



Independent Environmental Audit Report

Kings Park Waste Facility – SSD 5041
Sell & Parker Pty Ltd

Project Phase: Operation

Audit No. 4



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Statement of Limitations

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WDEC Contact Details

Company Name:	WD Environmental Consulting Pty Ltd
ABN:	91 675 295 646
Postal Address:	PO Box 4013, Guildford West NSW 2161
Email:	info@wdenvironmental.com.au
Phone	+61 421 941 563

Document Quality Control

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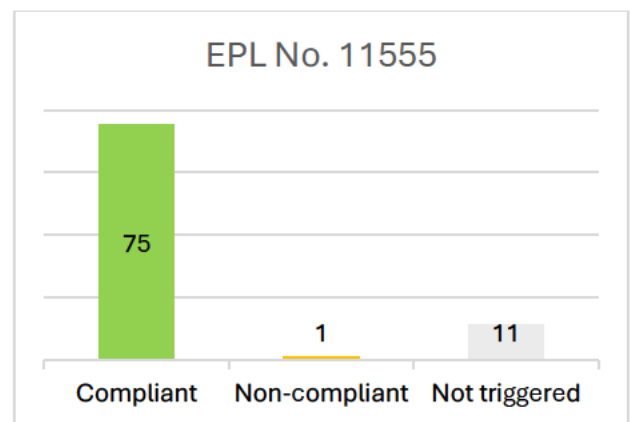
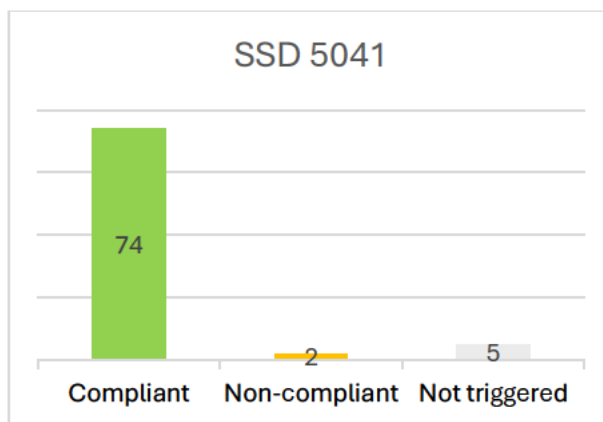
Executive summary

WD Environmental Consulting Pty Ltd (WDEC) was engaged by Sell & Parker Pty Ltd (the Proponent) to conduct this Independent Environmental Audit for the site located at 23-43 and 45 Tattersall Road, Kings Park NSW 2148 (the Site).

The approved project (SSD 5041) as modified (Mod 1-3), includes increasing the processing capacity of the existing metal recycling facility, including reconfiguration and expansion of the facility into the adjoining site at 23-43 Tattersall Road, Kings Park.

This Audit has been prepared to provide an independent and objective assessment of the environmental performance and compliance status of the operational phase of the approved project. This audit covers the period from the last audit (20 September 2022) to 10 July 2025.

This Independent Environmental Audit was conducted in accordance with the requirements of the Department of Planning and Environment (the Department) 2020 document titled 'Independent Audit Guideline Post Approval Requirements'. The Audit assessed the environmental performance and compliance status of the operational phase of the project including both the conditions of approval and Environmental Protection Licence (EPL) No. 11555.



A summary of the Audit findings is provided as follows:

- There were 81 conditions of approval and 86 EPL conditions assessed.
- There were two (2) non-compliances identified against the SSD 5041 conditions and one (1) against the EPL conditions. Noting that the EPL non-compliance repeats the same aspect identified in the SSD conditions (see SSD5041_IEA04_NC01) which means there were two (2) discrete non-compliances identified (see Table 7).
- There was one (1) recommendation identified against the conditions of approval and the EPL in relation to chemical storage (see Table 8).
- Five (5) of the conditions of approval assessed were not triggered during the operation phase.

- 11 of the EPL conditions assessed were not triggered during the operation phase.
- The Proponent was compliant with the remaining 74 conditions of approval and 75 EPL conditions triggered during the operational phase.
- The Proponent has satisfactorily closed out all non-compliances and recommendations from the previous Independent Audit (Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)).
- During the audit period there was one (1) incident and 6 complaints associated with the operation of the project.

The nature of the works and associated environmental impacts undertaken during the audit period appears to be consistent with those predicted in the EIS (including the physical extent).

1. Introduction

1.1 Project background

The approved project (SSD 5041) allows for an increase in the processing capacity of the existing metal recycling facility, including reconfiguration and expansion of the facility into the adjoining site at 23-43 Tattersall Road, Kings Park in the Blacktown City Council (BCC) local government area (LGA).

The expanded facility can receive, process and recycle up to 350,000 tonnes per annum of scrap metal. The development also increased and improved its recovery performance, including ferrous metals (i.e. containing iron), aluminium and small quantities of other metals such as copper (i.e. non-ferrous metals). Up to 6,000 tonnes per month of waste material is generated as a by-product of the process, consisting of mixed plastics, particulates, glass and foam from car bodies and building materials, known as shredder floc, which would be stored within an enclosed building.

The site is made up of two lots, which are legally known as Lot 5, DP 7086 (45 Tattersall Road) and Lot 2, DP 550522 (23-43 Tattersall Road). The site is approximately 6.1 hectares (ha) in area and has a primary frontage of about 246 metres (m) to Tattersall Road, with rear boundaries of both sites backing onto Breakfast Creek. Access to the site is off Tattersall Road, which connects to Sunnyholt Road, is a regional road connecting to the M7 motorway (DPE, November 2015).

At 45 Tattersall Road, the existing operation recovers metal for recycling through the operation of a 50-tonne hammermill, an 800 tonne metal shear and 1 oxyacetylene torch. The hammermill is a revolving mill that pounds scrap metal into small fragments. The shear is a blade which cuts metal objects that are too large for the hammermill, while the oxy-acetylene torch cuts metal objects that are too large for the shear.

Non-ferrous scrap metal such as aluminium or copper is also delivered to the site. This scrap metal is stockpiled before being transported off site in bulk.

In addition to the metal processing equipment, the existing site includes administrative buildings, (limited) car parking, two weigh bridges, maintenance facilities, recovered product stockpiles, a waste enclosure, a water treatment system and a stormwater detention basin.

The site's locational context is shown at Figure 1.



Figure 1: Site Location

Source: Waste Metal Recovery, Processing and Recycling Facility Expansion, Tattersall Road, Kings Park, Blacktown Environmental Impact Statement (ERM July 2014)

The approval and operation are being managed by Sell & Parker Pty Ltd (the Proponent).

1.2 Approvals requirement

Part C, Condition C9 of Schedule 2 of SSD 5041 sets out the requirement for undertaking the Independent Environmental Audit (IEA). The Department noted in their approval of the Auditor (NSW Planning ref: SSD-5041-PA-12) that the Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the Independent Audit Post Approval Requirements (2020).

1.3 Independent Auditor

In accordance with Schedule 2, Condition C9 of SSD 5041 and Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced, and independent of the Project, and appointed by the Planning Secretary.

The Audit Team comprises:

- Wayne Duffy (Auditor Lead): Bachelor of Applied Science, Exemplar Global Certified Lead Auditor/Environmental Management Systems Auditor (Certificate No C-472516).

Approval of the Audit Team was provided by the Department on 17 June 2025 (NSW Planning ref: SSD-5041-PA-12). The approval is presented in **Appendix B**.

1.4 Audit objectives

The objective of this Independent Audit is to satisfy SSD 5041 Schedule 2, Condition C9, which states:

- assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);
- review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and
- recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

As noted above, the Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the Independent Audit Post Approval Requirements (2020).

The IAPAR sets out the scope, methodology and reporting requirements for the Independent Audit.

This operational Independent Audit seeks to fulfil the requirements of Condition C9, to verify compliance with the relevant conditions, and assess the effectiveness of environmental management on the Project using the scope, methodology and reporting requirements from the IAPAR.

1.5 Audit scope

This Audit Report relates to the fourth IEA on the Project and is the second operational IEA. This Audit covers the 'audit period' from the previous Audit to the date of this Audit (20 September 2022 to 10 July 2025)

The scope of the Independent Audit comprises an assessment of compliance with:

- All conditions of consent applicable to the phase of the development that is being audited (i.e., Operational).
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997* – [EPL No. 11555](#).
- A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - Actual impacts compared to predicted impacts documented in the environmental impact assessment.
 - The physical extent of the development in comparison with the approved boundary.
 - Incidents, non-compliances and complaints that occurred or were made during the audit period.

- The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit.
- Feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee (if there is one for the Project), on the environmental performance of the project during the audit period.
- The status of implementation of previous Independent Audit findings, recommendations and actions, if any.
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.6 Independent Audit Report

This Independent Audit Report has been prepared in accordance with the IAPAR. To assist the reader, below provides a roadmap of the audit report and findings in accordance with Section 4.2.3 of the IAPAR.

Table 1: IAPAR Audit Report & Findings Set Out

Requirement (Section 4.2.3)	Relevant Section
1. A list of the approvals and documents audited.	Sections 2.1, 3.1 & Appendix A
2. A summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements.	Executive summary Sections 1.1.1 & 4
3. A summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period.	Section 3.3
4. Exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance.	Section 3.9.3
5. A brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 3.4
6. A brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement.	Section 3.2

Requirement (Section 4.2.3)	Relevant Section
7. A discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.	Section 3.8
8. Documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation.	Section 2.4
9. A summary of complaints, and the adequacy of the response to, and management of complaints.	Section 3.5
10. Details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents.	Section 3.6
11. An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the <i>Environmental Planning and Assessment Act 1979</i> .	Section 3.9.5
12. Evidence collected through site inspections undertaken during the audit.	Sections 2.7, 2.8 and 3.7
13. Evidence to support compliance assessment provided by the personnel interviewed during the audit.	Sections 2.7, 2.8 and 3.7
14. A brief discussion of any continual environmental management improvement opportunities identified as part of the audit.	Section 3.9.4
15. Key strengths of the development's environmental management and performance identified by the auditor.	Section 1.1.1 and 3.9.2

2. Audit methodology

2.1 Independent Audit scope development

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR.

Specifically, the scope for the Independent Environmental Audit involved:

- The Auditor performing a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the Independent Audit.
- A site-based audit and interviews with staff.
- Preparation of this audit report detailing the findings of the Audit.

The primary documents reviewed prior to and after the site visit are as follows:

- EIS prepared by ERM dated July 2014.
- Modification Assessments (Mod 1, 2 and 3).
- State Significant Development SSD 5041, Kings Park Waste Facility consent (approved 12 November 2015), updated to include Mod 1-3 (final determination date 29 May 2019).
- NSW EPA Environmental Protection Licence No. 11555 (version date: 22 February 2022)

Additional documents sighted are identified in the Audit Compliance Table in Appendix A.

2.2 Compliance evaluation

The assessment of compliance with development consent conditions applicable to the operation phase of the project is presented in the Audit Compliance Table in Appendix A and discussed in Section 3 of this report.

An assessment of compliance with the conditions of approval of SSD 5041 was undertaken through:

- Evidence-based evaluation including review of verifiable evidence such as site records, environmental management plans and sub-plans, monitoring records, and other project documents.
- Evaluation of the adequacy of post approval documents and compliance with these documents.
- Review of relevant environmental monitoring records, site records and documents sighted during the audit process.

2.3 Previous audit status evaluation

This Audit also included reviewing and evaluating the status of actions from the previous audit (Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022). This evaluation included

reviewing the actual close out evidence presented by the Proponent during the audit process. The findings of this evaluation are detailed in Section 3.4.

2.4 Consultation

WDEC consulted with the Department, the relevant local council and the NSW EPA to obtain their input into the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix C. A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 2.

Table 2: Key issues and areas of focus raised during consultation

Stakeholder	Issue/Focus
Department of Planning, Housing and Infrastructure	Due to previous noise complaints, please review the operational noise impact/s and compliance with operational hours for the reporting period.
Blacktown City Council (the Council)	Satisfied with the highlighted points, in particular the review of complaint data and response.
NSW EPA	A review of EPA records shows that for the 2024-2025 annual reporting period, there was one licence non-compliance reported by the licensee in its annual return. This was a non-compliance of licence condition L7.2 on two occurrences with an exceedance of the air blast overpressure level. The EPA received several complaints about alleged noise coming from the premises from members of the community during this reporting period.

2.5 Site personnel involvement

Table 3 below summarises the name, roles and company of the personnel who participated in the Audit.

