

Compliance Reporting 2024/2025

Redirect Recycling Pty Ltd – St Marys

25 Dunheved Circuit NSW, St Marys 2760

Doc No.	Date	Author / Position	Details	Reviewed	Approved
1	27.03.2026	James Sutton Environmental Manager	For issue to DPHI	James Sutton Environmental Manager	James Sutton Environmental Manager

Compliance Report Cover Page


Development consent / project approval #	SSD-10474
Name of operator	Redirect Recycling Pty Ltd
Compliance Report	Annual Compliance Report
Name of holder of development consent / project approval	Redirect Recycling Pty Ltd
Physical address	25 Dunheved Circuit, St Marys NSW 2760
Lot and DP	Lot 10 DP 1204457
Development	Use of an existing resource recovery facility for the sorting and processing of primarily wood and timber waste. It is proposed to increase the throughput of waste on site to from 18,000 tonnes per annum (tpa) to 150,000 tpa.
Period covered by this Compliance Report	19 November 2024 to 18 November 2025
Name of authorised reporting officer	James Sutton
Title of authorised reporting officer	Environmental Manager
Signature of authorised reporting officer	
Version/Revision Number	1
Date	27.03.2026

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1. Introduction

This Annual Compliance Report has been prepared to satisfy condition C11 of Development Consent SSD-10474 issued by the Department of Planning, Industry and Environment (the Department) on 30 September 2021. Condition C11 requires the Applicant (Redirect Recycling Pty Ltd) to submit a Compliance Report to the Planning Secretary within six months after the first year of commencement of the operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary). This report has been prepared in accordance with NSW Department of Planning, Industry and Environment document Compliance Reporting Post Approval Requirements (May 2020).

The Department was notified on 19 October 2023 that operations would commence on 19 November 2023. This Report will cover the period 19 November 2024 to 18 November 2025 encompassing the second full year of operations conducted under Development Consent SSD-10474.

The Project comprises a resource recovery and processing operation where wood waste is collected and shredded within an industrial building, prior to being transported offsite and used in the production of particle board. The SSD consent allows for the processing of up to 110,000 tonnes per annum of wood and timber waste, 30,000 tonnes of plasterboard, and 10,000 tonnes of metal waste. Prior to the SSD consent approval, a smaller scale operation was undertaken on the site in accordance with local Council Development Approval (DA140/2016).

Appendix I – Regional and Site Context provides regional context and the development footprint, including Environment Protection Licence 7654 (EPL 7654) boundary and details on the site activity.

During this reporting period 53942.91 tonnes of waste was received at the site. This was entirely made up from wood waste. No plasterboard or metal waste was received during the reporting period. Apart from shredding and storage, no other activity has occurred on the site during this reporting period.

Table 1 shows the names and contact details of the key personnel who are responsible for the environmental and compliance management of the development.

Table 1 Key Personnel & Contact Details

Name	Position	Email	Mobile
Mathew Dwyer	Head of Redirect Recycling	dwyer@redirectrecycling.com.au	0421 917 800
Aaron Murphy	Site Manager	murphy@redirectrecycling.com.au	0410 118 474
James Sutton	Environmental Manager	suttonjd@redirectrecycling.com.au	0414 987 168

2. Previous Actions

The previous Compliance Report covered the period 19 November 2023 to 18 November 2024 and was submitted on 7 May 2025. The Department provided their response on 17 May 2025 and stated the report to generally satisfy the reporting requirements of the consent and the NSW Planning Compliance Reporting Post Approval Requirements (2020).

Non-compliances that were identified in the Report had already been addressed in response to the first Independent Environmental Audit (SSD-10474-PA-20). No further actions were required in response to the 2023-2024 annual compliance report.

As required under Schedule 2, Condition C12 of the Consent, a copy of the Report was published on the company website.

3. Monitoring Data

Condition C15 of SSD-10474 requires Redirect Recycling carry out monitoring, whether directly or by way of a plan, strategy or program. The site’s Surface Water Management Plan requires water sampling to be undertaken at the StormFilter chamber bi-annually (during or following a rainfall event) for two years, then annually (subject to review of results).

During this reporting period Redirect Recycling engaged Land Risk Environmental Pty Ltd (LRE) to undertake a sampling event in May 2025. An additional sampling event was scheduled for November 2025; however, sampling was not undertaken within the reporting period due to unsuitable sampling conditions, results will be reported in the 2025-2026 Annual Compliance Report. Condition L1 of the EPL states that the licensee must comply with section 120 of the POEO Act, which prohibits the pollution of waters. In the absence of any EPL or Penrith City Council criteria, site-specific risk-based screening criteria should be adopted from NSW EPA made or approved guidance appropriate for the commercial/industrial land use and heavily disturbed receiving environment. These include: ANZG (2018) Australian and New Zealand Guidelines for Fresh and Marine Water Quality for heavily disturbed environments; and, primary contact recreation (PCR) guidelines adopted from National Health and Medical Research Council (NHMRC) (2011), Australian Drinking Water Guidelines and NHMRC (2008) Guidelines for Managing Risks in Recreational Water.

Table 2 displays the water quality results from May 2025 compared against adopted guidance criteria.

Table 2 Water sampling results – Storm Filter Chamber outlet and exit stormwater pit.

Parameter	Units	Adopted Criteria ¹	SW01	SW02	FD01
May 2025					
Total suspended solids (TSS)	mg/L	50	38	20	36
Total nitrogen		0.6	1.2	0.9	1.1
Total phosphorous		0.05	0.1	0.07	0.09

Note:

¹Australian and New Zealand Environment Conservation Council (“ANZECC”) Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (“ANZECC 2000”). Default trigger values for NSW, lowland rivers.

