of the EIS (Biodiversity Assessment Report SLR 2015) 	<p>An additional office building was observed during the site inspection. The date of construction of the office was not confirmed in this audit. Minimal information has been provided in regards to the office building, including evidence of appropriate construction measures (activation of the CEMP). The office has a small footprint (approximately 90m2), however its installation still varies from the consent.</p> <p>It is understood the surveys done for the OzArk report were done in the areas that were to be directly impacted, however survey points also talk to the general area surrounding that plot. The additional office built on the site in this audit period is located in an area that was in the Biodiversity Assessment Report's "areas not requiring assessment" as shown in Figure 8 of the report. Without evidence of due diligence prior to the construction of the office building this condition is considered non-compliant.</p> <p>NC REC 1: ProTen to include the additional unapproved office building in the SSD6882 Modification application.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-2	A6	<p>The Applicant shall ensure that:</p> <p>(a) the Development does not exceed a maximum population of 3.92 million broilers at any onetime;</p> <p>(b) the stocking densities of the Development comply at all times with the standards detailed in National Animal Welfare Standards for the Chicken Meat Industry (Barnett et al, 2008), as amended;</p> <p>(c) the Development is not populated with 3.92 million broilers in one day at the commencement of each production cycle;</p> <p>(d) the commencement of broiler population for each PPU is separated by a minimum of 36 hours; and</p> <p>(e) the time period for the population of the entire farm (all five PPUs) shall be a minimum of 10 days.</p>	Non-Compliant	<ul style="list-style-type: none"> • Examples of Batch/cycle numbers spreadsheets, Batch Verification Schedules. • Annual Review reports. • Show Cause letter from DPE dated 2022 in response to 2021 Annual Review. • Proten Response to Show Cause dated 28/7/2022. • Official Caution DPE dated 26/08/2022. • Show Cause letter from DPE dated August 2023 in response to the 2022 Annual Review. • Proten Response to Show Cause dated 12 September 2023. • Official Caution DPE dated 22/09/2023 	<p>In Section 4.4 of the 2021-2022 Annual Review, Proten self-reports a non-compliance and explain:</p> <p>"The total number of birds recorded for batch 2202 was 3,995,242, which is a 75,242 exceedance of the permitted a maximum population. The total number of birds recorded for batch 2204 was 3,969,716, which is a 49,716 exceedance of the permitted a maximum population." ProTen continue to be non-compliant with this condition because of the requirements of the relationship with Baiada.</p> <p>(b) Compliant. Population spreadsheets with total shed numbers, daily and total mortalities and sampled weight provided for the IEA were consistent with this.</p> <p>(c) Based on evidence provided, Proten have remained below the limit of 3.92 million total broilers placed on the first day of a cycle.</p> <p>(d) Section 4.4 of the 2021-2022 Annual Review reports a non-compliance because "Broilers were placed at each PPU at intervals of less than 36 hrs on 11 occasions during the reporting period." Again, in the 2022-2023 Annual Review reporting period, commencement of re-populating each PPU was under 36 hours. This occurred for the batches 2205, 2206, 2301, 2302, 2303, and 2304.</p> <p>(e) Section 4 of the 2022-2023 Annual Review reports a non-compliance because "On five occasions during the reporting period, population of the 5 farms was undertaken in less than 10 days." This occurred for five batches, 2206, 2301, 2302, 2303, and 2304. Placement non-compliances continued across the audit period due to the over-supply.</p> <p>It is understood the non-compliance with Condition A6a, A6d, and A6e continued in 2023 due to supplier need. ProTen were in the process of applying for a Modification at the time of this IEA.</p> <p>NC REC 2: ProTen to apply for Modification due to the ongoing non-compliance in the project exceeding production and population limits.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-3	A9	<p>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).</p> <p>Notes:</p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	Non-Compliant	<ul style="list-style-type: none"> • Occupation Certificates from Dartnell Building Certifiers for residences on the Development area dated 2016. • Occupation Certificates for the PPU sheds and associated infrastructure by Dartnell Building Certifiers dated 6 November 2017 	<p>Occupation Certificates provided for the existing Development, also assessed as part of previous IEA reports. However, the new office and Shed 3 at Farm 79 have not been through the same certification process.</p> <p>NC REC 3: ProTen to engage certifiers and pursue an occupation certificate retrospectively for the completed Shed 3 and new office at the site.</p>
NC-4	B16	<p>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:</p> <p>(a) detail the measures that would be implemented to ensure road safety, network efficiency and access during construction;</p> <p>(b) contain a drivers code of conduct to:</p> <p>(i) minimise the impacts of construction on the local and regional road network; and</p> <p>(ii) minimise conflicts with other road users.</p> <p>(c) detail heavy vehicle routes, access and parking arrangements;</p>	Non-Compliant	<ul style="list-style-type: none"> • ProTen/Corporate Traffic Plan and Protocols sighted during Document Review. • OEMP Section 4.5 Traffic Management • Site inspection • ProTen Contractor Induction and Employee Training records (sighted examples from 2021, 2022, 2023) 	<p>The Traffic Management Plan is part of the CEMP, which has only been relevant to the development for the re-construction of Shed 3 at Farm 79. The CEMP, including the Traffic Management Plan, were not provided for this IEA. Therefore this condition is non-compliant because a copy of the TMP was not provided.</p> <p>It should be noted that:</p> <ul style="list-style-type: none"> • The previous GHD IEA report did not assess the TMP, but instead referred to the 2017 IEA Report. • The 2017 Audit Report found this condition to be compliant. • Section 4.5 of the OEMP also outlines the traffic measures related to the operational phase. At the time of the site inspection these measures were being abided by, including while pick up and clean out stages of operations were being completed. The OEMP also has the Drivers Code of Conduct in Appendix D. <p>ProTen was unable to provide signed copies of the Driver's Code of Conduct to the auditors to show new drivers accessing the site have signed this and been debriefed on the TMP/Table 14 of the OEMP. Therefore, Narrandera is considered non-compliant in terms of the implementation of the TMP.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
		and (d) if necessary, detail procedures for notifying any nearby residents of any potential disruptions to routes			NC REC 4: Update the induction process to require the Drivers Code of Conduct/Driver Inductions to be resigned annually in the online induction system and keep these records easily accessible.
NC-5	B27	Construction activities associated with the Development shall be undertaken during the following construction hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; and (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays	Non-Compliant	• Site inspection and discussions	The project completed the construction phase several years ago. The project is currently in an operational phase. However, the following construction activities occurred inside this audit period: - Reconstruction of Shed 3 at Farm 79 (due to the fire incident) No evidence was provided to indicate whether construction occurred inside or outside these hours. While there were no evidence reviewed that would suggest construction would have occurred outside of these hours, this condition is considered non-compliant due to a lack of evidence provided by ProTen. NC REC 5: Update records-management procedures and include the responsibility across more than one position to ensure sound record-keeping. This should be done in Section 3.2 of the OEMP to clearly outline roles for the development, including the Environmental Representative position described in Condition C15 of the Consent.
NC-6	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. Note: The Interim Construction	Non-Compliant	• Site inspection and discussions	Minimal documentation was provided regarding the construction noise management for Shed 3 of Farm 79 in this audit period. No noise complaints were received by the site in the audit period. Based on site discussions there were no issues related to construction noise for Shed 3 and the additional office, however Narrandera provided no documented evidence of reviewing noise management and limits for those activities. This condition has been called non-compliant due to the lack of evidence to support a "compliant" finding. Construction activities have a potential for a greater noise impact. Refer to NC REC 5 .

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
		Noise Guideline identifies 'particularly annoying' activities that require the addition of 5dB(A) to the predicted level before comparing to the construction NML.			
NC-7	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	Non-Compliant	<ul style="list-style-type: none"> • Aitken Rowe Testing Lab results sheets dated 26/10/2021, 8/11/2021, and 18/11/2021. • Site inspection and site discussions • 2021-2022 Annual Review 	<p>EPL 20748 does not have any licenced discharge points and no discharge limits. Based on evidence provided (Annual Review 2021-2022 and Lab results) there have been discharges in the IEA period on the following dates and the grab samples collected exceeded the Nitrogen and Phosphorous limits in Table 13 of the WMP: 26/10/2021 (Farm 79) 8/11/2021 (Farm 78) 18/11/2021 (Farm 77)</p> <p>The discharges occurred due to heavy rainfall, however it did not qualify for the exemption in EPL Condition O5.3. Therefore, this is considered non-compliant as water discharged exceeded nitrogen and phosphorous limits in the WMP. Note, the auditors have called the site non-compliant in the Water Management Plan condition of the consent because it relates to 'implementing measures to prevent material harm'.</p> <p>Based on the information provided, ProTen pumped water out of the sediment dams to manage water levels and onto the surrounding paddocks which are used for cattle and sheep grazing. ProTen note that there was no risk of the water then entering waterways because the closest waterway to the site is 9.5km away.</p> <p>No further recommendations.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-8	B45	<p>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:</p> <p>(a) be prepared in consultation with the DPI;</p> <p>(b) detail water use, metering, disposal and management on-site;</p> <p>(c) detail the number and location of piezometers on-site;</p> <p>(d) detail the water licence requirements for the Development;</p> <p>(e) detail the management of wastewater streams on-site;</p> <p>(f) contain a Surface Water Management Plan, including:</p> <ul style="list-style-type: none"> • a program to monitor: • surface water flows and quality; • surface water storage and use; and • sediment basin operation; <p>(ii) sediment and erosion control plans;</p> <p>(iii) surface water impact assessment criteria, including trigger levels for investigating any potentially adverse surface water impacts;</p> <p>(iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria; and</p> <p>(g) contain a Groundwater Management Plan, including:</p> <p>(i) baseline data on groundwater</p>	Non-Compliant	<ul style="list-style-type: none"> • Narrandera Water Data - 2023_2024_30Sep23.pdf file on ProTen website. • Surface Water Exceedance Investigation report by SLR dated 2022. • Water Monitoring Notification letter for 6/09/2022 exceedance dated 31 October 2022. • Water Monitoring Notification letter for 23/10/2023 exceedance dated 17 November 2023. • Water Management Plan - Appendix G of the OEMP, dated 20/05/2020. • Annual Reviews (December 2020- April 2023) • "Surface Water Exceedance Investigation 2022" report dated 9 January 2023 by SLR for exceedances on 6/09/2022. • Evidence of monitoring being done by NATA accredited lab (Aitken Rowe Letters) • Notification for water exceedance on 20.11.2023 - Portal screenshot • Evidence of sampling on 24/09/2021 (chain of custody sheet). 	<p>As shown in the publicly available water monitoring results:</p> <ul style="list-style-type: none"> - six-monthly surface water monitoring has consistently exceeded the ANZECC Criteria and NSW Water Quality Objectives criteria for Total Nitrogen, Nitrate/Nitrite, and Phosphorus -Piezo 1 registered a 2 m reduction in Standing Water Level during the March 2023 sampling event and has therefore exceeded the 2 m trigger level from baseline average outlined in the WMP. -Standing Water levels for Piezo 1 Deep, Piezo 2 Deep, Piezo 3 Deep, and Piezo 6 Deep in September 2023 also did not meet criteria. <p>Results provided included the Lab Analysis Reports for the discharges from Farms 79, 78, and 77 on 26/10/2021, 8/11/2021, and 18/11/2021, respectively. These results exceeded the criteria in the WMP for Nitrogen and Phosphorous. This is a non-compliance. It should be noted that the Aitken Rowe Testing Lab results sheets did not contain results for all parameters listed in Table 13 - Surface water quality impact assessment criteria and water quality objectives, for example no TSS or Ammonia results were provided.</p> <p>ProTen provided evidence of engaging specialists to update the WMP. ProTen are in the process of finalising the WMP with updated, site-specific trigger values. However a Memorandum of the Surface Water Quality Trigger Review by SLR dated 20/04/2023 was provided for this IEA which justifies the change from ANZECC triggers to site-specific triggers. ProTen have been engaging specialists since January 2023 to do the review into the Water Management Plan. The auditor sighted evidence of SLR reviewing and updating the OEMP and WMP throughout 2023.</p> <p>As described under Condition B38 findings, three PPU's (Farms 79, 78, and 77) pumped out from the sediment dams with N and P exceedances to the neighbouring paddocks in 2021. The Response Plan from Section 9 of the WMP required the results to be reviewed to determine the need for an investigation report however no evidence of timely review was provided. Evidence</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
		<p>levels and quality;</p> <p>(ii) a program to monitor groundwater levels and quality;</p> <p>(iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and</p> <p>(iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.</p> <p>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.</p>			<p>of missed reporting and exceedances under the WMP, therefore non-compliance.</p> <p>Notifications and investigation reports were provided for the following surface water exceedances:</p> <ul style="list-style-type: none"> • 6 September 2022 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling. • 15 March 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling. • 23 October 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling. <p>Notifications and investigation reports were provided for the following groundwater exceedances:</p> <ul style="list-style-type: none"> • 15 March 2023 pH criteria at Piezo 1 Deep, Piezo 2 Deep, Piezo 3 Deep, Piezo 5 Deep and Piezo 6 Deep. For this sampling event the DPHI also noted that Piezo 1 Deep measured at 24.4 mTOC1, 2m from the baseline average of 26.4 mTOC1. • 23 October 2023 drawdown criteria of +/- 2m at Piezo 1 Deep, Piezo 2 Deep and Piezo 3 Deep (required as part of 6 monthly groundwater level and quality sampling). <p>No further recommendations.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-9	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 Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (OEH, 2010) as amended.	Non-Compliant	<ul style="list-style-type: none"> • Site inspection • Aboriginal Heritage Impact Assessment OzArk 2015 	<p>No significant alteration outside of the Development footprint were observed during the site inspection. However, there was an additional office installed in the development area near PPU 4/Farm 78 or Bore 2 (naming derived from EIS OzArk Aboriginal Heritage Impact Assessment Report).</p> <p>ProTen did not provide documents which related to the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (OEH, 2010) prior to the installation of the office.</p> <p>The OzArk Aboriginal Heritage Impact Assessment Report (report prepared as part of the EIS) described their study area as: "The direct impact footprint of the proposed works will be approximately 90ha of this area and includes the access road from the Sturt Highway." It is understood the surveys done for the OzArk report were done in the areas that were to be directly impacted, however survey points also talk to the general area surrounding that plot. The new office is located close to Farm 78 which the OzArk report's nearest survey was Plate # 4 "PPU 4, residences, and Bore 2".</p> <p>No documents related to the office were provided for this IEA (such as pre-disturbance reports or pre-clearing surveys). Due to inadequate evidence provided, this condition is considered non-compliant.</p> <p>No further recommendations.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-10	C1	<p>C1. The Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <p>(a) be approved by the Secretary prior to the commencement of construction;</p> <p>(b) identify the statutory approvals that apply to the Development;</p> <p>(c) outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>(d) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;</p> <p>(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;</p> <p>(f) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and</p> <p>(g) include the management plans under Condition C2 of this consent.</p>	Non-Compliant	<ul style="list-style-type: none"> Site inspection and site discussions 	<p>CEMP not provided for this IEA, therefore this condition could not be assessed. As no evidence has been provided and some construction activities have occurred this condition is considered non-compliant.</p> <p>The project was in an operational phase for this IEA period. However, construction activities were undertaken in the IEA period. These included the re-construction of Shed 3 Farm 79 and the addition of a small office near Farm 78 (unclear whether construction occurred in 2018 or at some point during Covid-19 (2021-2022)). ProTen could not provide records as evidence of implementing the CEMP during the construction of Shed 3 and the office. DPHI's approval of the CEMP could not be provided by ProTen because copies of these records could not be found, and it is likely they were held by a previous consultant. Therefore, non-compliance for preparation of the CEMP.</p> <p>NC REC 6: Restore the CEMP and TMP (may need to be requested from previous contractors). Alternatively, update the OEMP to describe the construction activities permitted under the Consent and associated requirements, and update the traffic section.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-11	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.	Non-Compliant	<ul style="list-style-type: none"> • Site inspection • Site sign in sheets, training, and toolbox talks stored at each PPU office from a range of dates. • OEMP 18/02/2021 • "Individual Training Document completion status" PDF exports from online training, for Farm 76-78 staff. 	<p>Due to:</p> <ul style="list-style-type: none"> - there being exceedances surface water discharge quality parameters under the WMP, - exceedances in operational population limits, - failure to report all non-compliances in line with the incident management and reporting procedures (Section 9 OEMP), <p>Narrandera is non-compliant with this condition.</p> <p>No further recommendations.</p>
NC-12	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.	Non-Compliant	<ul style="list-style-type: none"> • Incident reports regarding the 2021 fire to agencies (DPE, EPA) within 24 hours. • 2021-2022 Annual Review • Evidence of sampling on 24/09/2021 (chain of custody sheet). • Lab Analysis Results for 26/10/2021 at Farm 79, 8/11/2021 Farm 78, and 18/11/2021 Farm 77. • ProTen letter to DPE, dated 31 October 2022 (Actual file name: Notification to DPE Water monitoring exceedance 31.10.22). 	<p>The POEO Act defines material harm as:</p> <p>(1) For the purposes of this Part--</p> <p>(a) harm to the environment is material if--</p> <p>(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</p> <p>(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and</p> <p>(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.</p> <p>Surface water discharge incidents were not reported until the Annual Review report (discharges on 26/10/2021 at Farm 79, 8/11/2021 Farm 78, and 18/11/2021 Farm 77). These discharges exceeded criteria in the WMP, and therefore had the potential for material harm (147-1 a. i). Therefore, non-compliant. However, note there was no evidence of actual harm to human beings or ecosystems.</p> <p>No further recommendations.</p>
NC-13	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	Non-Compliant	<ul style="list-style-type: none"> • 2021 fire "Environment Incident Report: Attachment 1" • 2020-2021 Annual Review • 2021-2022 Annual Review, in particular Section 10.3 • 2022-2023 Annual Review 	<p>As above, in 2021 there were instances of surface water discharge incidents not being reported until the Annual Review report. Therefore, this condition is considered non-compliant in terms of timely incident investigation reporting process for the surface water discharges on 26/10/2021 (Farm 79), 8/11/2021 (Farm 78), and 18/11/2021 (Farm 77).</p> <p>No further recommendations.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-14	C15	<p>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:</p> <p>(a) be the principal point of advice in relation to the environmental performance of the Development;</p> <p>(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;</p> <p>(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;</p> <p>(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</p>	Non-Compliant	<ul style="list-style-type: none"> Site discussions 	<p>The role requirements for the Environmental Representative are not outlined in the OEMP, under Section 3.2 Roles and Responsibilities. No endorsement for the Environmental Representative was provided.</p> <p>NC REC 7: Apply for a new Environmental Representative for Narrandera to the DPHI. Refer also to NC REC 5 to clearly outline the roles for the project.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
		required under condition C1; (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			
Appendix 1: MANAGEMENT AND MITIGATION MEASURES					
NC-15	Section 3	The Development site will not accommodate more than 3.92 million birds any one time	Non-Compliant	<ul style="list-style-type: none"> • Annual Reviews • Batch/cycle numbers spreadsheets • Show Cause letter from DPE dated 2022 in response to 2021 Annual Review. • Proten Response to Show Cause dated 28/7/2022. • Official Caution DPE dated 26/08/2022. • Show Cause letter from DPE dated August 2023 in response to the 2022 Annual Review. • Proten Response to Show Cause dated 12 September 2023. • Official Caution DPE dated 22/09/2023 	<p>Exceedances of total number of birds on the site reported by ProTen due to over-supply of broilers. Refer to Condition A6 for further discussion of findings.</p> <p>Refer to NC REC 1.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-16	Section 3	Construction will be undertaken within the hours of: 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	Non-Compliant		No evidence was provided for the construction activities hours in the audit period for the reconstruction of Shed 3 at Farm 79 and the new office building. Due to the lack of evidence to demonstrate compliance with construction hours, a non-compliant finding has been included for this condition and Condition B27 of this Consent. Refer to NC REC 5 .
NC-17	Section 6.7.5	No disturbance will occur outside of the nominated disturbance footprint	Non-Compliant	Site inspection and discussions	No further disturbance was observed outside of the property boundary. However, disturbance outside the nominated footprint in the Consent occurred when ProTen installed an additional opposite Farm 78 for additional space during Covid-19 social distancing restrictions. This building is outside the marked disturbance on the project approval plans. The building is small (approx. 90 m2 footprint) and has a gravel driveway connecting it to the project road network. No records regarding its installation were provided for this IEA. Therefore this is non-compliant. Based on the Biodiversity Assessment Report done as part of Appendix I of the EIS, it is understood it is unlikely biodiversity values were impacted. Refer also to Condition A2. Refer to NC REC 1 .
NC-18	Section 6.8.4	No disturbance will occur outside of the nominated disturbance footprint	Non-Compliant	Site inspection EIS Consent	No further disturbance was observed outside of the property boundary. Disturbance has occurred opposite Farm 78 for the placement of an additional office building. The building is small (approx. 90 m2 footprint for the building and whole area of less than an acre in size) and has a gravel driveway connecting it to the project road network. No records regarding its installation were provided for this IEA. Therefore this is non-compliant. It should be noted, the OzArk Report completed for the EIS described its scope as generally coinciding with the planned footprint in the EIS Figures, however there were no pre-clearance surveys provided for this IEA.

