

2024 Annual Environment
Performance Review
Sell & Parker – Kings Park



2024 ANNUAL ENVIRONMENTAL PERFORMANCE REVIEW
SELL & PARKER SCRAP METAL RECYCLING KINGS PARK

KEY DETAILS

Environment Review and Response prepared by:	Sell & Parker Pty Ltd		
Head Office Address:	11 Meadow Way, Banksmeadow, NSW 2019		
Licensee:	Sell & Parker Pty Ltd		
In respect of:	Project Approval SSD 5041 (as modified) Operational Phase		
Project site & location:	Sell & Parker Pty Ltd Scrap Metal Recycling (23-43 and 45 Tattersall Rd, Kings Park, NSW 2148)		
Lot & DP:	LOT 5 DP 7086 and LOT 2 DP 550522		
EPA licence details:	Metallurgical activities EPL No. 11555		
Dates covered by this report:	1 January 2024 – 31 December 2024		
Key Personnel:	Luke Parker	Director	9316 9933
	Morgan Parker	Director	9316 9933
	Neil Sher	General Counsel	9695 6846
	Howard Richards	Environmental Manager	9316 9933

For and on behalf of Sell & Parker Pty Ltd, the undersigned certifies that the information contained within this report is neither false nor misleading.

Approved: Luke Parker

Signed: 
[Luke Parker \(Mar 5, 2025 16:11 GMT+8\)](#)

Date: Presented to Board March 2025

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2024 Annual Environment Performance Report

REPORT SCOPE

This Annual Environmental Performance Review (AEPR) has been prepared to satisfy Schedule 2, Part C, condition C11 of the Department of Planning and Environment State Significant Development Consent 5041

THIS WILL BE THE ANNUAL ENVIRONMENTAL REVIEW PREPARED FOR THE SELL & PARKER FACILITY.

Information provided in the AEPR can relate to the requirements of both Condition 3 as set out below.

CONDITION 11 OF PART C, SCHEDULE 2 - ANNUAL REVIEW

Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:

- 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 the 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.*

This review is conducted by reference to each subject matter and the criteria required by planning condition C 11 summary.

2024 Annual Environment Performance Report

ENVIRONMENTAL PERFORMANCE – 2024 ANNUAL REVIEW

On an annual basis, and in accordance with the requirements of its Consent and licence conditions, management undertake an annual review of the prior 12 months environmental performance of site to prepare this annual review. The annual review is then presented to the Board of Sell & Parker.

Senior management and as required third party consultants conduct environmental inspections of the Facility in accordance with the Consent and its EPL throughout the year.

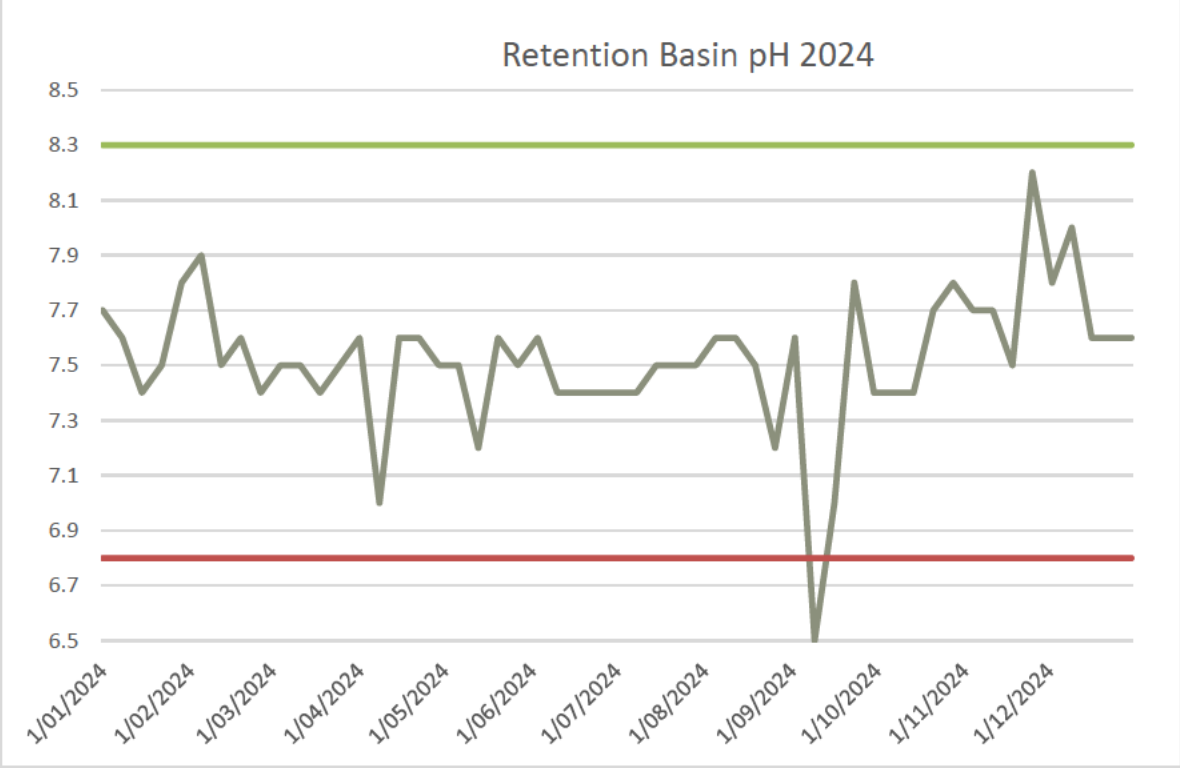
Inspections are undertaken in conjunction with the routine environmental monitoring and incident/complaint reporting procedures, to ensure there is on-site compliance with the approved Environmental Management System (EMS). Any non-conformances are recorded on inspection forms and the cause of any non-conformances are investigated by the Group Environmental Manager in conjunction with other relevant managers, including but not limited to the Site Operations Manager, Group Property Manager, Group General Counsel and the Directors as required.

SITE SECURITY, LIGHTING & SIGNAGE

Salient Matters	Comment
Works that were carried out in the past year.	Installation of additional security cameras General maintenance of fencing where required
Works that are proposed to be carried out over the next year.	Maintenance and repair of the site fencing for security and public safety.

RETENTION BASIN

Salient Matters	Comment
<p>Works that were carried out in the past year.</p>	<p>The following works were undertaken in 2024 within or adjacent to the retention basin</p> <ul style="list-style-type: none"> • Nil. <p>The Licensee has maintained its regular and ongoing inspections, and maintenance program.</p>
<p>Works that are proposed to be carried out over the next year.</p>	<p>Subject to SSD 10396, planning for a new acoustic fence in the vicinity of retention basin.</p>
<p>Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;</p> <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	<p>The retention basin is inspected and tested internally weekly for pH.</p> <p>Quarterly testing of metals since 2020 by an has shown results remain consistent.</p> <p>The Licensee notes that there are no water quality limits imposed by the DPE or EPA.</p> <p>Testing for trade waste discharge is carried out as per conditions in the Sydney Water ‘Consent to discharge industrial trade waste water’ contract conditions, which supports retention basin testing.</p> <p>In 2019 we had 708.7mm of rainfall and discharged 6,629,377 litres of filtered process water to trade waste. In 2020 we had 1313.8mm of rainfall and discharged 9,435,985 litres of filtered process water to trade waste. In 2021 we had 1057.6mm of rainfall and discharged 19,347,695 litres of filtered process water to trade waste. In 2022 we had 1503.8mm of rainfall and discharged 14,265,377 litres of filtered process water to trade waste. In 2023 we had 652.0mm of rainfall and discharged 21,520,953 litres of filtered process water to trade waste. In 2024 we had 773.2mm of rainfall and discharged 25,445,339 litres of filtered process water to trade waste.</p> <p>All tests results were within Sydney Water requirements.</p> <p>There are no predictions in relation to the EA or EIS on the retention basin.</p>

Salient Matters	Comment																										
	<div data-bbox="808 231 1984 1002" data-label="Figure">  <p>Retention Basin pH 2024</p> <table border="1"> <caption>Approximate data points from the Retention Basin pH 2024 graph</caption> <thead> <tr> <th>Date</th> <th>pH</th> </tr> </thead> <tbody> <tr><td>1/01/2024</td><td>7.7</td></tr> <tr><td>1/02/2024</td><td>7.8</td></tr> <tr><td>1/03/2024</td><td>7.5</td></tr> <tr><td>1/04/2024</td><td>7.6</td></tr> <tr><td>1/05/2024</td><td>7.6</td></tr> <tr><td>1/06/2024</td><td>7.6</td></tr> <tr><td>1/07/2024</td><td>7.4</td></tr> <tr><td>1/08/2024</td><td>7.5</td></tr> <tr><td>1/09/2024</td><td>6.5</td></tr> <tr><td>1/10/2024</td><td>7.8</td></tr> <tr><td>1/11/2024</td><td>7.8</td></tr> <tr><td>1/12/2024</td><td>7.6</td></tr> </tbody> </table> </div> <p data-bbox="808 1007 898 1034">Figure 1</p> <p data-bbox="808 1070 1525 1098">Source of the low pH on the 9th of September was not determined.</p> <p data-bbox="808 1134 1514 1161">Third party testing for trade waste discharges were conducted on</p> <ul data-bbox="808 1171 1984 1299" style="list-style-type: none"> • January 8-12, 18-2, • April 2-5, 5-9, 9-12, 29-3 May • July 1-2, 2-5, 29-30, 30-2 Aug • February 16-21 • May 3-7, 7-10, 10-13 • March 12-15 • June 3-4, 4-7, 7-11 • September 2-3, 4-6, 23-24 24-27 <p data-bbox="808 1337 1984 1394">Independent pH testing provided results from sewer discharge were between 7.0 to 8.1 so were in alignment with internal results.</p>	Date	pH	1/01/2024	7.7	1/02/2024	7.8	1/03/2024	7.5	1/04/2024	7.6	1/05/2024	7.6	1/06/2024	7.6	1/07/2024	7.4	1/08/2024	7.5	1/09/2024	6.5	1/10/2024	7.8	1/11/2024	7.8	1/12/2024	7.6
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1/11/2024	7.8																										
1/12/2024	7.6																										
Any non-compliance or complaints over the last year	Nil.																										

Salient Matters	Comment
Describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspection, maintenance and monitoring of the retention basin. Continuous improvement processes of the water treatment system.
Identify any trends in the monitoring data over the life of the project;	<p>Hydrocarbon concentrations have plateaued after the reducing trend since the filtration plant was installed. This is a reflection of continuous improvement processes with 'end of life vehicle' acceptance criteria.</p> <p>Baseline for the metals has been established.</p> <p>Of the 13 metals that Sell & Parker test against, all results are well below the established baseline limits. The changes discussed below and as demonstrated in the Appendix are not significant and for the most part relate to outlier events, but are still well below the established baseline.</p> <p>Historical – Year on Year</p> <p>2018 - 9 small variations, introduction of upgraded filter system</p> <p>2019 – 2 small variations in manganese & Strontium level noted</p> <p>2020 – 7 metals declined in concentration; 3 remained consistent, and 3 had small upward variations</p> <p>2021 – 6 metals declined further in concentration; 5 remained consistent.</p> <p>2022 - 5 metals have shown small variation (increase) in the past year as a result of an outlier influencing the trending, but remain under baseline limits. The remaining metals are all generally consistent with historical data.</p> <p>2023 - 4 metals have shown small variation (increase) in the past year as a result of an outlier influencing the trending, but remain under baseline limits. The remaining metals have shown small variation (decrease) in their trending.</p> <p>2024 - 5 metals have shown small variation (increase) in the past year as a result of an outlier influencing the trending, but remain under baseline limits. The remaining metals have shown small variation (decrease) in their trending.</p> <p>Only Zinc has shown a true increase in concentration at 0.4mg/lit over the past 3 years, which is well below the Sydney Water discharge limit of 5 mg/Lt.</p> <p>All levels are well within Sydney Water Industrial Trade Waste requirements.</p> <p>See individual graphs and comments attached in the Appendix.</p>

2024 Annual Environment Performance Report



Salient Matters	Comment
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The original intent in the EIS was for discharge to Breakfast Creek. This was subsequently changed to an Industrial Trade Waste discharge. Therefore, there are no impacts on surface waters to measure.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Monitoring continues on a quarterly basis.

OPERATING HOURS & NOISE AND AIRBLAST OVERPRESSURES

Salient Matters	Comment
Works that were carried out in the past year.	Operating hours – voluntary reduction in hours from mid November 2022. Shredder and Shearing to commence at 7am and finish at 8pm.
Works that are proposed to be carried out over the next year.	Continuation of the Noise Monitoring Program and maintenance of plant and equipment. Planning for the installation of Acoustic walls as per SSD 10396.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Operating hours – voluntarily adjusted in mid November 2022. Noise – Testing was conducted as part of the SSD 10396 application. Air blast overpressures – 3 – Notified on hotline to EPA. No action taken.</p> <p>Historical data – investigated and not further action taken 2020 - 9 noise complaints (covid) 2021 - 8 noise complaints (covid) 2022 - 1 noise self report 2023 - 1 noise report 2024 - 3 noise report</p> <p>Complaints Records - as outlined in complaints register <i>attached</i>.</p>
Any non-compliance over the last year.	Nil.
Describe what actions were (or are being) taken to ensure compliance;	<ul style="list-style-type: none"> Continuation of existing work practices including Noise Monitoring Programs and mitigation methods. Commenced planning to install additional acoustic noise walls to meet conditions of SSD 10396. Voluntary variation of operating hours in morning shoulder and evening.
Identify any trends in the monitoring data over the life of the project;	Focussed on meeting requirements for the approval of SSD 10396 so new testing standards can be implemented.