Table 3: Audit participation

Name	Position	Company	Opening Meeting	Site Inspection	Other (specify)	Closing Meeting
Howard Richards	Group Environment Manager (GEM)	Sell & Parker	Yes	Yes	N/A	Yes
Neil Sher	Group General Counsel	Sell & Parker	Yes	Yes	N/A	Yes
Jordon Rodgers	Group Property & Development Manager	Sell & Parker	No	No	N/A	No
Joel Spackman	Store man	Sell & Parker	No	Yes	N/A	No
John Millar	Maintenance Manager	Sell & Parker	No	Yes	N/A	No
Brad Scobie	Site Manager	Sell & Parker	No	Yes	N/A	No
Sukh Chandi	Recovery Supervisor	Sell & Parker	No	Yes	N/A	No
Kairon Buhagiar	Transport & Fleet Scheduler	Sell & Parker	No	No	SME	No
Matthew Goldstone	Ferrous Production Manager	Sell & Parker	No	No	SME	No
Linda Pannowitz-Lindsay	Maintenance Administrator	Sell & Parker	No	No	SME	No

SME – Subject Matter Expert called in to provide evidence on relevant audit questions.

2.6 Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting, held on site on 10 July 2025, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

At the closing meeting, held on 10 July 2025, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, timing for finalisation of the audit report and any post-audit actions were confirmed.

2.7 Site interviews

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which

included detailed requests for information and auditee responses to the request. Interviews were conducted at the site meeting held on 10 July 2025.

2.8 Site inspection

The on-site audit activities took place on 10 July 2025. The on-site audit included an inspection of the operational work areas and work activities being carried out. Photos are presented in [Appendix F](#).

2.9 Compliance status descriptors

The Auditor determined the compliance status of each compliance requirement in the Audit Table found in [Appendix A](#), using the descriptors from Table 2 of the IAPAR, as listed in Table 4, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the Audit.
Non-Compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the Audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the Audit is undertaken, therefore an assessment of compliance is not relevant.

2.10 Finalising the Audit

The Independent Audit Report was distributed to the Proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3. Audit findings

3.1 Approval audited

The documents audited comprised all the conditions from SSD 5041 applicable to the operations being undertaken. The evidence sighted against each requirement is detailed within Appendix A.

3.2 EMP, sub-plans and compliance documents

The adequacy of post approval documents must be determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document.
- Whether there are any opportunities for improvement.

A review was conducted of the:

- Operational Environmental Management Strategy
- Air Quality Management Plan
- Noise Management Plan
- Water Management Plan
- Waste Monitoring Management Plan
- Landscape Management Plan
- Emergency Response Plan

At the time of the audit inspection the site environmental risks were generally being appropriately managed by the Proponent.

The Auditor recommends that the Sub-Plans should be reviewed by the Proponent in accordance with Condition C12 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. This review should also take into account any relevant requirements or outcomes of the non-conformances and observations identified Section 3.9.

3.3 Notices, orders, penalties and prosecutions

To the Auditor's knowledge no formal notices were issued by the Department associated with SSD 5041 or the NSW EPA associated with EPL No. 11555 during the audit period.

3.4 Actions from previous audits

The Auditor assessed the status of the actions from the previous audit (Kings Park Environmental Audit Report Rev 0.1, JBS&G, dated 15 December 2022). Findings of this assessment are found within Table 5 below.

Table 5: Status of previous audit findings

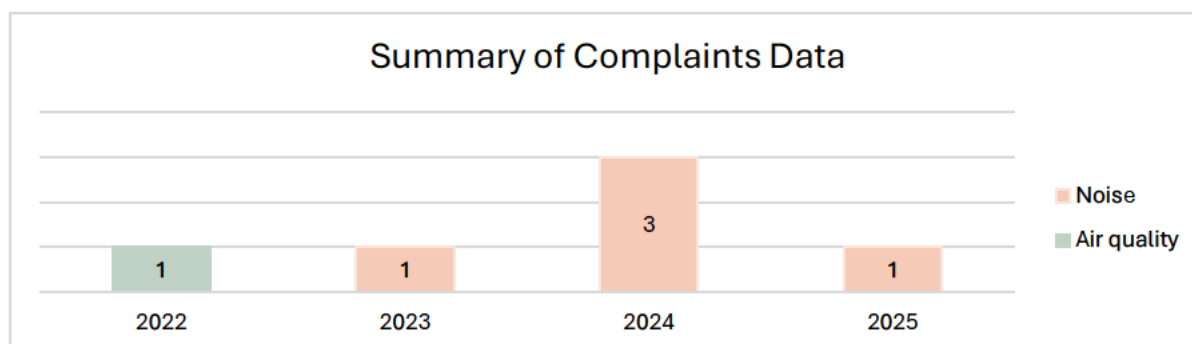
NC No. / Rec. No.	Ref.	Type	Summary of Findings	Auditor Comments	Status
N/A	N/A	Non-compliance	No non-compliances were identified in the previous audit.	Noted.	N/A
N/A	N/A	Recommendation	JBS&G are aware that a new modification to the development consent is currently being actioned through the planning process. Once approved, all management plans should be revised to ensure any new requirements have been incorporated into site practices.	The management plans were reviewed by the Proponent and determined that no changes were necessary.	Closed

3.5 Complaints

A complaints register is being maintained for the Project and is uploaded to the Sell 7 Parker website.

Noise complaints associated with operation were raised by the Department, NSW EPA and the Blacktown City Council as an issue of concern during consultation on the Audit scope.

There have been complaints associated with the operation of the project (SSD-5041) during the audit period summarised by category below. Each complaint was investigated and appropriately responded to by the Proponent. Details of these complaints and the Proponents response can be found on the Sell & Parker complaints register that is available to the public via their website.



3.6 Incidents

The Proponent identified a single incident, as defined by the consent, which occurred during the audit period. This was related to a fire on site (27 November 2022) which was reported to the Secretary in accordance with Condition C7 of the project approval and to the NSW EPA in accordance with Condition R2.1 of the EPL.

Further information on the fire incident is detailed within Appendix A.

3.7 Site inspection and interviews

Various areas of the operational site were visited as part of the accompanied site inspection on 10 July 2025. The site interviews occurred at various work sites during the site inspection. Table 6 provides a summary of the site inspection locations and interviewees. The attendees and interviewees were cooperative and appeared to be knowledgeable and appropriately experienced for their roles.

Table 6: Site Inspection Locations, Attendees and Interviewees

Site Location	Name	Role
Whole of site inspection, including full perimeter and accessible areas	Howard Richards	Group Environment Manager
Site office and parking area	Brad Scobie	Site Manager
Public drop-off location	Neil Sher	Group General Counsel
Entry and exit weighbridge		
Truck entry and exit points		
Middle weighbridge and inspection area		

Site Location	Name	Role
Non-ferrous separation area		
Oxy cutting area		
Chemical storage area		
Danieli Shear		
Water treatment system and basin		
Floc shed	Sukh Chandi and those above	Recovery Supervisor
Maintenance workshop	Joel Spackman John Millar and those above	Store man Maintenance Manager

3.8 Other relevant matters

During consultation, the Department requested the issues detailed in Section 2.4 for inclusion within the scope of the Audit. These requirements have been addressed, where relevant to the operational phase of the development, throughout this Audit Report (see **Table 2**). There were no other matters considered relevant by the Auditor.

3.9 Compliance performance

This section, including **Table 7** and **Table 8** present the compliance and observations, including actions in response to each of the findings, from the Independent Audit.

Detailed findings against each requirement are presented in **Appendix A**.

In summary:

- There were 81 conditions of approval and 86 EPL conditions assessed.
- There were two (2) non-compliances identified against the SSD 5041 conditions and one (1) against the EPL conditions. Noting that the EPL non-compliance repeats the same aspect identified in the SSD conditions (see SSD5041_IEA04_NC01) which means there were two (2) discrete non-compliances identified (see **Table 7**).
- There was one (1) recommendation identified against the conditions of approval and the EPL in relation to chemical storage (see **Table 8**).
- Five (5) of the conditions of approval assessed were not triggered during the operation phase.
- 11 of the EPL conditions assessed were not triggered during the operation phase.
- The Proponent was compliant with the remaining 74 conditions of approval and 75 EPL conditions triggered during the operational phase.

Table 7: Summary of Non-Compliances

Non-Compliance ID	SSD Cond.	EPL Cond.	Audit Finding	Recommendation
SSD5041_IEA04_NC01	B25	L7.1	The Proponent noted exceedances of the 120dB (Lin Peak) associated with the Development in the last three Annual Returns supplied to the NSW EPA and available on their EPL Register website.	No further actions recommended, as noted in the Audit findings, the Proponent appears to be undertaking all reasonable and feasible measures necessary to prevent explosions occurring at the premises.
SSD5041_IEA04_NC02	C12	-	The Proponent did not demonstrate they had undertaken a review, and if necessary, revise their strategies, plans, and programs required under this consent as triggered by the C7 fire incident report (2 December 2022).	The Proponent is to advise the Department how they will address this non-compliance.

Table 8: Summary of Recommendations

Recommendation ID	SSD Cond.	EPL Cond.	Audit Finding	Recommendation
SSD5041_IEA04_REC01	B10	O5.3	<p>During the site inspection it was noted that:</p> <ul style="list-style-type: none"> The operational work areas that present the highest risk from the potential release of chemicals are effectively self-contained, with all water in these areas captured and treated onsite. Water is reused onsite or disposed of in accordance with Sydney Water Trade Waste Agreement. Spill response kits were available across the site. One was low on stock (but not empty). Chemical storage lockers were located across the site. The gensets and lube station were self-bunded. The retractable hoses for dispensing the product at the lube station sits within a small, covered shed. There is evidence of staining in and adjacent to the concrete bund below the hoses. An IBC of hypochlorite solution was located on a bund adjacent to the water treatment area with a deluge safety shower and eyewash located in close proximity. The bund and IBC is located on an unlevel concrete slab which would reduce its effective storage capacity. The chemical is also stored within a trafficable area without any protection from potential mechanical damage. These present a risk of potential uncontrolled discharge to the self-contained site. The oil store is a covered and concrete bunded area. IBCs and smaller containers of mixed chemicals are stored within the bunded and covered area. There was some evidence of staining on the concrete outside the bund and there was damage to the raised lip of the bund (noting that there is a sump area below the raised lip of the bund). Spill response kits were located adjacent to the oil store. 	<ul style="list-style-type: none"> A site wide review of its chemical storage against the requirements of the relevant Australian Standards and the NSW EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007. The Proponent is to take appropriate action based on the outcomes of the review. Inspect and re-stock spill response kits as appropriate across the site. Ensure areas where chemicals are in use or are dispensed, such as the lube station dispensing area are inspected and appropriately cleaned. This may form part of the review of chemical storage.

3.9.1. Environmental performance

Overall, the Proponent has demonstrated that their environmental performance was effective at managing the environmental risks. As described in Section 3.4 above, the Proponent was able to demonstrate the effective close-out of actions from the previous independent audit (Kings Park Environmental Audit Report Rev 0.1, JBS&G, dated 15 December 2022).

3.9.2. Key strengths

Overall, the Proponent demonstrated a high level of management pertaining to their key operational risks, including:

- Appropriate segregation and management of imported recyclable metals, shredder floc waste and hazardous material (e.g. gas cylinders), This was demonstrated to the Auditor during the documentation review and the site inspection components of the audit.
- The systems and implantation of the maintenance of plant and equipment was noted to be of a high standard. This included a good understanding from on-site and office-based workers on implementing the systems.
- The water management system was well maintained and operational.
- In conjunction with the efforts to segregate incoming product, the Proponent was able to demonstrate management processes to minimise the potential for fires and had significant infrastructure in place for early detection of fires and firefighting.
- The GEM was able to demonstrate a good working knowledge of the environmental systems and requirements.

3.9.3. Exception reporting

The Audit identified that the Proponent was generally undertaking their operations in accordance with the project approval and the premises EPL. The compliance outcomes are summarised below:

- There were eighty-one (81) SSD 5041 conditions of approval and eighty-six (86) EPL No. 11555 conditions assessed.
- There were two (2) non-compliances identified against the SSD 5041 conditions and one (1) against the EPL conditions. Noting that the EPL non-compliance repeats the same aspect identified in the SSD conditions (see SSD5041_IEA04_NC01) which means there were two (2) discrete non-compliances identified (see Table 7).
- There was one (1) recommendation identified against the conditions of approval and the EPL in relation to chemical storage (see Table 8).
- Five (5) of the conditions of approval assessed were not triggered during the operation phase.
- 11 of the EPL conditions assessed were not triggered during the operation phase.
- The Proponent was compliant with the remaining 74 conditions of approval and 75 EPL conditions triggered during the operational phase.

3.9.4. Improvement opportunities

During the site inspection it was noted that the Proponent had implemented measures to manage chemical storage onsite and ensure that response measures were available onsite in the event of a spill or leak of chemicals. This includes containing all water within the high-risk operational areas for treatment and reuse or disposal in accordance with Sydney Water Trade Waste Agreement (only excluding the lower risk carpark catchment, which is immediately adjacent to the site office).

The Auditor identified improvement opportunities associated with chemical storage and spill response including recommending the Proponent consider undertaking:

- A site wide review of its chemical storage against the requirements of the relevant Australian Standards and the NSW EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007. The Proponent is to take appropriate action based on the outcomes of the review.
- Inspect and re-stock spill response kits as appropriate across the site.
- Ensure areas where chemicals are in use or are dispensed, such as the lube station dispensing area are inspected and appropriately cleaned. This may form part of the review of chemical storage.