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
					Refer also to Condition A2. Refer to NC REC 1 .
EPL 20748					
NC-19	A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Non-Compliant	<ul style="list-style-type: none"> • Annual Returns • Notice of Variation of Licence No. 20748 (Notice Number: 1629275) • Annual Reviews 	<p>Non-compliance with operational limits prior to 28 June 2023, with the accommodation capacity was limited to > 1000-3000 T accommodation capacity. Exceedances in the total population meant this limit was exceeded. ProTen applied to vary the EPL with the EPA on 24-May-2023 to address the non-compliance with the accommodation limit of 1000-3000 T. The EPL was varied on 28-Jun-2023. Therefore, from 28-June-2023 onwards Narrandera is compliant with the accommodation limit shown here in Condition A1.1.</p> <p>Refer to NC REC 1.</p>
NC-20	L4.1	The total number of birds accommodated at the premises, at any one time, must not exceed 3,920,000.	Non-Compliant	<ul style="list-style-type: none"> • Site inspection • Annual Returns • Annual Reviews 	<p>Non-compliance for exceeding the total population limit of birds on the site at the start of batch cycles. ProTen has reported exceedances in the total number of birds across the site (five PPUs) in Annual Returns. This is an ongoing non-compliance due to the numbers of birds transported to the site to be placed being dictated by the Supplier / Processor. These non-compliances have also been reported in the Annual Reviews. ProTen has provided the following explanation of the cause: The number of birds placed on the farms exceeded 3,920,000 in batch 2202 by 1.9% & in batch 2204 by 1.2% . Due to normally expected mortality, the number of birds on site decreased below 3,920,000 by day 10 in batch 2202 and by Day 5 in batch 2204. The total number of birds placed is determined by the Processor. Where hatchability of the eggs incubated exceeds the normal predicted levels, higher numbers of chicks are hatched and these need to be sent to the farm for animal welfare reasons.</p> <p>Refer to NC REC 2.</p>

Unique Identification Non-compliance	Condition	Requirement	Compliance Status	Evidence Collected	Independent Audit Findings and Recommendations
NC-21	O4.1	There must be a minimum of 36 hours between the commencement of broiler accommodation in each Poultry Production Unit.	Non-Compliant	<ul style="list-style-type: none"> • Site inspection and discussions • Annual Returns • Annual Reviews 	<p>Narrandera did not leave 36 hours in between re-populating each PPU (also referred to as "placement") for multiple batches in this audit period. This is non-compliant. ProTen has reported this in Annual Returns and provided the following justification: The time between commencement of placement between PPU's was less than 36 hours on 11 out of 30 placements during the reporting year. Due to Covid, there needed to be more flexibility when the birds were being delivered to the farms. There were no adverse effects or complaints given the large distances between individual farms. We will continue to monitor Placement programs and communicate with the Processor where scheduling may result in a noncompliance with the EPL.</p> <p>Refer to NC REC 2.</p>
NC-22	O5.3	<p>All waste water and contaminated stormwater must be captured in a waste water collection system and be prevented from leaving the premises.</p> <p>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.</p>	Non-Compliant	<ul style="list-style-type: none"> • Waste Management Plan • OEMP • Annual Reviews • Aitken Rowe Testing Lab results sheets dated 26/10/2021, 8/11/2021, and 18/11/2021. 	<p>Designed waste water collection system around Farms 77, 78, and 79 discharged on 26/10/2021, 8/11/2021, and 18/11/2021 due to large amounts of rain runoff collected. Discharges in this period did not qualify for the rainfall event exemption.</p> <p>No further recommendations.</p>
NC-23	R1.7	<p>Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder</p>	Non-Compliant	<ul style="list-style-type: none"> • Annual Return 22-4-2020 - 21-4-2021 • Annual Return 22-4-2021 - 21-4-2022 • Annual Return 22-4-2022 - 21-4-2029 	<p>Due to submitting the Annual Return via the portal, ProTen could not provide signed copies from the signatories (including A - ProTen Director). Administrative non-compliance.</p> <p>NC REC 8: Once Annual Returns are submitted via the EPA's submission portal, request signatures on the Certification statement to close out the Annual Return submission and retain signed copies as final copies.</p>

3.5. Previous audit recommendations

The previous IEA was undertaken by GHD in December 2020, with the report dated February 2021. The previous IEA found 11 recommendations to address non-compliances and improve the environmental performance of the development. We have considered whether ProTen addressed the recommendations from the previous IEA. Refer to **Table 7** for a summary of Narrandera's status against the recommendations.

Table 7: Status of Previous Audit Recommendations

2021 IEA Corrective Action	ProTen/SLR Response	Timing of Actions	Status
ProTen to engage with Baiada to review planning of population of the complex to maintain compliance with condition A6.	Drops and pickups of chickens from the Complex is determined by Baiada, however 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.	ProTen advised that they continued to have issues with the minimum 36 hours between placements in this IEA period. ProTen are attempting to resolve this by submitting a Modification. Preparation for this was occurring in 2023. The Modification is currently in the Assessment phase. Therefore, this is an ongoing non-compliance.
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.	ProTen confirmed continuous monitoring of storage areas to ensure ongoing compliance. Water treatment chemicals in water treatment sheds were compliant at the time of the site inspection.
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 March 30 2021. Completion of works to be budgeted for in 21/22 and completed by September 2021.	Auditors verified additional bunding recommendation was addressed by installing wrap-around metal screening on diesel tanks.

2021 IEA Corrective Action	ProTen/SLR Response	Timing of Actions	Status
	<p>Diesel tanks were not replaced with self-bunded tanks.</p> <p>A metal splash surround was installed around the diesel tanks on all farms during the reporting period. The purpose of this was to ensure spills can be contained within the current bund if a tank leaks.</p>		
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 February 28th, 2021.	Complete. ProTen confirmed the records are up to date.
Ensure that all information required by Condition C14 is published on the ProTen website.	<p>The OEMP is updated with the 2020 updated Water Management Plan.</p> <p>Monitoring results for the Complex are to be updated to January 2021 and uploaded onto the website. This is to be completed monthly.</p> <p>The complaints register is to be uploaded onto the website and updated monthly.</p>	<p>OEMP updated with 2020 Water Management plan and uploaded to the ProTen website.</p> <p>SLR in process of updating monitoring results from Aitkin Rowe onto website February 2021.</p> <p>Complaints register to be updated and placed on website by March 2021.</p>	<p>Monitoring results including 6-monthly water results were published on the website at the time of this IEA inspection (last results dated September 2023).</p> <p>No complaints register currently on website because the development has never received a complaint.</p>
Notify the public that the Freecall Environmental number is a complaints line.	<p>ProTen dispute this as a noncompliance as the number is available. Notwithstanding signs will be updated.</p> <p>The Freecall environmental number is to be displayed at the entrance to the farms and listed as a Environmental hotline</p>	Sign to be quoted and ordered from Janets Design and Signs and be put in place by end of March 2021	The complaints and enquiries number is available on the website at the time of the site inspection. Also the number is displayed at the front entrance of the development.
Ensure that monthly inspections of the surface water management systems	Monthly inspections of surface water management systems to be recorded on a form	Form to be created and controlled in Ileader by end of February 2021 for	ProTen confirmed that the Environmental

2021 IEA Corrective Action	ProTen/SLR Response	Timing of Actions	Status
include identifying areas of erosion and that works are undertaken to rectify identified erosion.	detailing erosion and corrective actions to be taken.	training and use by sites from March 2021.	inspection form has been updated to include dams.
Provide flammable cabinet for storage of small quantities of flammable liquids and gases in the store/workshop.	Quantities of flammable liquids stored in quantities of less than 5L, therefore not requiring storage within a flammable's cabinet. Continuous reviews of quantities to be undertaken on a monthly basis. If larger quantities of flammables required, then purchase of a flammable's cabinet will be considered.	No further current action as per response.	ProTen advised that no action is required.
Review vegetation buffers and schedule replanting in spring 2021 where vegetation plantings will not provide a 40 m buffer around each farm.	Vegetation buffers to be inspected and areas for revegetation identified. Watering system on sites have been identified as being in tact. Association from local landcare group to be investigated and revegetation plantings undertaken.	Planting to be undertaken by end of Spring 2021 as per guidelines for species selected.	Additional plantings were observed at the site inspection on some farms. ProTen should continue supplementary planting with endemic vegetation, and maintain the watering system.
Maintain a record of reviews of management plans.	Monthly Environmental meetings currently being held with SLR to minute reviews and changes to Management plans as per the schedule.	Additions to Agenda to be undertaken by SLR and ProTen beginning the monthly meeting in March 2021	ProTen did not provide documents that actually recorded the review of management plans for this IEA. This should be a recorded process, like annual PIRMP testing.
ARTL personnel conducting water quality sampling to include full name on COC.	Aitkin Rowe to be requested in writing to list the full name of the person conducting the water sampling on the Chain of Custody (COC) form.	Communication to Aitkin Rowe to be undertaken prior to next schedule water sampling in May 2021	Chain of Custody sheets provided (e.g. GW21-05 September 2021) include initials rather than full names. ProTen should consult with ARTL to resolve.

3.6. EMP, sub-plans, and compliance documents

This IEA considered the adequacy of Narrandera's management plans. ProTen operates under several different management plans, as outlined in the Operational Environmental Management Plan. The approved management plans required by SSD 6882 that were reviewed as part of this audit are summarised in **Table 8** with compliance assessed in **Appendix D**.

Table 8: Approved Management Plans

Condition of Consent	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
B3	Air Quality Management Plan	16/03/2016	Operational air quality management, including odour management measures. Monitoring measures triggered when complaints are received.	Compliant
B9	Emergency Disposal and Biosecurity Protocol	11/05/2016	Operational plan outlining mass mortality event procedures and options.	Compliant
B12	Biodiversity Management Plan	6/04/2016	Operational plan to prevent impacts to biodiversity and outline management measures.	Compliant
B16	Traffic Management Plan	Unknown as not provided for IEA.	Included in the CEMP which could not be provided for this IEA. The location of the CEMP and TMP is unknown.	Non-Compliant
B21	Waste Management Plan	20/05/2016	Waste handling, storage, and removal/disposal. Outlines no acceptance of waste on to site, no stockpiling of project wastes, and no re-use of waste on site (e.g. spent litter respread).	Compliant
B25	Emergency Plan	February 2021	Emergency or pollution incident response procedures.	Compliant
B36	Flood Emergency and Evacuation Plan	March 2016	Operational plan outlining emergency procedures related to flooding.	Compliant
B45	Water Management Plan, including Surface Water Management Plan and Groundwater Management Plan.	Assessed version in the OEMP 20/05/2020. Being updated at the time of this IEA.	Operational plans outlining surface water and groundwater management measures and monitoring program. Stormwater systems at Narrandera were being reviewed in terms of sufficient volumes to manage the stormwater and runoff from the sheds and prevent uncontrolled discharges. Exceedances in water criteria and incident reporting procedure not followed on some occasions.	Non-Compliant

Condition of Consent	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
B47	Landscape Management Plan	12/11/2015	Landscape management measures, including vegetation screens surrounding each PPU which is also an odour management measure.	Compliant
B55	Aboriginal Cultural Heritage Management Plan	24/03/2016	Operational plan for management of recorded Aboriginal heritage sites in the Development area as well as responsibilities and Unexpected Finds Protocol.	Compliant
C1	Construction Environmental Management Plan	Unknown as not provided for IEA.	Included in the CEMP which could not be provided for this IEA. The location of the CEMP and TMP is unknown.	Non-Compliant
C4	Operational Environmental Management Plan	18/02/2021	Operational plans for the Development. Most notably, includes the Complaints Management Strategy, hazardous goods and chemical management procedures, Review procedures, and Environmental Incidents Management System.	Compliant
C5	Operational Environmental Management Plan	18/02/2021	Related to Condition C4 above, in terms of the implementation of the approved OEMP including the commitments summarized in the OEMP and the Management Plans which fall inside the OEMP.	Non-Compliant

3.7. Consultation outcomes

The stakeholder consultation completed for the IEA undertaken in accordance with the 2020 PAR is summarised in **Table 9**. The responses have been provided as **Appendix F**.

Table 9: Stakeholder Consultation for the IEA

Regulator	Contact Details	Comment from IEA Team	Audit Team Response
Department of Planning, Housing and Infrastructure	Georgia Dragicevic Senior Compliance Officer. NSW Department of Planning & Environment. georgia.dragicevic@planning.nsw.gov.au	DPHI did not have any additional information requirements for the Euroley Poultry Complex (SSD 6882) IEA.	Audit team assessed compliance with approvals as per the IEA scope.
NSW EPA (Regulatory Operations)	Jason Price Unit Head Regulatory Operations NSW Environment Protection Authority	EPA did not have any additional information requirements for the Euroley Poultry Complex (SSD 6882) IEA.	Audit team assessed compliance with the EPL as per IEA scope and methodology.

Regulator	Contact Details	Comment from IEA Team	Audit Team Response
	D: 02 6969 0705 M: 0428 460 247		
Narrandera Council	Shane Wilson Deputy General Manager - Infrastructure PH: (02) 6959 5503	Council did not have any additional requirements or concerns regarding the project.	Audit team assessed compliance with approvals as per the IEA scope.
Department of Primary Industries	Lilian Parker Agricultural Land Use Planning DPI Agriculture Wagga Wagga Agricultural Institute Wagga Wagga NSW 2650 M: 0427 812 508	DPI requested the IEA consider Narrandera's compliance with existing operational limits in SSD 6882. DPI acknowledged ProTen had recently submitted an application to modify SSD 6882. The assistant auditor also had a telephone conversation with the DPI representative.	This IEA assessed Narrandera's compliance with SSD 6882 conditions regarding operational limits, animal welfare and best practice, emergency disposal, and biosecurity

3.8. Complaints

Based on the information provided for this IEA, there were no complaints received by Narrandera in this audit period. Based on discussions with site and evidence available, the Development has never received a complaint.

3.9. Incidents

Consent SSD 6882 defines "incident" as:

A set of circumstances that:

- *causes or threatens to cause material harm to the environment; and/or*
- *breaches or exceeds the limits or performance measures/criteria in this consent.*

The following incidents took place in this IEA period:

- Three controlled discharges in 2021 exceeding surface water criteria approved under the Water Management Plan.
- Multiple exceedances in groundwater level limits approved under the Water Management Plan.
- Further non-compliances (incidents which breached limits of the consent) were submitted as part of the Annual Review reports and Annual Returns from the audit period.

The incident reporting associated with these are discussed further in **Appendix C** under Condition C9. Conditions C9 and C10 are considered non-compliant in this IEA due to some incidents being reported in the Annual Review rather than within 24 hours of occurrence.

3.10. Actual vs predicted environmental impacts

The predictions made in the Environmental Impact Statement for Narrandera focused on and responded to issues related to odour emissions, air quality, noise, water resources, flora and fauna, Aboriginal Heritage, traffic and transport, visual amenity, and land use conflict.

The Annual Review reports reviewed for this IEA compared the surface water and groundwater results against the IEA predictions under the heading Comparison Against Predictions. The auditors did not note significant difference between the data provided in this IEA and the EIS reports.

The installation of the additional office near Farm 78 is regarded by the auditor to be outside of the EIS assessments. Therefore, there have been non-compliances found in this IEA related to its installation, particularly the lack of evidence around due diligence processes when planning the office. Refer to **Appendix C** for the complete findings.

3.11. Site inspection

Olivia O'Shannessy (Assistant Auditor) visited the site on 12 December 2023 to complete a site inspection and verify field components of the audit. Photographs from the site inspection are included as **Appendix B**.

3.12. Site interviews

The site inspection included discussions with several site personnel (refer **Section 2.4**). Findings from these interviews found that:

- Site personnel generally had a good understanding of the environmental compliance obligations for the site and sound record-keeping to demonstrate compliance.
- ProTen leadership demonstrated efforts to improve compliance for the Development, including pursuing the Modification to address Operational Limits non-compliances, and additional measures being done to improve efficiency of the vegetation screen management (improved supplier for endemic species via the Carbon Farming Project).

3.13. Previous Annual Review or Compliance Report recommendations

Narrandera have generally demonstrated to progress against the actions included in Section 11, Activities to be Completed During Next Reporting Period, in the Annual Review. It is noted, the Annual Reviews are not structured to include proposed improvements under each environmental topic, as outlined in Section 6 of the *Annual Review Guideline* (DPE, October 2015). Refer to IMP REC 8 in **Table 11**.

At the time of writing, SSD 6882 does not require the Development to prepare Compliance Reports.

3.14. Key strengths

During the IEA there were several positive environmental management aspects that were observed, and were considered noteworthy:

- Efforts to carbon-offset energy usage of the Development;
- Routine employee inductions and sign-in system introduces all personnel coming onto site to familiarise with HSEQ requirements and tracks training;
- Weekly inspections of the entire development records numerous environmental aspects, and evidence of inspection findings or actions being closed out; and
- Evidence of the routine monitoring program being completed in full in this audit period.

4. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

Table 10 outlines the recommendations made in relation to non-compliance's during the audit. These are referred to as NC RECs.

Additional recommendations relating to compliant conditions or aspects identified in the field (not captured in **Table 10**) are included within **Table 11**. These are referred to as improvement recommendations (IMP RECs).

Table 10: Summary of Non-Compliance Recommendations

Non-Compliance Number	Aspect	Condition Reference	Non-Compliance REC Number	Recommendation
NC-1 NC-15 NC-17 NC-18 NC-19	Terms of Consent (EIS)	A2	NC REC 1	NC REC 1: ProTen to include the additional unapproved office building in the SSD6882 Modification application.
NC-2 NC-20 NC-21	Operational Limits	A6	NC REC 2	NC REC 2: ProTen to apply for Modification due to the ongoing non-compliance in the project exceeding production and population limits.
NC-3	Structural Adequacy	A9	NC REC 3	NC REC 3: ProTen to engage certifiers and pursue an occupation certificate retrospectively for the completed Shed 3 and new office at the site.
NC-4	Traffic Management Plan	B16	NC REC 4	NC REC 4: Update the induction process to require the Drivers Code of Conduct/Driver Inductions to be resigned annually in the online induction system, and keep these records easily accessible
NC-5 NC-6 NC-16	Construction Noise	B27	NC REC 5	NC REC 5: Update records-management procedures and include the responsibility across more than one position to ensure sound record-keeping. This should be done in Section 3.2 of the OEMP to clearly outline roles for the development, including the Environmental Representative position described in Condition C15 of the Consent.
NC-10	Construction Environmental Management Plan	C1	NC REC 6	NC REC 6: Restore the CEMP and TMP (may need to be requested from previous contractors). Alternatively, update the OEMP to describe the construction activities permitted under the Consent and associated requirements, and update the traffic section.
NC-14	Environmental Representative	C15	NC REC 7	NC REC 7: Apply for a new Environmental Representative for Narrandera to the DPHI. Refer also to NC REC 5 to clearly outline the roles for the project.
NC-23	Annual Return	R1.7	NC REC 8	NC REC 8: Once Annual Returns are submitted via the EPA's submission portal, request signatures on the Certification statement to close out the Annual

Non-Compliance Number	Aspect	Condition Reference	Non-Compliance REC Number	Recommendation
				Return submission and retain signed copies as final copies.

Table 11: Opportunities for improvement

Aspect	Condition Reference	Improvement REC Number	Recommendation
Biodiversity Management Plan	B12	IMP REC 1	IMP REC 1: Update the BMP along with the OEMP updates to ensure it is a current, practical document.
Dangerous Goods	B22	IMP REC 2	IMP REC 2: Review the pick-up frequency for empty chemical (including sanitizer) containers to prevent a large number of empty containers being stored at the Farms or sitting on the ground outside of allocated storage areas (sheds).
Operational Noise	B32	IMP REC 3	IMP REC 3: Outline in the OEMP that noise monitoring would be triggered in the event of a noise complaint regarding the project or as directed by the DPHI or EPA. Alternatively, conduct routine (annual) noise monitoring to demonstrate the site is complying with those noise limits in the consent. This will also act to assess compliance again EPL condition L3.1.
Greenhouse Gas	B48	IMP REC 4	IMP REC 4: Update Table 23 of the EMP with the current energy efficiency measures at Narrandera (e.g. solar power).
Aboriginal Heritage	B52	IMP REC 5	IMP REC 5: Contact the L&DLALC in regards to the fallen limb within the scarred tree exclusion area for further advise.
Operational Environmental Management Plan	C4	IMP REC 6	IMP REC 6: Update the OEMP to include the current version of the EPL and all current water licenses (WALs), as well as the most recent consultation received from the agencies consulted in Table 2 (no comments are recorded from a number of the agencies). Ensure this latest version of the OEMP is uploaded to the ProTen website to satisfy Condition C14.
Management Plan Requirements	C6	IMP REC 7	IMP REC 7: Incorporate Management Plan review triggers into project requirements such as Annual Review report preparation or following non-compliance reporting. Ensure Management Plans are written in a manner that does not require the Management Plan to be continually updated with details and then sent for approval.