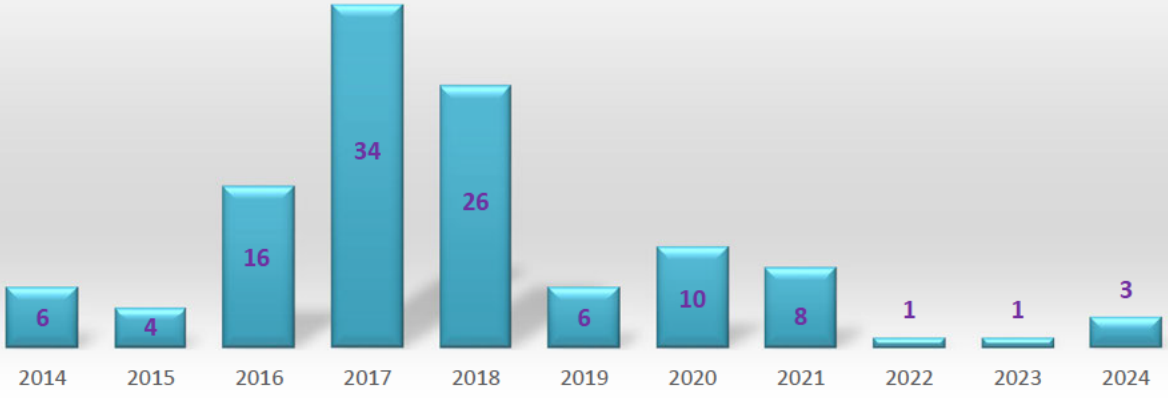
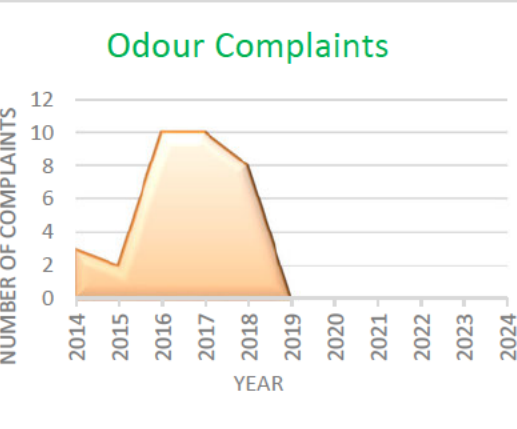
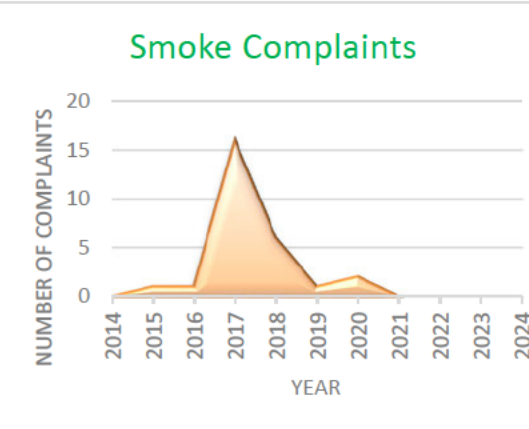
2024 Annual Environment Performance Report



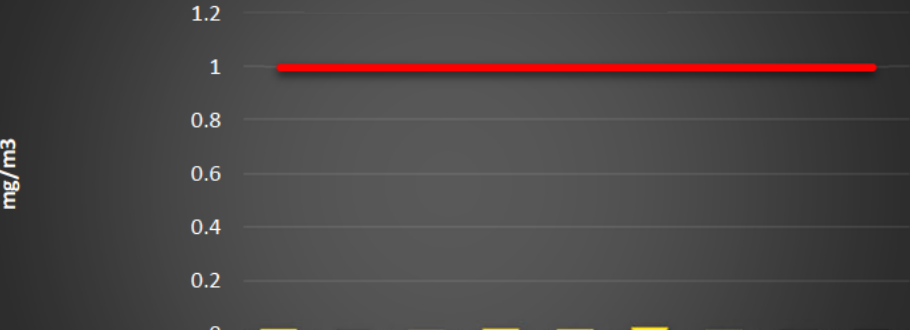
Salient Matters	Comment
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Airblast overpressure – Predictions are unable to be made. The East Shear has been identified as a potential noise source. Installation of acoustic walls under SSD 10396 will significantly improve any predicted or actual impact.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Operating hours – continued voluntary reduction in operating times for plant (start 7am and finish 8pm) Subject to SSD 10396 – acoustic fences Airblast overpressure – Upgrading of equipment as part of SSD 10396. Continuation of monitoring program and maintenance of machinery. Ensuring all new equipment when being considered for purchase, has its noise production considered.

AIR QUALITY

Salient Matters	Comment
Works that were carried out in the past year.	The Licensee introduced measures during the review year to control dust on site including <ul style="list-style-type: none"> Continuation of the voluntary reduction in operating times for plant New (larger capacity) sweeper is in operation
Works that are proposed to be carried out over the next year.	Subject to the approval of SSD 10396 plans <ul style="list-style-type: none"> Improved monitoring and the introduction of a TARP. Acoustic walls will impede ground level winds, reducing wind velocities and reducing potential for fugitive emissions.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	Dust Monitors Complaints records – See complaint Records – See full complaints record on page 31.

Salient Matters	Comment																									
<ul style="list-style-type: none"> the relevant predictions in the EIS; 	<div style="text-align: center;"> <h3 style="color: green;">Complaints</h3>  <table border="1" style="margin: 10px auto;"> <caption>Complaints Data</caption> <thead> <tr> <th>Year</th> <th>Number of Complaints</th> </tr> </thead> <tbody> <tr><td>2014</td><td>6</td></tr> <tr><td>2015</td><td>4</td></tr> <tr><td>2016</td><td>16</td></tr> <tr><td>2017</td><td>34</td></tr> <tr><td>2018</td><td>26</td></tr> <tr><td>2019</td><td>6</td></tr> <tr><td>2020</td><td>10</td></tr> <tr><td>2021</td><td>8</td></tr> <tr><td>2022</td><td>1</td></tr> <tr><td>2023</td><td>1</td></tr> <tr><td>2024</td><td>3</td></tr> </tbody> </table> </div> <p style="text-align: right; margin-top: 20px;">There were 3 complaint in 2024.</p>		Year	Number of Complaints	2014	6	2015	4	2016	16	2017	34	2018	26	2019	6	2020	10	2021	8	2022	1	2023	1	2024	3
Year	Number of Complaints																									
2014	6																									
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2024	3																									
	<div style="display: flex; justify-content: space-around;"> <div style="width: 45%;"> <h3 style="color: green; text-align: center;">Odour Complaints</h3>  </div> <div style="width: 45%;"> <h3 style="color: green; text-align: center;">Smoke Complaints</h3>  </div> </div>																									
	<p>Figure 2</p> <p>Figure 3 There were no odour complaints in 2024.</p> <p>Figure 4 There were no smoke complaints in 2024.</p>																									

Salient Matters	Comment																														
	<div data-bbox="461 252 981 683" data-label="Figure"> <p>Air Quality Complaints</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Number of Complaints</th> </tr> </thead> <tbody> <tr><td>2014</td><td>2</td></tr> <tr><td>2015</td><td>4</td></tr> <tr><td>2016</td><td>10</td></tr> <tr><td>2017</td><td>28</td></tr> <tr><td>2018</td><td>10</td></tr> <tr><td>2019</td><td>2</td></tr> <tr><td>2020</td><td>0</td></tr> <tr><td>2021</td><td>0</td></tr> <tr><td>2022</td><td>0</td></tr> <tr><td>2023</td><td>0</td></tr> <tr><td>2024</td><td>0</td></tr> </tbody> </table> </div> <p data-bbox="461 718 1057 746">Figure 5 There were no air quality complaint in 2024.</p>	Year	Number of Complaints	2014	2	2015	4	2016	10	2017	28	2018	10	2019	2	2020	0	2021	0	2022	0	2023	0	2024	0						
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2024	0																														
Any non-compliance over the last year	No.																														
Describe what actions were (or are being) taken to ensure compliance;	Continued compliance with Air Quality Management Plan and mitigation measures. Subject to the approval of SSD 10396 plans, new mitigation measures will be put in place.																														
Identify any trends in the monitoring data over the life of the project;	<p data-bbox="461 954 1070 983">Air Quality – Hammermill Emissions Collection System</p> <div data-bbox="461 1002 1232 1423" data-label="Figure"> <p>Solid Particles vs Limit</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Solid particles (mg/m³)</th> <th>Max Limit (mg/m³)</th> </tr> </thead> <tbody> <tr><td>2016</td><td>3</td><td>20</td></tr> <tr><td>2017</td><td>9.3</td><td>20</td></tr> <tr><td>2018</td><td>6.8</td><td>20</td></tr> <tr><td>2019</td><td>3.7</td><td>20</td></tr> <tr><td>2020</td><td>3</td><td>20</td></tr> <tr><td>2021</td><td>7.3</td><td>20</td></tr> <tr><td>2022</td><td>5.1</td><td>20</td></tr> <tr><td>2023</td><td>1.5</td><td>20</td></tr> <tr><td>2024</td><td>2.4</td><td>20</td></tr> </tbody> </table> </div> <p data-bbox="1249 1018 1984 1078">This year’s testing showed continued compliance. The ECS has been approved by the DPE.</p> <p data-bbox="1249 1225 1895 1286">Figure 6 Solid particles remain well under the EPL limit of 20mg/m³.</p>	Year	Solid particles (mg/m ³)	Max Limit (mg/m ³)	2016	3	20	2017	9.3	20	2018	6.8	20	2019	3.7	20	2020	3	20	2021	7.3	20	2022	5.1	20	2023	1.5	20	2024	2.4	20
Year	Solid particles (mg/m ³)	Max Limit (mg/m ³)																													
2016	3	20																													
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Salient Matters	Comment																														
	<div data-bbox="459 252 1438 810" style="background-color: #333; color: white; padding: 10px;"> <h3 style="text-align: center; color: green;">Type 1 vs Limit</h3>  <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td style="background-color: yellow;">Type 1 aggregate</td> <td>0.016</td> <td>0.0072</td> <td>0.011</td> <td>0.017</td> <td>0.015</td> <td>0.022</td> <td>0.0109</td> <td>0.0062</td> <td>0.0083</td> </tr> <tr> <td style="color: red;">Max Limit</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> </tr> </tbody> </table> </div> <p data-bbox="459 858 1137 912">Figure 7 Type 1 and Type 2 substances remain well under the EPL limit.</p>		2016	2017	2018	2019	2020	2021	2022	2023	2024	Type 1 aggregate	0.016	0.0072	0.011	0.017	0.015	0.022	0.0109	0.0062	0.0083	Max Limit	1	1	1	1	1	1	1	1	1
	2016	2017	2018	2019	2020	2021	2022	2023	2024																						
Type 1 aggregate	0.016	0.0072	0.011	0.017	0.015	0.022	0.0109	0.0062	0.0083																						
Max Limit	1	1	1	1	1	1	1	1	1																						
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The Emission Control System has proven to perform as designed.																														
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of current processes.																														

STORMWATER – WATER MANAGEMENT (CLEAN WATER RUN OFF)

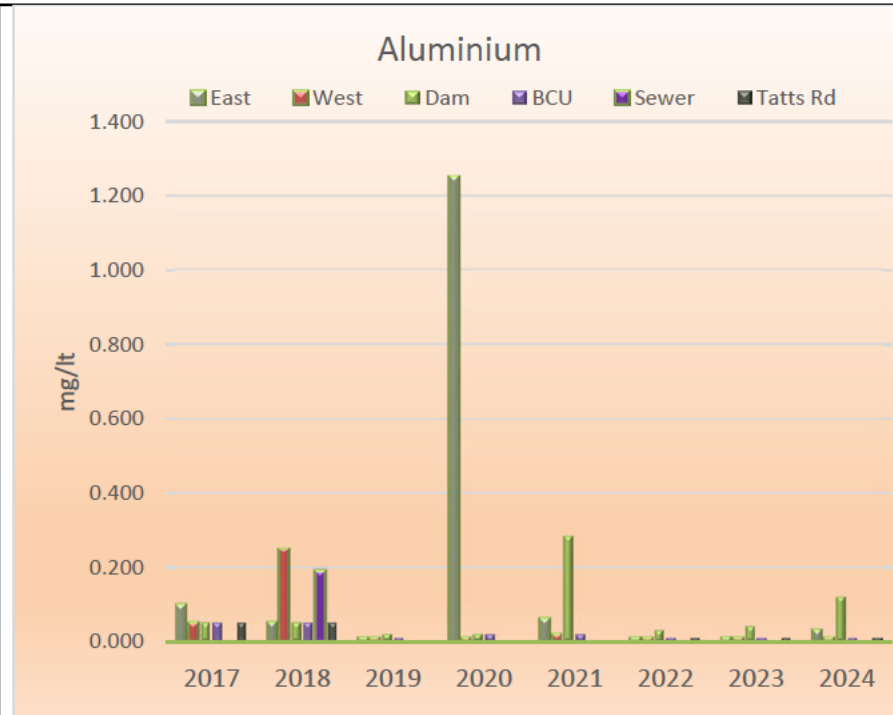
Salient Matters	Comment
Works that were carried out in the past year.	Continued use of stormwater sediment and hydrocarbon capture bags over and in stormwater access points.
Works that are proposed to be carried out over the next year.	Nil – continued maintenance and replacement as may be required.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	<p>Site discharges directly via roof to gutter to downpipe to stormwater. The front carpark discharges to stormwater via drain wardens.</p> <p>There are no monitoring requirements so no predictions in the environment assessment to report against.</p> <p>There were no complaints received regarding stormwater quality.</p>
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	Monthly inspection of drain filters and drain covers. Replacement and repair where required.
Identify any trends in the monitoring data over the life of the project;	Not applicable
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Not applicable
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	<p>Maintenance and checks of drains leading to stormwater will be regularly reviewed.</p> <p>Carpark is regularly swept to ensure area remains clean and tidy.</p>

LAND & LANDSCAPING

Salient Matter	Comment
Works that were carried out in the past year.	As concrete wears sections are replaced as required. This is a continuous improvement process. Monitoring and maintenance of landscaping including weed control is conducted by an appropriately licenced and experienced third party.
Works that are proposed to be carried out over the next year.	Ongoing monitoring and maintenance of landscaping including weed control. Concrete replacement and repair as required.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	Soil testing of excavations has highlighted that the extensive concrete hardstand for the operational site is providing the necessary protection and broad scale soil contamination is being avoided. As soil sampling and testing is done when excavations are required, there is no continuity of the process which means trending results would not produce meaningful data. Complaints Register - Nil.
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	Soil checks when excavation works are conducted. The facility has a comprehensive weed management program conducted by an appropriately licenced and experienced third party. Sell & Parker employ a gardener to maintain landscaped areas.
Identify any trends in the monitoring data over the life of the project;	As per consent condition B13 all excavation works include soil sampling for the identification of potential contaminants.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Not Applicable.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing monitoring protocols and testing as required.

GROUNDWATER

Salient Matter	Comment
Works that were carried out in the past year.	No works were carried out that would impact groundwater.
Works that are proposed to be carried out over the next year.	No proposed works or new monitoring points required.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	There is an EPL requirement to monitor our groundwater quality where excavation works are being undertaken (B13). No evidence of contamination from site activities. Yearly sampling of groundwater wells is conducted. There are no predictions in the EA. There have been no complaints received regarding groundwater.
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	The annual groundwater monitoring program has been completed. The yearly monitoring program commenced in 2019.
Identify any trends in the monitoring data over the life of the project;	



Groundwater monitoring started in 2017 and continued in 2018 with the 2018 Coffey report.

Initial and subsequent findings is that there is no link between the onsite retention basin and groundwater quality.