3.9.5. Actual verses predicted environmental impacts

The potential impacts identified in the EIS were subsequently pulled into Appendix B of the conditions of approval. The potential impacts were derived from a range of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project.

A full assessment of the accuracy of these predictions would likewise require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the operational requirements specified in the conditions, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Environmental Audit. Any such comparison made by the Auditor is qualitative only. Table 9 below provides a summary of the qualitative assessment made by the Auditor of the predicted environmental impacts from the EIS versus actual impacts noted on the project.

Table 9: Predicted vs actual environmental impacts

Environmental Aspect	Predicted Impact	Auditor Assessment
Physical extent of the development	The boundary of the operational area from the approval is shown in Figure 1.	The area of operation appears to match the footprint as described in the EIS. The extent of the operation can be seen in Figure 1 and 2.
Acoustics	Noise and vibration impacts to nearby commercial premises during construction and operation.	The Proponent was managing the predicted noise and vibration impacts from in accordance with the Noise Management Plan. Complaints data confirms that noise remains an ongoing management requirement at the site. However, the relative reduction noise complaints for each consecutive year also indicate appropriate management by the Proponent.

Environmental Aspect	Predicted Impact	Auditor Assessment
Air Quality	Potential localised air quality impacts associated with increased concentrations of TSP at nearby commercial and residential locations.	The Proponent was managing the predicted air quality impacts in accordance with the Air Quality Management Plan. There was no evidence of fugitive dust emissions being produced at the time of the audit site inspection with dust controls being applied. There has not been an air quality complaint raised since 2022, which the Proponent was unable to identify as being associated with their operations.
Soil and Water	Potential impacts include: <ul style="list-style-type: none"> accidental release/spillage of contaminants and wastewater generated on-site; earthworks resulting in potential erosional impacts; and impacts to water balance as a result of the expansion 	The Proponent was managing the predicted soil and water impacts in accordance with the Air Quality Management Plan. The water management system was well maintained and operational. The operational work areas that present the highest risk from the potential release of chemicals are effectively self-contained, with all water in these areas captured and treated onsite. Water is reused onsite or disposed of in accordance with Sydney Water Trade Waste Agreement.
Contaminated Land	Potential risks to human health and the environment resulting from exposure to historical contamination during ground intrusive works.	The Proponent advised that no unexpected finds of contamination had been identified during the audit period. There were no ground penetrating activities being undertaken on the day of the audit inspection.
Fire and Incident	Floc material has been identified as a potential source of fire. Any uncontrolled leaks or spills have the potential to contaminate soils within unsealed sections of the site, or be entrained in stormwater flow to the detention basin at the rear of the site. Overflow of potentially contaminated water from the detention basin, has the potential to detrimentally impact on Breakfast Creek.	Shredder floc material was being appropriately managed to minimise the potential for fire at the time of the audit inspection. See Appendix A, condition B35 for further details. The water management system was well maintained and operational. There was no evidence of overflow from the detention basin to Breakfast Creek at the time of the audit inspection.
Waste Management	Potential impacts include: <ul style="list-style-type: none"> excessive waste being directed to landfill; various types of waste being generated and stored onsite, with the 	The Proponent was managing the predicted waste impacts in accordance with the Waste Monitoring Management Plan. Appropriate segregation of waste was identified throughout the operational areas during the audit site inspection.

Environmental Aspect	Predicted Impact	Auditor Assessment
	<p>potential for misclassification;</p> <ul style="list-style-type: none"> contaminated waste not being correctly stored or disposed; off-site impacts to soil and/ or water and/or groundwater. 	

The nature of the works and associated environmental impacts undertaken during the audit period appear to be consistent with those predicted in the EIS.

306360E

306450E

306540E

306630E

306720E

6263730N

6263640N

6263550N

6263460N

6263730N

6263640N

6263550N

6263460N

- 1 Retained Vegetation (front)
- 2 Water basin
- 3 Water Treatment System
- 4 Retained vegetation (rear)
- 5 Site Office
- 6 Onsite parking
- 7 Fire fighting water tanks
- 8 Weighbridge (entry)
- 9 Truck Entrance
- 10 Truck Exit
- 11 Wheelwash
- 12 Weighbridge (exit)
- 13 Non-ferrous separation
- 14 Covered conveyors
- 15 Middle weighbridge & inspection area
- 16 Flocc shed
- 17 Air scrubber
- 18 Air Emission Scrubber
- 19 Maintenance workshop
- 20 Water misting cannon
- 21 Oxy cutting (single operator)
- 22 Non-ferrous Processing
- 23 Boundary noise wall (east)
- 24 Fire suppressant
- 25 Boundary noise wall (west)
- 26 Backup Diesel Generators
- 27 Oil store
- 28 Lube station
- 29 Met station
- 30 Public drop-off
- 31 Danielli Shear
- 32 Segregated specialty metal
- 33 Segregated gas cylinders
- 34 Traffic control & Inspection
- 35 Material segregation observed
- 36 Material segregation observed
- 37 Material segregation observed
- 38 Material segregation observed
- 39 Treated water tanks
- 40 Misting sprays observed
- 41 Material segregation observed
- 42 Dust suppression observed
- 43 Dust suppression observed
- 44 Public Signage
- 45 Truck Signage
- 46 Stg 2 water filtration



Title:	Sell & Parker Kings Park Facility Audit No. 4 (SSD-5041)
Project ID:	WDEC028
Project Location:	23-43 and 45 Tattersall Road, Kings Park Lot 2 DP 550522 and Lot 5 DP 7086
Figure Number:	02
Client:	Sell & Parker Pty Ltd
Map Scale:	1:2,000
CRS:	GDA2020 / MGA zone 56
Source:	SixMaps & MetroMaps (2025)
Prepared By:	Wayne Duffy
Date:	05/08/2025
Revision:	DRAFT

Legend

Site Boundary

Points of Interest

- 🌳 Landscaping
- 🚗 Parking
- 🌬️ Air Quality
- ♻️ Material Management
- 💧 Water Quality
- 🏠 Structure
- 🔊 Noise Management
- 🧪 Chemical Storage
- 🔥 Fire Management

All extents and locations are approximate

4. Conclusions

This Audit Report presents the findings of the Independent Environmental Audit for the operation phase 20 September 2022 to 10 July 2025.

Although there were some administrative non-compliances, the overall outcome of the Independent Audit demonstrated that the Proponent's environmental performance was managing the environmental risks of the operation.

The Proponent was able to provide compliance records and made them available to the Auditor at the time of the site interview and remotely. The relevant personnel associated with the project were available on the day of the Audit and were cooperative and appeared to be knowledgeable and appropriately experienced for their roles.

Except for the noise monitoring associated with condition B26 and EPL condition L7.1, relevant environmental and compliance monitoring records were being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

In summary:

- There were 81 conditions of approval and 86 EPL conditions assessed.
- There were two (2) non-compliances identified against the SSD 5041 conditions and one (1) against the EPL conditions. Noting that the EPL non-compliance repeats the same aspect identified in the SSD conditions (see SSD5041_IEA04_NC01) which means there were two (2) discrete non-compliances identified (see Table 7).
- There was one (1) recommendation identified against the conditions of approval and the EPL in relation to chemical storage (see Table 8).
- Five (5) of the conditions of approval assessed were not triggered during the operation phase.
- 11 of the EPL conditions assessed were not triggered during the operation phase.
- The Proponent was compliant with the remaining 74 conditions of approval and 75 EPL conditions triggered during the operational phase.
- The Proponent has satisfactorily closed out all non-compliances and recommendations from the previous Independent Audit (Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)).
- During the audit period there was one (1) incident and 6 complaints associated with the operation of the project.

The nature of the works and associated environmental impacts undertaken during the audit period appears to be consistent with those predicted in the EIS (including the physical extent).

The Auditor would like to thank the auditees from Sell & Parker for their cooperation and openness during the Independent Audit.

5. Appendices

[Appendix A](#) – Independent Audit Checklists

- Conditions of Approval SSD 5041
- Environmental Protection Licence (EPL No. 11555)

[Appendix B](#) – Planning Secretary Audit Team Agreement

[Appendix C](#) – Consultation

[Appendix D](#) – Independent Audit Declaration Form

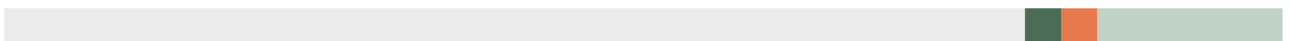
[Appendix E](#) – Technical Specialists Reports

[Appendix F](#) – Site Inspection Photographs


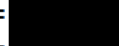


Appendix A

Independent Audit Checklists

Conditions of Approval SSD 5041
Environmental Protection Licence (EPL No. 11555)



Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
	SCHEDULE 2 - PART A - ADMINISTRATIVE CONDITIONS				
	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
A1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Development.	See evidence collected throughout the audit.	See the results of the audit below.	Compliant	
	TERMS OF CONSENT				
A2	The Applicant shall carry out the Development in accordance with the: (a) EIS prepared by ERM dated July 2014; (b) Response to Submissions report prepared by ERM dated 7 January 2015; (c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015; (d) Supplementary Response to Submissions prepared by Sell and Parker Pty Ltd dated 3 September 2015; (e) Modification Assessments (f) Site layout plans and drawings (See Appendix A); (g) Management and Mitigation Measures (see Appendix B).	N/A	See commentary in the compliance tables and the report.	Compliant	
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.		The Proponent confirmed that there have not been any inconsistencies.	Compliant	
A4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Department of Planning, Housing and Infrastructure, 1 July 2025)	Sell & Parker confirmed that Secretary had not requirements in relation to Condition A4. The Department did not raise any issues in relation to Condition B4 in consultation regarding the development of this audit scope.	Compliant	
	STATUTORY REQUIREMENTS				
A5	The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.	EPL No. 11555 (Licence version date: 22-Feb-2022) Sydney Water Trade Waste Agreement (Consent No. 39940) - 30/4/25 Consent to Discharge Industrial Trade Wastewater - Sample Analysis Report (39940) (Sell & Parker, 13/05/2025)	Sell & Parker holds the following licences and agreements: A current NSW EPA EPL for scrap metal processing and waste storage (EPL No. 11555) A Sydney Water Trade Waste Agreement (Consent No. 39940) to dispose of treated water to sewer.	Compliant	
	BUILDING CODE OF AUSTRALIA				
A6	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i> .	Occupation Certificate No. D2016-002 for SSD 5041 (Technical Inner Sight, 27 August 2018)	Sell & Parker provided a copy of the Occupation Certificate (OC) which is provided by the Independent Certifier. The OC confirms the building is suitable for occupation or use in accordance with its	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			classification under the Building Code of Australia.		
	LIMITS OF CONSENT				
	Waste limits				
A7	The Applicant shall not receive or process on the site more than 350,000 tonnes per calendar year of waste, subject to Condition A8.	NSW EPA WARRP Site online report: WARRP 2021-2022, 2022-2023, 2023-2024 Report (Online) Weighbridge Calibration Exit weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 97456 2444 878 (SSS Weighbridge Specialists, 8 May 2025) Inwards weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 102830 2444 878 (SSS Weighbridge Specialists, 8 May 2025)	Sell & Parker provided the annual waste reports which confirmed the volumes of waste received at the premises per year (during the Audit period) were compliant with the threshold of 350,000 tonnes per year. The tonnages reported for each year were: 2021/22 =  2022/23 =  2023/24 =  Weighbridge calibration records were in date confirming the accuracy of the data collected.	Compliant	
A8	Despite Condition A7, the Applicant shall not receive or process on the site more than 90,000 tonnes per calendar year of waste (on a weekly pro-rata basis) until: a) the Emissions Collection System for the hammer mill has been commissioned in accordance with Condition B20 and approved by the Secretary for operation; and b) a Final Occupation Certificate has been issued for the Development.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Not triggered	
A9	In deciding whether the grant approval to operate the Emissions Collection System for the hammer mill in accordance with Condition A8, the Secretary shall take into account the Commissioning Report submitted in accordance with Condition B21.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Not triggered	
A10	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Scrap Assist online (10/7/25)	During the audit, Sell & Parkers Transport & Fleet Scheduler demonstrated the Scrap Assist program. During this demonstration the details of the waste received in tonnes for the day were noted as:  (at the time of viewing)	Compliant	
	Waste type				
A11	The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	NSW EPA WARRP Site online report: WARRP 2023-2024 Report (Online) and EPA Annual Returns.	Sell & Parker provided the annual waste reports which confirmed the types of waste met the requirements of the EPL. During the site inspection only waste permitted by the EPL was observed onsite.	Compliant	