Aspect	Condition Reference	Improvement REC Number	Recommendation
Annual Reviews	C8	IMP REC 8	IMP REC 8: Describe proposed improvements under the relevant environmental topic in Section 6 and Section 7 (Water) to clearly link areas of concern or incidents to improvement responses and for consistency with Section 6 of the Annual Review Guideline (DPE, October 2015).
Complaints	C14	IMP REC 9	IMP REC 9: Upload the Complaints Register annually with the date to communicate Narrandera has had no complaints.
Waste	O5.1	IMP REC 10	IMP REC 10: Review the effective maximum capacity of chillers at each PPU to ensure site can practically store approx. 1% of each PPU population for the short term.

5. CONCLUSION

HEMA was engaged by ProTen to conduct an Independent Environmental Audit (IEA) of the Narrandera Poultry Production Complex at Euroley, NSW.

This IEA has been prepared to satisfy the requirements of the following approvals and guidelines:

- SSD 6882 Condition C12; and
- *Independent Audit Post Approval Requirements* (DPE 2020).

The IEA covers the period from 1 December 2020 to 12 December 2023. The DPHI endorsed the following IEA team in a letter dated 29/11/2023.

- Chris Jones as Lead Auditor; and
- Olivia O'Shannessy as Assistant Auditor.

Olivia O'Shannessy visited the site on 12 December 2023 to complete a site inspection and verify field components of the audit.

A summary of the audit outcomes is provided in **Table 12**.

Table 12: Audit Compliance Summary

Compliance Status	SSD 8753	SSD 8753 Appendix 1 – Management and Mitigation Measures	EPL 20748	Total
Not Triggered	18	6	10	34
Compliant	56	53	35	144
Non-Compliant	14	4	5	23
Total	88	63	50	201

APPENDIX A. DPHI ENDORSEMENT OF AUDIT TEAM

Our ref: SSD-6882-PA-26

Ms Kathryn Singh

SHEQ Advisor

ProTen Limited

99 Mount Street

NORTH SYDNEY, NSW, 2060

29/11/2023

Sent via the Major Projects Portal only

Dear Ms Singh

Euroley Poultry Production Complex (SSD 6882)

Independent Auditor 2023

I refer to your request of 28 November 2023 seeking approval of Mr Chris Jones and Ms Olivia O'Shannessy of Integrated Environmental Management Australia (the audit team) for the upcoming Independent Environmental Audit of Euroley Poultry Production Complex (the development), in accordance with Schedule 4, Condition C12 of development consent SSD 6882 (the consent).

Having considered the qualifications and experience of the audit team, the Planning Secretary endorses the appointment of the audit team to undertake the audit in accordance with Schedule 4, Condition C12 of the consent. This approval is conditional on the audit team being independent of the development and maintaining certification as lead or principal auditor with a relevant industry body.

Please ensure this correspondence, including the independent audit declaration form are appended to the Independent Audit Report.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. The auditor may wish to have regard to the Independent Audit Post Approval Requirements (Department 2020 or as updated). A copy of this guideline can be located at <http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of consent and any relevant EPL;
3. not use the term "partial compliance";
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

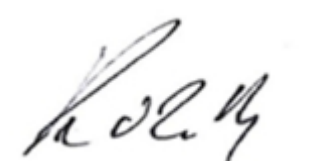
Within three months of undertaking the site inspection, you are to submit a copy of the audit report to the Planning Secretary, together with your response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Planning Secretary, it is recommended that you review the report to ensure it complies with the relevant consent condition.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

APPENDIX B. SITE INSPECTION PHOTOGRAPHS



Photo 1 Typical PPU workshop and office layout.



Photo 2 Water leak (untreated water) from water treatment shed.



Photo 3 New office building, outside of Farm 78, refer to Conditions A2 in Appendix D.



Photo 4 Example of front gates to each PPU, including safety and biosecurity notices and dead bird pick-up docket.

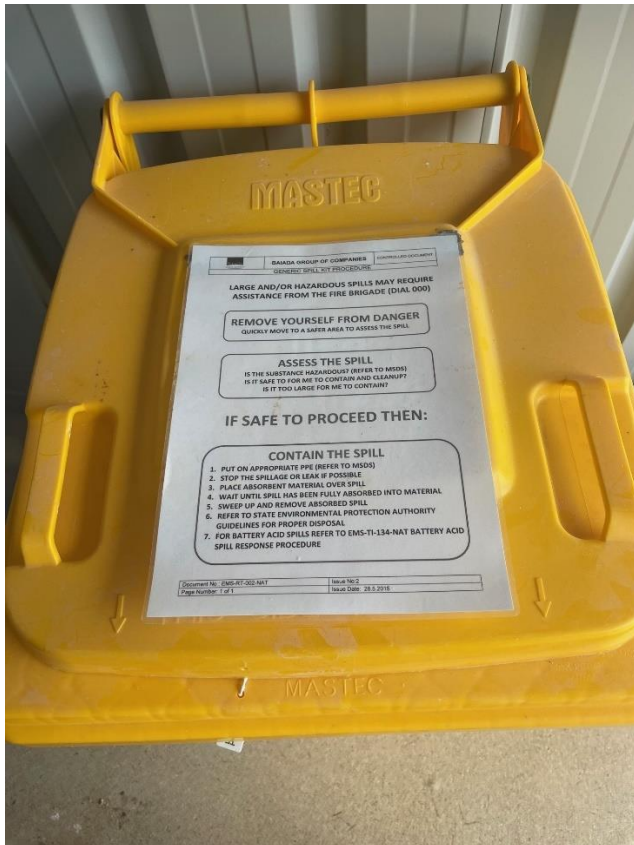


Photo 5 Spill kits at each PPU in multiple locations, with this one in the main chemical storage shed.



Photo 6 Chemical stored on appropriate bunding.



Photo 7 Day of site inspection some PPUs were doing clean out following the pick-up of birds. Example of filling up tank with water to wash out and sanitise each shed.



Photo 8 Fuel storage including the screening around the outside to prevent punctures of the tank. Some water inside tank bunds to be pumped out. Hoses should be returned to inside of the bund.



Photo 9 Mortalities to be stored in chillers prior to pick-up for disposal at the rendering plant. The Development has changed their approach in the mortalities storage, as the site changed from specific storage containers which required the specific chiller set-up established. However, ProTen changed to chillers for each PPU in this audit period and they have found this to be more suitable in terms of biosecurity.



Photo 10 Scarred tree including exclusion fencing in place. Refer to Improvement Recommendation 5.



Photo 11 Farm 79 entry.



Photo 12 Rinsed chemical drums to be taken to Griffith Feed and Grain by ProTen personnel.



Photo 13 Signage on entry to PPU's, including QR Codes at the front of the wheel wash to sign-in to each Farm.



Photo 14 Typical sediment dam.



Photo 15 Refuelling area at the mapped Development chiller area, which is now being used for equipment storage and vehicle park-up.



Photo 16 Area mapped for tree-screening requires planting out and maintenance to successfully establish.



Photo 17 Area of tree screen that is progressing.



Photo 18 Emergency information at the Narrandera entrance from Sturt Highway.



Photo 19 Emergency information located at the site entrance.



Photo 20 Sturt Highway entrance to the Narrandera site. Neighbouring farm property visible in background.



Photo 21 Google Earth aerial imagery of the location of the additional site office constructed during this audit period.

APPENDIX C. COMPLIANCE SPREADSHEET

Audit Scoring System	<i>Based on 2020 IEA Guidelines</i>
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Compliance Assessment Criteria	
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Audit Period


The Audit period is proposed from **1 December 2020 - 12 December 2023** (from the date after the last day of the previous IEA period to this IEA site inspection).

Note - First day of the Audit inspection is 12 December

Compliance Status	SSD	Appendix 1	EPL
Not Triggered	18	6	10
Compliant	56	53	35
Non-Compliant	14	4	5
Total	88	63	50

SSD 6882 Euroley Poultry Production Complex (Narrandera)

Audit Period: 1 December 2020 - 12 December 2023 (based on the day after the previous IEA audit period to the date of this IEA site inspection).

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
Part A: Administrative Conditions						
What the licence authorises and regulates						
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	• Incident reports or self-reporting documents	General evidence provided for this IEA. • Official Caution DPHI dated 26/08/2022 regarding Condition A6. • Official Caution DPHI dated 22/09/2023 regarding Condition A6.	Note, Consent SSD 6882 defines "incident" as: <i>A set of circumstances that:</i> • <i>causes or threatens to cause material harm to the environment; and/or</i> • <i>breaches or exceeds the limits or performance measures/criteria in this consent.</i> The Consent defines "construction" as: <i>The demolition of buildings or works, the carrying out of works, including bulk earthworks and erection of buildings and other infrastructure covered by this consent.</i> Narrandera (Euroley Poultry Production Complex) is compliant with the majority of conditions of SSD 6882. The site had non-compliances related to production limits, surface water exceedances, groundwater exceedances, and implementing commitments outlined in the site management plans, including the absence of a CEMP when an additional office and one shed was constructed in the audit period. These non-compliances are further discussed below. ProTen has generally demonstrated they have implemented reasonable and feasible measures to prevent and/or minimise any harm to the environment resulting from the development.	
Terms of Consent						
A2	The Applicant shall carry out the Development in accordance with: (a)State Significant Development Application SSD 6882; (b)Environmental Impact Statement, titled "Euroley Poultry Production Complex - SSD 6882" volumes one to three, prepared by SLR Consulting Australia Pty Ltd, dated 20 May 2015; (c)Response to Submissions report, titled "Euroley Poultry Production Complex (SSD 6882), Response to Submissions" prepared by SLR Consulting Australia Pty Ltd dated 1 September 2015; (d)the Management and Mitigation Measures located at Appendix 1; and (e)the plans and drawings located at Appendix 2.	Non-Compliant	• EIS • Response to Submissions report	• Site inspection and discussions • Annual Review reports • Environmental monitoring (website and internal records) • Rice Hull Shed maintenance invoice dated 4/07/2023. • Bore metres upgrade including Telemetry to allow for remote access by WaterNSW. Invoice dated 2023. • Appendix J of the EIS (Aboriginal Heritage Impact Assessment. OzArk 2015) • Appendix I of the EIS (Biodiversity Assessment Report SLR 2015)	An additional office building was observed during the site inspection. The date of construction of the office was not confirmed in this audit. It was unclear whether it had been constructed in 2018 or at some stage during Covid-19 (2021-2022). Minimal information has been provided in regards to the office building, including evidence of appropriate construction measures (activation of the CEMP). The office has a small footprint (approximately 90m2), however its installation still varies from the consent and these documents listed, and no evidence of consultation regarding the change was provided to the auditors. The OzArk Aboriginal Heritage Impact Assessment Report (report prepared as part of the EIS) described their study area as: "The direct impact footprint of the proposed works will be approximately 90ha of this area and includes the access road from the Sturt Highway." It is understood the surveys done for the OzArk report were done in the areas that were to be directly impacted, however survey points also talk to the general area surrounding that plot. The new office is located close to Farm 78 which the OzArk report's nearest survey was Plate # 4 "PPU 4, residences, and Bore 2". (Refer to Condition B31 for further findings on Aboriginal Heritage). The additional office built on the site in this audit period is located in an area that was in the Biodiversity Assessment Report's "areas not requiring assessment" as shown in Figure 8 of the report. Based on the report, it is likely this area was "native grassland". The Biodiversity Assessment Report defined its "study area" as: <i>Area of land containing the Development Site and land surrounding the proposed access road alignment and site entrance, which was subject to field surveys (including threatened species surveys). The boundary of the study area is shown in Figure 7.</i> Therefore, without evidence of due diligence prior to the construction of the office building this condition is considered non-compliant.	NC REC 1: ProTen to include the additional unapproved office building in the SSD6882 Modification application. 
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			Noted. From reviewing the documents for this IEA, there weren't any inconsistencies identified.	
A4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (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.	Compliant		• General evidence provided and site discussions • Official Caution DPE dated 22/09/2023 • Official Caution DPE dated 26/08/2022.	ProTen have been in the process of updating the WMP in the OEMP to reflect updates to triggers. DPE's show cause letters and official cautions acknowledge the non-compliances for A6 (farm operations limits) from 2021 onwards. Refer to Conditions A6 and B45 for further findings. No evidence of further requirements for plans and strategies provided by DPHI regarding reports and plans.	
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			The project commenced prior to this IEA, therefore this condition is not triggered.	
Farm Operations						
A6	The Applicant shall ensure that: (a)the Development does not exceed a maximum population of 3.92 million broilers at any onetime; (b)the stocking densities of the Development comply at all times with the standards detailed in National Animal Welfare Standards for the Chicken Meat Industry (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.	Non-Compliant	• Stocking Capacities for entire audit period • Show Cause response	• Examples of Batch/cycle numbers spreadsheets, Batch Verification Schedules. • Annual Review reports. • Show Cause letter from DPE dated 2022 in response to 2021 Annual Review. • Proten Response to Show Cause dated 28/7/2022. • Official Caution DPE dated 26/08/2022. • Show Cause letter from DPE dated August 2023 in response to the 2022 Annual Review. • Proten Response to Show Cause dated 12 September 2023. • Official Caution DPE dated 22/09/2023	During this audit period Baiada (broiler supplier for ProTen as well as the customer and processor) processing plant got approval to increase their capacity. Population of the Narrandera Farm was then expected to increase to keep up with the plant. Proten could not deny the incoming broilers from Baiada. ProTen argue the population exceedances were out of their control and were minor when compared to total population numbers. Proten believe they have managed any odour impacts associated with the population increase, and argue that odour is more so related to the shed stocking density (weight to square metre) rather than the total population number on a site or PPU. ProTen have remained under the 40kg/m2 stocking density limit required under Condition B8. (a) In Section 4.4 of the 2021-2022 Annual Review, Proten self-reports a non-compliance and explain: "The total number of birds recorded for batch 2202 was 3,995,242, which is a 75,242 exceedance of the permitted a maximum population. The total number of birds recorded for batch 2204 was 3,969,716, which is a 49,716 exceedance of the permitted a maximum population." ProTen continue to be <u>non-compliant</u> with this condition because of the requirements of the relationship with Baiada. (b) Proten advised they have firm standards regarding stocking densities, and have an internal stocking density standard which is less dense than the National Animal Welfare Standards for the Chicken Meat Industry, 40kg/m2. Population spreadsheets with total shed numbers, daily and total mortalities and sampled weight provided for the IEA were consistent with this. (c) Based on evidence provided, Proten have remained below the limit of 3.92 million total broilers placed on the first day of a cycle. (d) Section 4.4 of the 2021-2022 Annual Review reports a <u>non-compliance</u> because "Broilers were placed at each PPU at intervals of less than 36 hrs on 11 occasions during the reporting period." Again, in the 2022-2023 Annual Review reporting period, commencement of re-populating each PPU was under 36 hours. This occurred for the batches 2205, 2206, 2301, 2302, 2303, and 2304. (e) Section 4 of the 2022-2023 Annual Review reports a <u>non-compliance</u> because "On five occasions during the reporting period, population of the 5 farms was undertaken in less than 10 days." This occurred for five batches, 2206, 2301, 2302, 2303, and 2304. Placement non-compliances continued across the audit period due to the over-supply. It is understood the <u>non-compliance</u> with Condition A6a, A6d, and A6e continued in 2023 due to supplier need. ProTen are currently in the process of applying for a Modification.	NC REC 2: ProTen to apply for Modification due to the ongoing non-compliance in the project exceeding production and population limits.
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	• Evidence of employment. • Construction certificates • Certifier reports, inspections, consultation.	• ProTen Contact List with Names and details of residents on the farm accommodation. • Employment Contracts sighted at document review session and included Offer of Employment and Induction Pack from 2014, 2019, 2022 and 2023.	Farm Manager and Assistance Managers are housed in the farm houses. Evidence of employment with Proten was sighted at the document review session. Evidence of all Farm Managers living on site was provided. Narrandera includes Farms 75-79 and the employment contracts refers to the farms/PPUs in this way.	
Statutory Requirements						

[illegible]

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
B3	<p>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:</p> <p>(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.</p>	Compliant	<ul style="list-style-type: none">• Air Quality Management Plan• Results for Air quality, meteorological data, and odour.• Complaints register• Evidence of AQMP being prepared in consultation with EPA	<ul style="list-style-type: none">• OEMP• Met station results is managed by Green Brain.• Envirodata Field Calibration Report dated 18/01/2022• ProTen-wide Complaint register sighted at IEA inspection with last complaints added from March 2023. No complaints were recorded in this for Narrandera. Included all the information requirements.	<p>Air Quality Management Plan is in Appendix E of OEMP.</p> <p>Preparation a) Consultation done with the EPA is not attached to the AQMP. It is unclear whether the AQMP was provided to EPA. If any significant changes to the AQMP are required in the future, the AQMP must be provided to the EPA and the consultation appended to the management plan. b) Section 2, however there is no obvious ranking in the way the emission sources have been listed in Section 2.1 or displayed in Table 2-1. c) Table 2-1. Section 3 and 5. d) Table 2-1. e) i-iii) Section 2, in particular Table 2-1. For sub conditions iv - vii, these are not specific to the air quality control. The requirements are addressed in the Sections 3, 4, and 5.2.</p> <p>Implementation Narrandera does not require any air quality monitoring. Table 11 of the OEMP does outline criteria for particulate matter as from the EIS. The Site did not provide any air quality (including odour) complaints or incidents for this IEA period. The OEMP and AQMP do not expressly state that PM10 monitoring is not required despite there being criteria in the AQMP.</p> <p>Calibration certificate for the met station also provided by GreenBrain dated 2023. Envirodata also calibrated the met station in 18/01/2022 with Field Calibration Report provided.</p>	
Odour Validation Audit						
B4	<p>When directed by the EPA, the Applicant must submit an Odour Validation Report (OVR) to the EPA. The OVR must:</p> <p>(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 (h)any odour mitigation measures nominated must include a timetable for implementation</p>	Not Triggered	<ul style="list-style-type: none">• any consultation with EPA regarding odour?• OVR if triggered.• Odour monitoring results if triggered.	<ul style="list-style-type: none">• Site inspection and discussions	<p>No odour complaints in the audit period. Based on the evidence provided for the IEA, the EPA have not requested an odour assessment be undertaken.</p>	
Meteorology Monitoring						
B5	<p>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 Approved Methods for Sampling of Air Pollutants in New South Wales 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.</p>	Compliant	<ul style="list-style-type: none">• Met station maintenance, installation records.• Met monitoring results.	<ul style="list-style-type: none">• Met monitoring data spreadsheets.• Met station results is managed by Green Brain.• Envirodata Field Calibration Report dated 18/01/2022	<p>ProTen provided exported 10-minute monitoring results from random months in the IEA period with the monitoring parameters (e.g. December 2020, March 2021, July 2021, January 2022, May 2022, November 2022. February 2023, September 2023). The parameters in these included: Air temperature (2m), Air temperature (10m), Relative humidity, Wind speed, Wind direction, and Total rain.</p> <p>Narrandera changed weather monitoring systems on 30 August 2023, to an updated system with widgets and website. Calibration certificate for the met station also provided by GreenBrain dated 2023. Envirodata also calibrated the met station in 18/01/2022 with Field Calibration Report provided. Gaps in meteorological monitoring (required to be continuous) with changeover in software and contractors servicing the monitoring. However, this is not considered a non-compliance. It is understood ProTen used the BOM weather results instead during this servicing time.</p>	
Dust Management						
B6	<p>The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.</p>	Compliant		<ul style="list-style-type: none">• Site inspection• Appendix E of the OEMP (AQMP)	<p>Generally sound air quality management at the site inspection. Speed limits were posted at all relevant areas and roads were in sound condition. Based on the evidence provided there have been no complaints regarding dust generated by the project in this IEA period.</p> <p>Rice hull loading was the observed as the most "dusty" activity at the time of the inspection. The loader operator was advised to be wearing respiratory mask and PPE.</p>	
B7	<p>During construction and operation of the Development, the Applicant shall ensure that:</p> <p>(a)all vehicles on-site do not exceed a speed limit of 60 kilometres per hour; (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</p>	Compliant	<ul style="list-style-type: none">• Pre-starts, toolbox talks• Environmental site inspection records/checklists• Employee induction, site induction• Driver's Code of Conduct• Traffic Management Plan• Complaints register	<ul style="list-style-type: none">• Driver's Code of Conduct• ProTen Contractor Induction viewed on 11/12/2023.• "Individual Training Document completion status" PDF exports from online training, for Farm 76-78 staff.• Vehicle and Equipment Pre-Start Checklists, (hardcopies scanned in dated 2021, 2022)• Toolbox Talk Meeting Minutes, (hardcopies scanned in dated 2023).	<p>This audit period covers an operational phase. At the time of the inspection, ProTen showed the auditor the website for contractor management including all the Induction records "onlineinduction.com" for contractors. The Contractor Induction contains requirements around abiding by the speed limits, transport routes, etc. similar to the content of the Driver's Code of Conduct for the site. "Individual Training Document completion status" PDFs are evidence of tracking "new employee training", including when training was completed, next due date, and clear status ("not started" or "current"). New employee training contains the elements of Condition B7 as well as Traffic and Transport SOCs.</p>	
Animal Welfare and Best Practises						
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> <p>(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.</p>	Compliant	<ul style="list-style-type: none">• Regulator inspections (DPI)• Reports to RSPCA or correspondence from RSPCA• Meat Chicken Assessment Reports	<ul style="list-style-type: none">• Baiada Animal Welfare and Biosecurity Audit 4/4/2023• RSPCA Meat Chicken Assessment Report dated 10/10/2023• Baiada and RSPCA annual audits at each PPU	<p>No evidence was provided to indicate animal welfare practices were not complying with the listed manuals or guidelines. Refer below for the findings for the Appendix 1 measures. ProTen provided audits done by RSPCA and Baiada. RSPCA audits are required to be done twice annually. Baiada audits were also provided or sighted at the site inspection and are done regularly but at random.</p>	
Disease Management						
B9	<p>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:</p> <p>(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; (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.</p>	Compliant	<ul style="list-style-type: none">• Emergency Disposal and Bio-Security Protocol• Approval letter from DPE	<ul style="list-style-type: none">• Mortality pick-up dockets (contractor). (Random dates for IEA period).• OEMP Appendix L	<p>Emergency Disposal and Biosecurity Protocol in Appendix L of the OEMP. EDBP has not been updated in this IEA period and has been assessed in previous IEAs. The EDBP contains a cross-referencing table to track compliance with Condition B9.</p> <p>(a) Section 1.3 (b) Sections 1.2, 2, and 3 (c) Sections 3.1 and 3.2 (d) Section 3.5 (e) Section 3.6 (f) Section 3.5 (g) Section 2 (h) Section 3.5</p> <p>Based on site discussions, day-to-day mortalities go to the Baiada rendering plant. Wormtech composting facility is also the back-up facility (licenced by the EPA and certified to sell the composted product).</p> <p>It is noted the plan will be need to be updated for Modification 1 if approved.</p>	
Biodiversity						
Biodiversity Offset Strategy						