Evidence has been found that the Sydney Water sewer trunk line next to Breakfast Creek is leaking and is having a detrimental effect on the groundwater quality which is not caused by the Licence holder.

As per B13b) no contaminated groundwater was encountered during excavations. As the site is concreted the likelihood of groundwater contamination is very low.

Figure 8

Results from groundwater testing have shown the only source of contamination for aluminium into the down gradient wells (east and west) and Breakfast Creek is from the local sewer line. The level of Aluminium in the upgradient groundwater and retention basin are lower than the investigation level for fresh water at 0.055mg/L.

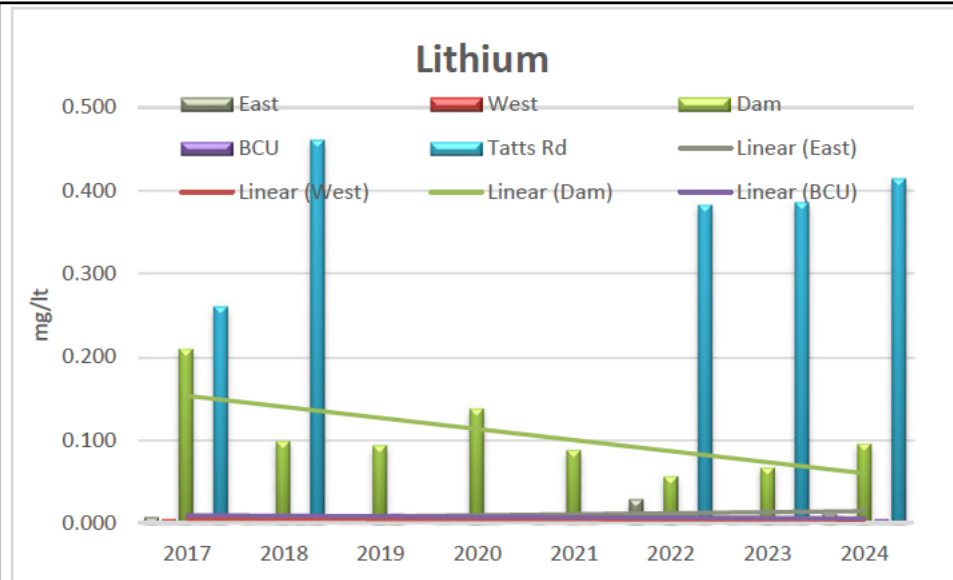


Figure 9

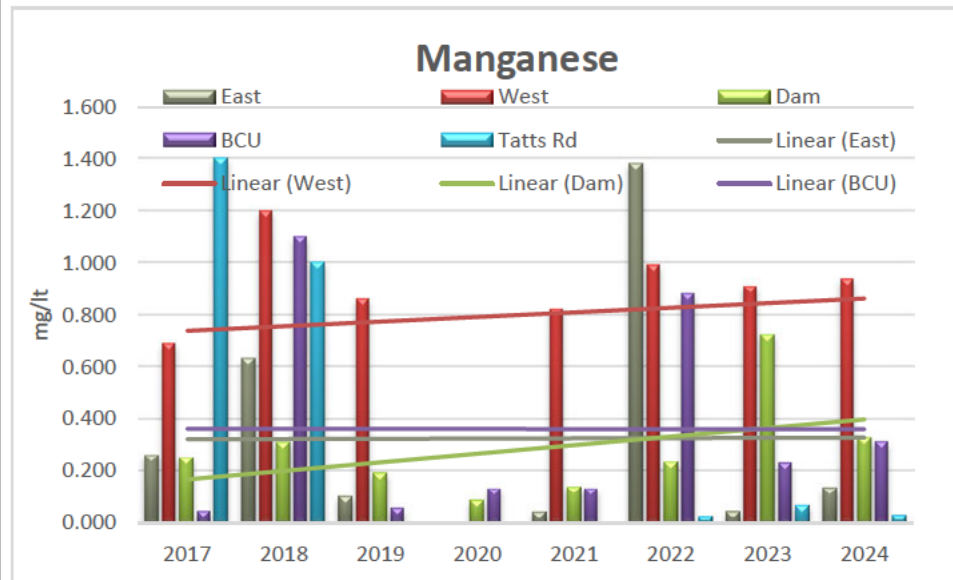


Figure 10

Results from groundwater testing have shown that while there are high levels of lithium in the upgradient well and the basin it is not migrating into Breakfast Creek.

The upgradient well has the highest levels, demonstrated in blue and is found in Tattersalls Road wells. The source is unknown and north of site.

There is no investigation level for lithium in fresh water.

Results from groundwater testing have shown that Manganese is in higher concentration in the down gradient wells than it is in the basin. Suggesting the concentration is natural or coming from an off site source.

The level of Manganese in all waters is lower than that required for Australian drinking water.

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Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	There are no predicted impacts on groundwater from the site's operations.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of existing monitoring programs.

SCRAP METAL (WASTE) INCL. FLOC

Salient Matters	Comment
Works that were carried out in the past year.	Ongoing inspections and maintenance on plant and equipment. Upgrade of separation equipment to improve removal of metals from the floc and improve product quality.
Works that are proposed to be carried out over the next year.	Continual improvement of the downstream separation processes to improve the segregation of metals from floc.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Waste types able to be received are regularly considered within our EPL constraints and in line with our waste monitoring program.</p> <p>FY information as per the 17/18 WARRP report, transported tonnes - [REDACTED] FY information as per the 18/19 WARRP report, transported tonnes - [REDACTED] FY information as per the 19/20 WARRP report, transported tonnes - [REDACTED] FY information as per the 20/21 WARRP report, transported tonnes - [REDACTED] FY information as per the 21/22 WARRP report, transported tonnes - [REDACTED] FY information as per the 22/23 WARRP report, transported tonnes - [REDACTED] FY information as per the 23/24 WARRP report, transported tonnes - [REDACTED]</p> <p>Ferrous [REDACTED] Aluminium [REDACTED] Batteries [REDACTED] Non-ferrous [REDACTED] Floc [REDACTED] Total <350 kt</p> <p>[REDACTED] Key = Commercial in confidence</p> <p>Floc which we produce from operations is transported to Landfill as waste. There were no complaints in regards to scrap metal or floc. There are no predictions in regard to floc in the EA.</p>

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Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	<p>Weighbridges regularly calibrated.</p> <p>Inspectors/spotters are used when scrap metal is being unloaded to assist in identifying and removing unwanted materials or prohibited materials (where possible) that third parties do not declare.</p> <p>Grader employed to check all black iron deliveries.</p>
Identify any trends in the monitoring data over the life of the project;	We have been actively reducing the percentage of metals within the floc material by increasing the number of downstream 'sorting' processes which has led to further resource recovery.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	None
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	<p>Continue to review of further recycling strategies and uses for floc.</p> <p>Continue to monitor technology for equipment and/or processes that can further improve the removal of fine fractions of metals from the floc.</p> <p>Continue to monitor technology for plant and equipment for advances which can further improve the processing of scrap metal whilst reducing costs and impacts on the environment including energy use and noise.</p>

HERITAGE

Salient Matters	Comments
Works that were carried out in the past year	Nil
Works that are proposed to be carried out over the next year,	Nil
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	Not applicable
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	Continued attention to Condition B41 during works.
Identify any trends in the monitoring data over the life of the project;	N/A
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	N/A
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	N/A

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MONITORING DATA

EXTERNAL

Condition C9 of the Consent requires that we conduct an independent environmental audit every three years. The construction audit was completed in 2016. The first operational audit was conducted in November 2019 and the second in 2022. A copy of each of those Independent Environmental Audits (IEA) are available on the website.

INTERNAL

Sell & Parker performs regular monitoring on either a weekly, monthly, quarterly or annual basis, as is required in accordance with its EPL, Consent 5041 and any approved management plan.

Below is all the monitoring data and results during the past year. As required by C11 (b) of our consent. It shows the comparison between the relevant statutory requirements and what we are recording, comparison to previous year's results and an analysis of these results to the relevant criteria.

RELEVANT STATUTORY MONITORING REQUIREMENTS

UNDER EPL 11555 & SSD 5041

Pursuant to our obligations under the development consent at C14 and our EPL requirements under Part 3 Limit conditions and Part 5 Monitoring and Recording Conditions the following information is provided below as the baseline requirements for monitoring various environmental factors and their impacts on the site. We note that throughout the licence and consent there are other monitoring requirements to be met in addition to or in consideration of these baseline requirements. If these reports and results are required they will be found on our website by following the attached link:

<https://www.sellparker.com.au/about/environmental-social-and-governance>

- *EPL P1.2 – provides for the hammermill stack test location*

<i>Air</i>			
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
3	Air discharge and monitoring	Air discharge and monitoring	Hammermill Stack

- *EPL P1.3 – provides for the Noise and Weather test locations can be summarised as follows:*

Noise/Weather

EPA identification no.	Type of monitoring point	Location description
1	Noise monitoring	189 Sunnyholt Road, BLACKTOWN NSW 2148 (Lot 23, DP 1063300)
11	Air blast overpressure monitoring	23-43 & 45 TATTERSALL ROAD, KINGS PARK NSW 2148
12	Meteorological Station	23-43 & 45 TATTERSALL ROAD, KINGS PARK NSW 2148
13	Noise monitoring	27 Charles Street, Blacktown NSW 2148 (Lot 1 DP 27141)

Limit Criteria and frequency

- EPL L2.2

POINT 3 – AIR CONCENTRATION LIMITS

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	1	Dry 273K, 101.3kPa		1hr or the min. sampling period specified
Solid Particles	milligrams per cubic metre	20	Dry, 273K, 101.3kPa		1hr or the min. sampling period specified

- EPL M2.2

POINT 3 – Air Monitoring Requirements and frequency

Pollutant	Units of measure	Frequency	Sampling Method
Dry gas density	kilograms per cubic metre	Yearly	TM-23
Moisture	percent	Yearly	TM-22
Molecular weight of stack gases	grams per gram mole	Yearly	TM-23
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Temperature	Celsius	Yearly	TM-2
Type 1 substance	milligrams per cubic metre	Yearly	TM-12
Type 2 substance	milligrams per cubic metre	Yearly	TM-13
Velocity	metres per second	Yearly	TM-2
Volumetric flowrate	cubic metres per second	Yearly	TM-2



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- **EPL L4.1**

POINT 1 – NOISE LIMITS

Time period	Measurement parameter	Measurement frequency	Noise level dB(A)
Day	LAeq (15 minute)	-	46
Evening	LAeq (15 minute)	-	46
Morning-Shoulder	LAeq (15 minute)	-	46
Morning-Shoulder	Lmax OR LA1,1min	-	58

- **EPL L7.1 - POINT 11 – AIRBLAST OVERPRESSURE**

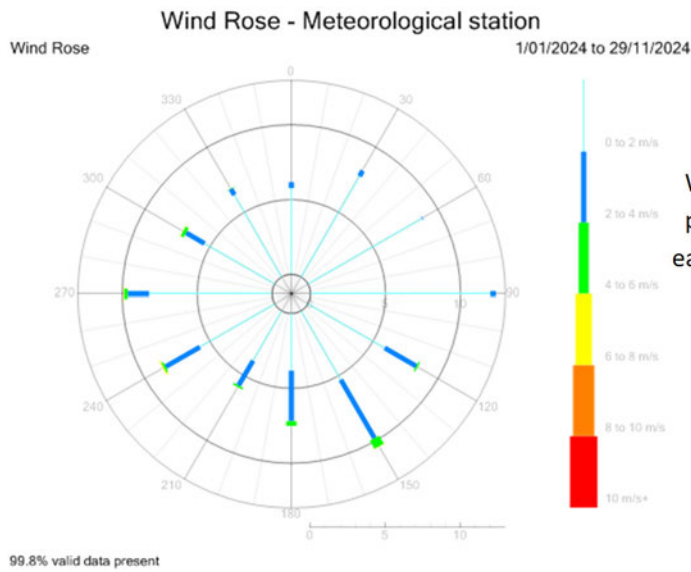
The air blast overpressure level from explosions on the Premises must not exceed 120dB (Lin Peak) when measured at Monitoring Point 11.

- **M4.1**

POINT 12 – WEATHER MONITORING

Parameter	Sampling method	Units of measure	Averaging period	Frequency
Siting	AM-1	-	-	-
Sigma Theta	AM-2 & AM-4	Degrees	10 minutes	Continuous
Temperature at 2 metres	AM-4	Kelvin	10 minutes	Continuous
Temperature at 10 metres	AM-4	Kelvin	10 minutes	Continuous
Total Solar Radiation	AM-4	Watts per square metre	10 minutes	Continuous
Wind Direction at 10 metres	AM-2 & AM-4	Degrees	10 minutes	Continuous
Wind Speed at 10 metres	AM-2 & AM-4	metres per second	10 minutes	Continuous
Rainfall	AM-4	millimetres per hour	1 hour	Continuous

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While the winds remain predominantly from the south as per previous years. There was a slight increase in the frequency of easterly winds