In May 2025 all laboratory analytical results for TSS were below adopted guidance criteria. Results for total nitrogen and phosphorus were outside the specified water quality guidance criteria in all samples.

Sampling was conducted during a rainfall event and actively flowing treated stormwater was observed at the time of sampling. Samples were collected using a bailer directly adjacent to the StormFilter chamber outlet weir (“SW01”) and at the site exit stormwater pit (“SW02”).

Table 3 displays the previous water quality results compared against adopted guidance criteria for reference.

Table 3 Previous water sampling results – StormFilter Chamber outlet.

Parameter	Units	Adopted Criteria ¹	SW01	FD01
May 2024				
TSS	mg/L	50	230	16
Total nitrogen		0.6	3.8	2.9
Total phosphorous		0.05	0.62	0.3
November 2024				
TSS	mg/L	50	250	230
Total nitrogen		0.6	3.3	3.5
Total phosphoros		0.05	0.5	0.4

Although total nitrogen and phosphorus were recorded above the adopted guidance criteria for the May 2025 sampling event, all parameters were recorded significantly lower than previous monitoring rounds undertaken at the site (refer to Table 3). This suggests that elevated results in earlier rounds may have been influenced by inadequate flow and water volumes, potentially causing disturbed or accumulated sediment to mix during sampling, and affecting results.

An additional sampling point (not sampled in May 2024 and November 2024) located at the sites exit stormwater pit was included in the May 2025 sampling event. This location represents water post discharge from the StormFilter chamber. It is noted that all parameters were lower than results at the StormFilter, demonstrating further improvement of water quality post treatment and exiting the site.

LRE have advised that further sampling during similar rain events are required to determine baseline stormwater quality. Redirect Recycling will continue bi-annual monitoring in 2026, adopting sampling practices advised by LRE for the next sampling events to allow establishment of stormwater quality trends.

4. Actual Verses Predicted Environmental Impacts

The predicted impacts associated with the development are described in the following documents:

- Environmental Impact Statement Rev 3, 25 November 2021 (EIS), prepared by Redirect Recycling
- Response to Submissions Report, 27 July 2021 (RtS), prepared by Jackson Environmental and Planning

Chapters 11 to 18 of the EIS contain an assessment of the predicted impacts of each environmental aspect requested for assessment via the Secretary’s Environmental Assessment Request (SEARs). These assessments were used to assess the actual impacts of the development.

When the actual impacts were assessed, the following factors were considered:

- The occurrence of environmental incidents.
- Compliance history against the conditions of consent and adherence to the approved management plan requirements.
- Results of environmental monitoring data compared to predictive levels.
- Number and frequency of internal actions raised during site inspections.
- The nature and frequency of complaints.
- Regulatory notices.
- The physical extent of the facilities operations compared to the approved boundaries.
- Consistency of designs with the EIS.
- Any planning approval modifications of consistency assessments.
- Appropriate implementation of environmental impact measures.

Table 3 Assessment of Predicted vs Actual Impacts

Environmental Impact	Predicted Impact	Actual Impact
Air Quality	An Air Quality Impact Assessment was undertaken during the EIS which concluded: “The results of the dispersion modelling indicate that dust and particulate matter concentrations due to the operation of the Proposal would comply with the	No dust or odour issues observed or recorded during daily site OEMP checklist inspections. No recorded dust or odour related complaints or incidents. Air quality mitigation measures

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Environmental Impact	Predicted Impact	Actual Impact
	established criteria at all sensitive receptors”.	(i.e., water mister) implemented. No non-compliances associated with implementation of the Air Quality and Odour Management Plan were identified.
Noise and Vibration	Noise and Vibration Impact Assessment was undertaken as part of the EIS, which concluded: “The noise impact associated with operational activities is predicted to comply with the noise criteria at all the considered residential receivers. Potential noise impacts from traffic on the surrounding road network, arising from additional truck movements associated with the operation of the recycling facility are predicted to not be noticeable as increases in noise level of 1dB was predicted”.	Less plant/machinery being utilised on site compared to those modelled in the EIS. No noise-related complaints received. No non-compliances associated with implementation of the Noise and Vibration Management Plan were identified.
Cultural Heritage	The Site was not considered to have any Aboriginal or Historic heritage value.	No heritage items identified. No excavation works undertaken as part of the SSD.
Waste Management	The Site was permitted to receive 110,000 tonnes of general solid waste per annum, triggering the requirement for an SSD.	No non-compliances associated with implementation of the approved Waste Management Plan were identified. Review of weighbridge data confirmed that the Site received less than the 110,00-tonne annual wood waste limit. No other waste was received.
Traffic	The EIS stated that “The traffic impacts due to the proposed operation of a timber waste recovery facility have been assessed to be minor”.	Traffic related mitigation measures have been installed at the site as per requirements. A driver’s code of conduct has been prepared and implemented. No instances of parking on public roadways or blocking property access have been reported or observed.
Water Use and Conservation	Nil impacts predicted in relation to water use and supply. No mitigation measures were proposed in the EIS.	Nil actual impacts observed.
Stormwater Management and Water Quality	The EIS stated that the main source of stormwater contamination will be oil fuel drops on the vehicle	‘StormFilter’, wheel wash and Gross Pollutant Trap (GPT) operational.

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Environmental Impact	Predicted Impact	Actual Impact
	paths and dust carried from the warehouse. Mitigation measures included the installation of an ‘Ocean Protect StormFilter’ system to treat rainwater and installation of a truck wheel wash.	<p>A biannual stormwater monitoring has been implemented as per the Surface Water Management Plan.</p> <p>Oil and fuel storage was within dedicated bunds.</p> <p>No actual water quality impacts identified.</p>

Based on the assessment of the environmental impacts identified in the EIS, the current environmental impacts were determined less than or equal to those anticipated within the EIS.