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
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 Framework for Biodiversity Assessment (OEH 2014) and the NSW Biodiversity Offsets Policy for Major Projects (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	• Annual Review 2018/20	• OEH Approved Certificate of Biodiversity Credits dated 2018. • Annual Reviews • Site Inspection	Previous audit report stated the 2018/19 Annual Review reported ProTen had not been able to identify any ecosystem credits despite submitting EOIs in the credit register. 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. Payment to the Biodiversity Conservation Fund for an offset obligation dated 2/07/2018 was also sighted for the previous IEA. Statement of reasonable equivalence also provided for this IEA. At the time of this IEA inspection, the biodiversity offset area on site was being maintained (allocated area in person, and in the management plans and plans of site), and is reported on in each Annual Review.	
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 Biodiversity Offset Strategy at Appendix K of the RTS prepared by SLR (dated 31 August 2015) have been completed	Compliant	• Annual Review 2018/2020		Refer to the finding above. Based on available information, alternate timing was agreed to by the Secretary.	
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.	Compliant	• Biodiversity Management Plan • Approval letter from DPE	• OEMP • Site Inspection	The Biodiversity Management Plan is attached to the OEMP as Appendix J. The BMP references information from the Biodiversity Offset Strategy prepared by SLR dated 31 August 2015 of the EIS. The north west remnant area was observed to be fenced and maintained at the time of the site inspection. Some new tree planting were observed at the inspection for some PPUs, and ProTen acknowledged the vegetation screens have still not met requirements but continue to maintain and do supplementary plantings. Table 1, Biodiversity Management Measures for the Development Site - Operational Phase, outlines measures related to the set-up of the temporary offset area as well as various Construction-phase measures. Refer to the improvement recommendation right.	IMP REC 1: Update the BMP along with the OEMP updates to ensure it is a current, practical document.
Traffic and Transport						
Site Access- Internal Roads and Parking						
B13	The Applicant shall ensure that: (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 AUSTRROADS; (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; (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	Compliant	• Site traffic plans • Traffic Management Plan • Signed copies of the Driver's Code of Conduct	• OEMP including site plans • Site inspection • Vehicle and Equipment Pre-Start Checklists, (hardcopies scanned in dated 2021, 2022) • Toolbox Talk Meeting Minutes, (hardcopies scanned in dated 2023). • Civil WAE Drawings Narrandera Entrance • Roll Base PDF • Engineers Intersection Design Statement • LRCE Entrance drawing WAE certified by Grant Dowling (LG Civil) dated 5.5.2022.	This condition would have been assessed in previous IEAs, however this IEA has noted the status during the site inspection and on site plans. The entrance to the site is large enough to prevent queuing and ProTen has not reported any incidents related to the operation of the project. As constructed plans dated 2022 were also provided. Therefore, based on evidence available this condition is considered compliant. The Driver's Code of Conduct in Appendix D of the OEMP contains these requirements and requires drivers to sign a declaration. However, ProTen was not able to provide copies of current signed Driver's Codes of Conduct. While the induction training module online and site sign in declarations cover aspects of the traffic and transport requirements of Narrandera, ProTen has not provided evidence of ensuring all new drivers accessing the farms are signing the Driver's Code of Conduct, however this is a non-compliance under Condition B16, the implementation of the Traffic Management Plan.	
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.	Compliant	• Evidence of approval/acceptance letter from the RMS	• LRCE Drawing "Intersection of Sturt Highway and New Access Road Setout Details" approved by RMS, dated 23.10.2015. • LRCE Entrance drawing WAE certified by Grant Dowling (LG Civil) dated 5.5.2022.	This is a construction condition and was not triggered inside this IEA period. However, this condition has been assessed and is compliant. The site provided LRCE design plans dated 2015 with approval from RMS and LRCE WAE plans for site-Sturt Highway intersection dated 2020 as evidence of compliance. The Certification of the entrance/intersection by certifier dated 5.5.2022.	
B15	Any works associated with the proposed Development shall be at no cost to RMS.	Not Triggered		• General evidence and site discussions	Based on site discussions and correspondence with agencies as required by the IEA Requirements, this condition is triggered.	
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: (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	Non-Compliant	• Traffic Management Plan • Signed copies of the Driver's Code of Conduct	• ProTen/Corporate Traffic Plan and Protocols sighted during Document Review. • OEMP Section 4.5 Traffic Management • Site inspection • ProTen Contractor Induction and Employee Training records (sighted examples from 2021, 2022, 2023)	The Traffic Management Plan is part of the CEMP, which has only been relevant to the development for the re-construction of Shed 3 at Farm 79. The CEMP, including the Traffic Management Plan, were not provided for this IEA. Therefore this condition is non-compliant because a copy of the TMP was not provided. It should be noted that: • The previous GHD IEA report did not assess the TMP, but instead referred to the 2017 IEA Report. • The 2017 Audit Report found this condition to be compliant. • Section 4.5 of the OEMP also outlines the traffic measures related to the operational phase. At the time of the site inspection these measures were being abided by, including while pick up and clean out stages of operations were being completed. The OEMP also has the Drivers Code of Conduct in Appendix D. ProTen was unable to provide signed copies of the Driver's Code of Conduct to the auditors to show new drivers accessing the site have signed this and been debriefed on the TMP/Table 14 of the OEMP. Therefore, while the TMP is a component of the CEMP, it is still relevant into the operational phase of the project, and Narrandera is considered non-compliant in terms of the implementation of the TMP.	NC REC 4: Update the induction process to require the Drivers Code of Conduct/Driver Inductions to be resigned annually in the online induction system, and keep these records easily accessible
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	• Waste Management Plan • Evidence of separating waste streams i.e. receipts from waste collection	• 2020 MIA QUIKSKIPs spreadsheets for each Financial Year records when the skip bins are picked up (twice monthly). Spreadsheet with December 2020-January 2022 during site inspection.	Spent bedding (litter), mortalities, chemical containers, and putrescible (general) waste included in the waste generated by the project. Evidence provided and sighted at the site visit of skip bins being regularly serviced (weekly) by local provider. Waste minimisation principles were observed at the site offices/facilities, as outlined in the Waste Management Plan. Skip bins were used for various domestic waste types (recyclables and general waste). It is understood the general waste goes to the Council landfills near Griffith via MIA Quikskips. No evidence was found to suggest waste materials from the project were not lawfully directed to the appropriate facilities.	
B18	Waste generated outside the site shall not be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste	Compliant	• Waste Management Plan	• General evidence and site discussions	Based on the evidence provided and discussions with site, it is understood no waste materials were accepted onto site in this IEA period.	
B19	The Applicant shall not stockpile, store or utilise spent bedding material in any way within the Development site.	Compliant	• Waste Management Plan • Evidence of spent bedding collection/ records of where spent bedding has been transported to	• Annual Reviews (annual waste volumes) • Waste Management Plan • Spent litter pick-up dockets from Bidgee Bulk company dated across 2023, some dockets dated 2021 and 2022 sighted at the inspection. • Site inspection	Based on evidence provided there was no evidence of spent bedding being stockpiled or utilised on the site. The company's biosecurity protocols do not facilitate the use of spent litter material near the PPUs due to biosecurity risk. Bidgee Bulk is the company that picks up and transports the spent litter. Pick-up dockets from Bidgee Bulk provide the amount collected and the intended destination. Based on site discussions, the 2022 flooding event created a higher risk of not being able to dispose of the spent litter off-site. However, ProTen identified the risk and averted the non-compliance by organising removal from the site.	
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	• Waste Management Plan • Evidence of mortalities being picked up/Records of collection	• Site inspection • OEMP • PPU population records including mortalities, sighted during inspection.	Condition not applicable in terms of No evidence of mortalities being disposed of (buried) on site, or any mass mortality events occurring in the IEA period. At the time of the shed fire at Farm 79, the shed was empty and being set up for the acceptance of birds in the new cycle. Mortalities are accepted by Baiada at the local rendering plant. Blood and bone, and other value-added products are produced.	
Waste Management Plan						

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
B21	<p>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:</p> <p>(a)detail the type and quantity of waste to be generated during construction and operation of the Development; (b)describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (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.</p>	Compliant	<ul style="list-style-type: none"> Waste Management Plan Approval letter from DPE Waste collection receipts/invoices/other evidence for various waste streams. Employee training and site inductions 	<ul style="list-style-type: none"> OEMP (and Waste Management Plan). Site inspection and discussions Annual Reviews Spent litter pick-up dockets from Bidgee Bulk company dated across 2023, some dockets dated 2021 and 2022 sighted at the inspection. Current Chemical Drum Recycling Register for each Farm. 	<p>Waste Management Plan (2016) is appended to the approved OEMP.</p> <p>a) Section 4.1 describes operational waste as is relevant to the phase of the project. Types and estimated quantities are also outlined. b) Section 3.1 lists key waste legislation. A full inventory of substances under the Dangerous Goods Code is included in the Emergency Plan (2016), but not in the WMP. c) Table 5 includes the waste type, its NSW classification, and disposal or reuse method. Some waste types do not include the way the waste is recycled, for example, the waste contractor that services oily rags, filters, batteries, light bulbs, etc. An improvement recommendation is suggested right. d) The Management and Mitigation Measures in Appendix 1 of the Consent are not in the WMP verbatim, but generally included in Table 6 (Waste Management and Mitigation Measures).</p> <p>Implementation Empty drums are recycled via Griffith Feed and Grain. ProTen take empty drums to GFG for transport to Wagga Wagga Kurrajong recycling centre.</p> <p>ProTen have had to accept batches that exceed the total population limit (Condition A6) in this audit period. This has increased the risk of inadequate storage space for mortalities. ProTen is expected to demonstrate each PPU have sufficient chiller space for the SSD Modification.</p> <p>Based on evidence provided, waste management is generally as per the WMP.</p>	
Hazard and Risk						
Dangerous Goods						
B22	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(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 the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997).</p> <p>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</p>	Compliant	<ul style="list-style-type: none"> Hazardous materials logbook/records Evidence of SDSs located on site. Employee training register / logbook 	<ul style="list-style-type: none"> Section 4.10 of OEMP Emergency Plan (from OEMP, 2016 and 2022 versions) Site inspection Current Chemical Drum Recycling Register for each Farm. 2020-2021 Annual Review 	<p>Dangerous goods on site included the LPG tanks, fuels (diesel, petrol), and chemical (water treatment including sodium hypochlorite). A full inventory of substances under the Dangerous Goods Code is included in the Emergency Plan (2016 and 2022 versions). Spill kits were present at each farm in relevant locations. SDSs were sighted at each of the farm offices.</p> <p>During the site inspection, large numbers of washed containers were present on some farms including around workshops and chemical storage/pump sheds. While compliant for storing containers on bunds suited to their capacity and in allocated areas, there were a large number of empty/ washed containers on site outside designated areas. There was no containers sighted with left over chemicals/ material inside. Refer to the improvement recommendation right.</p> <p>The diesel tanks on each farm were observed to have the additional screening recommended in the previous IEA done by GHD. At the time of the site inspection, water treatment chemical containers inside of storage and treatment sheds were stored on bunds appropriate to their capacity.</p>	IMP REC 2: Review the pick-up frequency for empty chemical (including sanitiser) containers to prevent a large number of empty containers being stored at the Farms or sitting on the ground outside of allocated storage areas (sheds).
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	<ul style="list-style-type: none"> Evidence of LPG tanks and areas complying with Australian Standards. 	<ul style="list-style-type: none"> Site inspection OEMP 	At the time of the site inspection, the areas around the LP Gas were maintained appropriately (signage, and bare earth reducing fire load). The Storage and Handling of LP Gas standard is referred to in the OEMP.	
Pre-construction						
B24	<p>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:</p> <p>(a)a Fire Safety Study for the Development, covering relevant aspects detailed in the Department's publication Hazardous Industry Planning Advisory Paper No. 2 - Fire Safety Guidelines and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. 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 (b)a Final Hazard Analysis prepared in accordance with the Department's Hazardous Industry Advisory Paper No.6 - Guidelines for Hazard Analysis</p>	Not Triggered	<ul style="list-style-type: none"> Fire Safety Study Final Hazards Analysis Evidence of approval of the Fire Safety Study and Final Hazardous Analysis 	<ul style="list-style-type: none"> Fire Safety Study 2020 IEA Report by GHD Narrandera Emergency Plan 2016. Narrandera Emergency Plan, October 2022. 	<p>a) This condition was closed out in the previous IEA period, with the finalisation and approval of the Fire Safety Study by DPIE dated 1/5/2020. b) The Preliminary Hazard Analysis (SLR, 2015) is referred to throughout Narrandera's Emergency Plans (both versions - 2016 and 2022).</p>	
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 Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines	Compliant	<ul style="list-style-type: none"> Emergency Plan Emergency Plan Addendum Report. Revision 1, GHD 2020 Site inductions 	<ul style="list-style-type: none"> Emergency Plan was updated December 2022 with PIRMP details (minor update with contact details). DPE's response to the fire incident. Incident reports regarding the 2021 fire to agencies (DPE, EPA). Environment Incident Report: Attachment 1 	<p>Emergency Plan (2016) by SLR details the emergency procedures for this site. Table 2 outlines the requirements of the HIPAP 1 and where they are addressed in the document. ProTen advised minor updates to the Emergency Plan were completed in this IEA period to reflect site details for example current site personnel and this version is dated 2022. The Emergency Plan is updated annually (as frequently as the PIRMP testing and Annual Review reports) to ensure the document is kept up to date and the update corresponds to staff training.</p> <p>ProTen provided documents outlining an incident at Farm 79 in the audit period and the following is a summary based onsite discussions and the documents provided: On 18/01/2021 at 3pm litter material in Shed 3 at Farm 79 caught on fire. The cause of the fire was determined to be the spreading of litter/bedding by machine. Based on the reports provided, shed 3 was the only shed affected and water used to fight the fire was largely contained to inside the shed (concrete base and contained bottom of shed) or remained within the swales and sediment dams of the PPU water management system. Based on the correspondence between Proten and DPE that was provided the incident was reported at 10:56PM 18/01/2021. ProTen notified Safework NSW of the incident at 9PM 18/01/2021. Based on the PDF "EPA Notification email - C00806-2021" ProTen notified EPA of the incident 10am 19/01/2021. Other parties notified of the incident included Narrandera Council and NSW Health on 19/01/2021. An incident report was provided shown to be sent to the EPA and DPE on 21/01/2021, less than 3 days following the incident. This is compliant with the requirement to provide the incident report within 7 days to DPHI. Coroner's Court "Notice of Dispensing Fire Inquiry" was also supplied in regards to the fire but this is not considered to be relevant in this IEA.</p>	
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			This condition is not relevant to this IEA period.	
Noise						
Construction Noise						
B27	<p>Construction activities associated with the Development shall be undertaken during the following construction hours:</p> <p>(a)7:00am to 6:00pm Mondays to Fridays, inclusive; and (b)8:00am to 1:00pm Saturdays; and (c)at no time on Sundays or public holidays</p>	Non-Compliant	<ul style="list-style-type: none"> Any construction activities in the audit period? 	<ul style="list-style-type: none"> Site inspection and discussions 	<p>The project completed the construction phase several years ago. The project is currently in an operational phase.</p> <p>However, the following construction activities occurred inside this audit period: - Reconstruction of Shed 3 at Farm 79 (due to the fire incident)</p> <p>No evidence was provided to indicate whether construction occurred inside or outside these hours. While there were no evidence reviewed that would suggest construction would have occurred outside of these hours, this condition is considered non-compliant due to a lack of evidence provided by ProTen. The NC Recommendation (right) suggest ProTen review record-keeping systems.</p>	NC REC 5: Update records-management procedures and include the responsibility across more than one position to ensure sound record-keeping. This should be done in Section 3.2 of the OEMP to clearly outline roles for the development, including the Environmental Representative position described in Condition C15 of the Consent.
B28	<p>Construction works outside of the standard construction hours identified in Condition B27 may be undertaken in the following circumstances:</p> <p>(a)construction works that generate noise that is: (i)no more than 5 dB(A) above rating background level at any residence in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009); and (ii)no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (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; (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</p>	Not Triggered	<ul style="list-style-type: none"> Any works outside of approved hours? 	<ul style="list-style-type: none"> Site inspection and discussions 	Based on site discussions this was not triggered.	