Figure 11

Rain - Meteorological station 1/01/2024 to 29/11/2024

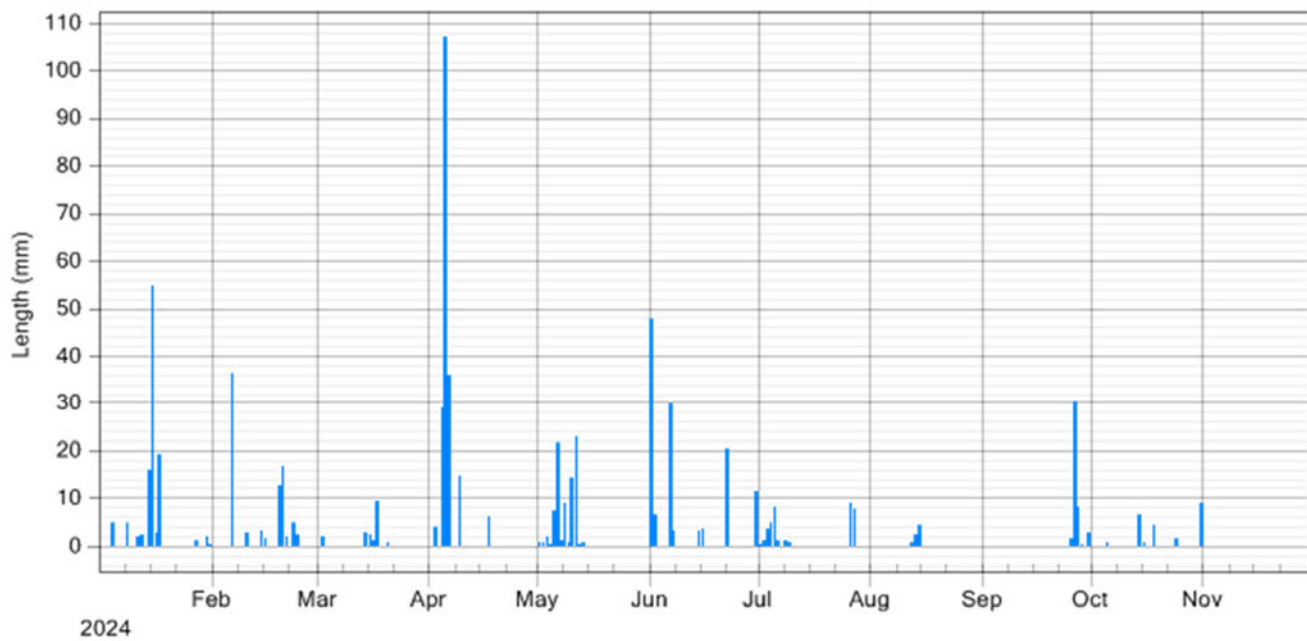


Figure 12 Rainfall below 1 mm is not visible on the graph



Ambient Temperature 2m and 10m - Meteorological station

1/01/2024 to 29/11/2024

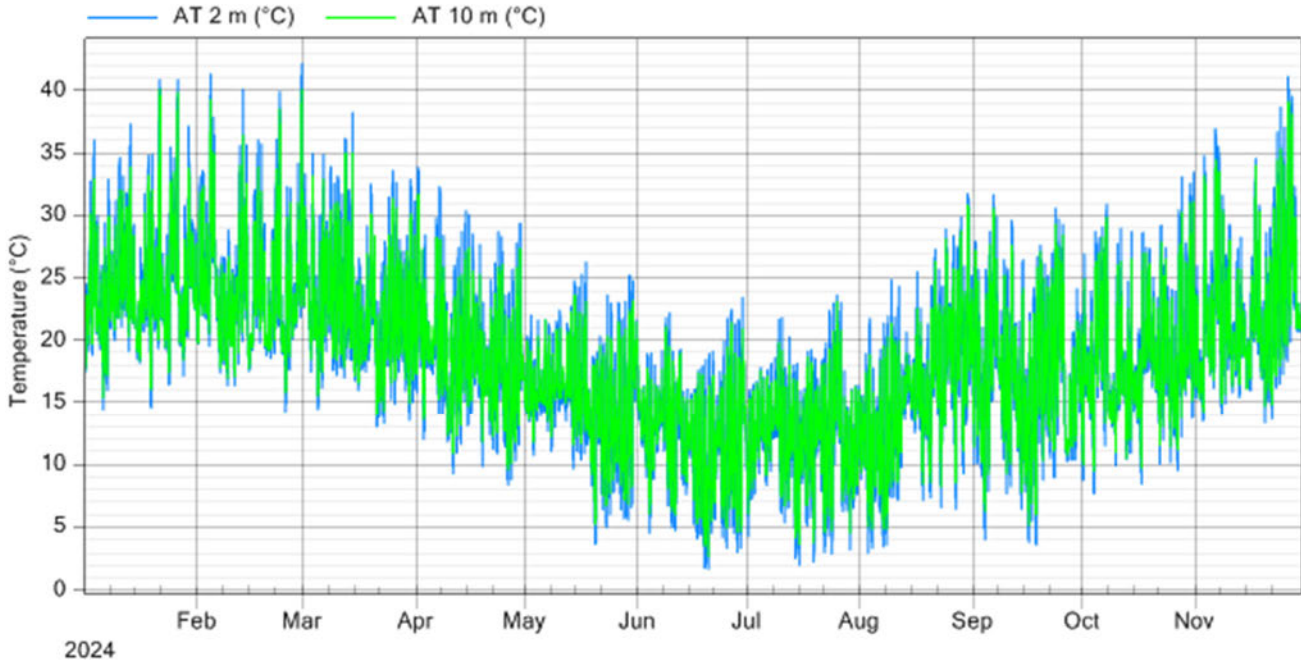


Figure 13

In March 2023 we reached 40°C for the first time. It occurred in January, February and December in 2024. June again was the coolest month not exceeding 24°C.



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MONITORING RESULTS AND REPORTING SUMMARY

Under SSD 5041 and EPL 11555

Consent or EPL Condition number	Requirement under consent / statutory requirements	2024 results (include exact figures and records)	Analysis improvement (C11 F)	Compliance
B1 and L3	Waste In/Out to be recorded on a daily basis, using weighbridge records.	Jan – Dec 2023 records, Financial Year corresponds to WARRP reporting period.		Compliant
B6 and L1	<ul style="list-style-type: none"> Water quality management and water discharge. To be compliant with s 120 of the POEO Act. 	N/A - There is no discharge, except in accordance with Industrial Trade Wastewater consent.	Nil	Compliant
B16 and M2 & M3	Emission Concentration Limit	As provided in Ektimo Report.	Operating within current limits	Compliant
B17 and E1 and L2 and M2 and M4	<ul style="list-style-type: none"> Air quality monitoring requirements and weather station. Monitoring points samples measured against table provided in licence under L2.2 	<ul style="list-style-type: none"> As per Ecotech reporting. As provided in Ektimo Report, testing conducted May 2024. 	<ul style="list-style-type: none"> Operating Operating within current limits 	Compliant
B25 and L7 and M7	<ul style="list-style-type: none"> Air blast Overpressure and Explosion Limits. Reported when over limit explosion event occurs 	There were 3 overpressure events from explosions in 2024.	Ongoing monitoring and regular training to ensure that gas bottles and other items likely to cause an explosion are removed.	Compliant
O3 B19	<ul style="list-style-type: none"> Dust Air emission mitigation 	<ul style="list-style-type: none"> Please find attached in Appendix under Monitoring Results. As specified in the approved Air Quality Management Plan 	<ul style="list-style-type: none"> Results impacted by bushfires and back burning activities. New sweeper purchased. 	Compliant
B26 and B28 & L4	Noise criteria (subject to <i>NSW Noise Policy for Industry</i>) and Vibration monitoring. Monitoring points established under licence not to exceed levels provided in licence under L4.1	No testing conducted due to resources being engaged to meet criteria for development consent SSD-10396.	Working to implement SSD-10396 criteria so validation testing can be conducted.	Compliant
B39	Monitoring of revegetated areas	Trees identified for retention must be protected.	Revegetated of area cleared due to presence of Maderia vine has been successful.	Compliant
L5	Hours - Business operations are structured around the opening and closing times as provided for in the EPL.	In November 2022 Sell & Parker voluntarily reduced operations from 6am to 7am (morning shoulder period) and from 9pm to 8pm in relation to the use of Plant.	No issues with early morning noise.	Compliant
L6	Odour Not required to monitor under licence.	No odour complaints received in 2023.	No odour complaints in 2023.	Compliant

Consent or EPL Condition number	Requirement under consent / statutory requirements	2024 results (include exact figures and records)	Analysis improvement (C11 F)	Compliance
O4	PRIMP Regular review with business operational changes	Conducted a practical review on February 29th, 2024 with a end of life vehicle bail fire response.	Conducted yearly as per regulatory requirements.	Compliant
M5 and M6	Pollution complaints and telephone complaints line. Updated when a complaint is received.	Nil pollution complaints.	Operation of the pollution complaints line is checked every quarter.	Compliant
R1 and R4	Annual Reporting WARPP and Annual returns	As per scrap metal data.	Annual return completed and submitted in June 2024. WRAPP completed and submitted in August 2024.	Compliant
EPL	License review	Internal review conducted.	No change.	Compliant

Monitoring Results - Emission Collection System

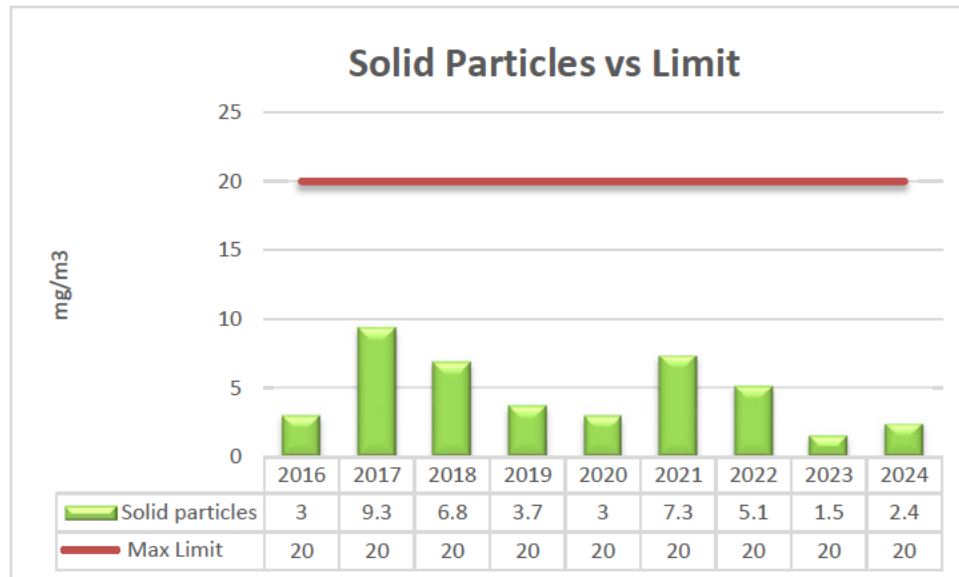


Figure 14 The solid particle emission rates remain less than the maximum allowable EPL limit.

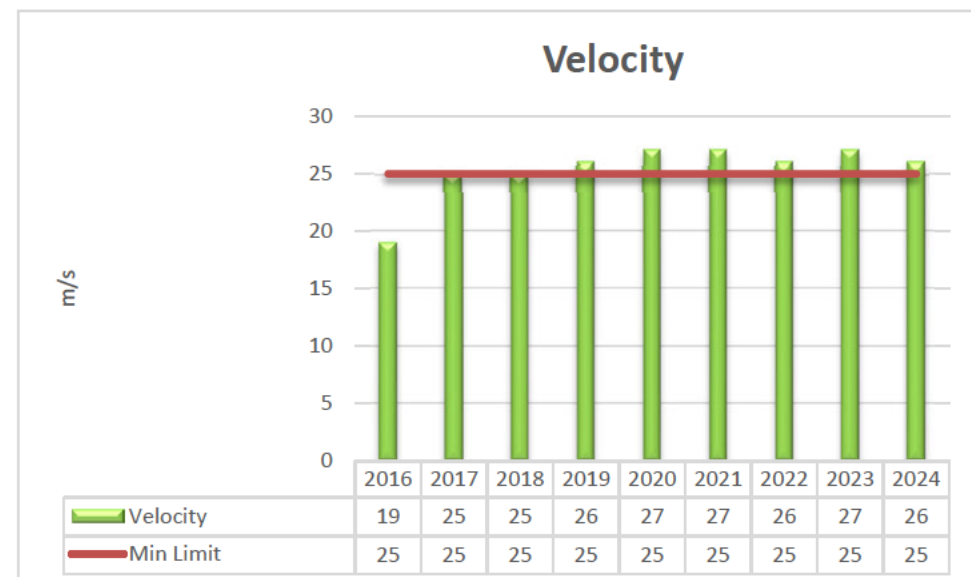


Figure 15 The velocity during testing was satisfactory, being above the targeted minimum velocity.

TRENDS

Trends identified as required by C11(d)

Requirement	Trend Analysis
Construction	Once off projects no trends to report
Water	Internal results show that since the installation of the filtration system the gradual build-up of concentration levels in the elements we measure have declined
Air Quality	The testing has shown that we continue to remain significantly below the air quality limits set by the EPL.
Noise and Vibration	No trends per se have been identified.
Landscaping	All established plants have been maintained. New plantings only required where we had a maderia vine outbreak. Given current dry conditions this is an excellent result.
Waste	Waste levels as a percentage of material received remain consistent and within EPA guidelines.
Operational	Diesel fuel consumption will remain variable due to supply change demands creating periods of double handling. Discharge water quality remains within Sydney Water discharge limits. Stack air quality emissions remain well below limits. Reduction of operational hours of plant has improved noise mitigation.
Emergency	Nil. No trends.

PREVIOUS ISSUES OF COMPLIANCE

The following issues concern Sell & Parkers EPL or Consent: Air overpressure

Unique ID	Compliance Issue	Risk level	How we have addressed issue	Compliance level now
L7.1 & B24/25	Air overpressure	Low	Inspections	Low

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INCIDENTS AND COMPLAINTS

COMPLAINTS RECORDS

During the reporting period Sell & Parker received 3 complaints.

A detailed register of complaints received, self reporting notifications and subsequent investigation and action taken is maintained on the Sell & Parker website and available for the public viewing at:

<https://www.sellparker.com.au/about/environmental-social-and-governance/> then monitoring results.

Sell & Parker's complaints phone number is available at:

<https://www.sellparker.com.au/about/environmental-social-and-governance/> then monitoring results and complaints.

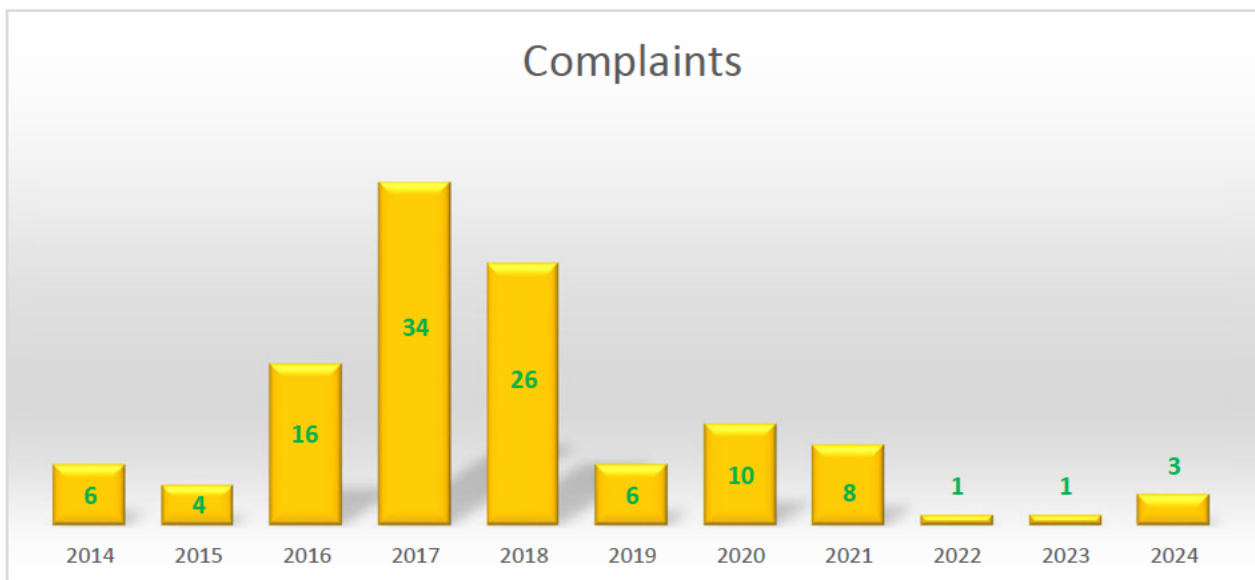


Figure 16

TRENDS REGARDING COMPLAINTS

As required by C11, we have identified trends in our monitoring data. It has been identified that there has been a substantial drop in complaints since the trommel roof installation commenced in July 2018. We were averaging 3 complaints per month prior to the roof installation and <1 complaint per month post installation prior to covid.