Conditions of Approval – SSD-5041																					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																
	DEMOLITION																				
A12	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	NearMaps aerial photos from November 2022 through to May 2025	The Proponent confirmed there has been no demolition required. A review of the NearMaps aerial photos confirmed that there did not appear to be any demolition undertaken during the audit period.	Compliant																	
	SURRENDER OF CONSENT																				
A13	<p>In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant shall and in the manner prescribed by clause 97 of the Regulation, surrender the development consents described in Table 1 within 14 days of the issue of a Construction Certificate for the Development.</p> <p>Table 1 – Consents to be surrendered</p> <table><tr><th colspan="2">Development Application No. DA-96-305</th></tr><tr><td>Land description</td><td>45 Tattersall Road, Kings Park</td></tr><tr><td>Development Description</td><td>Metal recycling facility on the southern portion of the site.</td></tr><tr><td>Date</td><td>27 November 1996</td></tr><tr><th colspan="2">Development Application No. 10204 of 2000</th></tr><tr><td>Land description</td><td>45 Tattersall Road, Kings Park</td></tr><tr><td>Development Description</td><td>Establishment of a hammermill and associated components and an approved handling capacity of 60,000 tpa on the northern portion of the site.</td></tr><tr><td>Date</td><td>11 May 2001</td></tr></table>	Development Application No. DA-96-305		Land description	45 Tattersall Road, Kings Park	Development Description	Metal recycling facility on the southern portion of the site.	Date	27 November 1996	Development Application No. 10204 of 2000		Land description	45 Tattersall Road, Kings Park	Development Description	Establishment of a hammermill and associated components and an approved handling capacity of 60,000 tpa on the northern portion of the site.	Date	11 May 2001	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
Development Application No. DA-96-305																					
Land description	45 Tattersall Road, Kings Park																				
Development Description	Metal recycling facility on the southern portion of the site.																				
Date	27 November 1996																				
Development Application No. 10204 of 2000																					
Land description	45 Tattersall Road, Kings Park																				
Development Description	Establishment of a hammermill and associated components and an approved handling capacity of 60,000 tpa on the northern portion of the site.																				
Date	11 May 2001																				
	STAGED SUBMISSION OF PLANS OR PROGRAMS																				
A14	With the approval of the Secretary, the Applicant may: a) submit any strategy, plan or program required by this consent on a progressive basis; and/or b) combine any strategy, plan or program required by this consent.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant																	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
A15	<p>Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall continue to implement existing strategies, plans or programs for operations on site that have been approved by previous consents or approvals.</p> <p>Note:</p> <ul style="list-style-type: none"> •If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program. •There must be a clear relationship between the strategy, plan or programs that are to be combined. 	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	OPERATION OF PLANT AND EQUIPMENT				
A16	<p>The Applicant shall ensure that all plant and equipment used for the Development is:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p>	<p>FIIX maintenance system (online). PC and Phone App Service Record Spreadsheet (Sell & Parker, 2025)</p> <p>F-93 Battery Forklift: Daily Pre-start (10/7/2025) Service Report (Linde, 1/5/2025) Scheduled Maintenance for 500hrs.</p> <p>L-9 Danieli Shear Work Instruction: Blade Change (Sell & Parker, March 2022) Daily Pre-start (16/6/2025)</p> <p>Blacktown Maintenance Repair Contact Flowchart (Sell & Parker, not dated)</p>	<p>Sell & Parker were able to demonstrate a thorough maintenance system, which includes the use of a proprietary online maintenance system (FIIX), which is accessed via mobile application or via a computer. The system includes both preventive (an onboarding process and scheduled maintenance triggered by hours and/or time of service) and reactive maintenance (triggered by observations, such as pre-start checklists) of their mobile and fixed plant and equipment.</p> <p>These maintenance processes were observed during the audit through:</p> <ul style="list-style-type: none"> • Discussion with the maintenance team (Maintenance Administrator and Maintenance Manager) and an operator (Store person). • The random selection of a mobile plant (ID: F-93 Linde Forklift R165) and fixed plant (ID: L-9 Danieli Shear) during the site inspection to verify Sell & Parkers processes. • Sighting the FIIX system, the associated service tracking spreadsheet and the Blacktown Maintenance Repair Contact Flowchart. <p>During the site walk, an Operator was able to demonstrate their knowledge of Sell & Parkers maintenance process and their competence in using maintenance system (FIIX). They were able to demonstrate they could access the FIIX app on their mobile phone by scanning the affixed QR code (the plant identification) and showing the Auditor the completed pre-start process for F-93 for that day.</p> <p>The Maintenance Administrator was able to</p>	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>demonstrate to the Auditor the broader maintenance system using the F-93 Linde Forklift R165 and L-9 Danieli Shear as examples. This included:</p> <ul style="list-style-type: none"> Confirming the effectiveness of the daily pre-start process using the L-9 Danieli Shear. This included providing an example of an "inspection fail" which was identified in the Daily Pre-Start (16 June 2025). This triggered a work order for the maintenance team. The FIIX records show that the rectification work was completed on 25 June 2025. Providing a record of the preventative maintenance undertaken on the F-93 Linde Forklift R165, which has a scheduled maintenance set at 500 hours or 1 year (whichever comes first). This was last performed by the supplier (Linde) 1 May 2025. <p>In addition to the FIIX system the Maintenance Administrator uses a Service Tracking Spreadsheet for all Sell & Parker plant and equipment use to assist the process of tracking the business maintenance requirements.</p> <p>The maintenance team also have a Blacktown Maintenance Repair Contact Flowchart to assist their workers to understand the maintenance process used at the site. During the site inspection the Flowchart was sighted on display on the workplace noticeboard found in the Non-ferrous Processing Building. It was also displayed within the Maintenance Administrators work cubicle.</p>		
	METEOROLOGICAL MONITORING				
A17	Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall install a suitable meteorological station on the site that complies with the requirements in the latest version of the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> . The Applicant shall operate the meteorological station for the life of the Development.	<p>Ambient Air Quality Monitoring Validated Report - Report No.: DAT22374 (Acoem Australasia, 28 February 2025)</p> <p>Maintenance Report for Sell & Parker Blacktown (Acoem, 1 July 2024)</p>	<p>Monthly report confirms the met station is operational.</p> <p>The bimonthly maintenance report confirms that the equipment is being maintained.</p> <p>During the site inspection one of the met sensors was noted attached to the southern side of the admin building.</p>	Compliant	
	PROTECTION OF PUBLIC INFRASTRUCTURE				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
A18	The Applicant shall: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by 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.	Sell & Parker confirmation. Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Blacktown City Council, 5 July 2025)	Sell & Parker did not identify any damage associated with the Development. No evidence of damage to infrastructure during the site inspection. The BCC did not raise any issues in relation to Condition A18 in consultation regarding the development of this audit scope.	Compliant	
DISPUTE RESOLUTION					
A19	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the Development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	Sell & Parker confirmation. Email: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (NSW EPA, 3 July 2025) Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Department of Planning, Housing and Infrastructure, 1 July 2025) Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Blacktown City Council, 5 July 2025)	Sell & Parker did not identify any damage associated with the Development. The Department, NSW EPA or BCC did not raise any issues in relation to Condition A19 in consultation regarding the development of this audit scope.	Compliant	
SCHEDULE 2 -PART B - ENVIRONMENTAL PERFORMANCE					
WASTE MANAGEMENT					
B1	Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall implement a Waste Monitoring Program for the Development. The program must: a) be prepared by a suitably qualified and experienced person(s); b) include suitable provisions to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site. c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	WASTE MONITORING MANAGEMENT PLAN 23-43 & 45 Tattersall Road, Kings Park, Rev F (Arcadis, 12 September 2019) Scrap Assist software Training: Ferrous Handbook (Doc OPS-SPR-PFG-001) (Sell & Parker, file date 2/9/24) Traffic Controller Training & Competency (TC), (Sell & Parker, 24/10/24)	Sell & Parker traffic controllers are given direction on the list of prohibited items. Ferrous Handbook is made available on site through a QR code (noted at the Traffic Controller hut near the Middle Weighbridge).	Compliant	
SOIL AND WATER					
Compliance Certificate					
B2	A Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> must be obtained from Sydney Water prior to the commencement of construction.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
Pollution of waters					

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B3	The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	<p>WATER MANAGEMENT PLAN 23-43 & 45 Tattersall Road, Kings Park, Rev H (Arcadis, 12 September 2019)</p> <p>Sydney Water Trade Waste Agreement (Consent No. 39940)</p> <p>NSW EPA EPL Register website for EPL No. 11555</p> <p>Email: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (NSW EPA, 3 July 2025)</p>	<p>Water is managed onsite in accordance with the Water Management Plan and discharged in accordance with the Trade Waste Agreement (No. 39940).</p> <p>There are no notices listed for non-compliance with S. 120 of the POEO Act on the NSW EPA EPL Register website associated with EPL No. 11555.</p> <p>The NSW EPA did not raise any issues in relation to Condition B3 in consultation regarding the development of this audit scope.</p>	Compliant	
	Water Management Plan				
B4	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The plan must:</p> <p>a) be prepared by a suitability qualified and experienced person(s) in consultation with the EPA;</p> <p>b) include a detailed site water balance;</p> <p>c) include details of water management, monitoring and incident response arrangements;</p> <p>d) include the details of the:</p> <p>(i) Water Management System for the site (see Condition B6);</p> <p>(ii) Water Management System commissioning, including the time frames for each stage of the commissioning (see Condition B7);</p> <p>(iii) Water Treatment Plant Trial, if required (see Condition B8);</p> <p>(iv) erosion and sediment controls (see Condition B9);</p> <p>(v) bunding (see Condition B10);</p> <p>(vi) flood management (see Condition B11); and</p> <p>(vii) clean water runoff areas that discharge direct to stormwater without treatment (i.e. car parks and roofs).</p>	<p>Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)</p>	<p>This item was closed out in the previous independent audit.</p>	Compliant	
B5	The Applicant shall carry out the Development in accordance with the Water Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>WATER MANAGEMENT PLAN 23-43 & 45 Tattersall Road, Kings Park, Rev H (Arcadis, 12 September 2019)</p> <p>Sydney Water Trade Waste Agreement (Consent No. 39940)</p> <p>See also the relevant rows within Worksheet 08. Mgt Plan Implementation</p> <p>Evidence of WTS being maintained from FIIX Service Report No. 23192 (Mak Water, 11 July 2023) Service Report No. 26877 (Mak Water, 1 July 2024) Service Report No. NSW2692 (Mak Water, 25 November 2023)</p>	<p>Water is managed onsite in accordance with the Water Management Plan and discharged in accordance with the Trade Waste Agreement (No. 39940).</p> <p>Sighted evidence of ongoing maintenance of the water treatment system.</p>	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
	Water Management System				
B6	The Applicant shall operate a Water Management System for the site. The system must: a) be designed by a suitably qualified and experienced person(s) in consultation with the EPA; b) include a treatment system with primary, secondary and tertiary treatment components; c) be consistent with the guidance in Managing Urban Stormwater - Soils and Construction Vol. 1 (Landcom, 2004); d) divert clean surface water around operational areas of the site; f) include water reuse based on a risk assessment of environment and human health impacts; and g) be commissioned in accordance with Condition B7.	See Condition B5	See Condition B5	Compliant	
	Water Management System commissioning				
B7	The Applicant shall commission the Water Management System prior to discharging any water from the site. The commissioning must: a) be completed within 2 years from the date of this consent, or within such other time agreed in writing by the Secretary; b) be undertaken by a suitably qualified and experienced person(s) in consultation with the EPA; c) include a program for acquiring baseline data of receiving waters and the establishment of site specific stormwater discharge criteria in the EPL; d) including testing of the performance of all components of the Water Management System, including the primary, secondary, and tertiary treatment systems; f) include off-site trials of treatment technologies if necessary.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	Water Treatment Plant trial				
B8	As part of commissioning the Water Management System, the Applicant may implement off-site trials of components of the Water Management System. Any trial must be conducted by a suitably qualified and experienced person(s) in consultation with the EPA.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	Erosion and sediment control				
B9	The Applicant shall implement erosion and sediment control measures on-site in accordance with <i>Managing Urban Stormwater: Soils and Construction Vol. 1</i> (Landcom, 2004).	Blacktown Erosion and Sediment Control Inspection, BT-ENV-FOR-ESC-21A, 26 November 2024. Blacktown Erosion and Sediment Control Inspection, BT-ENV-FOR-ESC-21A, 27 November 2024. Blacktown Erosion and Sediment Control Inspection, BT-ENV-FOR-ESC-21A, 28 November 2024. Blacktown Erosion and Sediment Control Inspection, BT-ENV-FOR-ESC-21A, 29 November 2024. Blacktown Erosion and Sediment Control Inspection, BT-ENV-FOR-ESC-21A, 30 November 2024. Amenities Relocation Report, 13 December 2024.	Sell & Parker advised that the last works requiring Blue Book erosion and sediment controls was associated with repairs to the carpark. Daily erosion and inspections were completed by the GEM during these works. These inspection reports were sighted at the time of the audit. Drain warden inspection reports supplied and evidence of the last change over was also	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
		File: Drain warden change over 5 March 25 (screen grab from CCTV)	provided in the form of a screen grab from the site off CCTV which shows them being replaced.		
	Bunding				
B10	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</i> .	Outcomes of the site inspection.	<p>During the site inspection it was noted that:</p> <ul style="list-style-type: none"> - The operational work areas that present the highest risk from the potential release of chemicals are effectively self-contained, with all water in these areas captured and treated onsite. Water is reused onsite or disposed of in accordance with Sydney Water Trade Waste Agreement. - Spill response kits were available across the site. One was low on stock (but not empty). - Chemical storage lockers were located across the site. - The gensets and lube station were self-bunded. - The retractable hoses for dispensing the product at the lube station sits within a small covered shed. There is evidence of staining in and adjacent to the concrete bund below the hoses. - An IBC of hypochlorite solution was located on a bund adjacent to the water treatment area with a deluge safety shower and eyewash located in proximity. The bund and IBC is located on an unlevel concrete slab which would reduce its effective storage capacity. The chemical is also stored within a trafficable area without any protection from potential mechanical damage. These present a risk of potential uncontrolled discharge to the self-contained site. - The oil store is a covered and concrete bunded area. IBCs and smaller containers of mixed chemicals are stored within the bunded and covered area. There was some evidence of staining on the concrete outside 	Compliant	SSD5041_IEA04_REC01