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action																				
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: (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.	Not Triggered		• Site inspection and discussions	It was noted that construction waste from burned-down Shed 3 was still present at Farm 79. Based on site discussions ProTen was considering re-purposing the concrete slab by crushing to a ballast-like material for stabilisation/prevent erosion in channels and sediment dams. This activity would likely be noisy and should fall under the requirements of this condition. Based on information on the construction of the additional office and Shed 3 at Farm 79, this condition has not been triggered in the IEA period.																					
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. 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.	Non-Compliant		• Site inspection and discussions	Minimal documentation was provided regarding the construction noise management for Shed 3 of Farm 79 in this audit period. No noise complaints were received by the site in the audit period. Based on site discussions there were no issues related to construction noise for Shed 3 and the additional office, however Narrandera provided no documented evidence of reviewing noise management and limits for those activities. This condition has been called non-compliant due to the lack of evidence to support a "compliant" finding. Construction activities have a potential for a greater noise impact.	Refer to NC REC 5 above.																				
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 in a previous IEA.																					
Operational Noise Limits																										
B32	The Applicant shall ensure that noise from the operation does not exceed the limits in Table 1 below <table><tr><th colspan="5">Table 1 – Noise Limits dB(A)</th></tr><tr><th>Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr><tr><td></td><td>L_{Aeq}(15 minute)</td><td>L_{Aeq}(15 minute)</td><td>L_{Aeq}(15 minute)</td><td>L_{A1} (1 minute)</td></tr><tr><td>All privately owned residential premises</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> 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.	Table 1 – Noise Limits dB(A)					Location	Day	Evening	Night			L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	All privately owned residential premises	35	35	35	45	Compliant	• Consultation with the EPA • Noise monitoring reports/results • Complaints register	• Site inspection and discussions • OEMP	INP 2000 (EPA) is understood to be the Industrial Noise Policy by the EPA. Noise Policy for Industry replaces this version. There is no noise management plan and no routine noise monitoring required for the project. The OEMP does not outline any routine noise monitoring program. Section 4.4 of the OEMP outlines the management measures to address noise, however no noise monitoring is committed to. ProTen have not conducted operational noise monitoring because there has been no noise complaints. The site has never received a complaint. ProTen has not undertaken any noise monitoring inside the audit period. ProTen understand this condition would not be triggered until a complaint regarding noise was received. This requirement is not outlined clearly in Section 4.4 (Noise) of the OEMP. Based on discussions, ProTen understand that only when a complaint regarding noise occurred would ProTen then conduct noise monitoring to confirm the noise level. However, there is no inclusion of these noise limits in the OEMP under the Noise section or the Complaints Strategy section. This condition is considered compliant because there have been no noise complaints in this audit period and there are no noise monitoring commitments in the approved OEMP. Therefore, the audit team have included an improvement recommendation right.	IMP REC 3: Outline in the OEMP that noise monitoring would be triggered in the event of a noise complaint regarding the project or as directed by the DPHI or EPA. Alternatively, conduct routine (annual) noise monitoring to demonstrate the site is complying with those noise limits in the consent. This will also act to assess compliance again EPL condition L3.1.
Table 1 – Noise Limits dB(A)																										
Location	Day	Evening	Night																							
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)																						
All privately owned residential premises	35	35	35	45																						
Noise Modifying Factors																										
B33	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. Note: Low frequency noise is currently under review by the Environment Protection Authority and the Department of Planning and Environment	Compliant	• What equipment/activities generate this type of noise during operations?	• Site inspection and discussions • OEMP • Complaints log	Noted. During the site inspection noise was reasonable (noise sources included trucks picking up poultry, chillers running, site vehicles). No evidence provided that noise was an issue during this IEA period. The OEMP does not outline what sources contribute low frequency noise during operations. These sources are not outlined in the Noise report by Global Acoustics in the EIS either.																					
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	• Rice Hull shed designs and Construction Certificate	• Occupation Certificates from Dartnell Building Certifiers for residences on the Development area dated 2016. • Occupation Certificates for the PPU sheds and associated infrastructure by Dartnell Building Certifiers dated 6 November 2017 • Compliance Certificate for Building Design, for rice hull storage shed, by Northern Consulting Engineers dated 2015.	Existing shed was still being used at the time of the site inspection. Previous IEAs have recorded this condition as compliant, however note that the construction certificate provided does not include the rice hull storage shed. The shed design compliance certificate dated 2015 was provided. ProTen did not have issues at the rice hull shed in the 2022 floods. Note, the condition implies rice hulls are used to bulk up feed but rice hulls are used as roost bedding.																					
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	• Building design plans and Construction Certificates	• OEMP Flooding Emergency and Evacuation Plan (2016). • Compliance Certificate for Building Design, for rice hull storage shed, by Northern Consulting Engineers dated 2015.	Requirement outlined in the Flooding Emergency and Evacuation Plan. Assessed as part of previous IEAs with the shed design compliance certificates as evidence.																					
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: (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	Compliant	• Emergency and Evacuation Plan • Approval of the Emergency and Evacuation Plan • Evidence of consultation with Council and the NSW State Emergency Service	• OEMP Flooding Emergency and Evacuation Plan (2016). • Site discussions	Flooding Emergency and Evacuation Plan is in Appendix M of the OEMP. Preparation (a) Section 1.3 (b) Section 3 (c) Section 4 and 5.6 (d) Section 3 and 5.4 (e) Section 5 (f) Section 3 and 5 (g) Section 5.2 Implementation: ProTen advised no flooding occurred in the audit period, and nothing from the Flooding Emergency and Evacuation Plan was triggered.																					
Construction Soil and Water Management																										
B37	Soil and water management measures consistent with Managing Urban Stormwater - Soils and Construction Vol. 1 (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	Compliant		• Site inspection • 2021-2022 Annual Review • Purchase Orders to plumbers for pipe leak repair	Note, the project has been in operations phase during this IEA period. At the site visit, generally blue book standards were being adhered to. Evidence of erosion repair was observed at some water treatment sheds where the water pumps had had a leak and area was stable at the time. The 2021-2022 Annual Review discusses the contributing factors of the 2021 discharges from Farms 77, 78, and 79 as "a series of pipe breakages" however it is understood these were promptly repaired and ongoing discharges did not occur. ProTen generally demonstrated regular maintenance of the engineered water management systems of the farms.																					
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	Non-Compliant	• Water monitoring results for the Audit period, or water monitoring for all discharges.	• Aitken Rowe Testing Lab results sheets dated 26/10/2021, 8/11/2021, and 18/11/2021. • Site inspection and site discussions • 2021-2022 Annual Review	The EPL 20748 does not have any licenced discharge points and no discharge limits. The Water Management Plan (part of the OEMP) contains water quality criteria. Based on evidence provided (Annual Review 2021-2022 and Lab results) there have been discharges in the IEA period on the following dates and the grab samples collected exceeded the Nitrogen and Phosphorous limits in Table 13 of the WMP: 26/10/2021 (Farm 79) 8/11/2021 (Farm 78) 18/11/2021 (Farm 77) Note, these are not licenced discharge points. The discharges occurred due to heavy rainfall, however it did not qualify for the exemption in EPL Condition O5.3. Refer to O5.3 for further findings. Based on the information provided, ProTen pumped water out of the sediment dams to manage water levels and onto the surrounding paddocks which are used for cattle and sheep grazing and cropping. ProTen note that there was no risk of the water then entering waterways because the closest waterway to the site is 9.5km away. Refer to the EPL findings, and findings below for the Water Management Plan.	No further recommendations as ProTen have begun to address this.																				

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
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 x 10-9 metres per second and a clay liner thickness of no less than 600mm, or an equivalent alternative	Compliant	<ul style="list-style-type: none">• Geotechnical Investigation dated 2018• Groundwater monitoring results• Evidence of permeability of site stormwater and water storages.	<ul style="list-style-type: none">• Site inspection• GHD IEA Report, 2020• Geotechnical Investigation, Existing Sediment Ponds, Existing Poultry Farms 75-79, Sturt Highway Euroley NSW dated 28/05/2018, Aitken Rowe Geotechnical Engineering	The previous IEA report contained information on the Aitken Rowe geotechnical investigation which found the permeability requirements of parts of the water management system (sediment dams, channels, and swales) were not met. However, further evidence provided regarding the construction Optimum Moisture Content (OMC) concluded there was a low risk of the surface water management system contaminating groundwater. The auditors provided no further recommendations and it is understood this was closed out. Based on the evidence provided, there were no changes to the surface water management system and water storage facilities in this IEA period and so this condition is considered compliant.	
Groundwater						
B40	The groundwater bores for the Development shall be constructed in accordance with the Minimum Construction Requirements for Water Bores in Australia, Third Edition, February 2012, (National Uniform Drillers Licensing Committee, 2012)	Not Triggered	<ul style="list-style-type: none">• Any GW bores installed in this audit period?	<ul style="list-style-type: none">• Site inspection• OEMP	No new groundwater bores have been installed in this IEA period based on the information provided. This condition has been assessed in previous IEAs for the two existing bores.	
B41	Groundwater extracted from the bores shall be treated in accordance with the standards contained within the National Water Biosecurity Manual- Poultry Production (DAFF, 2009)	Compliant	<ul style="list-style-type: none">• Groundwater monitoring results• GW Treatment training register or Protocol	<ul style="list-style-type: none">• Site inspection• OEMP	NWB Manual is referenced in key documents. Based on information provided, water treatment is consistent with the Manual.	
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	<ul style="list-style-type: none">• Groundwater monitoring results including quantities• Annual Reviews	<ul style="list-style-type: none">• Annual Reviews	The two bores onsite fall under WAL 11788. The WAL permits the extraction of up to 488 ML/year. <ul style="list-style-type: none">• 2020-2021 434 ML extracted• 2021-2022 456 ML extracted• 2022-2023 470 ML extracted Based on the information provided ProTen will not exceed the WAL limit of 488ML for the 2023 calendar year.	
Bunding						
B43	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection - Participants Handbook</i> .	Compliant	<ul style="list-style-type: none">• Chemicals and hazardous materials tracking register	<ul style="list-style-type: none">• Site inspection• OEMP• Chemical Application and Storage Report, multiple PDFs provided.• Narrandera Emergency Plan (Internal copy with 2022 PIRMP updates)	At the site inspection fuels and oils were appropriately stored on bunds or bunded areas in accordance with the EPA Handbook. Based on the site inspection, not all chemical containers (water treatment chemicals) were stored on bunds. However these containers had been emptied and washed prior to being placed on the ground. Due to the number of empty containers on the site at the time of the site inspection (refer to Photo Log), the Drum Muster pick up schedule should be revised to be more frequent. The diesel tanks on-site are bunded by a concrete slab. However, the area around the tanks where vehicles would stop and refuel are not on a bund. Therefore, ProTen should ensure refuelling should occur at the diesel and unleaded tanks at the former chiller area.	Refer to IMP REC 2.
Domestic Effluent						
B44	The Applicant shall obtain the relevant license/approval from Council under section 68 of the Local Government Act 1996 prior to the commencement of construction for all domestic effluent disposal and management systems on-site.	Compliant	<ul style="list-style-type: none">• Evidence of effluent/sewer system servicing	<ul style="list-style-type: none">• Site inspection and discussions• Purchase Orders for plumber provided from 2020, 2021, 2022, 2023.	Historical condition. Based on site discussions and the evidence provided this was closed out in a previous IEA period. Based on available evidence, ProTen continue to suitably maintain the sewage systems on site.	
Water Management Plan						
B45	<p>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:</p> <p>(a)be prepared in consultation with the DPI;</p> <p>(b)detail water use, metering, disposal and management on-site;</p> <p>(c)detail the number and location of piezometers on-site;</p> <p>(d)detail the water licence requirements for the Development;</p> <p>(e)detail the management of wastewater streams on-site;</p> <p>(f)contain a Surface Water Management Plan, including;</p> <p>(i)a program to monitor:</p> <ul style="list-style-type: none">•surface water flows and quality;•surface water storage and use; and•sediment basin operation; <p>(ii)sediment and erosion control plans;</p> <p>(iii)surface water impact assessment criteria, including trigger levels for investigating any potentially adverse surface water impacts;</p> <p>(iv)a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria; and</p> <p>(g)contain a Groundwater Management Plan, including:</p> <p>(i)baseline data on groundwater levels and quality;</p> <p>(ii)a program to monitor groundwater levels and quality;</p> <p>(iii)groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and</p> <p>(iv)a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.</p> <p>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.</p>	Non-Compliant	<ul style="list-style-type: none">• Water Management Plan• Evidence of consultation with DPI• Approval letter from DPE	<ul style="list-style-type: none">• Narrandera Water Data - 2023_2024_30Sep23.pdf file on ProTen website.• Surface Water Exceedance Investigation report by SLR dated 2022.• Water Monitoring Notification letter for 6/09/2022 exceedance dated 31 October 2022.• Water Monitoring Notification letter for 23/10/2023 exceedance dated 17 November 2023.• Water Management Plan - Appendix G of the OEMP, dated 20/05/2020.• Annual Reviews (December 2020- April 2023)• "Surface Water Exceedance Investigation 2022" report dated 9 January 2023 by SLR for exceedances on 6/09/2022.• Evidence of monitoring being done by NATA accredited lab (Aitken Rowe Letters)• Notification for water exceedance on 20.11.2023 - Portal screenshot• Evidence of sampling on 24/09/2021 (chain of custody sheet).	<p>Water Management Plan in Appendix G of the OEMP</p> <p>Preparation:</p> <p>(a) Section 1.3. Groundwater monitoring was reduced from quarterly to every six months in this IEA period. Based on evidence provided, Proten consulted with the appropriate parties, in particular NRAR, for this.</p> <p>(b) Section 5</p> <p>(c) Section 8.1</p> <p>(d) Section 2.4</p> <p>(e) Section 5</p> <p>(f) Sections 6, 7 and 9.</p> <p>(g) Sections 8-9</p> <p>(h) Section 5.6</p> <p>Implementation: As shown in the publicly available water monitoring results, six-monthly surface water monitoring has consistently exceeded the ANZECC Criteria and NSW Water Quality Objectives criteria for Total Nitrogen, Nitrate/Nitrite, and Phosphorus. Piezo 1 registered a 2 m reduction in Standing Water Level during the March 2023 sampling event and has therefore exceeded the 2 m trigger level from baseline average outlined in the WMP. Standing Water levels for Piezo 1 Deep, Piezo 2 Deep, Piezo 3 Deep, and Piezo 6 Deep in September 2023 also did not meet criteria. ProTen provided evidence of engaging specialists to update the WMP.</p> <p>Evidence of missed sampling and exceedances under the WMP, therefore <u>non-compliance</u>.</p> <p>Results provided included the Lab Analysis Reports for the discharges from Farms 79, 78, and 77 on 26/10/2021, 8/11/2021, and 18/11/2021, respectively. These results exceeded the criteria in the WMP for Nitrogen and Phosphorus. This is a <u>non-compliance</u>. It should be noted that the Aitken Rowe Testing Lab results sheets did not contain results for all parameters listed in Table 13 - Surface water quality impact assessment criteria and water quality objectives, for example no TSS or Ammonia results were provided.</p> <p>As described under Condition B38 findings, three PPUs (Farms 79, 78, and 77) pumped out from the sediment dams to the neighbouring paddocks in 2021. The 2021-2022 Annual Review explains the contributing factors were high rainfall in the Riverina region in quarter 3 of 2021 and a series of pipe breakages contributing to water levels in the sediment dams. The Annual Review reported these discharge events as non-compliance with Condition B38, however they are also non-compliant with this condition (B45) because ProTen did not follow the Response Plan in Section 9 of the WMP. The Response Plan requires the results to be provided to reviewed to determine the need for an investigation report.</p> <p>The 2022 Annual Review also outlines how ProTen installed flow meters at the time to identify differential flows and turn on an alarm when triggered.</p> <p>Notifications and investigation reports were provided for the following surface water exceedances:</p> <ul style="list-style-type: none">• 6 September 2022 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling.• 15 March 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling.• 23 October 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorus (mg/L) during the 6-monthly sampling. <p>Notifications and investigation reports were provided for the following groundwater exceedances:</p> <ul style="list-style-type: none">• 15 March 2023 pH criteria at Piezo 1 Deep, Piezo 2 Deep, Piezo 3 Deep, Piezo 5 Deep and Piezo 6 Deep. For this sampling event the DPHI also noted that Piezo 1 Deep measured at 24.4 mTOC1, 2m from the baseline average of 26.4 mTOC1.• 23 October 2023 drawdown criteria of +/- 2m at Piezo 1 Deep, Piezo 2 Deep and Piezo 3 Deep (required as part of 6 monthly groundwater level and quality sampling). <p>Proten are in the process of finalising the WMP with updated, site-specific trigger values. However a Memorandum of the Surface Water Quality Trigger Review by SLR dated 20/04/2023 was provided for this IEA which justifies the change from ANZECC triggers to site-specific triggers. ProTen have been engaging specialists since January 2023 to do the review into the Water Management Plan. The auditor sighted evidence of SLR reviewing and updating the OEMP and WMP throughout 2023.</p> <p>A letter from DPE with no date acknowledged the September 2023 exceedances and the WMP review, and requested no further actions.</p> <p>Under Section 9 - Surface Water and Groundwater Response Plan, ProTen refer to using the Environmental Incident Management System in the OEMP when surface water or groundwater criteria are triggered. However, it is unclear what this system is and there are no further references in the OEMP .</p>	No further recommendations as ProTen have begun to address this in the Modification and water reviews/studies.
Landscapes						

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
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		<ul style="list-style-type: none"> Site inspection Site discussions around complaints Complaints register 	No evidence was provided to indicate there is new or non-compliant lighting at the site. Based on the complaints register provided, there have been no complaints regarding lighting. Based on the incident reports provided, there were no lighting-related incidents in the audit period.	
Landscape Management Plan						
B47	<p>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:</p> <p>(a) detail the species to be planted on-site to achieve a vegetation buffer of 40 metres around each PPU;</p> <p>(b) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and</p> <p>(c) be consistent with the Management and Mitigation Measures at Appendix 1.</p>	Compliant	<ul style="list-style-type: none"> Landscape Management Plan Approval letter from DPE Evidence of supplementary planting 	<ul style="list-style-type: none"> Site inspection OEMP, including LMP by SLR 12/11/2015 Wagga Nursery purchase orders dated August 2022, as proof of supplementary plantings. 	<p>Previous IEAs have assessed compliance of this condition in terms of "prior to commencement of operations". ProTen have the LMP in the Narrandera OEMP document. Based on the evidence provided the LMP was also approved as part of the OEMP.</p> <p>a) Note, the planted vegetation buffers are roughly aligned with each PPU, but do not encircle each PPU for 40m as is suggested in Figure 3 of the LMP.</p> <p>b) Section 2.6.</p> <p>c) Generally consistent with Appendix 1 statement of commitments, which is very limited in relation to landscaping for the project anyway (under Biodiversity and Visual Amenity).</p> <p>Based on copies of weekly site inspections and discussions with site personnel, ProTen are maintaining the trees planted in the screen areas and replanting occasionally. ProTen have also identified an appropriate contractor to support species selection and provision of local providence plants (related to the carbon credit scheme).</p>	
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	<ul style="list-style-type: none"> GHG policies, and/or site procedures OEMP 	<ul style="list-style-type: none"> Site inspection and review of documents OEMP Section 4.12 	<p>Energy Efficiency and Greenhouse Gas section in the OEMP. Measures are outlined in Table 23. In addition to these ProTen have installed solar panels at the site. Currently the development site has sheep graze in the paddocks surrounding the PPUs, but ProTen began a carbon credit application for this area in 2023.</p> <p>The project has diesel generators for power separate to the mains (e.g. in case of outages).</p> <p>No further GHG minimisation measures were provided.</p>	IMP REC 4: Update Table 23 of the EMP with the current energy efficiency measures at Narrandera (e.g. solar power).
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	Compliant	<ul style="list-style-type: none"> Evidence of archaeological surveys being completed. 	<ul style="list-style-type: none"> Site inspection and discussions 2020 IEA Report, GHD 	This condition relates to pre-construction actions. Based on previous IEA Reports, it is understood this condition was closed out.	
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 PPUs. Representatives from relevant Registered Aboriginal Parties should be included in this assessment	Compliant		<ul style="list-style-type: none"> Site inspection and discussions 2020 IEA Report, GHD 	This condition relates to pre-construction actions. Based on previous IEA Reports, it is understood this condition was closed out.	
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 Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (OEH, 2010) as amended.	Non-Compliant	<ul style="list-style-type: none"> Any other disturbance for the operations? Pre-clearance surveys. 	<ul style="list-style-type: none"> Site inspection Aboriginal Heritage Impact Assessment OzArk 2015 	<p>No significant alteration outside of the Development footprint were observed during the site inspection. However, there was an additional office installed in the development area near PPU 4/Farm 78 or Bore 2 (naming derived from EIS OzArk Aboriginal Heritage Impact Assessment Report).</p> <p>ProTen did not provide documents which related to the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (OEH, 2010) prior to the installation of the office.</p> <p>The OzArk Aboriginal Heritage Impact Assessment Report (report prepared as part of the EIS) described their study area as: <i>"The direct impact footprint of the proposed works will be approximately 90ha of this area and includes the access road from the Sturt Highway."</i> It is understood the surveys done for the OzArk report were done in the areas that were to be directly impacted, however survey points also talk to the general area surrounding that plot. The new office is located close to Farm 78 which the OzArk report's nearest survey was Plate # 4 "PPU 4, residences, and Bore 2".</p> <p>No documents related to the office were provided for this IEA (such as pre-disturbance reports or pre-clearing surveys). Due to inadequate evidence provided, this condition is considered <u>non-compliant</u>.</p>	No further recommendations as disturbance has already occurred. Refer to NC Rec 1.
B52	The three known Aboriginal sites (EPPC-ST1, EPPC-ST2 and EPPC-H1) shall be fenced during construction and operation of the Development to exclude vehicles, pedestrians and animals from the sites	Compliant	<ul style="list-style-type: none"> Site inspections/notes or Annual Reviews which record any maintenance done for existing sites. 	<ul style="list-style-type: none"> Site inspection OEMP 	<p>Fenced Aboriginal sites were observed during the site inspection. The fences and conditions around the sites were in good condition, excluding vehicles, pedestrians, and animals on the property (sheep).</p> <p>During the site inspection it was discussed that a branch had fallen off one of the trees (not the scar tree) within the 10m buffer area. It is noted that if scarred trees naturally fall over, the Leeton and District Local Aboriginal Land Council (L&DLALC) should be contact as stated in Section 4.1 of the Aboriginal Cultural Heritage Management Plan. Therefore, an improvement recommendation is provided right to follow up with the L&DLALC on this matter.</p>	IMP REC 5: Contact the L&DLALC in regards to the fallen limb within the scarred tree exclusion area for further advise.
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 NSW Heritage Act 1977 may be required before further work can continue in that area	Not Triggered	<ul style="list-style-type: none"> Any earthworks during the audit period? Any finds? 	<ul style="list-style-type: none"> Site inspection OEMP (Appendix K) 	Based on information provided, not triggered in this audit period.	
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 National Parks and Wildlife Act 1974.	Not Triggered		<ul style="list-style-type: none"> Site inspection OEMP (Appendix K) 	The Unexpected Finds Protocol is included in Appendix K of the OEMP (also referred to as "Unanticipated Finds Protocol") and describes the process from this condition. Based on information provided, no sites or remains were discovered or suspected.	
Aboriginal Cultural Heritage Management Plan						
B55	<p>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:</p> <p>(a) describe the management actions, including fencing, for the three known Aboriginal sites (EPPC-ST1, EPPC-ST2 and EPPC-H1) during construction and operation; and</p> <p>(b) incorporate any additional sites found during pre-clearance surveys</p>	Compliant	<ul style="list-style-type: none"> Aboriginal Cultural Heritage Management Plan. Approval letter from DPE 	<ul style="list-style-type: none"> Site inspection OEMP (Appendix K) 	<p>The ACHMP is in Appendix K of the OEMP.</p> <p>a) Section 4. At the site inspection the management actions (fencing) were maintained.</p> <p>b) No evidence was provided to indicate additional sites were found since pre-clearance surveys.</p>	
Environmental Management Reporting and Auditing						
Construction Environmental Management Plan						
C1	<p>C1. The Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <p>(a) be approved by the Secretary prior to the commencement of construction;</p> <p>(b) identify the statutory approvals that apply to the Development;</p> <p>(c) outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>(d) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;</p> <p>(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;</p> <p>(f) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and</p> <p>(g) include the management plans under Condition C2 of this consent.</p>	Non-Compliant	<ul style="list-style-type: none"> Construction Environmental Management Plan. DPE's approval of the CEMP 	<ul style="list-style-type: none"> Site inspection and site discussions 	<p>CEMP not provided for this IEA, therefore this condition could not be assessed. As no evidence has been provided and some construction activities have occurred this condition is considered <u>non-compliant</u>.</p> <p>The project was in an operational phase for this IEA period. However, construction activities were undertaken in the IEA period. These included the re-construction of Shed 3 Farm 79 and the addition of a small office near Farm 78 (unclear whether construction occurred in 2018 or at some point during Covid-19 (2021-2022). ProTen could not provide records as evidence of implementing the CEMP during the construction of Shed 3 and the office.</p> <p>DPHI's approval of the CEMP could not be provided by ProTen because copies of these records could not be found, and it is likely they were held by a previous consultant.</p>	NC REC 6: Restore the CEMP and TMP (may need to be requested from previous contractors). Alternatively, update the OEMP to describe the construction activities permitted under the Consent and associated requirements, and update the traffic section.