The complaints in 2019, 2020 and 2021 were due to a significant decrease in background noise due to Covid-19 restrictions which including the majority of Australia working from home. We also believe that more 'awareness' was drawn to the site following the community consultation process regarding Sell & Parkers SSD application 10396.

It should be noted that the complaints from 2019 and where investigated response provided. No regulatory action has been taken.

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COMPLAINTS REGISTER

13/05/24	12:54	Report to EPA	Unknown	Loud noise with rumbling sounds	Complaint received from EPA on 23/05/24. Replied to EPA enquiry 30/05/24.	SW
22/05/24	10:58	Reports to EPA	Unknown	Noise emissions	Complaints investigated. No unusual site activities at times provided.	W-SW
28/11/24	Not provided	Report to EPA	Unknown	Loud banging metallic noises	Complaints investigated. No unusual site activities at times provided.	?

Figure 17

ACTIONS UNDERTAKEN OR PROPOSED TO ADDRESS OUTCOMES OF COMPLAINT:

Changes to come as part of SSD-10396.

REPORTABLE INCIDENTS

- Nil

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ADDITIONAL COMMITMENTS

PUBLIC SAFETY

Since the Facility opened a number of measures have been implemented to minimise the risks to the public and to ensure public safety. These measures are regularly reviewed for applicability and customers are regularly reminded of their need to consider the safety of others on site.

- the site is fully fenced;
- access points to the site are gated and locked after operational hours;
- access points to the site require security tags and there are warning signs;
- security on site outside of operational hours
- all visitors (including consultants) must sign in & out of strategically located *sine pro* registers
- the site is under video surveillance; and
- escorted access to work zones
- site inductions for all contractors

CHANGES TO DEVELOPMENT APPROVAL AND/OR ENVIRONMENTAL PROTECTION LICENCES

SSD 5041

MOD 1

The following variations have been made to the consent:

- Remove condition A2 and replace with
 - Shall carry out the Development in accordance with
 - EIS prepared by ERM dated July 2014
 - Response to Submissions report prepared by ERM dated 7 January 2015
 - Supplementary Response to Submissions prepared by Mecone dated 30 June 2015
 - Supplementary Response to Submissions prepared by Sell & Parker dated 3 September 2015
 - Site layout plans and drawings (See Appendix A)
 - Management and Mitigation Measures (see Appendix B).
 - Modification application SSD 5041 Mod 1 and accompanying document titled Statement of Environmental Effects 23-24 and 45 Tattersall Rd Kings Park dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016 and further additional information from Allens Linklaters dated 9 February 2017
- Insert condition B35A as follows; prior to
 - Expanded operations;
 - Issue of an Occupational certificate; or
 - The date being 4 months after the determination of MOD 1,
 - (whichever is sooner) the applicant must ensure that an appropriate sprinkler system and smoke detection system have been installed within the Floc storage in Building C, to the satisfaction of FRNSW
- Insert condition B35B as follows: Prior to:
 - Expanded operations;
 - Issue of an Occupational certificate; or
 - The date being 4 months after the determination of MOD 1,

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- (whichever is sooner) the applicant must ensure that all fire safety measure required by the NCC for buildings A, B & C have been installed and verified through a Fire Safety Audit in accordance with *Australian Standard 4655- Fire Audits* to the satisfaction of FRNSW
- Remove condition B19 and replace as follows;
 - Installation of appropriate dust screens at the property boundary and replacement of existing dust screens and shade cloths at the Tattersall Road boundary of the 45 Tattersall Rd site
 - Replace all drawings in Appendix A with ones attached on mod 1

MOD 2

The following variations have been made to the consent:

Delete condition A2 and replace with the following:

A2. The applicant shall carry out the development in accordance with the:

- EIS prepared by ERM dated July 2014;
- response to submissions report prepared by ERM dated 7 January 2015;
- supplementary response to submissions prepared by Mecone dated 30 June 2015;
- supplementary response to submissions prepared by Sell & Parker dated 3 September 2015;
- site layout plans and drawings (see appendix a);
- management and mitigation measures (see appendix b);
- modification application SSD 5041 mod 1 and accompanying document titled statement of Environmental effects 23-43 and 45 tattersall road, kings park dated august 2016 prepared by Higgins planning, additional information from Higgins planning dated 22 December 2016 and further additional information from Allens and Linklaters dated 9 February 2017; and
- modification application SSD 5041 mod 2 and accompanying document titled statement of Environmental effects 23-43 and 45 Tattersall Road, Kings Park dated December 2017 prepared by Higgins Planning.

Insert new Condition B35C immediately after Condition B35B as follows:

- B35C. Prior to the issue of an occupation certificate for the awning annex adjacent to Building C, the Applicant must ensure that an appropriate sprinkler system has been installed within the awning annex, to the satisfaction of FRNSW

MOD 3

The following variations have been made to the consent:

A2. The applicant shall carry out the development in accordance with the:

Insert condition A2i) as follows;

- Modification Application SSD 5041 MOD 3 and accompanying document titled Section 4.55(1A) Application (SSD 5041 – Mod 3), 23-43 and 45 Tattersall Road, Kings Park dated December 2018 prepared by Arcadis Australia Pacific Pty Ltd.

B6. The Applicant shall operate a Water Management System for the site. The system must:

- Remove condition B6e)
 - include water quality monitoring that can determine the performance of the water management system against EPL discharge limits

B7. The Applicant shall commission the Water Management System prior to discharging any water from the site. The commissioning must:

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- Remove condition B7e)
 - Identify and implement changes to the Water Management System that may be necessary to achieve compliance with the discharge criteria in the EPL: and

B31. The Applicant shall comply with the construction and operation hours in Table 3 unless otherwise agreed to in writing by the Secretary.

- Insert condition B31 as follows

Table 3: Hours of Construction and Operation

Activity		Day	Hours
Construction		Monday – Friday	7 am to 6 pm
		Saturday	8 am to 1 pm
		Sunday & Public Holidays	Nil
Operation	Oxyacetylene torch cutting	Monday – Saturday Sunday & Public Holidays	9 am to 3 pm Nil
	Maintenance and Cleaning	Monday – Saturday Sunday	9 pm – 6 am 24 hours
	All other activities	Monday – Saturday Sunday & Public Holidays	6 am – 9 pm Nil

EPL 11555

2021 - Annual Shredder Floc Performance Report was added.

2022 – Further monitoring location for noise was added to EPL.

OTHER MATTERS

A State significant development known as SSD 10396 has been approved subject to conditions.

INCIDENTS AND AREAS OF IMPROVEMENT

- Reporting continues to improve with the implementation of the Damstra (Vault) recording and management system which is further improving data quality.
- Risks surrounding the increasing types and numbers of batteries within our society continues to increase. Given the increasing percentage of rechargeable batteries in household items and in particular lithium type, there will be a corresponding increase to our safety risk. Given the constant rate of discovery of rechargeable batteries in new forms and in new items there will continue to be a gap between the risk and mitigation measures.
- Stockpile procedures are operating well. This will not diminish the lithium ion battery problem, it will however allow us to deal with the arising issues at a smaller scale.
- A new mitigation measure has been proposed as part of the SSD application to further reduce noise transmission. The new internal walls will have a noticeable improvement on noise reduction.
- Continue working relationship with the NSWFR by providing training opportunities through the provision of resources and space to conduct trainings on site.
- Review of Noise and Air Quality management plans in preparation for SSD 10396.
- Introduction of TARP as part of SSD 10396 for Air Quality Management Plant.
- Introduction of a live monitoring feedback tool will be introduced as part of SSD 10396 to assist educating plant & equipment operators.

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INITIATIVES FOR THE NEXT 12 MONTHS - 2024

The following initiatives are subject to our proposed SSD 10396 being approved:

- Environmental initiatives for the Facility in 2024– will also include a review of all strategies, plans and programs relating to any variation to the EPL and/or the approval of SSD 10396.

Developments proposed and what has been completed – according to consent C 11 (a)

Proposed for 2025								
Proposed	Reason for Proposal	2019	2020	2021	2022	2023	2024	2025
Non-ferrous admin upgrade	Lack of space	Review early 2020	Review early 2020	On Hold	On Hold	On Hold	On Hold	On Hold
SSD 10396	Maximise site efficiency	Commence EIS	Lodged late 2020	Responses to Requests for further information provided	Class 1 Proceedings commenced	Approved Subject to conditions	Fulfilling conditions so we can implement mitigation measures	Fulfilling conditions so we can implement mitigation measures
Downstream recovery processes	To improve the recovery of non-ferrous materials.					Downstream sorting capability of non-ferrous materials to be upgraded to improve recovery	Finessing of systems to maximise sorting efficiency	Finessing of systems to maximise sorting efficiency
Variable Frequency Drive	Save electricity						Installed	Fine tuning
Copper recovery plant	Improve copper recovery						Planning	Order

STRATEGIC AND COMMERCIAL REVIEW

In concert with this operational environmental review the Corporate Group of the Licence holders has carried out a review against the commercial and policy imperatives which have occurred during the past twelve month period.

- 1 Required plans were reviewed.
- 2 Environment Management System (EMS) documentation has been reviewed in conjunction with plan approvals. This is an ongoing process.
- 3 Response of proposed variations to EPL has been provided and awaiting response by EPA.
- 4 Review of plans will be conducted as per triggers in consent condition C12 when activated.
- 5 Planning commenced for the writing of new plans as per SSD 10396 conditions.

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SUMMARY

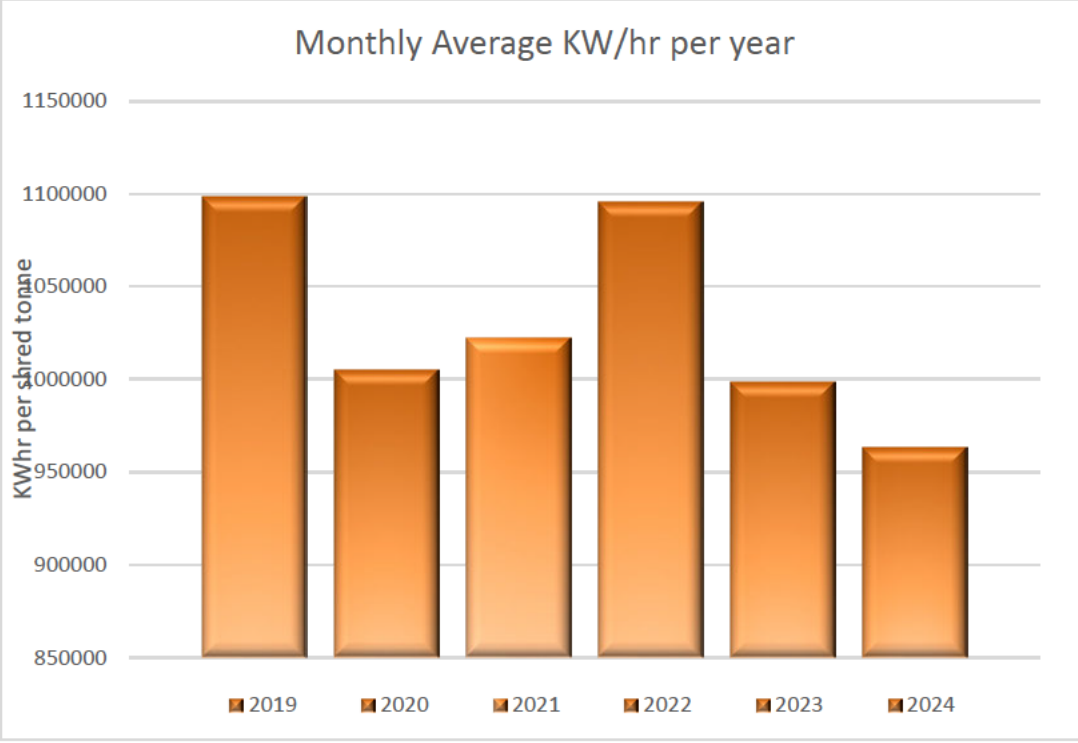
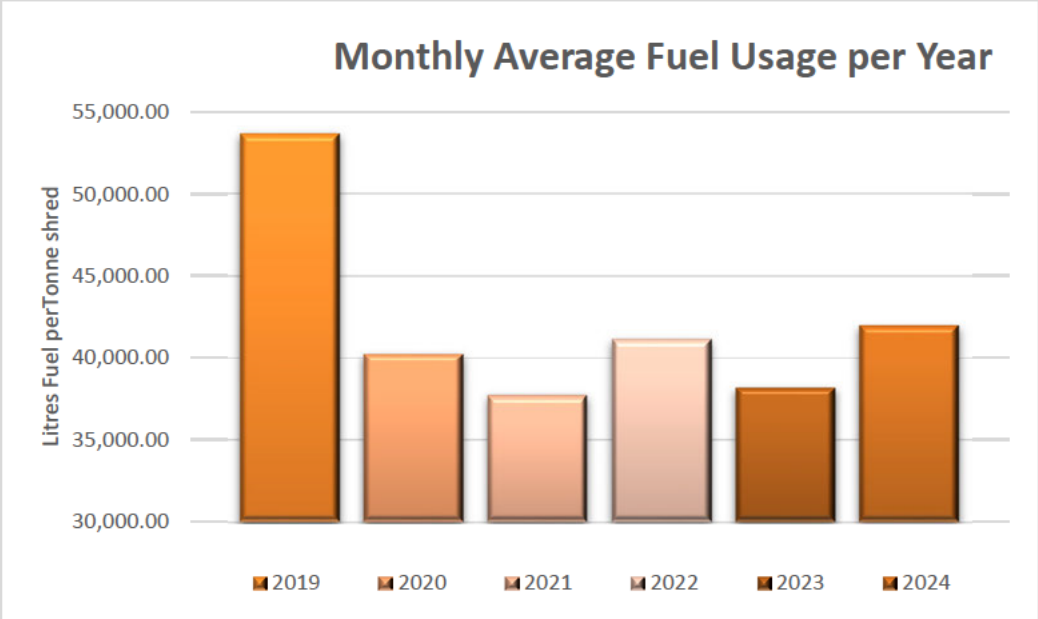
PART C	
ENVIRONMENTAL MANAGEMENT, REPORTING & AUDITING	
ENVIRONMENTAL MANAGEMENT	
Operational Environmental Management Strategy (C3)	
Within 6 months of the date of this consent, the Applicant shall prepare an Operational Environmental Management Strategy to the satisfaction of the Secretary. This strategy must:	
a) be prepared by a suitably qualified and experienced person(s);	Higgins Planning
b) provide a strategic framework for environmental management of the Development;	Section 1.7 of Management plan
c) identify the statutory approvals that apply to the Development;	Section 2.1 of Management plan
d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	Section 3 of Management plan
e) describe in general how the environmental performance of the Development would be monitored and managed; and	Section 6 of Management plan
f) describe the procedures that would be implemented to:	
i. keep the local community and relevant agencies informed about the operation and environmental performance of the Development;	Section 7 of Management plan Complies. Sell & Parker's website contains links to up to date environmental performance of the project with monitoring results. Sell & Parker also has a community consultation plan.
ii. receive, handle, respond to, and record complaints;	Section 8 of Management plan
iii. resolve any disputes that may arise;	Section 8.1 of Management plan
iv. respond to any non-compliance; and	Section 7.1 of Management plan
v. respond to emergencies.	Section 7.3 of Management plan
Management Plan Requirements (C5)	
The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:	
a) detailed baseline data;	See approved plans on website.
b) a description of:	See approved plans on website.
i. the relevant statutory requirements (including any relevant approval, licence or lease conditions);	
ii. any relevant limits or performance measures/criteria;	See approved plans on website.
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;	See approved plans on website.
iv. the measures that would be implemented to comply with the relevant statutory	
v. requirements, limits, or performance measures/criteria;	See approved plans on website.
c) a program to monitor and report on the:	See approved plans on website.
i. impacts and environmental performance of the Development;	
ii. effectiveness of any management measures;	See approved plans on website.
iii. a contingency plan to manage any unpredicted impacts and their consequences;	See approved plans on website.
iv. a program to investigate and implement ways to improve the environmental performance of the Development over time;	See approved plans on website.