5. Compliance Status Summary

There were no non-compliances with SSD-10474 during this reporting period. See Appendix II Compliance Table for a full list of SSD-10474 conditions, including compliance status.

6. Incidents

There were no notifiable incidents, as defined by the development consent, during the audit period.

7. Complaints

There were no complaints received during this reporting period. The Complaints Register is maintained on the Redirect Recycling website. Refer to link. [Environmental - Redirect Recycling](#)

Appendix I Regional and Site Context



LEGEND:

NOTES:

TOTAL SITE AREA: 6,253m²
 TOTAL BUILT UP AREA: 3,660m²

ISSUE	DESCRIPTION	DATE	DRAWN	AUTH
1	Development Application	17-06-2020	DC	SC/AS

CROSSMULLER CONSTRUCTION
 OFFICE
 2 WELLS WAY SOMERSET, TAS 7250 AUSTRALIA
 Tel: 02 4346 9800 Fax: 02 4346 9200



PROJECT
 RESOURCE RECOVERY FACILITY

LOCATION
 25 DUNHEVED CIRCUIT
 ST MARYS

DRAWING
 POTENTIALLY IMPACTED PROPERTIES
 WITHIN 500M RADIUS

SCALE 1:2000 @ A1, 1:4000 @ A3	STAGE DA
PROJECT NUMBER 2020/01	DRAWING NUMBER DA08
	ISSUE A

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Appendix II Compliance Table

Condition Number	Condition	Development Phase	Date Submitted	Compliance Status	Evidence/Comments
SCHEDULE 2 PART A: ADMINISTRATIVE CONTROLS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	At all times		Compliant	There has been no material harm to the environment, evidence is that there have been no notifications of harm as a result of construction or operation of the development to either the Department or EPA.
TERMS OF CONSENT					
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS, Response to Submissions and Supplementary Information; (d) in accordance with the Development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in Appendix 2.	At all times		Compliant	No non-compliances have been recorded against the consent, directions of the planning secretary, EIS, Response to submissions, development layout mitigation measures listed in Appendix 2 of the consent.
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	At all times		Not triggered	
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	At all times		Compliant	No inconsistencies, ambiguities or conflicts between any of the planning documents has been identified during the reporting period.
LIMITS OF CONSENT					
Lapsing					
A5	This consent lapses five years after the date from which it operates unless the development has physically commenced on the land to which the consent applies before that date.	Noted		Compliant	Operations commenced 19 November 2023.
Waste					
A6	The Applicant must not receive or process more than 150,000 tonnes of general solid waste (non-putrescible) per year, comprising: (a) 110,000 tonnes per year of wood and timber waste; (b) 30,000 tonnes per year of plasterboard; and (c) 10,000 tonnes per year of metal waste.	At all times		Compliant	a) Transaction Summary Report 19/11/24 to 18/11/25 determined 53942.91 tonnes of net wood waste received at the site. b) No plasterboard has been received on site to date c) No metal waste stream is accepted on site
A7	The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.	At all times		Compliant	Waste Contribution Monthly Reports (WCMR) submitted to the NSW EPA's Waste and Resource Reporting Portal (WARRP) between November 2024 and November 2025 all reported stock limits below the Authorised Amount (704 tonnes).
NOTIFICATION OF COMMENCEMENT					
A8	The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.	N/A		Compliant	Letter from ReDirect to DPHI, dated 19 October 2023, Re: Notification of commencement of operations. Ref: SSD-10474-PA-15. The letter stated that operations would commence on 19 November 2023.

A9	If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.	At all times		Not triggered	Not applicable. No Staging proposed for the SSD.
SURRENDER OF EXISTING CONSENTS OR APPROVALS					
A10	Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the following existing development consents for the site in accordance with the EP&A Regulation: (a) DA01/1034 granted by Penrith Council on 24 July 2001; and (b) DA15/1042 granted by Penrith Council on 20 June 2016.	Noted		Not triggered	DPHI have agreed to an alternative timeframe of 24 months from the commencement of the development (Ref: SSD-10474-PA-21). Surrender required by 19 November 2025 unless otherwise agreed by DPHI (which is outside the reporting period).
A11	Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A109, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. Note: <i>This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 6 of the EP&A Act. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>	Noted		Compliant	Noted
EVIDENCE OF CONSULTATION					
A12	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	N/A		Not Triggered	Not triggered during reporting period. No requirement to consult during the reporting period.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
A13	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	N/A		Not Triggered	The development has not been staged.
A14	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Noted		Not Triggered	The development has not been staged.
A15	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Noted		Not Triggered	The development has not been staged.
PROTECTION OF PUBLIC INFRASTRUCTURE					

A16	Before the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	N/A		Not Triggered	No impact on public infrastructure
A17	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	N/A		Not Triggered	No impact on public infrastructure
DEMOLITION					
A18	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).	N/A		Not Triggered	No demolition conducted
STRUCTURAL ADEQUACY					
A19	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	N/A		Not Triggered	No construction of buildings undertaken
COMPLIANCE					
A20	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	At all times		Compliant	Site, WHS & Environmental Site Induction Toolbox talks
OPERATION OF PLANT AND EQUIPMENT					
A21	All plant and equipment used on site, or to monitor the performance of the development, must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	At all times		Compliant	Maintenance / service records Daily pre-start checks
EASEMENTS					
A22	Within six months of the commencement of operation of the development, an easement, or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.	At all times		Compliant	Plan of Subdivision of Lot 143 DP1307832 and Lot 9 DP31908, registered on 19 August 2024. Pursuant to 88B of the Conveyancing Act 1919. The registered plans for Lot 9 DP 31908 depict the newly created easement which provides shared access to 21 and 25 Dunheved Circuit. The plans were registered on 19 August 2024.