[illegible]

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
C8	<p>Each year, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(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: (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; (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</p>	Compliant	<ul style="list-style-type: none">All Annual Reviews from the Audit PeriodDPE Responses to the submitted Annual Reviews	<ul style="list-style-type: none">Annual Reviews for 2020, 2021, 2022, and 2023. (Note, these are on the website).	<p>Annual Review reports provided covered the reporting period to April 2023. The Annual Review associated with the period May 2023 to November 2023 is not due until the end of July 2024. Based on evidence provided for this IEA, Narrandera has been attaching any letters from DPE/DPHI following the submission on the Annual Reviews to the following Annual Review report appendices.</p> <p>(a) Throughout document, particularly Sections 4 and 11. (b) Note, ProTen has an annual review period based on a different reporting period (22-21 April). Therefore the "calendar year" of this condition is not applicable. (i) Sections 6, 7, and 10. (ii) Sections 3.5, 6, 7, and 10. (iii) Sections 6, 7, and 10. (iv) Sections 6 and 7. (c) Sections 1 and 10. (d) Section 7, Appendix D, and Appendix E. (e) Sections 6 and 7. (f) Section 11. Annual Reviews are not structured to include proposed improvements under each environmental topic as outlined in Section 6 of the Annual Review Guideline (DPE, October 2015). See improvement recommendataion.</p>	IMP REC 8: Describe "proposed improvements" under the relevant environmental topic in Section 6 and Section 7 (Water) to clearly link areas of concern or incidents to improvement responses and for consistency with Section 6 of the Annual Review Guideline (DPE, October 2015).
Reporting						
Incident Reporting						
C9	<p>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.</p>	Non-Compliant	<ul style="list-style-type: none">Incident notificationsIncident reports	<ul style="list-style-type: none">Incident reports regarding the 2021 fire to agencies (DPE, EPA) within 24 hours.2021-2022 Annual ReviewEvidence of sampling on 24/09/2021 (chain of custody sheet).Lab Analysis Results for 26/10/2021 at Farm 79, 8/11/2021 Farm 78, and 18/11/2021 Farm 77.ProTen letter to DPE, dated 31 October 2022 (Actual file name: Notification to DPE Water monitoring exceedance 31.10.22).	<p>The POEO Act defines material harm as: <i>(1) For the purposes of this Part-- (a) harm to the environment is material if-- (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.</i></p> <p>Incident response procedures are described under the OEMP in Section 9, Environmental Incident Management Strategy.</p> <p>The shed 3 fire incident notifications were sent out within 24 hours.</p> <p>ProTen sent out a letter to DPE to notify of the potential for a non-compliance with A2(d); B8 (f), B19 and B21(d) due to flooding on local roads preventing waste (spent litter) to be picked up from the site. However, based on site discussions, the storage of spent litter on site did not end up occurring.</p> <p>Surface water discharge incidents were not reported until the Annual Review report (discharges on 26/10/2021 at Farm 79, 8/11/2021 Farm 78, and 18/11/2021 Farm 77). These discharges exceeded criteria in the WMP, and therefore had the potential for material harm (147-1 a. i). Therefore, <u>non-compliant</u>. However, note there was no evidence of actual harm to human beings or ecosystems.</p>	No further recommendations as ProTen have begun to address this in the Modification and water reviews/studies.
C10	<p>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</p>	Non-Compliant	<ul style="list-style-type: none">Incident notificationsIncident reports	<ul style="list-style-type: none">2021 fire "Environment Incident Report: Attachment 1"2020-2021 Annual Review2021-2022 Annual Review, in particular Section 10.32022-2023 Annual Review	<p>As above, in 2021 there were instances of surface water discharge incidents not being reported until the Annual Review report. Therefore, this condition is considered <u>non-compliant</u> in terms of timely incident investigation reporting process for the surface water discharges on 26/10/2021 (Farm 79), 8/11/2021 (Farm 78), and 18/11/2021 (Farm 77).</p>	Refer to Condition C9 recommendation.
Regular Reporting						
C11	<p>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.</p>	Compliant		<ul style="list-style-type: none">Annual Reviews for 2020, 2021, 2022, and 2023. (Note, these are on the website).Annual Returns (unsigned)	<p>Refer to specific conditions for reporting obligations, however Narrandera has demonstrated they have been uploading reports to the Environmental Documents page of their website, submitting the Annual Reviews, and Annual Returns.</p>	
Auditing						
Independent Environmental Audit						
C12	<p>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:</p> <p>(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.</p> <p>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary</p>	Compliant		This IEA.	<p>This IEA has been undertaken as requested by the DPHI. This IEA satisfies the requirements of this condition.</p>	
C13	<p>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</p>	Compliant			<p>The majority of this IEA was completed within the 3 months of this condition. It is understood an extension on due date was accepted.</p> <p>This IEA will be provided to ProTen for submission to DPHI. The compliance of the submission of the IEA Report and Response to Recommendations will be assessed in the next IEA.</p>	
Access To Information						

Condition Number	Condition	Compliance	Evidence Requested	Source of Evidence	Finding	Recommended Action
C14	Within 6 months of the date of this consent, the Applicant shall: (a)make copies of the following publicly available on its website: (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; (viii)any other matter required by the Secretary; and (b)keep this information up to date, to the satisfaction of the Secretary	Compliant		ProTen "Environmental Documents" webpage	(a) Generally compliant, however the CEMP and TMP should be made available as soon as possible. (i) Documents referred to in Condition A2 are available in the OEMP or EIS. (ii) The current EPL and Consent are available. (iii) Generally all strategies, plans, and programs required under this consent available, with the exception of the Construction Environmental Management Plan (CEMP) and the Traffic Management Plan (TMP). Refer to the improvement recommendation. (iv) Environmental Monitoring data - Sept 2017, Environmental Monitoring data - March 2018, Environmental Monitoring data - May 2018, Environmental Monitoring data - Aug 2018, Environmental Monitoring data - Dec 2018, Environmental Monitoring data - March 2020, Environmental Monitoring data - April 2021, Narrandera Monitoring Data - Sep 2022, Narrandera Monitoring Data - March 2023, Narrandera Monitoring Data - Sept 2023 (v) A current complaints register is not available on the website. However, based on the other information provided by the site the project has never received a complaint. Therefore, ProTen has not uploaded a document. Note, the 'App C Complaints and Incidents Strategy' is available. (vi) Annual Review 2017 (Final), Annual Review 2017, Annual Review 2018, Annual Review 2019-2020, Annual Review 2020-2021, Annual review 2022 and Annual review 2022-2023. (vii) IEA Response to Recommendations (Feb 2021) and Narrandera Poultry Independent Environmental Audit (2020). (viii) Nothing further based on information available.	IMP REC 9: Upload the Complaints Register annually with the date to communicate Narrandera has had no complaints.
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: (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; (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	Non-Compliant	• Approval of the Environment Representative from DPE	• Site discussions	The role requirements for the Environmental Representative are not outlined in the OEMP, under Section 3.2 Roles and Responsibilities. No endorsement for the Environmental Representative was provided. The previous IEA Report includes Nathan Archer from SLR Consulting as the Environmental Representative however he is no longer involved with the project. ProTen advised the person previously in the role would be Eryn Bath, however there were no records of her approval from DPHI. It is unclear whether the Environmental Representative would be Kate Singh (ProTen SHEQ Advisor) or a representative from SLR Consulting. NC REC is provided right.	NC REC 7: Apply for a new Environmental Representative for Narrandera to the DPHI. Refer also to NC REC 5 to clearly outline the roles for the project.

Not Triggered	18	20%
Compliant	56	64%
Non-Compliant	14	16%
Total number of conditions	88	

APPENDIX 1: MANAGEMENT AND MITIGATION MEASURES					
Audit Period: 1 December 2020 - 12 December 2023 (based on the day after the previous IEA audit period to the date of this IEA site inspection).					
Aspect/Commitment	EIS Section	Compliance	Source of Evidence	Finding	Recommended Action
General					
ProTen will carry out the Development at Euroley generally in accordance with the Development application and this EIS report.	Section 3	Compliant	<ul style="list-style-type: none">• Site inspection• General evidence provided for the IEA.	Development has been carried out generally in accordance with the consent and EIS. ProTen have exceeded production limits throughout the audit period and installed another office building on the site, however these are further described in particular conditions because the operations have been generally as per the EIS therefore this condition is considered compliant.	
The Development site will not accommodate more than 3.92 million birds any one time	Section 3	Non-Compliant	<ul style="list-style-type: none">• Annual Reviews• Batch/cycle numbers spreadsheets• Show Cause letter from DPE dated 2022 in response to 2021 Annual Review.• Proten Response to Show Cause dated 28/7/2022.• Official Caution DPE dated 26/08/2022.• Show Cause letter from DPE dated August 2023 in response to the 2022 Annual Review.• Proten Response to Show Cause dated 12 September 2023.• Official Caution DPE dated 22/09/2023	Exceedances of total number of birds on the site reported by ProTen due to over-supply of broilers. Refer to Condition A6 for further discussion of findings.	Refer to NC REC 1.
Construction will be undertaken within the hours of: 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	Section 3	Non-Compliant		Narrandera has been operating in this audit period. No evidence was able to provided for the construction activities done in the audit period, the reconstruction of Shed 3 at Farm 79 and the new office building. Due to the lack of evidence to demonstrate compliance with construction hours, <u>a non-compliant</u> finding has been included for this condition and Condition B27 of this Consent.	Refer to NC REC 5.
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	Section 3	Compliant	<ul style="list-style-type: none">• OEMP• Site inductions for contractors and employees• Driver's Code of Conduct	Based on evidence provided Narrandera comply with these times during operations.	
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.	Section 3	Compliant	<ul style="list-style-type: none">• Site interviews• Annual Reviews• Complaints Register	Based on evidence provided and site interviews, Narrandera has not received a complaint for the duration of the project.	
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.	Section 6.2.5	Not Triggered	Site inspection	This condition relates to dust management during the construction phase of the project. However, there were construction activities completed during this audit period in the form of the Shed 3 Farm 79 and the installation of the office demountable.	
Dust will be minimised by 'wetting' down surfaces being worked or carrying traffic in dry periods.	Section 6.2.5	Not Triggered	Site inspection	This condition relates to dust management during the construction phase of the project. Findings on dust and air quality management during this IEA period (operations) is provided below.	
During Operations					
A meteorological station will be installed within the Development site to collect on- going and up-to-date weather data	Section 6.2.5	Compliant	Site inspection Meteorological monitoring data	Meteorological station visited at site inspection, and random sample of met monitoring results provided for this audit. ProTen are maintaining and collecting data from the meteorological station.	
The poultry sheds and feed silos will be fully enclosed to reduce the level of moisture and to minimise emissions of dust/particulate matter	Section 6.2.5	Compliant	Site inspection Shed designs/drawings. Batch Verification Schedule inspection sheets dated 2022 and 2023.	All farms were visited during the site inspection. Based on this, shed inspection sheets, and shed design drawings, sheds are fully enclosed. ProTen reported no concerns related to this.	
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.	Section 6.2.5	Compliant	Evidence of procedures/ protocols to maintain sheds and surrounds. Batch Verification Schedule inspection sheets dated 2022 and 2023. Animal Welfare Inspections by RSPCA (Approved Farming Scheme Meat Chicken Assessment Report) dated 2020, 2021, 2022, 2023.	Based on evidence provided, tidy and sanitary environment is maintained in the surrounds of the sheds, as well as procedures implemented to ensure sanitary and safe environmental conditions for the poultry.	
Stocking densities and bird health within each of the poultry sheds will be regularly checked and, if necessary, appropriate corrective measures will be implemented.	Section 6.2.5	Compliant	Stock numbers - Annual Review reports and Batch tracking spreadsheets Site discussions. Batch Verification Schedule inspection sheets dated 2022 and 2023. Animal Welfare Inspections by RSPCA (Approved Farming Scheme Meat Chicken Assessment Report) dated 2020, 2021, 2022, 2023.	Stocking densities and shed populations were provided as evidence. ProTen discussed the non-compliances relating to timing for introducing flocks to Farms and total populations.	
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	Section 6.2.5	Compliant	Site inspection Shed inspections	Based on discussions and documents provided, ProTen personnel do regular inspections of sheds and the farm.	
Internal access roads will be appropriately maintained to minimise dust and noise emissions	Section 6.2.5	Compliant	Site inspection	Based on the site inspection and lack of complaints to site, this condition is compliant.	
Noise					
A 60 km/hr speed limit will be adopted on the site access road between the Development site and the Sturt Highway	Section 6.3.5	Compliant	Site inspection	Speed signs are erected around the site, including 60 km/hr signage coming off the Sturt Highway onto the main road for the site. Vehicles were observed to be compliant with traffic and speed signs.	

Aspect/Commitment	EIS Section	Compliance	Source of Evidence	Finding	Recommended Action
Plant and equipment will be maintained in good repair and operators will be appropriately instructed on how to minimise noise generation at all times	Section 6.3.5	Compliant	Site inspection Plumbing POs dated 2022 and 2023.	General demonstration of keeping machinery and equipment serviced and replacements. Invoices from repair of water pipe leaks and pump shed leaks from plumber provided.	
Noise generating equipment purchased by the operator will comply with relevant occupational health and safety requirements	Section 6.3.5	Compliant	Site inspection	General demonstration of keeping machinery and equipment serviced and replacements.	
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	Section 6.3.5	Compliant	Site inspection Generator use logs	The site has used the diesel generators in the IEA period. The night before the site inspection there was a power outage so generators had been triggered until grid came back on that morning.	
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.	Section 6.3.5	Compliant	Site inspection OEMP (Traffic Section 4.5)	At the site inspection, unidirectional traffic was demonstrated at each Farm.	
Traffic and Transport					
An intersection between the Sturt Highway and the Development site access 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 Austroads Guide to Road Design, Part 4A. Unsignalized and Signalised Intersections.	Section 6.4.4	Compliant	Site inspection GHD IEA Report	Historical condition assessed as part of previous IEA as compliant. Based on site discussions, the Modification application may revisit this condition.	
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.	Section 6.4.4	Compliant	Site inspection	Verified in previous IEA. Compliant at the time of this IEA site inspection.	
The access road will be bitumen sealed for a minimum length of 50 metres from the Sturt Highway intersection.	Section 6.4.4	Compliant	Site inspection	The access road was observed during the site inspection and was bitumen for over 50m.	
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.	Section 6.4.4	Compliant	Site inspection	Verified in previous IEA. Sign posts were in place at the time of this IEA site inspection.	
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.	Section 6.4.4	Compliant	Site inspection	Verified in previous IEA, including construction and as-built plans, and approval from RMS. Compliant at the time of this IEA site inspection.	
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.	Section 6.4.4	Compliant	Site inspection OEMP (Traffic Section 4.5)	Internal roads were in good condition for the site inspection. Each PPU demonstrated compliance with the unidirectional traffic flow and signage.	
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	Section 6.4.4	Compliant	Site inspection OEMP (Traffic Section 4.5)	It was noted at the time of the site inspection, a section of fencing off the main access road had been damaged by a truck driving into the fence. Based on discussions, this incident was more so related to driver behaviour rather than road design, road conditions, or weather conditions.	
All internal roads will be maintained clear of obstruction and used exclusively for the purposes of transport, loading-unloading and parking	Section 6.4.4	Compliant	Site inspection OEMP (Traffic Section 4.5)	Loading and unloading activities were observed during the site inspection. Internal roads were maintained in good condition and were clear of obstruction.	
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.	Section 6.5.4	Compliant	Flooding info requested	Minimal erosion and sediment issues observed during the site inspection, therefore limited controls in place. It was noted that at the site inspection eroded banks of the channels had been repaired with ballast material.	
All clean extraneous surface water from upslope will be diverted around areas of disturbance	Section 6.5.4	Compliant	Site inspection	Project designs assessed in the EIS and construction was assessed in IEA following construction. At the site inspection water did not move onto operational areas of the site (inside the sediment dams and drains).	
The stormwater management system described in Section 3.12 (of the EIS) will be constructed and appropriately maintained.	Section 6.5.4	Compliant	Site inspection	Construction of stormwater system was assessed in previous IEAs. Evidence of ProTen maintaining erosion points during the audit period, however they advised the stormwater system has generally been able to cope.	
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)	Section 6.5.4	Compliant	Staff training and inductions	Narrandera groundsman, Farm Managers, and Assistant farm managers qualified for use and handling. Refer to Condition B22.	
All chemical use will be undertaken in full compliance with the relevant statutory requirements, including the Pesticides Act 1999.	Section 6.5.4	Compliant	Site inspection	Based on evidence provided and the storage of chemical on site this is compliant.	
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.	Section 6.5.4	Compliant	Site inspection Purchase Orders to plumbers	Based on site discussions and the evidence provided no issues with the waste water systems from the staff amenities and staff accommodation have occurred. This would have been assessed following construction.	
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.	Section 6.5.5 and 6.5.6	Compliant	Flooding info requested	Assessed in post-construction certification (Construction Certificates and Occupation Certificates) and in previous IEA.	
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	Section 6.5.5 and 6.5.6	Compliant	Site inspection and discussions	Assessed in post-construction certification and in previous IEA.	
The flood management plan described in Section 6.5.6 (of the EIS) will be implemented where necessary.	Section 6.5.5 and 6.5.6	Compliant	Site inspection and discussions	Based on information provided for this IEA, not triggered.	
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 Minimum Construction Requirements for Water Bores in Australia (National Uniform Drillers Licensing Committee, 2012). The installation of the wells should include normal Development practice including a commissioning test on the well.	Section 6.6.3	Compliant	Site inspection and discussions	Assessed as part of previous IEAs.	
Monitoring of wells will comply with the existing WAL conditions	Section 6.6.3	Compliant	Site inspection and discussions	WALs on site now have automatic metres to monitor water-take.	
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.	Section 6.6.3	Compliant	Site inspection and discussions	No disease outbreak and mass mortality occurred in this audit period, based on the evidence provided. Therefore, not triggered.	
Biodiversity					
No disturbance will occur outside of the nominated disturbance footprint	Section 6.7.5	Non-Compliant	Site inspection and discussions	No further disturbance was observed outside of the property boundary. However, disturbance outside the nominated footprint in the Consent occurred when ProTen installed an additional opposite Farm 78 for additional space during Covid-19 social distancing restrictions. This building is outside the marked disturbance on the project approval plans. The building is small (approx. 90 m2 footprint) and has a gravel driveway connecting it to the project road network. Based on the Biodiversity Assessment Report done as part of Appendix I of the EIS, it is understood it is unlikely biodiversity values were impacted. No records regarding its installation were provided for this IEA. Therefore this is <u>non-compliant</u> . Refer also to Condition A2.	Refer to NC REC 2.
Erosion and sediment control measures will be installed and maintained to prevent the erosion and sedimentation impact on any areas downstream supporting remnant vegetation.	Section 6.7.5	Compliant	Site inspection and discussions	Erosion repair sighted at site inspection.	