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d) a protocol for managing and reporting any:	See approved plans on website.
i. incidents;	See approved plans on website.
ii. complaints;	See approved plans on website.
iii. non-compliances with statutory requirements; and	See approved plans on website.
iv. exceedances of the impact assessment criteria and/or performance criteria; and	See approved plans on website.
v. a protocol for periodic review of the plan.	See approved plans on website.
Revision of Strategies, Plans & Programs (C12)	
Under C12, after 3 months of submission of an annual review under C11, C7, C9 or any Mod under the consent the proponent shall review, and if necessary revise, the strategies, plans, and programs required under this consent.	Compliant
<i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i>	
REPORTING	
Incident (C7)	
The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Compliant
Regular (C8)	
The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Compliant
ACCESS TO INFORMATION (C14)	
The Applicant shall:	
a) make copies of the following publicly available on its website:	
i. the documents referred to in Condition A2;	Compliant
ii. all current statutory approvals for the Development;	Compliant
iii. all approved strategies, plans and programs required under the conditions of this consent;	Compliant
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;	Compliant
v. a complaints register, updated on a monthly basis;	Compliant
vi. the annual reviews of the Development;	Compliant
vii. any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; and	Compliant
viii. any other matter required by the Secretary; and	Compliant
b) keep this information up to date.	Compliant

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KPI DATA

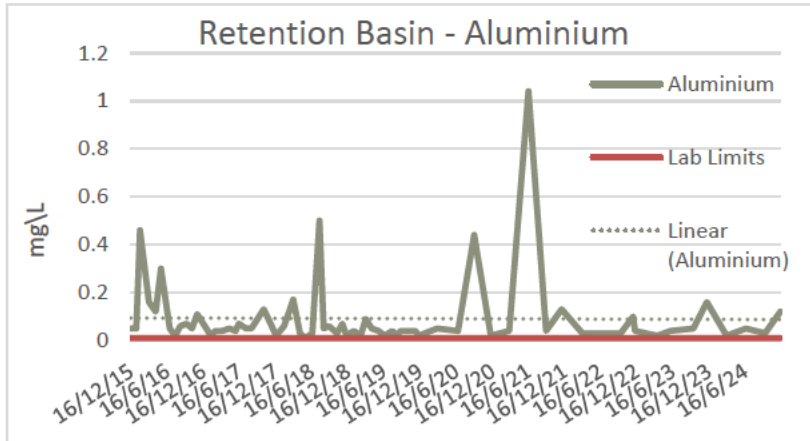
Topic	Explanation	Compliance
Electricity	<p>Even with upgrades in the finishing equipment to improve product recovery and reduce the floc percentage, electricity usage remains lower than 2019.</p>  <p>Figure 18</p>	Compliant
Diesel	<p>With the increase in tonnages more efficient use of mobile equipment has been achieved so there has been a reduction in fuel usage since 2019.</p>  <p>Figure 19</p>	Compliant

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Appendix

MONITORING RESULTS

Metal Graphs

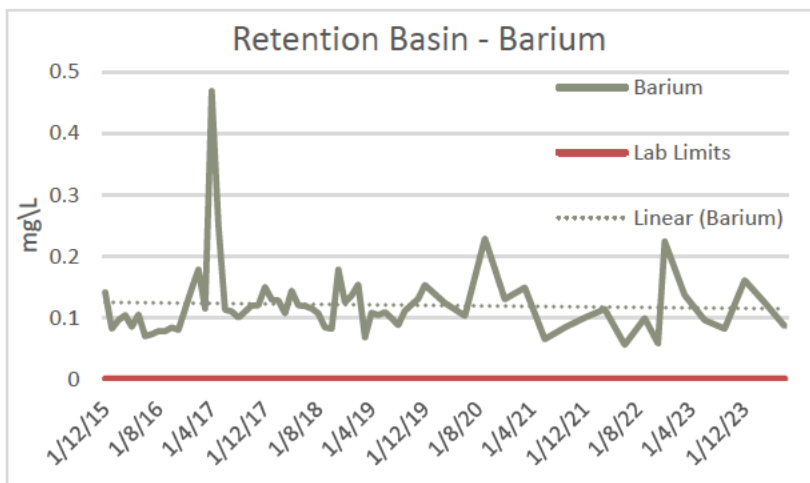


As Aluminium has dropped to the lowest levels, an outlier will under the current management system result in a change in the trending.

Levels are only slightly above the lower laboratory limit for reporting and well below Sydney Water discharge limits

[Sydney Water limit 100mg/L](#)

Figure 20

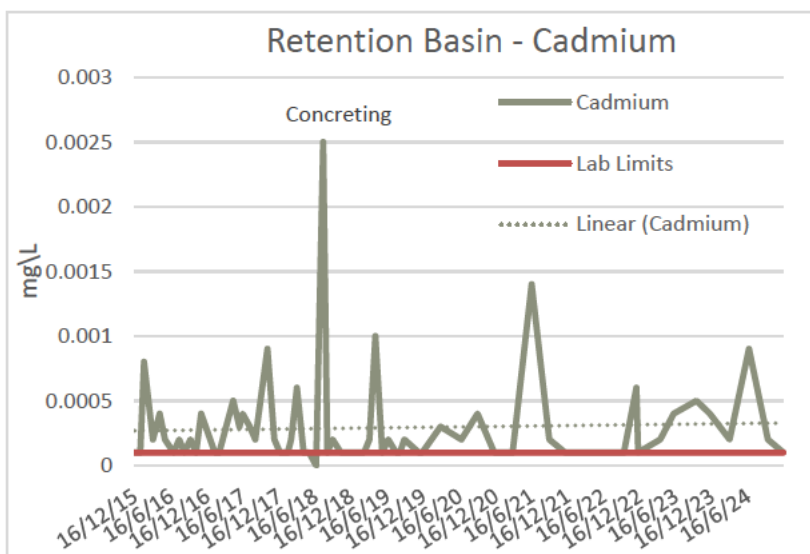


The trend line in 2018 was indicating that the concentration of Barium in the retention basin was increasing slightly. With the commissioning of the water treatment system the concentration reduced.

It is indicating a low gradient decreasing trend in 2024 while the concentration remains at a low level.

[Sydney Water limit 5mg/L](#)

Figure 21



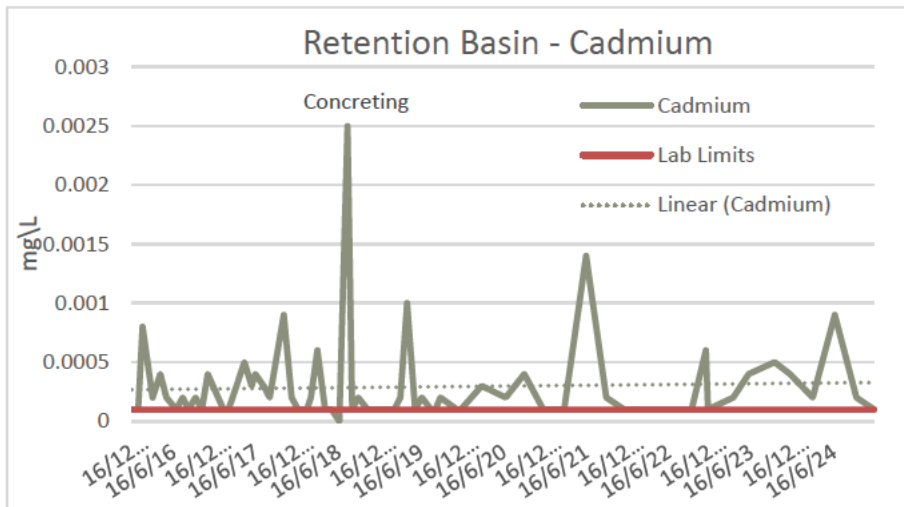
The trend line in 2018 was indicating that the concentration of Cadmium in the retention basin was increasing slightly. With the commissioning of the water treatment system the trendline reduced and then flatlined.

The recent outlier has seen the trend line gradient to increase. It is likely given the low concentration levels that these fluctuations will continue to occur.

[Sydney Water limit 1mg/L](#)

Figure 22

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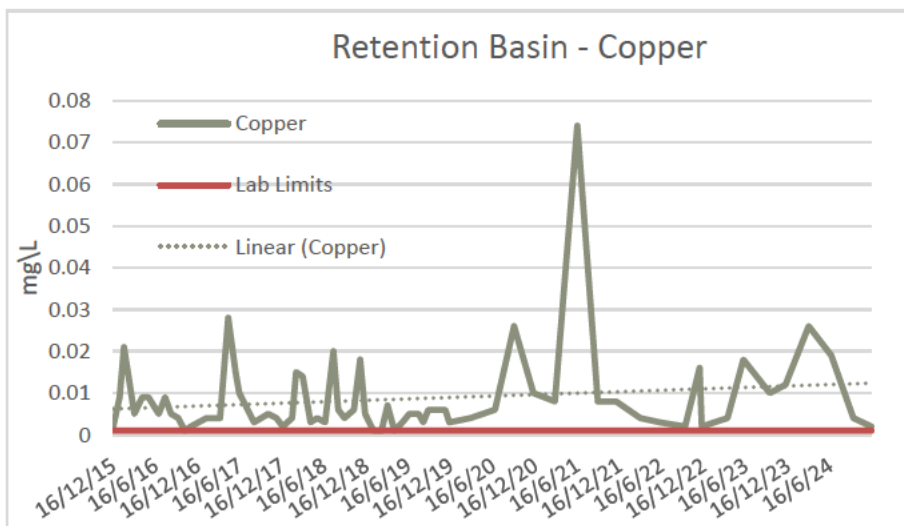
The trend line is indicating a very small increase of chromium over time.

Results are remaining within previous levels and are well below discharge limits.

The average result since testing begun is 0.000291mg/L.

Sydney Water limit 3mg/L

Figure 23

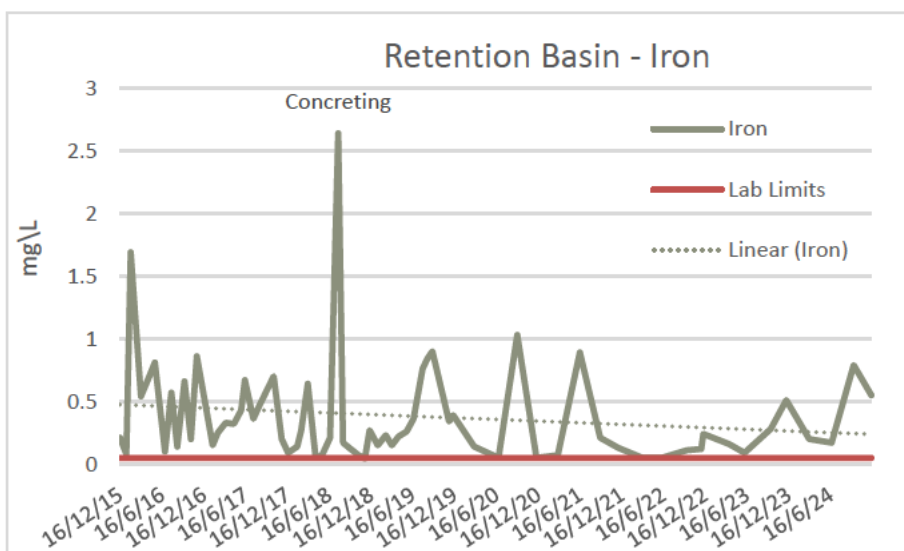


The trend line in 2018 was indicating that the concentration of Copper in the retention basin was increasing slightly.

With the commissioning of the water treatment system the concentration had been reducing, However the outlier in 2021 has pushed the trend line back into a slight incline which is currently being maintained.

Sydney Water limit 5mg/L

Figure 24



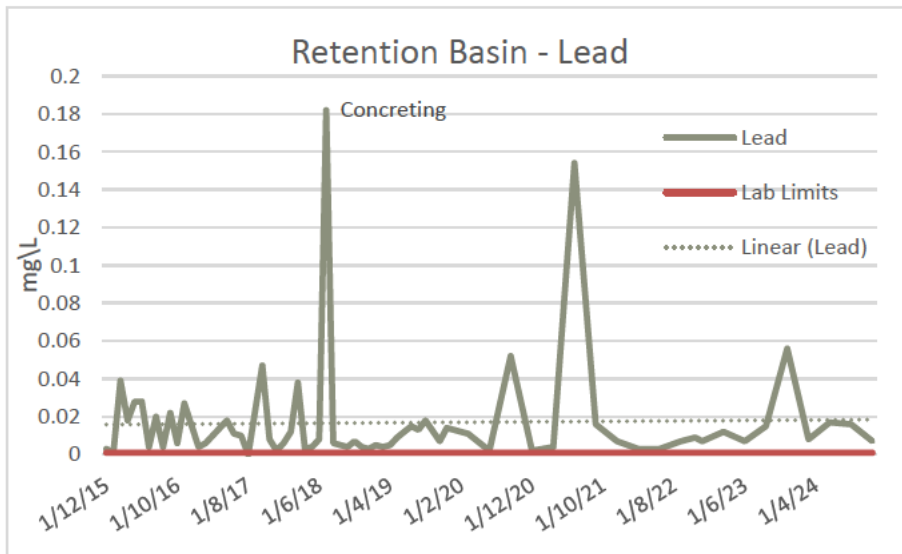
The trend line in 2018 was indicating that the concentration of Iron in the retention basin was decreasing even with the concreting outlier of July 2018.