A23	Within six months of the commencement of operation of the development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.	During Construction		Compliant	Plan of Subdivision of Lot 143 DP1307832 and Lot 9 DP31908, registered on 19 August 2024. Pursuant to 88B of the Conveyancing Act 1919. Land Registry Services record form dated 19 August 2024 with the registration of Lot 143 DP1307832 and Lot 9 DP31908 subdivision. The provided plans confirm that four (4) detention tanks are located within the boundary of Lot 9. The plans were registered on 19 August 2024.
UTILITIES AND SERVICES					
A24	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Prior to commencement of operations		Not Triggered	No construction of utility works proposed under this consent
A25	Before the commencement of operation, the Applicant must lodge a Feasibility study with Sydney Water for the development which accurately details water and wastewater demands, prepared by a Water Servicing Coordinator. Approval from Sydney Water is also required if it is proposed to discharge trade wastewater to Sydney Water's sewerage system.	Prior to commencement of operations		Compliant	Approval from Sydney Water received as per Section 73. Rose Atkins Rimmer Sydney Water application form confirming use of a certified water services coordinator
A26	Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Prior to commencement of operations		Compliant	Sydney Water Compliance Certificate for 25 Dunheved Circuit, St Marys Ref: Case No. 207410. Prepared under Division 9 Section 73 of the Sydney Water Act 1994. Dated 11 October 2023. The compliance certificate was received prior to the commencement of operations.
APPLICABILITY OF GUIDELINES					
A27	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Noted		Compliant	Noted
A28	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted		Compliant	Noted
ADVISORY NOTES					
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Prior to commencement of operations		Compliant	Environmental Protection Licence (EPL) #21487. EPL variation obtained prior to commencement of development.
PART B: SPECIFIC ENVIRONMENTAL CONDITIONS					
TRAFFIC AND ACCESS					
Parking					
B1	The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Prior to commencement of construction		Compliant	Adequate parking with 10 car parking spaces for permanent staff (only 5 permanent staff onsite). No ReDirect vehicles parking on public streets.
ADVISORY NOTES					

B2	<p>The Applicant must ensure:</p> <p>(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002);</p> <p>(b) all car spaces are to be line marked and dedicated for the parking of vehicles only and not be used for storage of materials;</p> <p>(c) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;</p> <p>(d) the site is not to be serviced or accessed by any vehicle greater than 19m in length;</p> <p>(e) all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway;</p> <p>(f) the development does not result in any vehicles queuing on the public road network;</p> <p>(g) heavy vehicles and bins associated with the development are not parked on local roads, footpaths, reserves, parks or vacant land in the vicinity of the site;</p> <p>(h) all vehicles associated with the development are prohibited from parking along Dunheved Circuit, Links Road and the surrounding road network;</p> <p>(i) signage, which is clearly visible from the public road, is placed within the development site to indicate entry and exit at the driveway access on Dunheved Circuit;</p> <p>(j) all vehicles are wholly contained on site before being required to stop;</p> <p>(k) all vehicles are to enter and exit the site in a forward direction;</p> <p>(l) all loading and unloading of materials is carried out on-site;</p> <p>(m) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network;</p> <p>(n) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and</p> <p>(o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations.</p>	N/A		Compliant	<p>The Transport Planning Partnerships (TPPP) memorandum, dated 3 September 2021.</p> <p>Traffic management plan.</p> <p>Driver code of conduct.</p>
Operational Traffic Management Plan					

B3	<p>Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C2 and must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s), in consultation with Council;</p> <p>(b) detail the numbers and frequency of vehicle movements, including light and heavy vehicles, size of heavy vehicles, routes and peak movements and internal pedestrian routes;</p> <p>(c) detail the measures to be implemented to ensure road safety and network efficiency throughout operation, including:</p> <p>(i) ensuring no queuing or parking of heavy vehicles occurs in Dunheved Circuit, the adjacent reserve, footpaths or the surrounding road network.</p> <p>(ii) redirecting incoming trucks to other facilities to prevent traffic build up and queuing in Dunheved Circuit; and</p> <p>(iii) ensuring there is no conflict of vehicles entering and exiting the site at the driveway entrance, including the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information;</p> <p>(d) detail measures to minimise noise from development related traffic, including procedures for receiving and addressing complaints from the community about development related traffic and noise;</p> <p>(e) include a Driver Code of Conduct and induction training that includes procedures for:</p> <p>(i) ensuring drivers implement safe driving practices and adhere to designated routes including prioritising the use of arterial roads and avoiding residential streets;</p> <p>(ii) minimising road traffic noise, particularly during night-time operations;</p> <p>(iii) ensuring drivers adhere to site-specific speed limits.</p> <p>(f) include a program to monitor the effectiveness of these measures;</p> <p>(g) include procedures for ensuring all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway;</p> <p>(h) restrict access to vehicles that are over 19.0 metres long;</p> <p>(i) include a Traffic Control Plan (TCP) detailing the onsite measures to be implemented to control the manoeuvring of vehicles in designated areas, and the installation of signage,</p> <p>(j) recommend and implement additional traffic management measures where necessary, that have been developed in consultation with Council and to the satisfaction of the Planning Secretary, to maintain road safety and network efficiency throughout operation; and</p>	At all times		Compliant	<p>Operational Traffic Management Plan, ReDirect Recovery Facility, 25 Dunheved Circuit, St Marys, Rev 3, dated 12 September 2022.</p> <p>DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p>
B4	<p>The Applicant must:</p> <p>(a) not commence operation until the Operational Traffic Management Plan required by Condition B3 is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the Operational Traffic Management Plan approved by the Planning Secretary for the duration of operation.</p>			Compliant	<p>DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p> <p>The Project commenced operations on 19 November 2023.</p>
WASTE MANAGEMENT					
Waste Monitoring Program					
B5	<p>From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>(b) include suitable provision to monitor the:</p> <p>(i) quantity, type and source of waste received on site; and</p> <p>(ii) quantity, type and quality of the waste outputs produced on site; and</p> <p>(c) ensure that:</p> <p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p> <p>(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>	At all times		Compliant	<p>Waste Management Plan version 4, dated 12 April 2023</p> <p>Weighmore tracking software issued for compliance and the waste received is pre classified as exclusively wood waste</p>
Waste Management Plan					