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>the bund and there was damage to the raised lip of the bund (noting that there is a sump area below the raised lip of the bund).</p> <p>- Spill response kits were located adjacent to the oil store.</p> <p>Recommendations:</p> <p>- The spill response kits should be inspected and re-stocked as appropriate.</p> <p>- The lube station dispensing area is inspected and appropriately cleaned.</p> <p>- Review chemical storage against the requirements of the relevant Australian Standards and the NSW EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007. The Proponent is to take appropriate actions based on the outcomes of the review.</p>		
	Flood management				
B11	<p>The Applicant shall ensure that:</p> <p>a) the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level;</p> <p>b) any part of a new structure below the 1 in 100 year Average Recurrence Interval flood level is designed and constructed to be compatible with flooding; and</p> <p>c) any perimeter fence or wall does not restrict or impede the flow of overland flow.</p>	Occupation Certificate No. D2016-002 for SSD 5041 (Technical Inner Sight, 27 August 2018)	<p>Sell & Parker provided a copy of the Occupation Certificate (OC) which is provided by the Independent Certifier.</p> <p>The OC confirms the building is suitable for occupation or use in accordance with its classification under the Building Code of Australia.</p>	Compliant	
	Imported soil				
B12	<p>The Applicant shall:</p> <p>a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;</p> <p>b) keep accurate records of the volume and type of fill to be used; and</p> <p>c) make these records available to the Department upon request.</p>		<p>Sell & Parker confirmed that they have never brought any in VENM or ENM as they have not required fill.</p> <p>There was no evidence of filling on site.</p>	Compliant	
	Contamination				
B13	<p>Prior to commencing any excavation works, the Applicant shall:</p> <p>a) identify all potential contaminants that could be disturbed, mobilised and discharged to receiving waters;</p> <p>b) detail the procedures for testing, classifying, handling, storing and disposing of contaminated water, soils and/or groundwater encountered in excavations, in particular during excavation of the stormwater detention basin; and</p> <p>c) detail the measures for periodically testing surface water run-off that may accumulate in excavations, and the procedures for off-site disposal of contaminated water.</p>	Black Iron Medium Strip (Sell & Parker, Dec 24)	Noted that this is an internal due diligence report to ensure materials can be stored on the site.	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B14	The Applicant shall provide a contamination report to the Department detailing any contamination investigation carried out in the immediate vicinity of the existing detention basin. This report shall be provided to the Department on completion of the works to upgrade the detention basin.	Metromap aerial photos (31 August 2021 - 6 October 2024)	Sell & Parker confirmed that they have not undertaken an upgrade works to the detention basin. Review of the aerial photos appears to confirm that no works have been undertaken on the detention basin.	Compliant	
	AIR QUALITY				
	Odour				
B15	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Complaints Register on website (Kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/) Email: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (NSW EPA, 3 July 2025) Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Department of Planning, Housing and Infrastructure, 1 July 2025) Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Blacktown City Council, 5 July 2025)	The Department, NSW EPA or BCC did not raise any issues in relation to Condition B15 in consultation regarding the development of this audit scope. No offensive odours were noted during the site inspection at the time of the audit.	Compliant	
	Emissions limits				
B16	The Applicant shall ensure that emissions from the Development do not exceed the emission limits specified in the EPL.	Sell & Parker - EPA Licence Monitoring Data (Sell & Parker website) NSW EPA EPL Register website for EPL No. 11555	Monitoring data provided by Sell & Parker for the Hammermill Stack (EPL Point 3) confirms there have been no exceedances of the EPL emission limit (Condition L2.2). There are no notices listed for non-compliance with air emission limits on the NSW EPA EPL Register website associated with EPL No. 11555.	Compliant	
	Air Quality Management Plan				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B17	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary. The plan must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</p> <p>b) describe the measures that would be implemented to ensure:</p> <p>(i) all reasonable and feasible measures are employed to minimise air emissions;</p> <p>(ii) compliance with the relevant conditions of this consent;</p> <p>(iii) contingency measures are deployed to minimise impacts should adverse air emissions occur or appear likely to occur;</p> <p>c) include well defined triggers for the deployment of construction and operational air quality measures;</p> <p>d) include well defined triggers for ceasing or partially ceasing operations on site during adverse air quality conditions;</p> <p>e) include an Air Quality Monitoring System to evaluate the performance of the Development commensurate with the system proposed in the Air Quality Assessment, prepared by ERM dated September 2015;</p> <p>f) include details of the location, frequency and duration of monitoring; and</p> <p>g) include a protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur.</p>	<p>Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)</p>	<p>This item was closed out in the previous independent audit.</p>	Compliant	
B18	<p>The Applicant shall carry out the Development in accordance with the Air Quality Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>Air Quality Management Plan, Rev E (Arcadis, 11 September 2019)</p> <p>Toolbox Meeting Form - Dusty Loads (Sell & Parker, 3/9/24)</p> <p>Outcomes of the site inspection</p>	<p>Air monitoring system in place on the roof of the site office.</p> <p>Sel & Parker have also delivered a Toolbox talk on dusty loads to their own workers with the aim of managing air quality.</p> <p>Dust suppression was noted with water was being applied at a number of locations on site and a road sweeper was in operation cleaning and applying water to the roads during the audit.</p> <p>There was no evidence of dust being generated at the time of the audit.</p>	Compliant	
	Air emissions mitigation				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B19	<p>The Applicant shall:</p> <p>a) operate the Development so that air emissions are minimised during all meteorological conditions; and</p> <p>b) implement best management practice, including all reasonable and feasible air and odour emissions mitigation measures to minimise emissions from the Development, including but not limited to:</p> <p>(i) installation of an Emissions Collection System servicing the hammer mill that is capable of achieving emission control performance equivalent to the system described in the Air Quality Assessment prepared by ERM dated September 2015;</p> <p>(ii) operating one oxy-acetylene torch at a time;</p> <p>(iii) operating the oxy-acetylene torch only between the hours of 9 am and 3 pm;</p> <p>(iv) cutting any metal beam that is up to 100 millimetres thick with the shear, where possible;</p> <p>(v) enclosure of all conveyors and conveyor transfer points;</p> <p>(vi) dust suppression through the use of water sprays/misters;</p> <p>(vii) sealing of on-site surfaces and regularly maintaining them to prevent dust re- entrainment from vehicle movements and other equipment use; and</p> <p>(viii) installation of appropriate dust screens at the property boundary and replacement of dust screens and shade cloths at the Tattersall Road boundary of the 45 Tattersall Road site.</p>	<p>Air Quality Management Plan, Rev E (Arcadis, 11 September 2019)</p> <p>See Ecotech references.</p> <p>PM10 Monitoring Spreadsheet (Sell & Parker) - rolling data</p> <p>Outcomes of the site inspection</p>	<p>Spreadsheet identifies sources of exceedances of PM10 and the relevant controls implemented.</p> <p>During the site inspection the following controls were noted:</p> <ul style="list-style-type: none"> - ECS servicing the hammermill was in place and operational - A single oxy-acetylene torch was being operated between the approved hours, within an area set up with block walls to minimise wind impacts and with a misting cannon wetting down the process. - Enclosed conveyors were observed throughout the site. - Water sprayers and misters were observed in operation at multiple operational working areas. <p>The roads were sealed and maintained.</p> <ul style="list-style-type: none"> - Each of the boundaries was screen by significant structures. - A road sweeper was located onsite and was observed maintaining the cleanliness of the internal roads. - The wheel wash was in place and operational prior to the truck site exit. - The surfaces of the entrance and exit roads was clear of tracked materials, including sediment or oil. - Although the wind speed was moderate to strong at the time of the inspection there was no evidence of visible/fugitive dust being generated on the site. 	Compliant	
	Emissions Collection System commissioning				
B20	<p>The Applicant shall commission the Emissions Collection System for the hammer mill. The commissioning must:</p> <p>a) be undertaken by a suitability qualified and experienced person(s) in consultation with the EPA;</p> <p>b) test the performance of the system against the performance parameters set out in the Air Quality Assessment prepared by ERM dated September 2015; and</p> <p>c) identify and implement any changes to the system that may be necessary to achieve environmental air quality performance commensurate with that set out in the Air Quality Assessment prepared by ERM dated September 2015.</p>	<p>Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)</p>	<p>This item was closed out in the previous independent audit.</p>	Compliant	
	Commissioning Report				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B21	The Applicant shall submit to the Secretary a Commissioning Report detailing the outcomes of the commissioning of the Emissions Collection System for the hammer mill.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	Construction emissions mitigation				
B22	During construction, the Applicant shall ensure that: a) all vehicles on site do not exceed a speed of 30 kilometres per hour; b) all loaded construction vehicles entering or leaving the site have their loads covered; and c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads.		This is a construction phase condition and therefore was not assessed during this operational audit.	Not triggered	
	Stockpile management				
B23	The Application shall manage stockpiles of scrap metal and processed material to ensure air emissions are minimised.	Shift Handover Checklists No's 125 - 132 (Sell & Parker, 2025) Outcomes of site inspection	Daily shift handover checklists demonstrate that the operational team review environmental controls are in place between shifts. There was no evidence of dust being generated during the audit.	Compliant	
	EXPLOSION LIMITS				
	Airblast overpressure				
B24	The Applicant shall undertake all reasonable and feasible measures necessary to prevent explosions from occurring at the Premises.	Complaints Register on website (Kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/) EPL Reporting: Email: REF-NO-30487 Report to NSW EPA (NSW EPA, 5 June 2024) Email: RE: REF-NO-30487 (Sell & Parker, 19/7/24) - Official Report Internal Awareness: Environmental Communications - Accumulators (Sell & Parker, File date: 23/4/24). Environmental Communications - Airblast Overpressure (Sell & Parker, File date: 22/10/24) Toolbox talk - Minimising Noise (Sell & Parker, 27/6/2025) Damstra Online Sell & Parker Safety System: Airblast Overpressure - signed off by Sell & Parker workers (22 October 2024). Toolbox Meeting Form - Enviro Communication Accumulators (26 April 2024).	During consultation to develop the audit scope, the NSW EPA identified concerns with the exceedances of the air blast overpressure levels. The following observations were made through the audit: EPL reporting The airblast overpressure events were appropriately reported by Sell & Parker in accordance with Condition R2 of the EPL No. 11555. Controls and awareness The Noise Management Plan (NMP) identifies controls aimed at excluding waste items being delivered to the premises and ending up in processing machinery that may lead to an airblast overpressure event. This includes all parties involved in the process (waste generators and Sell & Parker operators) being made aware of the materials that are not accepted on the site and the processes to follow should they be	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
		<p>External Awareness: Environmental Compliance Communication - Supplier Information Batteries (Sell & Parker, 23/10/23) Environmental Compliance Communication - Supplier Information Gas Bottles (Sell & Parker, 17/6/24)</p> <p>Implement Disincentive: Noise Management Plan - Rev E (Arcadis, 12 September 2019) Email: FW: Scrap Assist Ticket: 11603181 (Sell & Parker, 10 July 2025) Email: FW: Express waste deduction - Gas Tanks (Sell & Parker, 10 June 2025)</p>	<p>identified on site (including appropriate segregation for appropriate management and disposal). The awareness is provided to relevant parties via internal and external Sell & Parker developed communications (see evidence sighted).</p> <p>Sell & Parker also implements a disincentive process, whereby the waste generator has a portion of the overall tonnage of their load deducted and therefore their payment due to the inclusion of unacceptable waste. Evidence of this was sighted by the auditor showing process of "Deductions" being implemented. This included identifying gas bottles within a delivery that were set aside by the Sell & Parker weighbridge operator.</p> <p>Sel & Parker have also delivered a Toolbox talk on minimising noise to their own workers.</p> <p>Monitoring and event investigation The GEM provided an in-depth understanding the process that is followed by Sell & Parker to monitor airblast overpressure and the process where a potential airblast overpressure event has been flagged by the monitoring.</p> <p>Sell & Parker implement an online real time monitor (EPL Monitoring Point 11) which provides text message alerts for a potential airblast overpressure event (i.e., >120dB (Lin Peak). All potential events are investigated by the GEM and recorded for appropriate reporting.</p> <p>General It is noted by the Auditor that although there were 2 events reporting in the last EPL Annual Return, neither of these events corresponded to a noise complaint from the community.</p> <p>Site inspection The site inspection confirmed this process</p>		