With the commissioning of the water treatment system the concentration has continued to reduce.

Sydney Water limit 50mg/L

Figure 25

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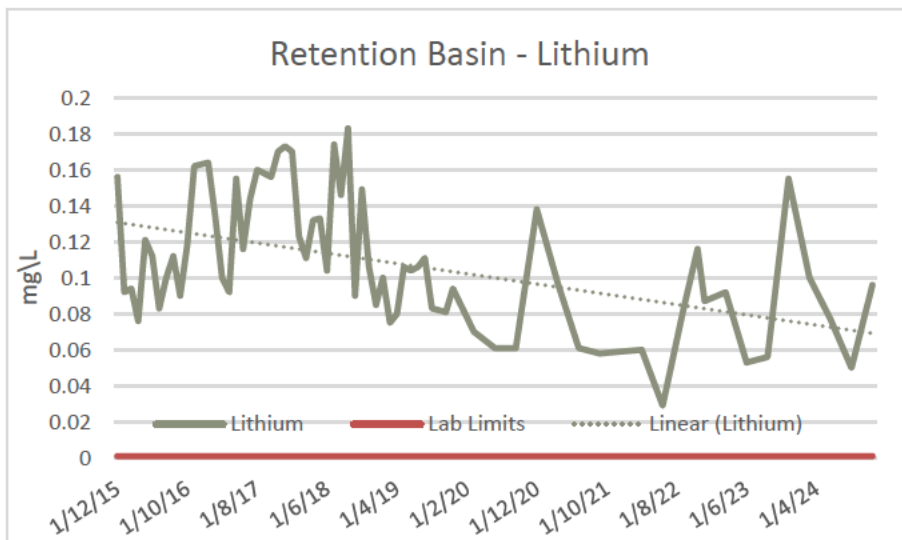
The trend line in 2018 was indicating that the concentration of Lead in the retention basin was increasing slightly, with the result skewed by the fire outlier of July 2018.

With the commissioning of the water treatment system the concentration was reducing and in 2020 had flatlined.

Another outlier in 2021 has resulted in the trendline having a very slight incline.

[Sydney Water limit 2mg/L](#)

Figure 26



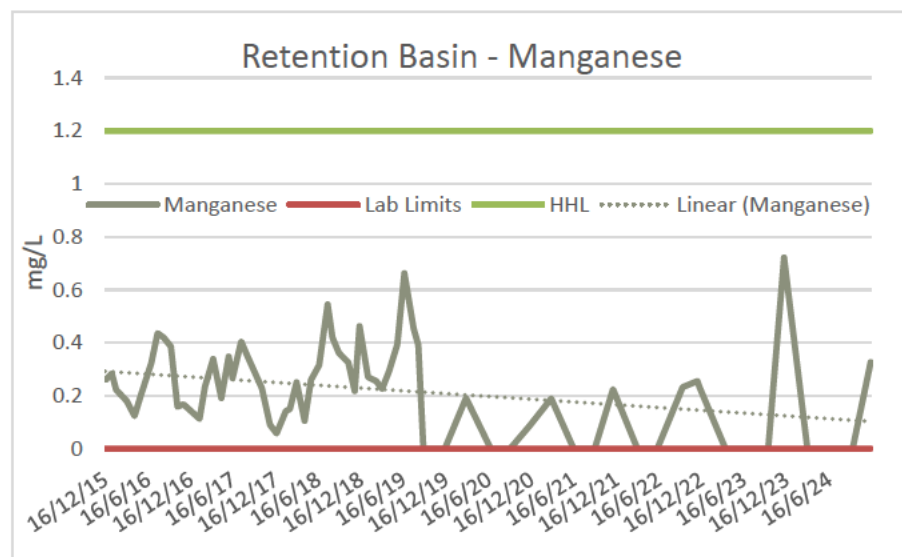
The trend line in 2018 was indicating that the concentration of Lithium in the retention basin was increasing.

With the commissioning of the water treatment system the concentration is reducing.

This is an excellent result given the increasing use of lithium ion batteries in our society.

[Sydney Water limit 10mg/L](#)

Figure 27



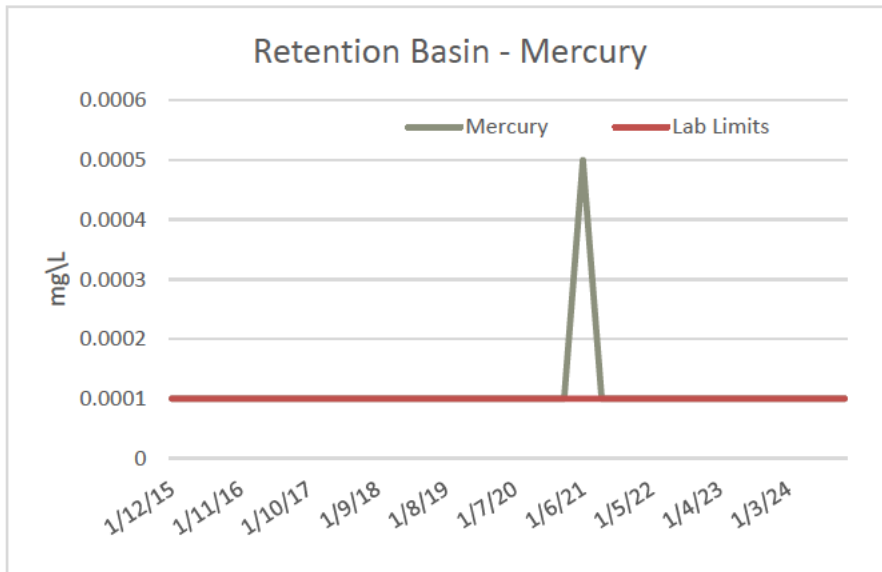
The trendline in 2018 was indicating that the concentration of Manganese in the retention basin was increasing.

With the commissioning of the water treatment system the concentration of manganese in the retention basin is decreasing.

We have added the ANZECC Human Health Limit (99%) as a guide of the water quality.

Figure 28

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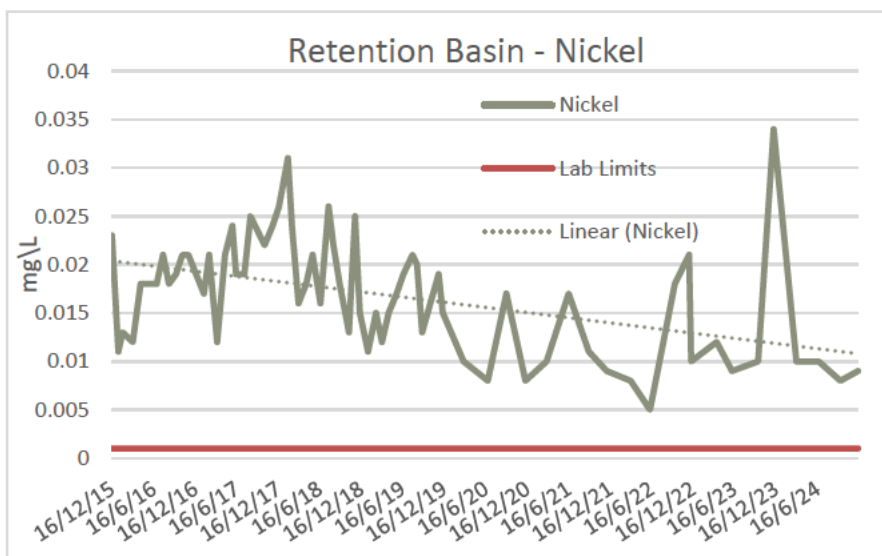


The trend line has indicated that the concentration of Mercury in the retention basin is steady.

A level above the lab lower limit was recorded for the first time 2021. Despite investigations no cause was found and the subsequent tests has returned to normal. The anomaly was below Sydney Water limits.

Sydney Water limit 0.03mg/L

Figure 29

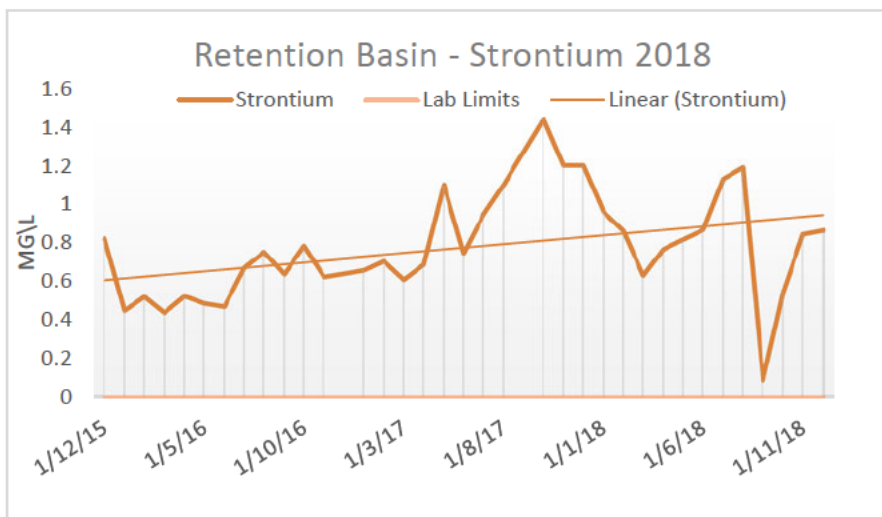


The trend line in 2018 was indicating that the concentration of Nickel in the retention basin was increasing.

With the commissioning of the water treatment system the concentration has been reducing.

Sydney Water limit 3mg/L

Figure 30

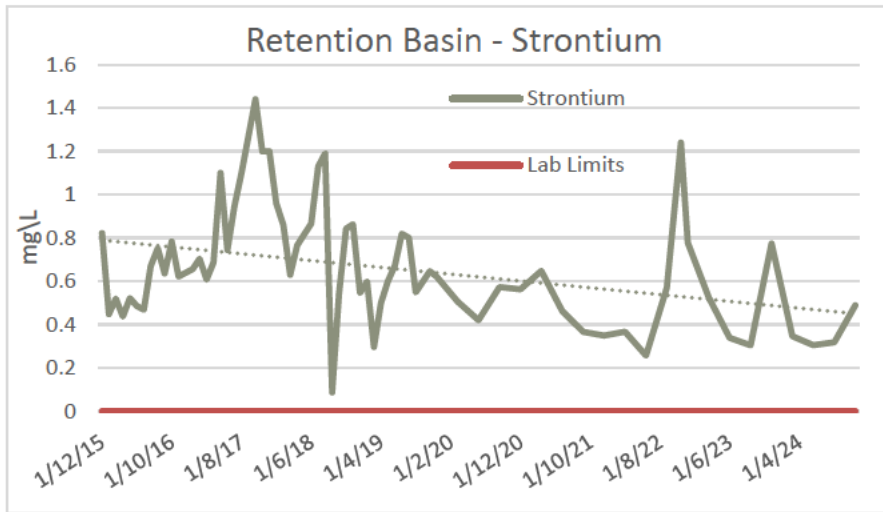


The trend line is indicating that the concentration of Strontium in the retention basin is increasing.

The ground and surface water in the area have high background levels of Strontium. These results are reflective of the surrounding natural environment.

Figures 31

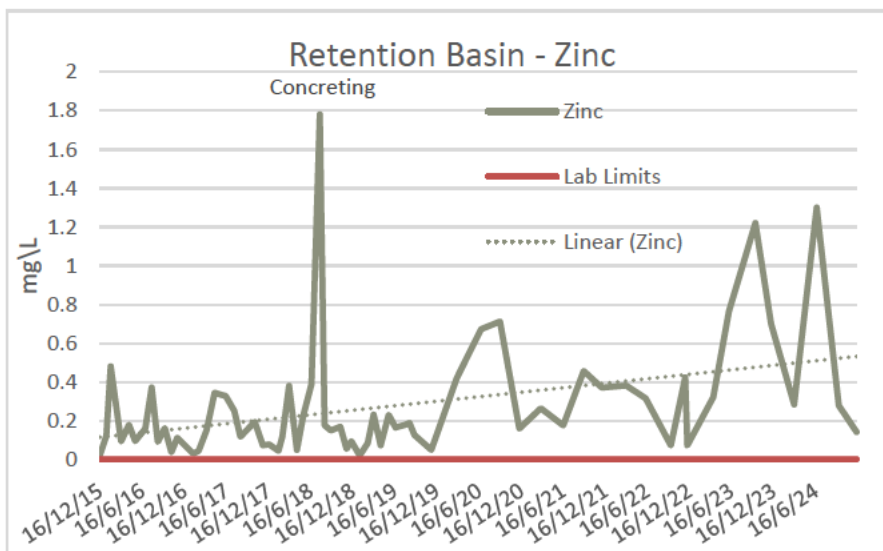
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The trend line in 2024 is indicating that the concentration of Strontium in the retention basin continues to fall. There is a much greater consistency in results since the filtration system was commissioned.

Sydney Water limit NL

Figure 32

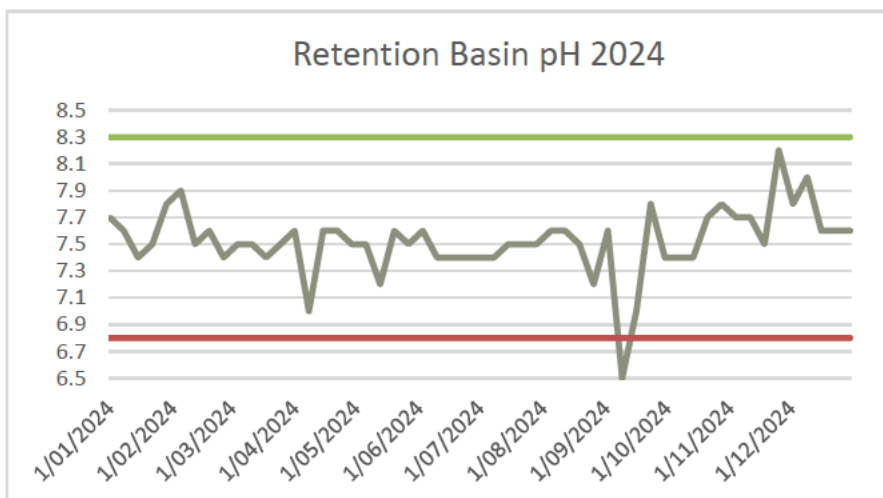


The level of variation between tests has shown a marked increase since the commissioning of the water treatment system. We will monitor this trend.