B6	Prior to the commencement of operation of the development, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with Condition C22. The Plan must: (a) be prepared in consultation with SafeWork NSW; (b) detail the type and quantity of waste to be generated during operation of the development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Environment Protection Authority, 2014); (d) describe the management of any non-conforming waste received at the site, consistent with the 'Standards for managing construction waste in NSW' (EPA, 2019); (e) describe the processes and procedures for managing asbestos received at the site; (f) detail the materials to be reused or recycled, either on or off site; and (g) include the Management and Mitigation Measures included in Appendix 2.			Compliant	Waste Management Plan version 4, dated 12 April 2023
B7	The Applicant must: (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.	At all times		Compliant	DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3. The Project commenced operations on 19 November 2023. Toolbox Talk – dated 22 November 2023, Subject: St Marys OEMP – Waste Management Plan.
Statutory Requirements					
B8	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	At all times		Compliant	Waste Management Plan version 4, dated 12 April 2023 Weighbridge Records
B9	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Prior to operation		Compliant	All waste material removed from site is pre classified in accordance with NSW Waste Classification Guidelines.
B10	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	At all times		Compliant	No waste classification data obtained as all waste is pre-classified.
Waste Reveal, Loading, Unloading and Storage					
B11	The Applicant must only receive waste on site that is authorised for receipt by an EPL.	Prior to operation		Compliant	Waste Management Plan Weigh bridge transaction report
B12	All waste must be stored wholly within the designated waste storage areas.	At all times		Compliant	No observations of waste stored outside <i>Daily OEMP Checklist</i> uploaded to DataStation with site observations
B13	All waste must be loaded and unloaded within the designated loading and unloading areas.	Noted		Compliant	All waste observed being unloaded within building <i>Daily OEMP Checklist</i> uploaded to DataStation with site observations
SOILS, WATER QUALITY AND HYDROLOGY					
Discharge Limits					

B14	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	At all times		Compliant	Tanks (OSDs), an Ecosol Gross Pollutant Trap (GPT) and Stormfilter cartridges to remove finer particulates and oil and grease. One (1) monitoring event was completed in the reporting period which did not identify surface water impacts representative of a pollution event. Email correspondence between ReDirect and the consultant Land Risk Environmental, dated 18 June 2025, detailing the surface water biannual monitoring results
Stormwater Mangement System					
B15	Prior to the commencement of operation of the development, the Applicant must design, install and operate a stormwater management system for the development. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be in accordance with the Stormwater Management Plan Report (ref. 10113-002-smp) prepared by Eclipse Consulting Engineers Pty Ltd, dated 13 May 2021, and the Remedial Stormwater Drainage Plan (Drg No. C04-A) prepared by Consulting Engineers Pty Ltd, dated 23 February 2021. (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.	At all times		Compliant	Stormwater Management Plan Report, 21-25 Dunheved Circuit, St Marys NSW, Rev 2, dated 23 February 2021. Letter from Eclipse Consulting Engineers to Penrith City Council, dated 5 September 2024. Ref: 10113-003-I. Remedial Stormwater Drainage Plan, Drawing C04-A, Prepared by Eclipse Engineers, dated 23 February 2021. (a) The stormwater management system was designed by Eclipse Consulting Engineers, who are considered to be suitably qualified and experienced. (b) Prepared by Eclipse Engineers in accordance with Australian Standards and guidelines. (c) Prepared by Eclipse Engineers in accordance with Australian Standards and guidelines.
B16	Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	N/A		Compliant	Consultation was sought from Council on 30 October 2024. Council responded on 5 November 2024 confirming the rainwater needs to be a minimum of 15kL. A 15kL was installed following Council's advice.
Surface Water Management Plan					
B17	Prior to the commencement of operation of the development, the Applicant must prepare a Surface Water Management Plan (SWMP) to the satisfaction of the Planning Secretary. The SWMP must be prepared by a suitably qualified and experienced person(s), form part of the OEMP required by Condition C22, and must include: (a) a program to monitor surface water flows, quality, storage and use; (b) a maintenance schedule for all stormwater devices and treatment measures; (c) detail the management of wastewater streams on the site, including leachate; (d) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and (e) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.	Prior to operation		Compliant	Surface Water Management Plan, 21-25 Dunheved Circuit, St Marys NSW, Rev 1, dated 5 October 2022.
B18	The Applicant must: (a) not commence operation until the Surface Water Management Plan required by condition B1714 is approved by the Planning Secretary; and (b) implement the most recent version of the Surface Water Management Plan approved by the Planning Secretary for the duration of the development.	Prior to operation		Compliant	DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.