Conditions of Approval – SSD-5041																												
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																							
			<p>was being followed through conversations with Sell & Parker operators and the sighting of segregated waste (including an area for placement of gas bottles identified on site, containing segregated gas bottles).</p> <p>Clear and legible signage stating unacceptable materials were noted during the site inspection, including the key locations of the public waste drop-off point and the truck weighbridge entrance to the site.</p>																									
B25	The Applicant shall ensure that the airblast overpressure level from any explosions on the premises does not exceed 120dB (Lin Peak) when measured at the boundary of the premises.	<p>NSW EPA EPL Register website for EPL No. 11555</p> <p>Annual Return (19-Apr-2022 - 18-Apr-2023)</p> <p>Annual Return (19-Apr-2023 - 18-Apr-2024)</p> <p>Annual Return (19-Apr-2024 - 18-Apr-2025)</p>	<p>Sell & Parker noted exceedances of the 120dB (Lin Peak) associated with the Development in the last three Annual Returns supplied to the NSW EPA and available on their EPL Register website.</p> <p>As noted above, Sell & Parker appear to be undertaking all reasonable and feasible measures necessary to prevent explosions occurring at the premises.</p> <p>No further actions recommended.</p>	Non-compliant	SSD5041_IEA04_NC01																							
	NOISE AND VIBRATION																											
	Noise criteria																											
B26	<p>The Applicant shall ensure that noise generated by the construction and/or operation of the Development does not exceed the noise criteria in Table 2.</p> <p>Table 2: Noise criteria (dB(A))</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th><th colspan="5">Noise criteria (dB(AH)</th></tr> <tr> <th>Day</th><th>Evening</th><th>Night</th><th colspan="2">Morning Shoulder</th></tr> <tr> <td></td><td>LAeq (15 minute)</td><td>LAeq (15 minute)</td><td>LAeq (15 minute)</td><td>LAeq (15 minute)</td><td>LAeq 11 minute)</td></tr> </thead> <tbody> <tr> <td>189 Sunnyholt Road</td><td>46</td><td>46</td><td>38</td><td>46</td><td>58</td></tr> </tbody> </table>	Location	Noise criteria (dB(AH)					Day	Evening	Night	Morning Shoulder			LAeq (15 minute)	LAeq (15 minute)	LAeq (15 minute)	LAeq (15 minute)	LAeq 11 minute)	189 Sunnyholt Road	46	46	38	46	58	<p>Kings Park Metal Recovery Processing and Recycling Facility - Noise Monitoring Report (Renzo Tonin & Associates, 28 August 2025)</p> <p>Email: Sell & Parker Pty Ltd - EPA Request for Noise Monitoring at Kings Park Facility (EPL 11555) (NSW EPA, 25 July 2025)</p>	<p>A noise monitoring report (Renzo Tonin & Associates, 28 August 2025) confirmed that noise monitoring of EPL Point 1 had been undertaken.</p> <p>Correspondence from the NSW EPA confirms that the EPL does not specify when noise monitoring must be undertaken (i.e., the frequency of monitoring required).</p>	Compliant	
Location	Noise criteria (dB(AH)																											
	Day	Evening	Night	Morning Shoulder																								
	LAeq (15 minute)	LAeq (15 minute)	LAeq (15 minute)	LAeq (15 minute)	LAeq 11 minute)																							
189 Sunnyholt Road	46	46	38	46	58																							
	Noise compliance measurement																											

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B27	Noise generated by the Development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the latest version of the <i>NSW Industrial Noise Policy</i> .	Kings Park Metal Recovery Processing and Recycling Facility - Noise Monitoring Report (Renzo Tonin & Associates, 28 August 2025)	Noise monitoring was undertaken in accordance with the latest version of the NSW Industrial Noise Policy at EPL Point 1 (Renzo Tonin & Associates, 28 August 2025).	Compliant	
	Vibration criteria				
B28	The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's <i>Assessing Vibration: A Technical Guideline</i> (February 2006) at residential receivers.	Complaints Register on website (Kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/)	No vibration complaints noted in the complaints register. There was no vibration evident from the activities at the time of the site inspection.	Compliant	
	Noise Management Plan				
B29	Prior to the commencement of construction of the Development, the Applicant shall prepare a Noise Management Plan to the satisfaction of the Secretary. The plan must: a) be prepared by a suitably qualified and experienced persons(s) in consultation with the EPA; b) describe the measures that would be implemented to ensure: (i) all reasonable and feasible measures are employed to minimise noise impacts; (ii) the installation and maintenance of appropriate physical noise barriers; (iii) air handling devices are designed and located to minimise noise impacts; (iv) truck drivers are aware of suitable truck noise mitigation measures; (v) contingency measures are deployed to minimise impacts should an exceedance of the criteria occur or appear likely to occur; and (vi) compliance with the relevant conditions of this consent; c) include a Noise Monitoring Program to evaluate the performance of the Development; and d) include a protocol to determine the occurrence of an exceedance of the criteria in this consent should such an exceedance occur.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
B30	The Applicant shall carry out the Development in accordance with the Noise Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Noise Management Plan - Rev E (Arcadis, 12 September 2019) Outcomes of the site inspection	Noise barrier walls in place on the perimeter of the site. No evidence of tonal type reversing alarms being used. FIIX maintenance system being used to track ongoing maintenance of plant and equipment. See additional details outline in Condition B24.	Compliant	
	Construction and operation hours				

Conditions of Approval – SSD-5041																																	
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																												
B31	<div>The Applicant shall ensure that noise generated by the construction and/or operation of the Development does not exceed the noise criteria in Table 3.</div> <div>Table 3: Hours of Construction and Operation</div> <table><tr><th colspan="2">Activity</th><th>Day</th><th>Hours</th></tr><tr><td colspan="2" rowspan="3">Construction</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>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="6">Operation</td><td rowspan="2">Oxy-acetylene torch cutting</td><td>Monday - Saturday</td><td>9 am to 3 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="2">Cleaning and maintenance</td><td>Monday - Saturday</td><td>9am to 6 am</td></tr><tr><td>Sunday & Public Holidays</td><td>24 hours</td></tr><tr><td rowspan="2">All other activities</td><td>Monday - Saturday</td><td>6 am to 9 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr></table>	Activity		Day	Hours	Construction		Monday - Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Oxy-acetylene torch cutting	Monday - Saturday	9 am to 3 pm	Sunday & Public Holidays	Nil	Cleaning and maintenance	Monday - Saturday	9am to 6 am	Sunday & Public Holidays	24 hours	All other activities	Monday - Saturday	6 am to 9 pm	Sunday & Public Holidays	Nil	Sell & Parker Weighbridge Tickets: Ticket: 10036511 (18 April 2023) – 1 st truck (06:12) Ticket: 10040581 (18 April 2023) – Last truck (16:40) Ticket: 11223401 (10 September 2024) – 1 st truck (06:40) Ticket: 11225321 (10 September 2024) – Last truck (17:32) Ticket: 11546191 (1 May 2025) – 1 st truck (06:21) Ticket: 11548211 (1 May 2025) – Last truck (19:11)	The Proponent was able to demonstrate that the operating hours were being undertaken in accordance with the condition with records of the first and last trucks entering and leaving the site within the approved hours of operation.	Compliant	
Activity		Day	Hours																														
Construction		Monday - Friday	7 am to 6 pm																														
		Saturday	8 am to 1 pm																														
		Sunday & Public Holidays	Nil																														
Operation	Oxy-acetylene torch cutting	Monday - Saturday	9 am to 3 pm																														
		Sunday & Public Holidays	Nil																														
	Cleaning and maintenance	Monday - Saturday	9am to 6 am																														
		Sunday & Public Holidays	24 hours																														
	All other activities	Monday - Saturday	6 am to 9 pm																														
		Sunday & Public Holidays	Nil																														
B32	Despite condition B31, the delivery of material to the site may occur at any time, if that delivery is required by police or other authorities; and/or of there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification shall be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.	The Proponent advised that there has been no requirement for delivery of material to the site outside those listed in Condition B31.	The Proponent advised that there has been no requirement for delivery of material to the site outside those listed in Condition B31.	Compliant																													
	Noise mitigation																																
B33	The Applicant shall: a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development; b) minimise the noise impacts of the Development during adverse meteorological conditions; c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the noise criteria in this consent.	Noise Management Plan - Rev E (Arcadis, 12 September 2019) Outcomes of the site inspection	Noise barrier walls in place on the perimeter of the site. No evidence of tonal type reversing alarms being used. FIIX maintenance system being used to track ongoing maintenance of plant and equipment. See additional details outline in Condition B24.	Compliant																													
	TRAFFIC AND ACCESS																																