While the trendline is increasing it is well below required site and Sydney water discharge limits.

Sydney Water limit 5mg/L

Figure 33



The internal pH levels remain stable. Sydney Water discharge pH readings are in alignment with internal results.

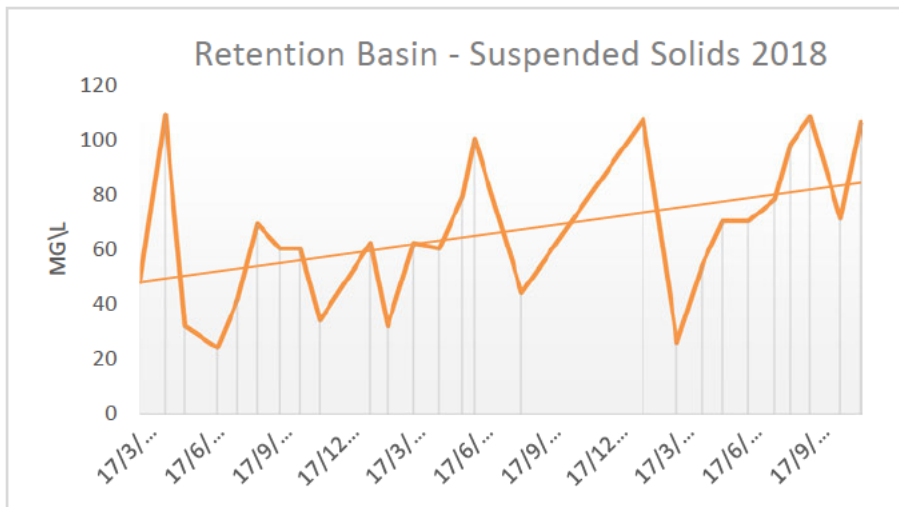
An unknown source caused a low pH spike in September. It was quickly corrected.

Sydney Water limit 7-10

Figure 34



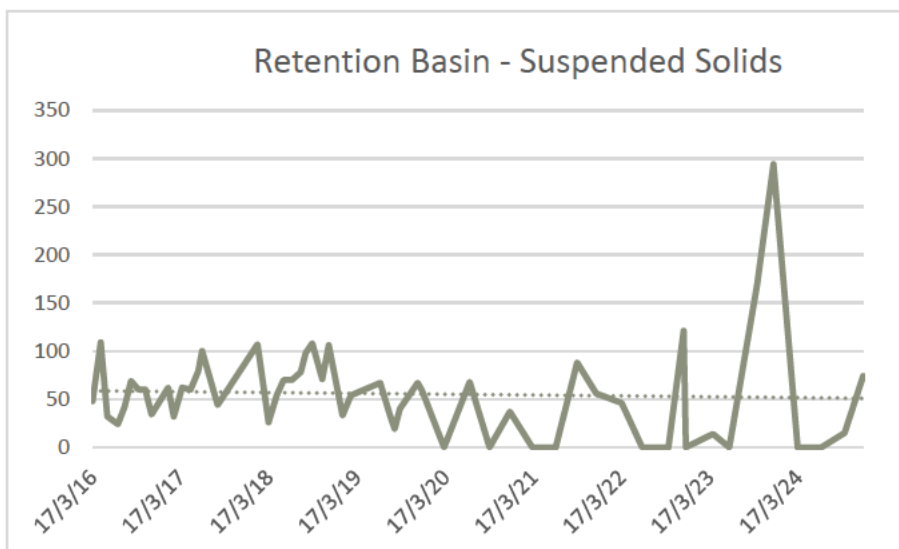
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The trend line in 2018 was indicating that the concentration of suspended solids in the retention basin was increasing.

It is expected that the total level of solids in the retention basin will reduce with the commissioning of the filtration system.

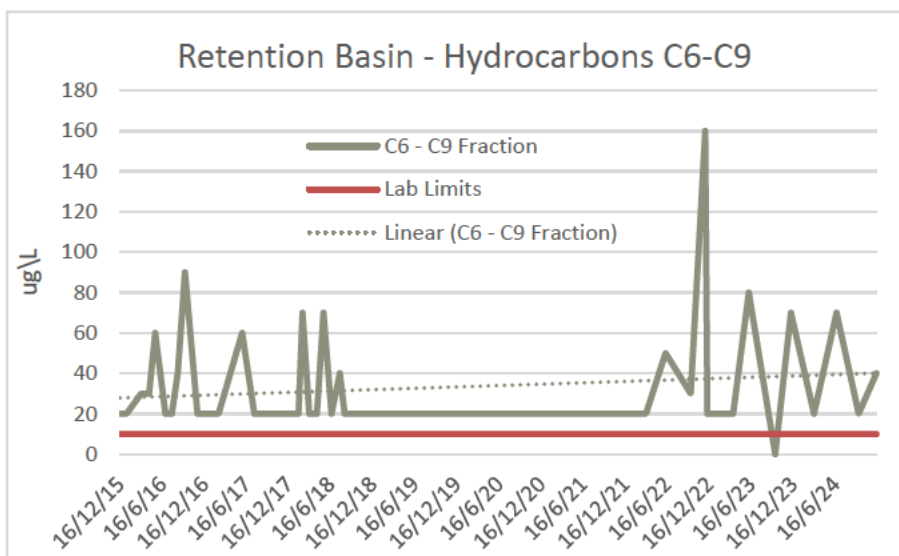
Figure 35



Since the commissioning of the water treatment plant the levels of suspended solids have continued to fall even with thw two high level results recorded late in 2023.

Sydney Water limit 600mg/L

Figure 36



The trend line in 2018 was indicating that the hydrocarbon concentration of C6-C9 in the retention basin was decreasing.

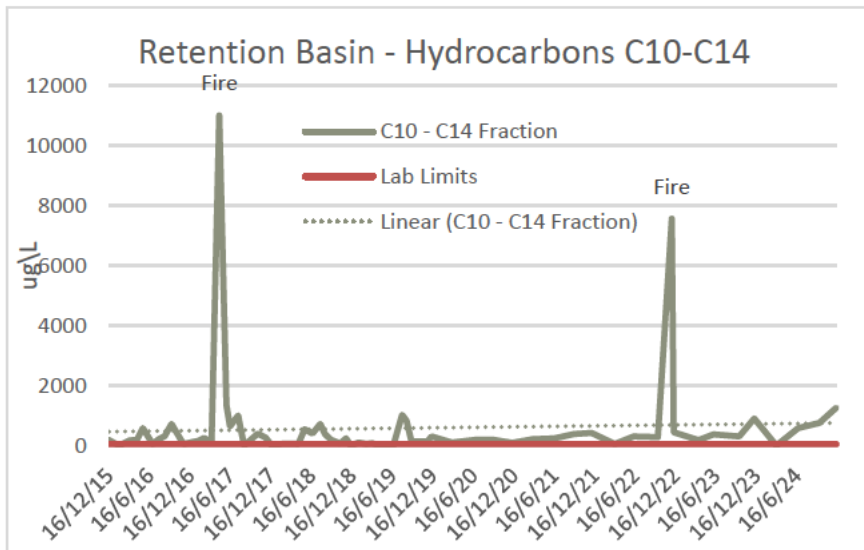
This trend has continued with the commissioning of the water treatment system.

As predicted in the 2021 report an outlier has caused the trendline to show an increase in hydrocarbon levels.

Sydney Water limit for oil and grease is 200,000ug/L

Figure 37

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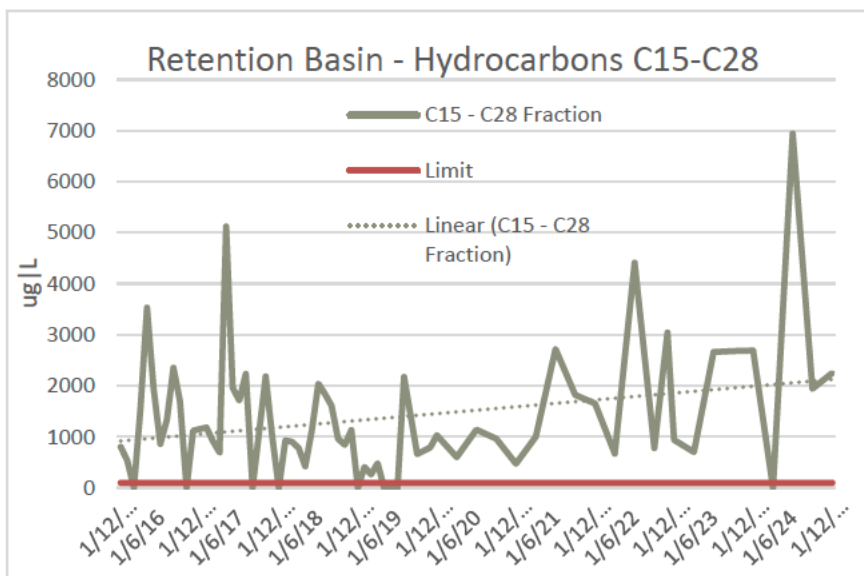


The trend line was originally indicating that the concentration of C10-C14 hydrocarbons in the retention basin were continuing to decrease.

As predicted in the 2021 report an outlier has caused the trendline to show an increase in hydrocarbon levels.

Sydney Water limit for oil and grease is 200,000ug/L

Figure 38

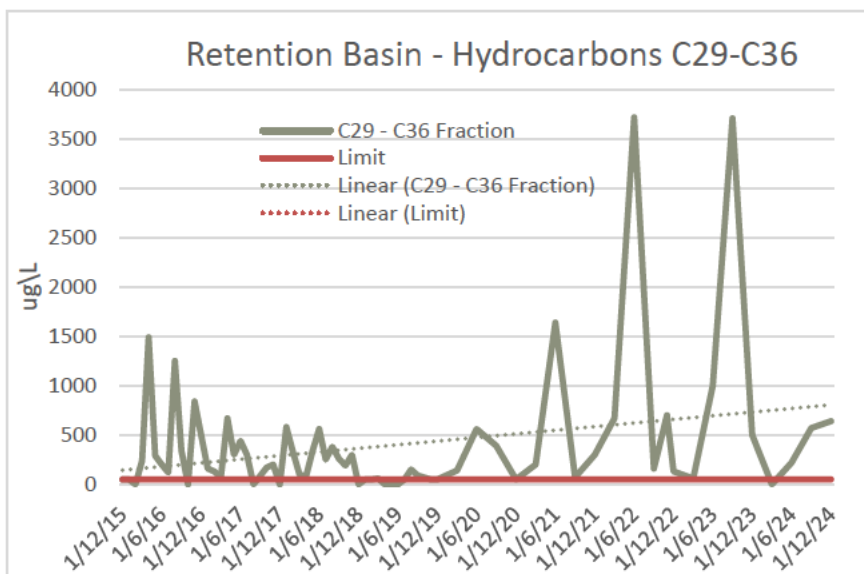


The trendline is showing an increase in the hydrocarbon levels.

Results remain well below discharge limits.

Sydney Water limit for oil and grease is 200,000ug/L

Figure 39



The trendline is showing an increase in the hydrocarbon levels.

Results remain well below discharge limits.

Sydney Water limit for oil and grease is 200,000ug/L

Figure 40

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Dust Monitoring 2018				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	312	27.5	180	23.5
February	161	26.4	145	22.1
March	0	0	244	24.7
April	17	9.0	63	21.6
May	303	38.8	319	39.7
June	103	18.4	158	25.0
July	355	42.9	364	38.7
August	965	53.9*	368	42.2
September	371	30.4	587	37.9
October	202	24.5	313	26.1
November	427	38.7	373	39.7
December	164	23.9	246	25.9

Dust Monitoring 2019				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	166	30.2	329	33.8
February	324	35.1	445	31.8
March	304	27.4	345	26.1
April	0	0	290	27.0
May	285	35.3	332	42.5
June	129	16.7	145	19.9
July	160	22.6	218	33.5
August	229	30.0	362	40.8
September	720	22.6	902	34.7
October	162	33.2	325	37.1
November [^]	489	56.1	675	75.9
December [#]	695	132.7	528	86.6

*Activities at the neighbouring Pick 'n Payless site created dust that caused the monitor to reach sustained high levels that have skewed the results.

Dust Monitoring 2020				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January [^]	356	42.5	831	50.6
February	227	23.3	260	25.2
March	246	19.7	151	19.7
April	253	23.8	312	36.2
May	228	22.8	280	35.2
June	271	24.3	656	50.0
July	311	23.3	627	44.6
August	780	26.8	583	41.3
September	329	40.5	333	32.6
October	336	25.5	414	30.4
November	553	36.9	582	28.3
December	315	24.3	291	23.3

Dust Monitoring 2021				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	267	26.1	499	25.8
February	341	23.3	182	20.2
March	388	25.2	233	40.7
April	253	31.9	398	34.7
May	495	28.2	390	34.2
June	310	20.7	210	33.6
July	199	33.5	179	25.1
August	470	41.4	221	24.9
September	379	32.2	395	27.3
October	1090	29.3	721	23.6
November	346	21.3	174	16.7
December	440	18.6	161	17.0

[^] Bush fire affected data

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Dust Monitoring 2022				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	373	17.6	179	17.0
February	524	17.5	312	23.6
March	82	10.5	185	17.2
April	155	11.1	127	16.7
May	197	14.6	148	21.6
June	226	16.3	412	36.4
July	92	11.2	195	25.3
August	308	16.9	222	19.3
September	147	14.3	166	16.9
October	156	15.4	147	14.4
November	473	17.1	214	22.9
December	413	14.6	185	19.2

Dust Monitoring 2023				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	103	12.3	149	15.9
February	122	16.1	149	19.8
March	154	15.3	190	23.7
April	85	11.2	126	16.2
May	177	15.5	156	25.6
June	85	17.7	209	24.8
July	123	17.8	156	26.0
August	125	15.9	227	23.5
September	420	23.9	145	23.6
October	424	21.8	440	23.6
November	91	14.0	172	15.6
December	96	12.8	204	18.8

Dust Monitoring 2024				
	Monthly Air Quality Monitoring Data		Monthly Air Quality Monitoring Data	
	In Station		Out Station	
	Max	Average	Max	Average
Month				
January	147	14.9	179	16.4
February	92	17.3	178	20.4
March	90	18.6	177	20.0
April	62	12.5	145	24.0
May	102	11.9	148	25.4
June	56	10.1	41	10.4
July	158	12.4	11	2.8
August	169	18.9	19	11.8
September	5644	18.6	14	4.4
October	102	17.4	41	11.4
November	296	14.6	18	10.6
December	121	17.2	14	2.3

Figure 41