Aspect/Commitment	EIS Section	Compliance	Source of Evidence	Finding	Recommended Action
Weed management practices will be implemented to minimise the spread of exotic species into natural areas within the site.	Section 6.7.5	Compliant	Site inspection Annual Reviews including photos Personnel training Herbicide application records including rates, reason for application, and locations	OEMP includes landscape management measures including weed management. Farm manager and personnel training requires familiarisation of landscape management. Narrandera Groundperson conducts weekly inspections which takes note of weeds and performs weed spraying. Evidence of sprayed weeds was apparent during the site inspection.	
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.	Section 6.7.5	Compliant	Site inspection and discussions	Biodiversity offset strategy assessed in previous IEAs, and elements have been summarised for management measures to be included in the OEMP.	
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.	Section 6.7.5	Compliant	Site inspection and discussions	Supplementary plantings were observed during site inspection. ProTen should continue to invest in the vegetation screen until established.	
Aboriginal Heritage					
No disturbance will occur outside of the nominated disturbance footprint	Section 6.8.4	Non-Compliant	Site inspection EIS Consent	Disturbance has occurred opposite Farm 78 for the placement of an additional office building. The building is small (approx. 90 m2 footprint for the building and whole area of less than an acre in size) and has a gravel driveway connecting it to the project road network. No records regarding its installation were provided for this IEA. Therefore this is <u>non-compliant</u> . It should be noted, the OzArk Report completed for the EIS described its scope as generally coinciding with the planned footprint in the EIS Figures, however there were no pre-clearance surveys provided for this IEA. Refer also to Condition A2.	Refer to NC REC 2.
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.	Section 6.8.4	Compliant	Site inspection EIS	Based on the information provided for this IEA, all exclusion fences have been in place in the audit period and maintained. The fencing for the sites visited (hearth and multiple scarred trees) was in good condition at the time of the site inspection.	
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.	Section 6.8.4	Not Triggered	Site inspection Annual Reviews and general evidence provided	Based on information provided, not triggered.	
Visual Amenity					
The luminaires on each poultry shed will be aimed downwards and on Section 6.10.3 switched on during loading-unloading and servicing activities outside of daylight hours and during heavy fog.	Section 6.10.3	Compliant	Site inspection General evidence provided	Based on observations during the site inspection there was no evidence of shed luminaires direction or lumens being changed from this. It is understood the farms use lighting as needed. No evidence of lighting impacts were provided for this IEA.	
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	Section 6.10.3	Compliant	Site inspection General evidence provided	ProTen demonstrated continued efforts to improve the vegetation screens around each PPU. The amenity of the site at the time of the site inspection was considered sound.	
Biosecurity and Poultry Disease					
Pro Ten will meet all standards of care and management for animal health and welfare detailed in the National Animal Welfare Standards for the Chicken Meat Industry (Barnett et al, 2008).	Section 6.12	Compliant	Staff inductions and training RSPCA and Baiada inspection reports OEMP Batch Verification schedules	Based on evidence provided, sound care and management of poultry has occurred throughout the audit period in accordance with the National Animal Welfare Standards.	
Pro Ten will implement a suite of biosecurity measures in accordance with the National Farm Biosecurity Manual for Chicken Growers (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	Section 6.12	Compliant	Batch/population spreadsheets Staff inductions and training RSPCA and Baiada inspection reports OEMP Batch Verification schedules	Based on evidence provided, biosecurity measures have been complied with throughout the audit period in accordance with the Biosecurity Manual.	
In the unlikely event of a major disease outbreak, the EPA and DPI will be contacted as soon as the breakout is suspected. 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.	Section 6.12	Not Triggered	Site inspection	Based on information provided, a disease outbreak did not occur in the audit period.	
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.	Section 6.12	Not Triggered	Site inspection	Based on information provided, a disease outbreak did not occur in the audit period.	
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	Section 6.12	Not Triggered	Site inspection	Based on information provided, a disease outbreak did not occur in the audit period.	
Waste management					
No on-site stockpiling or disposal of waste materials will occur.	Section 3.10	Compliant	Site inspection Annual Reviews	No evidence observed of stockpiled wastes or waste generated by the development used at or around the PPUs.	
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.	Section 3.10	Compliant	General evidence of waste management, skip bins empty at site inspection	Receipts from waste contractor picking up skip bins every week. At the site inspection waste was being put in skip bins.	
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.	Section 3.10	Compliant	Site inspection Griffith Feed and Grain receipts	A number of empty, washed containers were being stored on the site including outside of allocated storage areas. Chemical containers should be picked up more frequently if containers have to be stored out near the skip bins. ProTen advised they do this themselves now. An improvement recommendation has been put forward previously.	
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.	Section 3.10	Compliant	Litter pick-up receipts from trucks	As outlined in the WMP. Evidence of spent litter being picked up at the end of production cycles.	
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 Way	Section 3.10	Compliant	Mortalities pick-up receipts, and observed at site inspection	As outlined in the WMP. Evidence of mortalities being picked up routinely. Mortalities were being stored in chillers at each PPU rather than at the chillers location described in the OEMP.	
Greenhouse Gas and Energy Efficiency					
Low lux internal shed lighting will be installed within the poultry sheds.	Section 6.11	Compliant	Baiada and RSPCA welfare audits Site inspection	No evidence provided of shed lighting exceeding low lux. ProTen discussed internal standards and the fact that low lighting is favourable inside the sheds.	
External shed lighting will only be used when necessary during times of low light and/or heavy fog.	Section 6.11	Compliant	OEMP Site inspection Complaints register	No evidence of external lighting on unnecessarily. No evidence of complaints regarding the development were provided for this IEA.	

Aspect/Commitment	EIS Section	Compliance	Source of Evidence	Finding	Recommended Action
The integrity of the poultry sheds will be regularly checked in order to identify and rectify any air leaks, which place additional load on ventilator fans.	Section 6.11	Compliant	Site inspection and discussions.	Shed clean outs were being done at the time of the site inspection. Clean out procedures used by ProTen to audit the shed conditions. Prompt maintenance discussed with ProTen personnel.	
Ventilation fans and heaters will be regularly maintained and serviced to ensure optimal performance and efficiency	Section 6.11	Compliant	ProTen maintenance schedule.	Based on information provided, ProTen has only had routine maintenance done on automated systems in the sheds in this audit period. Examples of maintenance inspections and Batch Verification Schedule shed inspections are evidence of routine maintenance.	
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.	Section 6.11	Compliant	Site inspection and discussions. Batch Verification Schedules, including shed inspections filled out.	Based on information provided, ProTen has only had routine maintenance done on automated systems in the sheds in this audit period. Examples of maintenance inspections and Batch Verification Schedule shed inspections are evidence of routine maintenance.	

Not Triggered	6
Compliant	53
Non-Compliant	4

10%
84%
6%

EPL 20748 Euroley Poultry Production Complex (Narrandera)																																
Anniversary Date: 22 April																																
Audit Period: 1 December 2020 - 12 December 2023 (based on the day after the previous IEA audit period to the date of this IEA site inspection).																																
Condition Number	Condition	Compliance	Source of Evidence	Finding	Recommended Action																											
1	Part 1: Administrative Conditions																															
A1	What the licence authorises and regulates																															
A1.1	<div>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</div> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Livestock intensive activities</td><td>Bird accommodation</td><td>> 3000 - -1 T accommodation capacity</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Livestock intensive activities	Bird accommodation	> 3000 - -1 T accommodation capacity	Non-Compliant	<div><div>• Annual Returns</div><div>• Notice of Variation of Licence No. 20748 (Notice Number: 1629275)</div><div>• Annual Reviews</div></div> <div>Non-compliance with operational limits prior to 28 June 2023, with the accommodation capacity was limited to > 1000-3000 T accommodation capacity. The exceedances in the total population meant this limit was exceeded. ProTen applied to vary the EPL with the EPA on 24-May-2023 to address the non-compliance with the accommodation limit of 1000-3000 T. The EPL was varied on 28-Jun-2023. Therefore, from 28-June-2023 onwards Narrandera is compliant with the accommodation limit shown here in Condition A1.1.</div> <div>Evidence of testing the PIRMP annually with all relevant staff. Evidence of updating the Emergency Plan along with the annual PIRMP testing (PIRMP test form).</div>	Refer to NC REC 1.																						
Scheduled Activity	Fee Based Activity	Scale																														
Livestock intensive activities	Bird accommodation	> 3000 - -1 T accommodation capacity																														
A2	Premises or plant to which this licence applies																															
A2.1	<div>The licence applies to the following premises:</div> <table><tr><th>Premises Details</th></tr><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></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	<div><div>• Site inspection and discussions</div><div>• General evidence provided for this IEA, i.e. Annual Returns</div></div>	Based on evidence provided it is understood all scheduled activities of the project in the audit period occurred within the premises. Other conditions talk about disturbance outside approved disturbance footprint.																						
Premises Details																																
NARRANDERA POULTRY PRODUCTION COMPLEX																																
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UROLY																																
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A3	Other activities																															
A3.1	<div>This licence applies to all other activities carried on at the premises, including:</div> <table><tr><th>Ancillary Activity</th></tr><tr><td>Waste storage</td></tr></table>	Ancillary Activity	Waste storage	Compliant	<div><div>• Site inspection and discussions</div><div>• Annual Reviews</div><div>• Receipts from waste pick ups</div></div>	Wastes from operations (dead birds, spent litter) are serviced regularly and re-used in the Baiada-ProTen product chain. Spent litter transported to farms in the local region. Designed surface water (including surface water runoff from sheds and clean out) system surrounding the PPU's. Enclosed sewage system and routine pick up for putrescible waste.																										
Ancillary Activity																																
Waste storage																																
A4	Information supplied to the EPA																															
A4.1	<div>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. In this condition the reference to "the licence application" includes a reference to:</div> <div>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</div> <div>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence</div>	Noted.	<div><div>• Site inspection</div><div>• EPL</div></div>	Noted. Licence information is consistent with the actual project.																												
2	Part 2: Discharges to Air and Water and Applications to Land																															
P1	Location of monitoring/discharge points and areas																															
P1.1	<div>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.</div>	Noted.		Noted.																												
	<div>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.</div> <table><tr><th colspan="4">Water and land</th></tr><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>2</td><td>Surface water quality monitoring</td><td></td><td>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>3</td><td>Surface water quality monitoring</td><td></td><td>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>4</td><td>Surface water quality monitoring</td><td></td><td>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>5</td><td>Surface water quality monitoring</td><td></td><td>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><tr><td>6</td><td>Surface water quality</td><td></td><td>Sediment dam No 1 at PPU 5</td></tr></table>	Water and land				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	6	Surface water quality		Sediment dam No 1 at PPU 5		<div><div>• Site inspection and discussions</div><div>• Annual Returns</div></div> <div>EPA ID No. 1-5 surface water monitoring points relate to each of the Farms/PPUs on the Narrandera Complex. There are four sediment dams on each corner of each PPU connected by channel drains.</div> <div>EPA ID No. 6-12 groundwater monitoring points relate to piezos located across the Narrandera property.</div>	
Water and land																																
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																													
6	Surface water quality		Sediment dam No 1 at PPU 5																													

Condition Number	Condition		Compliance	Source of Evidence	Finding	Recommended Action	
P1.2		monitoring	Compliant				
	7	Groundwater quality monitoring					Piezometer labelled 'Piezo 1' 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
	8	Groundwater quality monitoring					Piezometer labelled 'Piezo 2' 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
	9	Groundwater quality monitoring					Piezometer labelled 'Piezo 3' 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
	10	Groundwater quality monitoring					Piezometer labelled 'Piezo 4' 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
	11	Groundwater quality monitoring					Piezometer labelled 'Piezo 5' 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
	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		Compliant	• site inspection • Met station monitoring results	Meteorological station visited at site inspection. Monitoring data exported and provided to auditors as evidence of it functioning and being used to inform operations.		
	<table><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>1</td><td>Meteorological Station</td><td>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></table>	EPA identification no.					Type of monitoring point
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	Part 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.		Compliant	• site inspection • Annual Reviews • Aitken lab results for GW and SW quality monitoring • Narrandera Monitoring sheets 2023_2024_30Sep23 (downloaded from website)	Section 120 of the POEO Act states: <i>Prohibition of pollution of waters</i> (1) A person who pollutes any waters is guilty of an offence. <i>Note— An offence against subsection (1) committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation—see section 169.</i> (2) In this section— <i>pollute waters includes cause or permit any waters to be polluted</i> Results were provided for the discharge grab samples from Farms 77, 78, and 79 for this audit. These results included exceedances in nutrients (Nitrate and Phosphorous). Note, the auditors have called the site non-compliant in the Water Management Plan condition of the consent because it relates to 'implementing measures to prevent material harm'. No evidence was provided to demonstrate pollution of waters occurred as result of these discharges		
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	• site inspection • Annual Reviews • Waste Management Plan	Based on the evidence provided and discussions with site, it is understood no waste materials were accepted onto site or stockpiled or disposed of on the site during this audit period. Evidence provided of mortalities being managed as per the approvals and Waste Management Plan.		
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		Noted.		Noted. Refer to the findings above.		
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	• Site inspection	Based on the OEMP, EPL and Consent no noise monitoring was required in the audit period. There is no evidence to verify compliance with the noise criteria of 35dB(A). The CEMP was not provided for this IEA. It is unknown whether noise monitoring is triggered when construction activities are undertaken at the site. During this audit period, ProTen reconstructed Shed 7903. Construction noise can not be verified for this IEA. Construction activities have a greater potential to have noise impacts. Refer to Conditions B28 and B30 of the Consent for detailed findings regarding noise monitoring during construction. Refer also to the associated non-compliance recommendation.		
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		Compliant	• site inspection	Based on information provided by ProTen, there have been no noise monitoring done in the audit period. Furthermore, based on information provided there have been no complaints received by the site, including regarding noise.		
L3.3	The noise emission limits identified in this licence apply under all meteorological conditions except: a) during rain and wind speeds (at 10m height) greater than 3m/s; and b) under "non-significant weather conditions". 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.		Not Triggered		Not triggered because there has been no noise monitoring completed in the audit period.		
L4	Other Limit Conditions						

Condition Number	Condition	Compliance	Source of Evidence	Finding	Recommended Action
L4.1	The total number of birds accommodated at the premises, at any one time, must not exceed 3,920,000.	Non-Compliant	<ul style="list-style-type: none"> Site inspection Annual Returns Annual Reviews 	<p><u>Non-compliance</u> for exceeding the total population limit of birds on the site at the start of batch cycles. ProTen has reported exceedances in the total number of birds across the site (five PPUs) in Annual Returns. This is an ongoing non-compliance due to the numbers of birds transported to the site to be placed being dictated by the Supplier / Processor. These non-compliances have also been reported in the Annual Reviews. ProTen has provided the following explanation of the cause: <i>The number of birds placed on the farms exceeded 3,920,000 in batch 2202 by 1.9% & in batch 2204 by 1.2% . Due to normally expected mortality, the number of birds on site decreased below 3,920,000 by day 10 in batch 2202 and by Day 5 in batch 2204. The total number of birds placed is determined by the Processor. Where hatchability of the eggs incubated exceeds the normal predicted levels, higher numbers of chicks are hatched and these need to be sent to the farm for animal welfare reasons.</i></p>	Refer to NC REC 2.
L4.2	All waste water 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	<ul style="list-style-type: none"> Geotechnical Investigation, Existing Sediment Ponds, Existing Poultry Farms 75-79, Sturt Highway Euroley NSW dated 28/05/2018, Aitken Rowe Geotechnical Engineering 	Based on the evidence provided, there were no changes to the surface water management system and water storage facilities in this IEA period and so this condition is considered compliant.	
L4.3	All waste water 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	<ul style="list-style-type: none"> Geotechnical Investigation, Existing Sediment Ponds, Existing Poultry Farms 75-79, Sturt Highway Euroley NSW dated 28/05/2018, Aitken Rowe Geotechnical Engineering 	<p>As per the above finding, the construction of the surface water system on site was reviewed in previous IEAs and following construction. Therefore, based on information provided this condition remains compliant.</p> <p>However, it should be noted the Narrandera WMP was being updated for some time during this audit period and ProTen advised they are reviewing this design as high volumes of water are sitting in the stormwater systems at each PPU.</p>	
4	Part 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> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	Compliant	<ul style="list-style-type: none"> Site inspection Batch Verification Schedule, including forms filled out Weekly site inspection forms by on-site personnel Online training portal exports including dates and status 	<p>a) Evidence of processing, handling, movement of materials associated with the approved activities.</p> <p>b) Evidence of general competency for activities related to waste, e.g. used chemical containers stored and transported off-site for re-use.</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> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	Compliant	<ul style="list-style-type: none"> Site inspection and discussions Invoices for plumbing (water leak repairs), etc. Batch Verification Schedule, including forms filled out Weekly site inspection forms by on-site personnel 	<p>a) Evidence of recent servicing of plant, including sheds and ancillary infrastructure.</p> <p>b) Site inductions provided. All plant and equipment operated in a proper and efficient manner during site inspection, and evidence provided during IEA suggests compliance.</p>	
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	<ul style="list-style-type: none"> Site inspection and discussions Complaints register Driver's code of conduct personnel training and visitor induction 	Based on evidence provided, ProTen has undertaken dust minimisation practices through audit period. At the time of the site inspection, there was minimal dust generated by traffic. The property is largely vegetated and areas immediately around the PPUs were grassed. Staff are trained to identify dusty conditions and respond. The operational phase of Narrandera should be low risk for wind-blown dust as the site should be maintaining vegetated areas (swales, vegetation screens).	
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading	Compliant	<ul style="list-style-type: none"> Site inspection and discussions Complaints register Driver's code of conduct 	Trucks observed entering and leaving the site had loads covered at the site inspection. Based on evidence provided no complaints have been received by the site.	
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	<ul style="list-style-type: none"> Site inspection and discussions Annual Returns Annual Reviews 	<p>Narrandera did not leave 36 hours in between re-populating each PPU (also referred to as "placement") for multiple batches in this audit period. This is <u>non-compliant</u>. ProTen has reported this in Annual Returns and provided the following justification: <i>The time between commencement of placement between PPUs was less than 36 hours on 11 out of 30 placements during the reporting year. Due to Covid, there needed to be more flexibility when the birds were being delivered to the farms. There were no adverse effects or complaints given the large distances between individual farms. We will continue to monitor Placement programs and communicate with the Processor where scheduling may result in a noncompliance with the EPL.</i></p> <p>At the time of the site inspection the site was at the end of a batch and in the process of de-populating and cleaning-out.</p>	Refer to NC REC 2.
O5	Waste management				
O5.1	<p>The premises must:</p> <p>a) Have sufficient on site chillers to store all general bird mortalities (~1% of birds on site at any time);</p> <p>b) Remove all mortalities found in the sheds immediately to the chillers; and</p> <p>c) Ensure that when chillers are in use they are kept at < 4 degrees Celsius.</p>	Compliant	<ul style="list-style-type: none"> Waste Management Plan OEMP Site inspection and discussions 	<p>Note, storage of mortalities has changed since the start of operations. Previously, mortalities were picked up in specific containers and machinery and transferred to the chiller area at the site. However, in this audit period ProTen have just had chillers at the entry gate at each PPU for storage of mortalities until pick-up.</p> <p>Maximum number of birds on-site at any one time is 3.92 million birds. 1% of 3.92 million birds equals 39,200 birds. Therefore, considering the current mortality storage system of having chillers at each PPU, condition O5.1a would require capacity to store approx. 7,840 mortalities at each PPU chiller. However, ProTen should review the maximum capacity of the chillers to ensure if this scenario occurred each PPU would comply with this condition (O5.1a). See improvement recommendation right.</p> <p>ProTen have had to accept batches that exceed the total population limit (non-compliance with Accommodation/Scale limit in Condition A1.1) in this audit period. This has increased the risk of inadequate storage space for mortalities. Furthermore, since the limits in A1.1 have increased from "1000 - 3000 T" accommodation capacity to "more than 3000 - 1 T" accommodation capacity, Narrandera has not demonstrated they have appropriately increased their chiller capacity. ProTen is expected to demonstrate each PPU have sufficient chiller space for the SSD Modification.</p>	IMP REC 8: Review the effective maximum capacity of chillers at each PPU to ensure site can practically store approx. 1% of each PPU population for the short term.
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	<ul style="list-style-type: none"> Waste Management Plan OEMP Site inspection and discussions 	ProTen's mortalities are picked up by Baiada and taken to either of two rendering plants at Griffith. Evidence of monitoring bird numbers picked up from sheds and then picked up from the Farms.	
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.	Non-Compliant	<ul style="list-style-type: none"> Waste Management Plan OEMP Annual Reviews Aitken Rowe Testing Lab results sheets dated 26/10/2021, 8/11/2021, and 18/11/2021. 	<p>Designed waste water collection system around Farms 77, 78, and 79 discharged on 26/10/2021, 8/11/2021, and 18/11/2021 due to large amounts of rain runoff collected.</p> <p>Discharges in this period did not qualify for the rainfall event exemption.</p>	
5	Part 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	<ul style="list-style-type: none"> Site inspection and discussions Surface water, groundwater, weather monitoring records 	Records of results provided for this IEA.	