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B34	The Applicant shall ensure that: a) site access, driveways and parking areas are constructed and maintained in accordance with the latest versions of Australian Standard AS 2890.1 and AS 2890.2; b) the swept path of the longest vehicle entering and exiting the subject site, as well as maneuverability through the site, is in accordance with AUSTROADS Guide to Road Design; c) the Development does not result in any vehicles parking or queuing on the public road network; d) all vehicles are wholly contained on site before being required to stop; e) all loading and unloading of heavy vehicles is carried out on-site; f) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and g) all vehicles enter and leave the site in a forward direction.	Outcomes of the site inspection.	During the site inspection it was noted that: - The site access, driveways and parking areas appeared to be well maintained. - No trucks were parking or queuing on the public road network at the time of the site inspection. - All vehicles were entering and leaving site in a forward direction.	Compliant	
	HAZARD AND RISK				
	Fire management				
B35	The Applicant shall: a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the Preliminary Hazard Analysis of Sell & Parker Pty Ltd Metal Recycling Facility Expansion prepared by Arriscar dated 10 March 2014; b) ensure the height of any stock pile of shredder floc does not exceed 4 metres; c) extinguish any fires on-site promptly; and d) maintain adequate fire-fighting capacity on-site.	Thermal Camera - Shredder FLIR Outcomes of the site inspection. Fire Incident: Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/) EPA Report 17462 Email: REF-NO-17462 Report to NSW EPA (NSW EPA, 28 November 2022) Letter to the Secretary: Incident Report - Sell & Parker Pty Limited - 45 Tattersall Road Kings Park EPL 11555 SSD 5041 Incident - 27 November 2022 (Sell & Parker, 2 December 2022) Request R3 Report - Fire Incident - Sell & Parker - EPL 11555 (DOC22/1046496, NSW EPA 25 January 2023) Request for further information - R3 Report - Fire Incident Sell & Parker Pty Ltd - EPL 11555 (Sell & Parker, 7 February 2023)	Thermal cameras are located at various operational points (floc IR, Black iron stockpile 1 Thermal B, Black iron stockpile 2 Thermal B, Danieli IR Thermal B, Shredder FLIR, FR2 thermal B, Downstream thermal B, Sorter thermal B, Mill VSD thermal B, 1B and 2B) to assist in the early identification and control of potential fires. During the site inspection the following was noted in relation to fire management: - The Shredder FLIR thermal camera was sighted in operation. - The stockpiles of the shredder floc did not exceed 4m. - There were fire suppression systems set up at various points around the site. These included water holding tanks at the front and rear of the premises. A backup diesel generator was located at the front of the site to maintain continual fighting water to the site. The Proponent noted that there had been a fire incident on the 27 November 2022. The Proponent appropriately reported the fire incident in accordance with the EPL. Immediate notification was provided to the EPA in accordance with Condition R2.1 (EPA REF-NO-17462).	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>A written report was provided to the EPA within 7 days in accordance with Condition R2.2.</p> <p>Based on the EPAs request for a written report of the event in accordance with Condition R3.1, Sell & Parker issued a written report within the required timeframe in accordance with Condition R3.</p>		
B35A	<p>Prior to:</p> <ul style="list-style-type: none"> (i) expanded operations; (ii) the issue of an Occupation Certificate; or (iii) the date being 6 months after the determination of MOD 1 by the Land and Environment Court, (whichever is sooner), the Applicant must ensure that an appropriate sprinkler system and smoke detection system have been installed within the floc storage area in Building C to the satisfaction of FRNSW. 	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B35B	Prior to: (i) expanded operations; (ii) the issue of an Occupation Certificate; or (iii) the date being 7 months after the determination of MOD 1 by the Land and Environment Court, (whichever is sooner), the Applicant must ensure that all fire safety measures required by the NCC for Buildings A, B, & C (as shown on drawing 14023-16-001-FH-01 Rev P4) have been installed and verified through a Fire Safety Audit in accordance with Australian Standard 4655 – Fire Safety Audits, to the satisfaction of FRNSW.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
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.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
B35D	Prior to the commencement of operation of the relocated pre-shredder the Applicant shall submit a Final Stockpile Plan to the satisfaction of the Secretary and FRNSW.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	Emergency Response				
B36	The Applicant shall prepare and implement an emergency response plan for the site. The plan must: a) include a risk assessment of likely incidents that could occur on-site (e.g. spills, explosion, fire and flood) based on the activities being undertaken, site risks and consequence to the receiving environment; b) include the early warning flood readiness and evacuation plan for the site; c) document the systems and procedures to deal with the types of incidents identified including relevant incident notification procedures; and d) be accessible on the site at all times.	Emergency Services Information Package (ESIP), Version 1 (Sell & Parker, June 2020) Done July 3 File Name: BT Evac Sept 2024	Emergency Response Plan in place and evidence was provided by the Proponent that it was being tested.	Compliant	
	VISUAL AMENITY				
	Lighting				
B37	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with <i>Australian Standard AS 4282 1997</i> .	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022) Complaints Register on website (Kings Park Facility - Monitoring Results (https://www2.sellparker.com.au/about/environmental-social-and-governance/))	This provision of the external lighting was closed out in the previous independent audit. There were no community complaints associated with lighting during the reporting period.	Compliant	
	Signage				
B38	The Applicant shall install any new signage in consultation with Council. Note: This condition does not apply to signage identified as exempt or complying development in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
	Landscaping				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
B39	Prior to the commencement of construction of the Development, the Applicant shall prepare a Landscape Management Plan to the satisfaction of the Secretary. The plan shall: a) be prepared by a suitably qualified and experienced person(s); b) detail the landscaping measures including vegetation that would be implemented to minimise the visual impact of the Development, particularly from adjoining premises and public vantage points; c) describe the measures to be implemented to protect and retain the mature trees along the northern boundary of the site; and d) include measures for monitoring and maintenance of revegetated areas.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
B40	The Applicant shall carry out the Development in accordance with the Landscape Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Plant Survey 2023, LPS Contracting Pty Ltd, 23 November 2023. Plant Survey (LPS Landscapes, 15 December 2024) Weed Control Report, December Quarter 2023, LPS Contracting Pty Ltd, 11 January 2024. Weed Control Report, June Quarter 2023, LPS Landscapes, 10 July 2023. Weed Control Report, March Quarter 2023, LPS Contracting Pty Ltd, 6 April 2023. Weed Control Report, September Quarter 2023, LPS Contracting Pty Ltd, 6 October 2023.	Plant surveys and weed controls reports are prepared in accordance with the Landscape Management Plan. Monthly inspections are undertaken by the GEM in accordance with the Landscape Management Plan.	Compliant	
	HERITAGE				
B41	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained.	Procedure - Unexpected Finds, BT-ENV-PRO-UEF-24A (Sell & Parker, 3 January 2025)	The Proponent advised that there have been no unexpected finds of Aboriginal cultural objects or human remains during the Audit Period. Unexpected Finds Procedure available and in date.	Compliant	
	SECURITY				
B42	The Applicant shall: a) install and maintain a perimeter fence and security gates on the site; and b) ensure that the security gates on site are locked whenever the site is unattended.	Blacktown Monthly Site Inspection, BT-ENV-FOR-INS-22B, 31 August 2022. Blacktown Monthly Site Inspection, BT-ENV-FOR-INS-24A, 27 February 2025. Blacktown Monthly Site Inspection, BT-ENV-FOR-INS-24A, 31 July 2024. Blacktown Monthly Site Inspection, BT-ENV-FOR-INS-23A, 30 November 2023. 2024 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, 5 March 2025)	Monthly inspections are undertaken by the GEM. The inspection form includes an visual condition assessment of the perimeter fences and the access gates. The latest Annual Environmental Performance Review notes that general maintenance and repair of the site fencing had been carried out in the previous year and was planned to continue into the next year. The perimeter fencing that was visible during the Audit site inspection appeared to be in good order.	Compliant	
	SCHEDULE 2 - PART C - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
	ENVIRONMENTAL MANAGEMENT				
	Construction Environmental Management Plan				
C1	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages; c) identify the statutory approvals that apply to the Development; d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment; e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts; f) describe of the roles and responsibilities for all relevant employees involved in construction; g) include arrangements for community consultation and complaints handling procedures during construction; and h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent. 	Not triggered.	This condition was associated with the construction phase and therefore has not been triggered for this Operational Audit	Not triggered	
C2	The Applicant shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Not triggered.	This condition was associated with the construction phase and therefore has not been triggered for this Operational Audit	Not triggered	
	Operational Environmental Management Strategy				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
C3	<p>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:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) provide a strategic framework for environmental management of the Development; c) identify the statutory approvals that apply to the Development; d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; e) describe in general how the environmental performance of the Development would be monitored and managed; and f) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies. 	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	This item was closed out in the previous independent audit.	Compliant	
C4	The Applicant shall carry out the Development in accordance with the Operational Environmental Management Strategy approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>Operational Environmental Management Plan - Rev E (Arcadis, 12 September 2019)</p> <p>Damstra online system Litmos online system also used Induction & Safe Work Practices Handbook (HR-SPR-FOR-009) - Environmental Best Practice. Inducted person - 11/4/24 (HR-SPR-FOR-001 Version #6)</p>	Sell & Parker include environmental management in their induction process for new workers. The Proponent has been able to demonstrate that they are compliant with their OEMP.	Compliant	
	Management plan requirements				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
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; b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; (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; (iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; c) a program to monitor and report on the: (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures; (iii) a contingency plan to manage any unpredicted impacts and their consequences; (iv) a program to investigate and implement ways to improve the environmental performance of the Development over time; d) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (v) a protocol for periodic review of the plan.	Independent Environmental Audit - Doc Ref: PRJ1110019083-1 (Lloyd's Register, 6 April 2020)	This item was closed out in the previous independent audit.	Compliant	
C6	The Secretary may waive some of the requirements in Condition C5 if they are unnecessary or unwarranted for particular management plans/strategies.	The Proponent advised that the Secretary has not waived any of the requirements in Condition C5.	The Proponent advised that the Secretary has not waived any of the requirements in Condition C5.	Compliant	
	REPORTING				
	Incident reporting				
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.	Letter to the Secretary: Incident Report - Sell & Parker Pty Limited - 45 Tattersall Road Kings Park EPL 11555 SSD 5041 Incident - 27 November 2022 (Sell & Parker, 2 December 2022)	The Proponent notified the relevant agencies and the Secretary in relation to the fire incident. See Condition B35 for more details on the fire incident.	Compliant	
	Regular reporting				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
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.	Monitoring Results (https://www2.sellparker.com.au/about/environmental-social-and-governance/) 2022 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2023) 2023 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2024) 2024 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2025)	The Proponent provides regular reporting of the environmental monitoring undertaken on its website. The reporting includes: - Complaints data - Airblast Overpressure noise monitoring - Noise monitoring data - Air quality Monitoring of the Hammermill Stack Additional air quality monitoring data (PM10 and met station) is supplied in the Annual Environment Performance Review reports found on the Sell & Parker website.	Compliant	
	INDEPENDENT ENVIRONMENTAL AUDIT				
C9	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary; c) include consultation with the relevant agencies; d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals); e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.	Independent Environmental Audit - Doc Ref: MEL6041336/1 (Lloyd's Register Quality Assurance, 13 April 2017) Independent Environmental Audit - Doc Ref: PRJ1110019083-1 (Lloyd's Register, 6 April 2020) Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022)	The Proponent has undertaken the required Independent Environmental Audits. This Audit is being undertaken within the required timeframe.	Compliant	
C10	Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022) Letter: Response to DPE RFI (15 February 2023) regarding IEA Report concerning Kings Park Waste Facility – SSD 5041, Ref No 62596 / 150,709 (JBS&G, 14 March 2023)	The last audit report was issued to the Secretary within three months of commissioning the audit. The audit team provided a response to questions raised by DPE.	Compliant	
	Annual review				


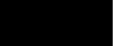


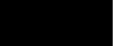


Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
C11	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <p>a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;</p> <p>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:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria;</p> <p>(ii) requirements of any plan or program required under this consent;</p> <p>(iii) the monitoring results of previous years; and</p> <p>(iv) the relevant predictions in the EIS;</p> <p>c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>d) identify any trends in the monitoring data over the life of the Development;</p> <p>e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</p>	<p>Sell & Parker website https://www2.sellparker.com.au/about/environmental-social-and-governance/</p> <p>2022 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2023) 2023 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2024) 2024 Annual Environment Performance Review Sell & Parker - Kings Park (Sell & Parker, March 2025)</p>	The Proponent has undertaken an annual review of the environmental performance of the Development. These annual reviews are available on the Sell & Parker public website.	Compliant	
	Revision of strategies, plans and programs				
C12	<p>Within 3 months of the submission of an:</p> <p>a) annual review under Condition C11 above;</p> <p>b) incident report under Condition C7 above;</p> <p>c) audit under Condition C9 above; or</p> <p>d) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent.</p> <p>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.</p>	No evidence was presented by the Proponent to demonstrate a review of the relevant management plans was completed as a result of the C7 notification in 2022.	No evidence was presented by the Proponent to demonstrate a review of the relevant management plans was completed as a result of the C7 notification in 2022.	Non-compliant	SSD5041_IEA04_NC02
C13	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	See audit findings.	The Proponent has been able to demonstrate that the operations are being undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary.	Compliant	
	ACCESS TO INFORMATION				

Conditions of Approval – SSD-5041					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
C14	<p>The Applicant shall:</p> <p>a) make copies of the following publicly available on its website:</p> <p>(i) the documents referred to in Condition A2;</p> <p>(ii) all current statutory approvals for the Development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(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;</p> <p>(v) a complaints register, updated on a monthly basis;</p> <p>(vi) the annual reviews of the Development;</p> <p>(vii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; and</p> <p>(viii) any other matter required by the Secretary; and</p> <p>b) keep this information up to date.</p>	Sell & Parker website https://www2.sellparker.com.au/about/environmental-social-and-governance/	All required documentation available on the website.	Compliant	
	APPENDIX A - SITE LAYOUT AND PLANS				
	See Approval Document (not attached)	Outcomes of the site inspection.	The site inspection confirmed that the Development has been undertaken in accordance with the Site Layout provided in Worksheet ii.	Compliant	
	APPENDIX B – MANAGEMENT AND MITIGATION MEASURES				
	Summary of relevant requirements detailed in Section 3.9.5.	Outcomes of the audit	Outcomes of the audit	Compliant	

Environmental Protection Licence –EPL No. 11555														
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID									
	1 Administrative Conditions													
A1	What the licence authorises and regulates													
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Metallurgical activities</td><td>Scrap metal processing</td><td>> 100000 - 500000 T annual production capacity</td></tr><tr><td>Waste storage</td><td>Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste</td><td>Any listed waste type stored</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Metallurgical activities	Scrap metal processing	> 100000 - 500000 T annual production capacity	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored	Outcomes of the site inspection.	The scheduled activities being undertaken at the time of the audit were consistent with "Metallurgical activities" and "Waste storage".	Compliant	
Scheduled Activity	Fee Based Activity	Scale												
Metallurgical activities	Scrap metal processing	> 100000 - 500000 T annual production capacity												
Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored												
A2	Premises or plant to which this licence applies													
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>SELL & PARKER PTY LTD</td></tr><tr><td>23-43 AND 45 TATTERSALL ROAD</td></tr><tr><td>KINGS PARK</td></tr><tr><td>NSW 2148</td></tr><tr><td>LOT 5 DP 7086, LOT 2 DP 550522</td></tr></table>	Premises Details	SELL & PARKER PTY LTD	23-43 AND 45 TATTERSALL ROAD	KINGS PARK	NSW 2148	LOT 5 DP 7086, LOT 2 DP 550522	Outcomes of the site inspection.	The scheduled activities being undertaken at the time of the audit were within the premises boundary of 23-43 and 45 Tattersall Road, Kings Park NSW 2148.	Compliant				
Premises Details														
SELL & PARKER PTY LTD														
23-43 AND 45 TATTERSALL ROAD														
KINGS PARK														
NSW 2148														
LOT 5 DP 7086, LOT 2 DP 550522														
A3	Information supplied to the EPA													
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Noted	Noted	Not triggered										
2	Discharges to Air and Water and Applications to Land													
P1	Location of monitoring/discharge points and areas													