AIR QUALITY					
Dust Minimisation					
B19	The Applicant must take all reasonable steps to prevent and minimise dust generated during all works authorised by this consent.	At all times		Compliant	Internal dust suppression sprayers <i>Daily OEMP Checklist</i> uploaded to DataStation. Section 3 of the checklist includes dust mitigation measures which were required to be implemented daily.
B20	During operation, the Applicant must ensure: (a) all loading, unloading, materials handling, sorting, sampling, processing and storage operations are undertaken within a fully enclosed building; (b) no waste, waste derived products and/or finished products, are stored outside of the building at any time; (c) the roller doors of the processing building are kept closed at all times, except when vehicles are entering or exiting the building; (d) a wheel wash at the vehicle egress point is operational and used at all times by trucks exiting the site; (e) all trucks entering and exiting the premises have their loads covered; (f) the following areas are sealed with concrete or asphalt: (i) roads and carparking areas; (ii) operating, storage, unloading and loading areas; and (iii) any unused external surfaces; (g) the site is maintained in a manner that prevents and minimises the emission of air pollutants, including dust; (h) no material, including sediment, is tracked off site; (i) vehicles and plant are switched off when not in use, fitted with pollution reduction devices where reasonably practicable and maintained in accordance with manufacturer's specifications; and (j) a dust suppression system is operational and used at all times when processing materials that create dust.	At all times		Compliant	<i>Daily OEMP Checklist</i> uploaded to DataStation. Use of water misters within warehouse All surfaces sealed Trucks had loads covered All activities (including tipping and storage) occurring within the warehouse Dedicated street sweeper present on site No evidence of mud tracking or sediments leaving site A wheel wash was installed and was operational.
Air Quality Discharges					
B21	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Prior to commencement of construction		Compliant	The EPL does not contain air quality / discharge criteria. Maintenance register and plant workorder spreadsheet used to track when plant is due for service and when faults are identified.
Air Quality Management Plan					
B22	Prior to the commencement of operation of the development, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C22. The AQMP must: (a) be prepared by a suitably qualified and experienced person(s); (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.	At all times		Compliant	Air Quality and Odour Management Plan, Rev 1, dated 22 July 2022

B23	The Applicant must: (a) not commence operation under this consent until the AQMP required by condition B22 is approved by the Planning Secretary; and (b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development.	At all times		Compliant	DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.											
Odour Management																
B24	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	At all times		Compliant	No organic material is imported to site which would give rise to offensive odour, nor does the use of plant and machinery result in a noticeable odour.											
NOISE																
Hours of Work																
B25	The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary. Table 1 Hours of Work	N/A		Compliant	The Site is permitted to operate 24/7.											
	<table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Construction / Fit Out</td> <td>Monday – Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</td> </tr> <tr> <td>Operation</td> <td>Monday - Sunday</td> <td>24 hours</td> </tr> </tbody> </table>	Activity	Day	Time	Construction / Fit Out	Monday – Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Operation	Monday - Sunday	24 hours				
Activity	Day	Time														
Construction / Fit Out	Monday – Friday	7 am to 6 pm														
	Saturday	8 am to 1 pm														
Operation	Monday - Sunday	24 hours														
B26	Works outside of the hours identified in condition B25 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary; (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Noted		Compliant	The Site is permitted to operate 24/7.											
Operational Noise Limits																
B27	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2. Table 2 Noise Limits dB(A)	Noted		Compliant	St Marys Noise Assessment, Report No. 20216, Rev A, dated February 2021. The modelled noise impact assessment assumed that the site would be operating 24hrs/day, with no variations in operations from day to night. The model also assumed that one (1) telehandler, one (1) front end loader and one (1) shredder were being utilised indoors for 100% of the period, all noise sources were operating simultaneously and that two (2) trucks in a 15 min period would enter, tip material and leave the site. The front-end loader and telehandler presented the greatest sound power level (105 dBA). Based on the above assumptions, predicted noise levels at all identified sensitive receivers were found to comply with relevant criteria for day, evening and night periods. <i>Daily OEMP Checklist</i> includes noise mitigation and conduct.											
	<table border="1"> <thead> <tr> <th>Location</th> <th>Day L_{Aeq}(15 minute)</th> <th>Evening L_{Aeq}(15 minute)</th> <th>Night L_{Aeq}(15 minute)</th> <th>Night L_{AMax}</th> </tr> </thead> <tbody> <tr> <td>All residential receivers</td> <td>49</td> <td>43</td> <td>38</td> <td>52</td> </tr> </tbody> </table> <p><i>Note</i> Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.</p>	Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _{AMax}	All residential receivers	49	43	38	52					
Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _{AMax}												
All residential receivers	49	43	38	52												
Road Traffic Noise																

B28	Prior to the commencement of operation of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must implement the Code of Conduct for the life of the development.	Noted		Compliant	Operational Traffic Management Plan, ReDirect Recovery Facility, 25 Dunheved Circuit, St Marys, Rev 3, dated 12 September 2022. Completed Driver Code of Conduct Declarations (15 declarations in total). Section 9 of the Operational Traffic Management Plan (OTMP) includes a Driver Code of Conduct. The OTMP was prepared prior to the operation of the development.
Operational Noise Management Plan					
B29	Prior to the commencement of the development, the Applicant must prepare an Operational Noise Management Plan (ONMP) for the development to the satisfaction of the Planning Secretary. The ONMP must form part of the OEMP required by Condition C2 and be prepared in accordance with Condition C1. The ONMP must: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe the measures to be implemented to manage noise generating activities during operation; and (c) include a complaints management system that would be implemented for the duration of the development.	N/A		Compliant	Operational Noise Management Plan, revision 1, dated 10 August 2022.
B30	The Applicant must: (a) not commence construction until the ONMP required by condition B25 is approved by the Planning Secretary; and (b) implement the most recent version of the ONMP approved by the Planning Secretary for the duration of construction.	N/A		Compliant	DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.
HAZARDS AND RISK					
B31	The Applicant must store all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.	At all times		Compliant	Site inspection observations found that dangerous goods were stored in accordance with Australian Standards and NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual'
Dangerous Goods					
B32	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.	N/A		Compliant	Site visit inspection observations found that dangerous goods were stored in accordance with the Australian Dangerous Goods Code, and in accordance with all relevant Australian Standards
Bunding					
B33	The Applicant must 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 Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	N/A		Compliant	Site visit inspection observations liquid chemicals stored within bunded areas
FIRE SAFETY					
B34	Prior to the commencement of operation of the development, the Applicant is to engage a fire safety engineer or other suitably qualified consultant to prepare the final fire safety design of the development, including firewater containment, in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of the National Construction Code.	N/A		Compliant	Fire Engineering Report, Waste Sorting Facility, 25 Dunheved Circuit, St Marys, Rev B, dated October 2016. Submission of Fire Engineering Report to DPHI, dated 26 October 2023, Ref: SSD-10474-PA-14. DPHI approval of Fire Engineering Report, dated 17 October 2023. Ref: SSD-10474-PA-14.