Condition Number	Condition	Compliance	Source of Evidence	Finding	Recommended Action																																																																												
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	<ul style="list-style-type: none">• Site inspection and discussions• Surface water, groundwater, weather monitoring records	Based on evidence provided, records were not requested by EPA during the audit period. Records were generally in legible, orderly form. ProTen advised they were looking into upgrading their electronic compliance system.																																																																													
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	<ul style="list-style-type: none">• Site inspection and discussions• Surface water, groundwater, weather monitoring records	Monitoring results generally comply with these requirements. Names are shortened but are still legible, and units are not always consistent but still reported in the appropriate unit (e.g. nutrient results are in mg/L rather than ug/L in the lab reports).																																																																													
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	<ul style="list-style-type: none">• Annual Returns• Narrandera Monitoring sheets 2023_2024_30Sep23 (downloaded from website)	Monitoring done in association with the EPL is consistent with the tables below.																																																																													
M2.2	Water and/ or Land Monitoring Requirements POINT 2,3,4,5,6 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Yearly</td><td>Grab sample</td></tr></table> Licence - 20748 <table><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Yearly</td><td>In situ</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr></table> POINT 7,8,9,10,11,12 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Ammonia</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Calcium</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Chloride</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Magnesium</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Nitrate</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>pH</td><td>pH</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Phosphorus</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Potassium</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Sodium</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Sulfate</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr><tr><td>Total dissolved solids</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Electrical conductivity	microsiemens per centimetre	Yearly	Grab sample	Nitrogen (total)	milligrams per litre	Yearly	Grab sample	pH	pH	Yearly	In situ	Phosphorus (total)	milligrams per litre	Yearly	Grab sample	Total suspended solids	milligrams per litre	Yearly	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Ammonia	milligrams per litre	Yearly	Representative sample	Calcium	milligrams per litre	Yearly	Representative sample	Chloride	milligrams per litre	Yearly	Representative sample	Electrical conductivity	microsiemens per centimetre	Yearly	Representative sample	Magnesium	milligrams per litre	Yearly	Representative sample	Nitrate	milligrams per litre	Yearly	Representative sample	pH	pH	Yearly	Representative sample	Phosphorus	milligrams per litre	Yearly	Representative sample	Potassium	milligrams per litre	Yearly	Representative sample	Sodium	milligrams per litre	Yearly	Representative sample	Sulfate	milligrams per litre	Yearly	Representative sample	Total dissolved solids	milligrams per litre	Yearly	Representative sample	Compliant	<ul style="list-style-type: none">• Annual Returns• Monitoring results• Annual Review reports	EPL monitoring only requires one sample per year for surface water monitoring and groundwater monitoring. Therefore, the frequency/number of samples provided for the Annual Return reporting is compliant. The units of measure are also consistent between the EPL and the Annual Returns.	
Pollutant	Units of measure	Frequency	Sampling Method																																																																														
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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	<ul style="list-style-type: none">• General evidence provided regarding environmental consultants assisting ProTen• Site inspection and discussions• Lab results, NATA accredited.	Based on evidence provided, water sampling is done by suitably qualified staff.																																																																													
M4	Weather monitoring																																																																																
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively. POINT 1 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>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></table>	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	<ul style="list-style-type: none">• Site inspection• Exported met results	The Meteorological Station has an averaging period of 10 minutes or daily. The station cannot output an average of 15 minutes. However, because the meteorological data is gathering results less than 15 minutes (at intervals of 10 minutes) this is considered "continuous" monitoring and is considered compliant. All of these parameters are measured.																																															
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Rainfall	AM-4	millimetres per hour	15 minutes	Continuous																																																																													
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	Compliant	<ul style="list-style-type: none">• Site inspection and general evidence reviewed	The complaints register for Narrandera is blank because the site has never received a complaint. However, measures are in place to receive and respond to a complaint.																																																																													
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Not Triggered	<ul style="list-style-type: none">• Site inspection and general evidence reviewed	Not triggered because there have been no complaints in this audit period.																																																																													
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Not Triggered	<ul style="list-style-type: none">• Site inspection and general evidence reviewed	Not triggered because there have been no complaints in this audit period.																																																																													
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not Triggered	<ul style="list-style-type: none">• Site inspection and general evidence reviewed	Not triggered because there have been no complaints in this audit period.																																																																													
M6	Telephone complaints line																																																																																
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant	<ul style="list-style-type: none">• Site inspection (documents at Development entrance and front gate).• Annual Returns• OEMP• Complaints register (blank)• ProTen website	Complaints phone number clearly displayed on site and on ProTen website, available to the public.																																																																													

Condition Number	Condition	Compliance	Source of Evidence	Finding	Recommended Action
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.	Compliant	<ul style="list-style-type: none"> Annual Returns OEMP Complaints register (blank) 	Complaints phone number clearly displayed on site and on ProTen website, available to the public.	
M6.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	Compliant	<ul style="list-style-type: none"> Annual Returns OEMP Complaints register (blank) 	Noted. Based on available evidence, the complaints telephone line has been functional for this audit period.	
6	Part 6: Reporting Conditions				
R1	Annual return documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Compliant	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2023 	Annual Returns are filled out in a portal with these set headings (requirements 1-7). Annual Returns have generally been consistent with other records provided for this IEA. Evidence provided of Annual Returns being submitted correctly electronically. However, ProTen failed to report ongoing placement/accommodation exceedances (Condition O4.1) in the 2022-2023 Annual Return under Part C) Statement of Compliance - Licence Conditions (sub condition R1.1.3).	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. 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.	Compliant	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2024 	Reporting period is based on the April anniversary date. All Annual Returns provided from this audit period are consistent with this.	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Not Triggered	<ul style="list-style-type: none"> General evidence supplied for this IEA 	The EPL has not been transferred in this audit period. Therefore, not triggered.	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not Triggered	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2026 	The EPL has not been revoked or surrendered in this audit period. Therefore, not triggered.	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2027 	Auditor sighted ProTen being able to access the eConnect EPA portal and ProTen advised they use the portal to submit Annual Returns. Based on the Annual Returns, the documents were submitted by 22 June each year of this audit period.	
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	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2028 	ProTen demonstrated they could supply Annual Returns up to 4 years old if required.	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder	Non-Compliant	<ul style="list-style-type: none"> Annual Return 22-4-2020 - 21-4-2021 Annual Return 22-4-2021 - 21-4-2022 Annual Return 22-4-2022 - 21-4-2029 	Due to submitting the Annual Return via the portal, ProTen could not provide signed copies from the signatories (including A - ProTen Director). Recommendation is provided.	NC REC 8: Once Annual Returns are submitted via the EPA's submission portal, request signatures on the Certification statement to close out the Annual Return submission and retain signed copies as final copies.
R2	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	<ul style="list-style-type: none"> Site inspection Annual Reviews General evidence provided for this IEA 	Based on evidence provided, written reports were not requested during the audit period.	
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	<ul style="list-style-type: none"> Site inspection Annual Reviews General evidence provided for this IEA 	Based on evidence provided, written reports were not requested during the audit period.	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Not Triggered	<ul style="list-style-type: none"> Site inspection Annual Reviews General evidence provided for this IEA 	Based on evidence provided, written reports were not requested during the audit period.	
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	<ul style="list-style-type: none"> Site inspection Annual Reviews General evidence provided for this IEA 	Based on evidence provided, written reports were not requested during the audit period.	
7	Part 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	<ul style="list-style-type: none"> Site inspection 	Every Farm was visited as part of this audit and every farm office contained a copy of the EPL and PIRMP (included in the Emergency Plan).	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it	Compliant	<ul style="list-style-type: none"> Site inspection 	Based on evidence provided, no EPA inspection during the audit period.	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	Compliant	<ul style="list-style-type: none"> Site inspection 	EPL was provided to auditor at each Farm.	
8	Part 8: Special Conditions				
E1	Odour validation audit				

Condition Number	Condition	Compliance	Source of Evidence	Finding	Recommended Action
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	Compliant	<ul style="list-style-type: none">• Site inspection• Complaints register	<p>Based on evidence provided for this IEA and consultation with agencies, no Odour Verification Report has been requested. There has been no formal odour monitoring completed for the site, however odour was managed at the site inspection and no odour complaints have been received by the site.</p>	

Not Triggered	10
Compliant	35
Non-Compliant	5
	50
Noted.	3
Total EPL conditions	53

**APPENDIX D. DECLARATION OF
INDEPENDENCE FORM (AT
TIME OF ENDORSEMENT)**

Euroley Poultry Production Complex (Narrandera Farm) NSW

Declaration of Independence - Auditor

Project Name: Euroley Poultry Production Complex (Narrandera Farm)

Consent Number: SSD 6882

Description of Project: Construction and operation of five PPUs at Euroley NSW

Project Address: Euroley, Narrandera LGA

Proponent: ProTen Ltd

Date: 28/11/2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

-
- approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Names of Proposed Auditors:

Lead Auditor: Chris Jones

Assistant Auditor: Olivia O'Shannessy

Signature of **Lead Auditor**



Qualification: Bachelor of Environmental Science

Principal Environmental Auditor through Exemplar Global

Company: Integrated Environmental Management Australia Pty Ltd (IEMA)


Signature of **Assistant Auditor**



Qualification: Bachelor of Environmental Science and Management

Company: Integrated Environmental Management Australia Pty Ltd (IEMA)

**APPENDIX E. AUDIT REPORT
DECLARATION FORM**

Independent Audit Report Declaration Form	
Project Name	Narrandera IEA
Consent Number	SSD 6882
Description of Project	Construction and operation of the Euroley Poultry Production Complex including, five PPU's each consisting of 16 sheds, a maximum operational capacity of 3.92 million broilers at any one time, internal access roads and construction pads, 10 residential dwellings for farm managers accommodation, four groundwater bores, intersection on the Sturt Highway, LPG storage tanks, water detention dams, and ancillary infrastructure.
Project Address	Euroley, NSW (Lots 1, 41, 42, 44, 45 and 54 in DP 750898, Lot 1 in DP 1054064)
Proponent	ProTen Ltd
Title of Audit	Independent Environmental Audit – Narrandera Poultry Production Complex
Date	24/05/2024
<p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019); ii. the findings of the audit are reported truthfully, accurately and completely; iii. I have exercised due diligence and professional judgement in conducting the audit; iv. I have acted professionally, objectively and in an unbiased manner; v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child; vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child; vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <p>Notes:</p> <p>a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</p> <p>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)</p>	
Name of Auditor	Chris Jones
Signature	
Qualification	Principal Auditor (Environmental Management Systems Auditor) Exemplar Global
Company	IEMA
Company Address	41 Llewellyn Street Merewether NSW 2291

APPENDIX F. RECORDS OF CONSULTATION

From: [Wilson, Shane](#)
To: [Olivia Oshannessy](#)
Cc: [Chris Jones](#); [Planning](#)
Subject: RE: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation
Date: Wednesday, 6 December 2023 10:29:56 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)

Hi Olivia

Council has no specific aspects or concerns with regard the project.

I'm sure that the standard IEA elements will be adequate to Council.

Regards

Shane Wilson

Deputy General Manager - Infrastructure

PH: (02) 6959 5503 | Fax: (02) 6959 1884 | Email: shane.wilson@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: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Sent: Wednesday, 6 December 2023 9:15 AM
To: Wilson, Shane <Shane.Wilson@Narrandera.nsw.gov.au>
Cc: Chris Jones <chris.jones@iema.com.au>; Planning <planning@Narrandera.nsw.gov.au>
Subject: RE: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Good morning Shane,

Thank you for picking up this email.

As per my email yesterday, please forward on any feedback the Council has on the [project](#) (ProTen's Narrandera farm) or any specific aspects you would like reviewed in the IEA.

Kind regards,

OLIVIA O'SHANNESSY
Environmental Consultant



ABN 32 622 237 870
PO Box 3161,
Ground Floor, 41 Llewellyn Street,
MEREWETHER NSW 2291 AUSTRALIA
e: olivia.oshannessy@iema.com.au
m: 0439 423 702 I w: www.iema.com.au



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From: Wilson, Shane <Shane.Wilson@Narrandera.nsw.gov.au>
Sent: Wednesday, December 6, 2023 8:07 AM
To: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Cc: Chris Jones <chris.jones@iema.com.au>; Planning <planning@Narrandera.nsw.gov.au>
Subject: RE: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Morning Olivia

Thank you for your email.

Please note that Garry Stoll is no longer with Narrandera Shire and I will be your point of contact for this matter.

Can you please ensure that all planning related correspondence is emailed to:
planning@narrandera.nsw.gov.au

Regards

Shane Wilson

Deputy General Manager - Infrastructure

PH: (02) 6959 5503 | Fax: (02) 6959 1884 | Email: shane.wilson@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: Olivia Oshannessy <olivia.oshannessy@iema.com.au>

From: [Jason Price](#)
To: [Olivia Oshannessy](#)
Cc: [Chris Jones](#)
Subject: FW: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation [ref:!00D7F06iTix.!500GA01QzjTT:ref]
Date: Thursday, 28 December 2023 11:25:20 AM
Attachments: [Outlook-c1c2ivs4.png](#)
[image001.png](#)
[Outlook-55eyem0c](#)
[Appointment of Experts_29112023_020303.pdf](#)

G'day Olivia – the EPA does not have any additional information requirements in relation to the upcoming IEA for the Euroley Poultry Complex (SSD 6882).

Regards

Jason Price

Unit Head

Regulatory Operations

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: Environment Line <info@environment.nsw.gov.au>
Sent: Tuesday, 5 December 2023 2:54 PM
To: EPA Delivery Hub Mailbox <EPA.DeliveryHub@epa.nsw.gov.au>
Subject: Fw: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation [ref:!00D7F06iTix.!500GA01QzjTT:ref]

Regards

Zane

Environment Line

Department of Planning and Environment

T 131 555 E info@environment.nsw.gov.au

4 Parramatta Square, 12 Darcey St, Parramatta NSW 2150

<https://www.epa.nsw.gov.au/about-us/contact-us/environmentline>

www.dpie.nsw.gov.au

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

RE: SSD 6882 Euroley Poultry Complex Independent Environmental Audit 2023 - Request for Consultation

Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>

Tue 12/5/2023 9:57 AM

To: Olivia Oshannessy <olivia.oshannessy@iema.com.au>

Cc: Chris Jones <chris.jones@iema.com.au>; Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Hi Olivia,

Thank you for consulting the department on the upcoming IEA for Euroley Poultry Complex. In addition to consent condition requirements, please consider compliance with the operational limits, management of air quality, including odour and water management.

Should you have any questions, please call me on 4247 1852.

Kind Regards,
Georgia

From: Olivia Oshannessy <olivia.oshannessy@iema.com.au>

Sent: Tuesday, 5 December 2023 9:40 AM

To: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>

Cc: Chris Jones <chris.jones@iema.com.au>

Subject: SSD 6882 Euroley Poultry Complex Independent Environmental Audit 2023 - Request for Consultation

Good morning Georgia,

As per the attached endorsement letter, Integrated Environmental Management Australia Pty Ltd (IEMA) have been approved to conduct the Independent Environmental Audit (IEA) for the Euroley Poultry Production Complex (SSD 6882). The Euroley Poultry Production Complex is more commonly referred to as Narrandera farm. The IEA will be completed in accordance with Condition C12 of SSD 6882 and the Independent Audit Post Approval Requirements (DPE 2020). The audit team were endorsed on 29/11/2023 and consists of:

- Chris Jones, Principal Environmental Consultant at IEMA – Lead Auditor
- Olivia O'Shannessy, Environmental Consultant at IEMA – Assistant Auditor

The audit period will be 1 December 2020 (based on the day after the previous IEA audit period) to 11 December 2023 (the date of this IEA site inspection component).

As per Section 3.2 of the Independent Audit Post Approval Requirements, I am emailing to confirm the parties/agencies the Department would like consulted for this IEA. This consultation will inform the scope of the audit and will be summarised in the IEA Report.

Furthermore, can I please request the Department's feedback on the project and/or any key aspects the Department would like reviewed as part of the IEA?

If you would like to discuss the site or the scope of the IEA, please do not hesitate to contact myself or Chris Jones (0401 800 918).

Kind regards,

OLIVIA O'SHANNESY
Environmental Consultant



ABN 32 622 237 870

PO Box 3161,

Ground Floor, 41 Llewellyn Street,

MEREWETHER NSW 2291 AUSTRALIA

e: olivia.oshannessy@iema.com.au

m: 0439 423 702 I w: www.iema.com.au



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From: [Olivia Oshannessy](#)
To: [Lilian Parker](#)
Cc: [Chris Jones](#)
Subject: Re: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation
Date: Wednesday, 13 December 2023 9:14:43 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Outlook-lomxhmi4.png](#)
[Outlook-32wtzht.png](#)

Hi Lilian,

Thank you for reaching out with DPI's response to the Euroley Poultry Complex Mod application.

This IEA will assess Euroley's compliance with the current SSD 6882. The IEA will present findings for those conditions related to limits on farm operations, animal welfare and best practice, emergency disposal, and biosecurity.

Kind regards,

OLIVIA O'SHANNESSEY
Environmental Consultant



ABN 32 622 237 870
PO Box 3161,
Ground Floor, 41 Llewellyn Street,
MEREWETHER NSW 2291 AUSTRALIA
e: olivia.oshannessy@iema.com.au
m: 0439 423 702 | w: www.iema.com.au

From: Lilian Parker <lilian.parker@dpi.nsw.gov.au>
Sent: Monday, December 11, 2023 12:21 PM
To: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Subject: Re: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Hi Olivia

As discussed last week the DPI Ag response to the Euroley Poultry Complex Mod has now been uploaded to the Major Projects Portal:

<https://www.planningportal.nsw.gov.au/major-projects/projects/euroley-poultry-farm-mod-1-bird-number-and-access-changes>

Lilian

Lilian Parker
Agricultural Land Use Planning
DPI Agriculture
Wagga Wagga Agricultural Institute Wagga Wagga NSW 2650
M: [0427 812 508](tel:0427812508) | E: lilian.parker@dpi.nsw.gov.au



Department of Primary Industries
Department of Regional NSW

I acknowledge the Wiradjuri people as the traditional custodians of the land on which I live and work. I pay my respects to Wiradjuri Elders past, present and emerging.

From: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Sent: Friday, 8 December 2023 10:28 AM
To: Lilian Parker <lilian.parker@dpi.nsw.gov.au>
Subject: RE: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Hi Lilian,

I'm sorry I missed your calls. I am in meetings until around 2pm today. I will give you a call back then.

Thanks for reaching out,

Kind regards,

OLIVIA O'SHANNESSEY
Environmental Consultant



As the festive season approaches, we want to take this opportunity to extend our heartfelt thanks for your trust and partnership throughout the year. Your support and collaboration have been integral to our shared successes, and we deeply appreciate your continued confidence in our services.

Please be advised that our office will be closing at midday on the 22nd of December 2023 - and we will be back on the 3rd of January 2024.



ABN 32 622 237 870
PO Box 3161,
Ground Floor, 41 Llewellyn Street,
MEREWETHER NSW 2291 AUSTRALIA
e: olivia.oshannessy@iema.com.au
m: 0439 423 702 | w: www.iema.com.au

From: Lilian Parker <lilian.parker@dpi.nsw.gov.au>
Sent: Friday, December 8, 2023 9:45 AM
To: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Subject: Re: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Hi Olivia
I have been trying to call you to discuss your request. Please let me know a good time to contact you.
thanks
Lilian

Lilian Parker
Agricultural Land Use Planning
DPI Agriculture
Wagga Wagga Agricultural Institute Wagga Wagga NSW 2650
M: 0427 812 508 | E: lilian.parker@dpi.nsw.gov.au



Department of Primary Industries
Department of Regional NSW

I acknowledge the Wiradjuri people as the traditional custodians of the land on which I live and work. I pay my respects to Wiradjuri Elders past, present and emerging.

From: Olivia Oshannessy <olivia.oshannessy@iema.com.au>
Sent: Tuesday, 5 December 2023 1:52 PM
To: DPI Landuse Ag Mailbox <landuse.ag@dpi.nsw.gov.au>
Cc: Chris Jones <chris.jones@iema.com.au>
Subject: Euroley Poultry Complex (SSD 6882) Independent Environmental Audit - Request for Consultation

Dear Lilian Parker,

As per the attached endorsement letter, Integrated Environmental Management Australia Pty Ltd (IEMA) have been approved to conduct the Independent Environmental Audit (IEA) for the Euroley Poultry Production Complex (SSD 6882). The Euroley Poultry Production Complex is more commonly referred to as Narrandera farm and is operated by ProTen. The IEA will be completed in accordance with Condition C12 of SSD 6882 and the Independent Audit Post Approval Requirements (DPE 2020). The audit team were endorsed on 29/11/2023 and consists of:

- Chris Jones, Principal Environmental Consultant at IEMA – Lead Auditor
- Olivia O'Shannessy, Environmental Consultant at IEMA – Assistant Auditor

The audit period will be 1 December 2020 (based on the day after the previous IEA audit period) to 11 December 2023 (the date of this IEA site inspection component).
In accordance with Section 3.2 of the *Independent Audit Post Approval Requirements*, I am emailing to request your feedback on the project and any key aspects the DPI would like reviewed as part of the IEA.

If you would like to discuss the site or the scope of the IEA, please do not hesitate to contact myself or Chris Jones (0401 800 918). Please provide your feedback by 19 January 2024 to enable sufficient time for assessment. Please note the site inspection component will be Monday 11 December.

Kind regards,

OLIVIA O'SHANNESSY
Environmental Consultant



ABN 32 622 237 870
PO Box 3161,
Ground Floor, 41 Llewellyn Street,
MEREWETHER NSW 2291 AUSTRALIA
e: olivia.oshannessy@iema.com.au
m: 0439 423 702 | w: www.iema.com.au