B35	The premises must have appropriate fire services to be able to respond to a fire event at the facility in accordance with FRNSW 'Fire Safety in Waste Facilities' guidelines.	At all times		Compliant	<p>Fire Engineering Report, Waste Sorting Facility, 25 Dunheved Circuit, St Marys, Rev B, dated October 2016</p> <p>Wood waste and plasterboard recycling facility, 25 Dunheved Circuit, St Marys, Fire Safety Study, Rev 4, dated 10 July 2023</p> <p>The FSS was prepared in consultation with FRNSW who advised that the FSS "has been prepared to the satisfaction of FRNSW and will meet the operational requirements of FRNSW".</p>
B36	<p>Prior to commencement of operation of the development, the Applicant must prepare a Fire Safety Study (FSS) for the development to the satisfaction of the Planning Secretary. The FSS must:</p> <p>(a) cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPPCC, 1994);</p> <p>(b) be developed in consultation with and approved by FRNSW;</p> <p>(c) consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.</p>	At all times		Compliant	<p>Wood waste and plasterboard recycling facility, 25 Dunheved Circuit, St Marys, Fire Safety Study, Rev 4, dated 10 July 2023</p> <p>Fire and Rescue NSW (FRNSW) Letter, Re: Review of Fire Safety Study (FSS), dated 13 July 2023. Ref: FRN16/2631 BFS23/3772 8000029394.</p>
B37	<p>Prior to the commencement of operation of the development, the Applicant must prepare a comprehensive Emergency Response Plan (ERP) for the site in consultation with FRNSW to the satisfaction of the Planning Secretary. The ERP must:</p> <p>(a) be prepared by a suitably qualified consultant;</p> <p>(b) specifically address foreseeable on-site and off-site fire events and other emergency incidents;</p> <p>(c) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards); and</p> <p>(d) detail other risk control measures that could be implemented in a fire emergency caused by any unique hazards specific to the site.</p>	At all times		Compliant	<p>Emergency Plan – St Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023</p> <p>Emergency Services Information Package, Marys Resource Recovery Facility, 25 Dunheved Circuit, St Marys NSW, dated May 2023.</p> <p>Fire and Rescue NSW (FRNSW) Letter, Re: Emergency Plan Submission, dated 1 August 2023. Ref: FRN16/2361 BFS23/2680 8000028330.</p> <p>DPHI Letter: Approval of the St Mary Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p>
VISUAL AMENITY					
Lighting					
B38	The Applicant must ensure the lighting associated with the development: <p>(a) complies with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and</p> <p>(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.</p>	At all times		Compliant	<p>Electrical Design Statement, 25 Dunheved Circuit, St Marys NSW, dated 9 June 2024.</p> <p>The electrical design statement certified that the electrical elements at the project had been designed in accordance with AS4282:1997.</p> <p>The electrical design statement certified details that electrical elements are mounted in a manner which does not create nuisance to surrounding properties.</p>
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT					
Management Plan Requirements					


C1	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p> <p>(b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(c) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</p> <p>(d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(e) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(f) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(g) a protocol for periodic review of the plan.</p> <p>Note: <i>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	At all times		Compliant	<p>OEMP ReDirect Recycling Facility, 25 Dunheved Circuit, St Marys NSW, Rev 1, dated 10 November 2023</p> <p>DPHI Letter: Approval of the St Mary Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p>
OPERATIONAL ENVIRONMENTAL MANGEMENT PLAN					
C2	<p>The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.</p>	N/A		Compliant	Management Plans Approved by the DPE
C3	<p>As part of the OEMP required under Condition C2 of this consent, the Applicant must include the following:</p> <p>(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(b) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance;</p> <p>(v) respond to emergencies; and</p> <p>(c) include the following environmental management plans:</p> <p>(i) Operational Traffic (see Condition B3);</p> <p>(ii) Waste (see Condition B6); (iii) Surface Water (see Condition B1715);</p> <p>(iv) Air Quality (see Condition B22);</p> <p>(v) Operational Noise (see Condition B29); and</p> <p>(vi) Emergency Response Plan (see Condition B37)</p>			Compliant	<p>The OEMP contains the following information:</p> <p>(a) Roles, responsibilities, authority and accountabilities of personnel involved are detailed in table 21 of section 9.3 of the OEMP and section 3.1 of the OEMP</p> <p>(b)</p> <p>(i) Detailed section 9.3 of the OEMP</p> <p>(ii) Detailed section 9.3 of the OEMP</p> <p>(iii) Detailed section 8.2 of the OEMP</p> <p>(iv) Detailed section 8.2 of the OEMP</p> <p>(v) Detailed in the Emergency Response Plan</p> <p>(c)</p> <p>(i) Sighted Operational Traffic Management Plan (B3)</p> <p>(ii) Sighted Waste Management Plan (B6)</p> <p>(iii) Sighted Surface Water Management Plan (B17)</p> <p>(iv) Sighted Air Quality and Odour management plan (B22)</p>

C4	<p>The Applicant must:</p> <p>(a) not commence operation until the OEMP is approved by the Planning Secretary; and</p> <p>(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).</p>			Compliant	<p>DPHI Letter: Approval of the St Marys Resource Recovery Facility Operational Environmental Management Plan, dated 3 August 2023, Ref: SSD-10474-PA-3.</p> <p>The site commenced operations under SSD-10474 on 19 November 2023.</p> <p>Evidence of implementation of OEMP:</p> <p>WHS site induction Toolbox Talk dated 22 November 2023</p> <p>Asbestos training toolbox talk dated 31 October 2023</p> <p>OEMP daily checklist</p>
REVISION OF STRATEGIES, PLANS AND PROGRAMS					
C5	<p>Within three months of:</p> <p>(a) the submission of a Compliance Report under condition C111;</p> <p>(b) the submission of an incident report under condition C77;</p> <p>(c) the submission of an Independent Audit under condition C133;</p> <p>(d) the approval of any modification of the conditions of this consent; or</p> <p>(e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.</p>	N/A		Compliant	<p>(a) 2023-2024 Annual Compliance Report submitted 7 May 2025. SSD-7401 Management Plan Statement of Review submitted 20 May 2025. DPHI email response received 13 June 2025 stating no comments on the document.</p> <p>(b) No reportable incidents have occurred.</p> <p>(c) Independent audit submitted 23 October 2024 (Independent Audit No.1 – St Marys Resource Recovery Facility SSD-10474). SSD-7401 Management Plan Statement of Review submitted 24 January 2025. DPHI email response received 30 January 2025 stating no comments on the document.</p> <p>(d) No modifications to conditions for consent.</p> <p>(e) No formal direction from DPHI to update review management plans.</p>
C6	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>	N/A		Not Triggered	No modifications to the consent or directions from DPHI have been issued.
REPORTING AND AUDITING					
Incident Notification, Reporting and Response					
C7	<p>The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.</p>	N/A		Not Triggered	The have been no notifiable incidents at the site.

Non-Compliance Notification					
C8	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	At all times		Compliant	No non-compliance against conditions of the consent identified during reporting period (19 November 2024 - 18 November 2025).
C9	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	At all times		Not Triggered	No non-compliance against conditions of the consent identified during reporting period (19 November 2024 - 18 November 2025).
C10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	At all times		Not Triggered	The self-reported non-compliances or incidents reported during the reporting period (19 November 2024 - 18 November 2025).
Compliance Reporting					
C11	Within six months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: (a) identify any trends in the monitoring data over the life of the development; (b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Prior to operation		Compliant	First Annual Compliance Report for the period 19 November 2023 to 18 November 2024 submitted to DPHI 7 May 2025. DPHI review 19 May 2025 considered the Annual Compliance Report to generally satisfy the reporting requirements of the consent and the NSW Planning Compliance Reporting Post Approval Requirements (2020).
C12	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.	Prior to construction		Compliant	2023-2024 Annual Compliance Report available on Redirect website (www.redirectrecycling.com.au/environmental/)
Independent Audit					
C13	Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must: (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and (c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).	Prior to operation		Compliant	IEA not required during reporting period 19 November 2024 to 18 November 2025. Previous IEA report was submitted by ReDirect to DPHI 29 October 2024 within the first 12 months of operation. Next IEA due 2027. (a) N/A (b) N/A (c) N/A

C14	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C13 of this consent; (b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.	At all times		Not Triggered	(a) N/A (b) N/A (c) N/A (d) N/A
Monitoring and Environmental Audits					
C15	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing. Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Prior to operation		Compliant	Email correspondence between ReDirect and the consultant Land Risk Environmental, dated 18 June 2025, detailing the surface water biannual monitoring results.
ACCESS TO INFORMATION					
C16	At least 48 hours before the commencement of the development and for the life of the development (or such other time as agreed by the Planning Secretary), the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (v) 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; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaint register, updated monthly; (ix) the Compliance Report of the development; (x) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; (xi) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.	Prior to operation		Compliant	The following documents are accessible on the website URL: Environmental - ReDirect. (a) The following documents were found to be accessible on the website: (i) The EIS, amendment report and RTS (ii) SSD-10474 (iii) All management plans (iv) No regular reporting on environmental performance required (v) No environmental monitoring results required under consent (vi) No staging report applicable (vii) Phone number and email address provided (viii) A monthly complaints register is maintained on the website. (ix) Compliance report/s available (x) IEA (KMPG, 2024) (xi) no other matters required (b) All information is considered to be up to date.

Appendix III – Compliance Report Declaration

Project Name	St Mary Resource Recovery Facility
Project Application Number	SSD-10474
Description of Project	Use of an existing resource recovery facility for the sorting and processing of primarily wood and timber waste. It is proposed to increase the throughput of waste on site to from 18,000 tonnes per annum (tpa) to 150,000 tpa.
Project Address	25 Dunheved Circuit, St Marys NSW 2760
Proponent	Redirect Recycling Pty Ltd
Title of Compliance Report	Annual Compliance Report
Date	27.03.2026
<p>I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> i. the Compliance Report has been prepared in accordance with all relevant conditions of consent; ii. the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements; iii. the findings of the Compliance Report are reported truthfully, accurately and completely; iv. due diligence and professional judgement have been exercised in preparing the Compliance Report; and v. the Compliance Report is an accurate summary of the compliance status of the development. <p>Notes:</p> <ul style="list-style-type: none"> • Under section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (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 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 • The <i>Crimes Act 1900</i> contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years’ imprisonment or 200 penalty units, or both). 	
Name of Authorised Reporting Officer	James Sutton
Title	Environmental Manager
Signature	
Qualification	Bachelor of Environmental Science
Company	Redirect Recycling Pty Ltd
Company Address	2 Wella Way Somersby NSW 2250