Environmental Protection Licence –EPL No. 11555																							
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																		
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Noted.	Noted.	Not triggered																			
P1.2	<div>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</div> <table><tr><th colspan="4">Air</th></tr><tr><th>EPA identi- fication no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>3</td><td>Air discharge and monitoring</td><td>Air discharge and monitoring</td><td>Hammermill Stack</td></tr></table>	Air				EPA identi- fication no.	Type of Monitoring Point	Type of Discharge Point	Location Description	3	Air discharge and monitoring	Air discharge and monitoring	Hammermill Stack	<div>Annual Emission Testing Report, Report Number R012570, Ektimo, 10 June 2022.</div> <div>Annual Emission Testing Report, Report Number R014713, Ektimo, 5 July 2023.</div> <div>Annual Emission Testing Report, Report Number R016827, Ektimo, 4 June 2024.</div> <div>Letter: Re: Ektimo Emissions Report R018494, Solid Particle Results - Ref: R018494-1 (9 May 2025).</div>	<div>Ektimo 2025 report clarifies that the solid particle results were actually 19.8mg/m3, but their NATA only allows them to report to a whole number 20mg/m3.</div> <div>During the audit period the air discharge and monitoring point (Point 3) was operational and monitoring was undertaken by the licence holder.</div>	Compliant							
Air																							
EPA identi- fication no.	Type of Monitoring Point	Type of Discharge Point	Location Description																				
3	Air discharge and monitoring	Air discharge and monitoring	Hammermill Stack																				
P1.3	<div>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</div> <table><tr><th colspan="3">Noise/Weather</th></tr><tr><th>EPA identi- fication no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>1</td><td>Noise monitoring</td><td>189 Sunnyholt Road, BLACKTOWN NSW 2148 (Lot 23, DP 1063300)</td></tr><tr><td>11</td><td>Air blast overpressure monitoring</td><td>23-43 & 45 TATTERSALL ROAD, KINGS PARK NSW 2148</td></tr><tr><td>12</td><td>Meteorological Station</td><td>23-43 & 45 TATTERSALL ROAD, KINGS PARK NSW 2148</td></tr><tr><td>13</td><td>Noise monitoring</td><td>27 Charles Street, Blacktown NSW 2148 (Lot 1 DP 27141)</td></tr></table>	Noise/Weather			EPA identi- fication 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)	Noted.	Noted.	Compliant	
Noise/Weather																							
EPA identi- fication 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)																					
3	Limit Conditions																						
L1	Pollution of waters																						
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Sydney Water Trade Waste Agreement (Consent No. 39940).	Discharge of treated water is via a Sydney Water Trade Waste Agreement.	Compliant																			
L2	Concentration limits																						
L2.1	For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Noted.	Noted.	Not triggered																			

Environmental Protection Licence –EPL No. 11555																											
Condition	Requirement					Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																		
L2.2	Air Concentration Limits <table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td>Dry 273K, 101.3kPa</td><td></td><td>1hr or the min. sampling period specified</td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>20</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1hr or the min. sampling period specified</td></tr></table>					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	Annual Emission Testing Report, Report Number R012570, Ektimo, 10 June 2022. Annual Emission Testing Report, Report Number R014713, Ektimo, 5 July 2023. Annual Emission Testing Report, Report Number R016827, Ektimo, 4 June 2024. Letter: Re: Ektimo Emissions Report R018494, Solid Particle Results - Ref: R018494-1 (9 May 2025).	The reporting provided confirms that the Type 1 and 2 substances and the solid particles were within the air concentration limits for the audit period. The sampling and analysis of the Solid Particles was undertaken by Ektimo (NATA Accreditation No. 14601) as reported in their emission testing reports. The Auditor notes that the reports contained Chain of Custody (CoC) forms for the analysis provided by EnviroLab (NATA Accreditation No. 2901), but no CoC forms were attached for the analysis undertaken by Ektimo. While ISO/IEC 17025:2017 and NATA accreditation may not explicitly require a chain of custody in every case, for USEPA Method 17, it is recommended and often expected as part of good laboratory practice and regulatory compliance.	Compliant	
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																						
L3	Waste																										
L3.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence. <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>D220</td><td>Lead; lead compounds</td><td></td><td>Waste storage</td><td>No more than 100 tonnes of lead; lead compounds is to be stored at any one time.</td></tr><tr><td>NA</td><td>Scrap metal</td><td></td><td>Metallurgical Activities</td><td>As permitted by licence conditions L3.2 & L3.3.</td></tr></table>					Code	Waste	Description	Activity	Other Limits	D220	Lead; lead compounds		Waste storage	No more than 100 tonnes of lead; lead compounds is to be stored at any one time.	NA	Scrap metal		Metallurgical Activities	As permitted by licence conditions L3.2 & L3.3.	Container Weight Declaration Dispatch: 11418731 (Sell & Parker, 30 January 2025) Container Weight Declaration Dispatch: 11630101 (Sell & Parker, 26 June 2025)	The Proponent advised that they never store more than 100t of lead at any time as the lead is sent off as batches when the storage reaches approximately 23t. This was confirmed by the container weight declaration dockets which showed two loads below the 23t.	Compliant				
Code	Waste	Description	Activity	Other Limits																							
D220	Lead; lead compounds		Waste storage	No more than 100 tonnes of lead; lead compounds is to be stored at any one time.																							
NA	Scrap metal		Metallurgical Activities	As permitted by licence conditions L3.2 & L3.3.																							

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
L3.2	A maximum of 350,000 tonnes of scrap metal is permitted to be <i>received</i> at the Premises per year on a weekly pro rata basis.	NSW EPA WARRP Site online report: WARRP 2021-2022, 2022-2023, 2023-2024 Report (Online). Weighbridge Calibration. Exit weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 97456 2444 878 (SSS Weighbridge Specialists, 8 May 2025). Inwards weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 102830 2444 878 (SSS Weighbridge Specialists, 8 May 2025).	Sell & Parker provided the annual waste reports which confirmed the volumes of waste received at the premises per year (during the Audit period) were compliant with the threshold of 350,000 tonnes per year. The tonnages reported for each year were: 2021/22 =  2022/23 =  2023/24 =  Weighbridge calibration records were in date confirming the accuracy of the data collected.	Compliant	
L3.3	A maximum of 350,000 tonnes of scrap metal is permitted to be <i>processed</i> at the Premises per year on a weekly pro rata basis.	NSW EPA WARRP Site online report: WARRP 2021-2022, 2022-2023, 2023-2024 Report (Online) Weighbridge Calibration Exit weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 97456 2444 878 (SSS Weighbridge Specialists, 8 May 2025) Inwards weighbridge - REPAIR AND VERIFICATION REPORT, Report No. 102830 2444 878 (SSS Weighbridge Specialists, 8 May 2025)	Sell & Parker provided the annual waste reports which confirmed the volumes of waste received at the premises per year (during the Audit period) were compliant with the threshold of 350,000 tonnes per year. The tonnages reported for each year were: 2021/22 =  2022/23 =  2023/24 =  Weighbridge calibration records were in date confirming the accuracy of the data collected.	Compliant	
L3.4	The Licensee must record the amount of waste (in tonnes) received at the premises on a daily basis.	Scrap Assist online (10 July 2025).	During the audit, Sell & Parkers Transport & Fleet Scheduler demonstrated the Scrap Assist program. During this demonstration the details of the waste received in tonnes for the day noted as:  (at the time of viewing).	Compliant	
L4	Noise limits				

Environmental Protection Licence –EPL No. 11555																									
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																				
L4.1	<p>Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2.</p> <p>POINT 1,13</p> <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>LAeq (15 minute)</td><td>-</td><td>46</td></tr><tr><td>Evening</td><td>LAeq (15 minute)</td><td>-</td><td>46</td></tr><tr><td>Morning-Shoulder</td><td>LAeq (15 minute)</td><td>-</td><td>46</td></tr><tr><td>Morning-Shoulder</td><td>Lmax OR LA1,1min</td><td>-</td><td>58</td></tr></table>	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	<p>Kings Park Metal Recovery Processing and Recycling Facility - Noise Monitoring Report (Renzo Tonin & Associates, 28 August 2025)</p> <p>Email: Sell & Parker Pty Ltd - EPA Request for Noise Monitoring at Kings Park Facility (EPL 11555) (NSW EPA, 25 July 2025)</p>	<p>A noise monitoring report (Renzo Tonin & Associates, 28 August 2025) confirmed that noise monitoring of EPL Point 1 had been undertaken.</p> <p>Correspondence from the NSW EPA confirms that the EPL does not specify when noise monitoring must be undertaken (i.e., the frequency of monitoring required).</p>	Compliant	
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																						
L4.2	<p>For the purpose of condition L4.1;</p> <ul style="list-style-type: none">• Day is defined as the period from 7am to 6pm Monday to Saturday.• Evening is defined as the period from 6pm to 10pm Monday to Saturday.• Morning Shoulder is defined as the period 6am to 7am Monday to Saturday.	Noted.	Noted.	Not triggered																					
L4.3	<p>The noise limits set out in condition L4.1 apply under all meteorological conditions except for the following:</p> <p>a) Wind speeds greater than 3 metres/second at 10 metres above ground level.</p> <p>b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</p> <p>c) Stability category G temperature inversion conditions.</p>	Noted.	Noted.	Not triggered																					
L4.4	<p>For the purposes of condition L4.3:</p> <p>a) Data recorded by a meteorological station installed on the premises must be used to determine meteorological conditions; and</p> <p>b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Fact Sheet D of Noise Policy for Industry (section D1.4 - use of sigma theta data).</p>	<p>Ambient Air Quality Monitoring Validated Report - Report No.: DAT22374 (Acoem Australasia, 28 February 2025).</p> <p>Maintenance Report for Sell and Parker Blacktown (Acoem, 1 July 2024).</p>	<p>Monthly report confirms the met station is operational.</p> <p>The bimonthly maintenance report confirms that the equipment is being maintained.</p> <p>During the site inspection one of the met sensors was noted attached to the southern side of the admin building.</p>	Compliant																					

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
L4.5	<p>To determine compliance:</p> <p>a) With the $L_{Aeq(15 \text{ minute})}$ noise limits in condition L4.1, the noise measurement equipment at monitoring points 1 and 13 must be located:</p> <ul style="list-style-type: none"> · Approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or · Within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable within approximately 50 metres of the boundary of a National Park or a Nature Reserve. <p>b) With the $LA_{1,1min}$ noise limits in condition L4.1, the noise measurement equipment at the monitoring points 1 and 13 must be located within 1 metre of a dwelling façade.</p> <p>c) With the noise limits in condition L4.1, the noise measurement equipment at the noise monitoring point/s specified in this licence must be located:</p> <ul style="list-style-type: none"> · At the most affected point at a location where there is no dwelling at the location; or · At the most affected point within an area at a location prescribed by conditions L4.5(a) or L4.5(b). 	Kings Park Metal Recovery Processing and Recycling Facility - Noise Monitoring Report (Renzo Tonin & Associates, 28 August 2025)	Noise monitoring was undertaken in accordance with the latest version of the NSW Industrial Noise Policy at EPL Point 1 (Renzo Tonin & Associates, 28 August 2025).	Compliant	
L4.6	<p>A non-compliance of condition L4.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured:</p> <ul style="list-style-type: none"> • at a location other than an area prescribed by conditions L4.5(a) and L4.5(b); and/or • at a point other than the most affected point at a location. 	Noted.	Noted.	Not triggered	
L4.7	<p>For the purposes of determining the noise generated at the Premises the modification factors in Fact Sheet C of the Noise Policy for Industry must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.</p> <p>Note: Noise is 'sound pressure levels' for the purposes of conditions L4.1 to L4.7.</p> <p>Note: Noise Policy for Industry is the document titled "Noise Policy for Industry" published by the NSW Environment Protection Authority in October 2017".</p>	Noted.	Noted.	Not triggered	
L5	Hours of operation				

Environmental Protection Licence –EPL No. 11555																														
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																									
L5.1	<div>Activities at the premises must be conducted within the following approved hours:</div> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday to Friday</td><td>7am to 6pm</td></tr><tr><td>Saturday</td><td>8am to 1pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="2">Oxy-acetylene torch cutting</td><td>Monday to Saturday</td><td>9am to 3pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="2">Cleaning & Maintenance</td><td>Monday to Saturday</td><td>9pm to 6am</td></tr><tr><td>Sunday & Public Holidays</td><td>24 hours</td></tr><tr><td rowspan="2">All other operational activities</td><td>Monday to Saturday</td><td>6am to 9pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr></table> <div>Note: The EPA will not permit any changes to hours of oxy-acetylene torch cutting unless the Secretary of the NSW Department of Planning and Environment (or nominee) agrees in writing to change the hours of operation specified in development consent No. SSD 5041.</div>	Activity	Day	Hours	Construction	Monday to Friday	7am to 6pm	Saturday	8am to 1pm	Sunday & Public Holidays	Nil	Oxy-acetylene torch cutting	Monday to Saturday	9am to 3pm	Sunday & Public Holidays	Nil	Cleaning & Maintenance	Monday to Saturday	9pm to 6am	Sunday & Public Holidays	24 hours	All other operational activities	Monday to Saturday	6am to 9pm	Sunday & Public Holidays	Nil	Sell & Parker Weighbridge Tickets: Ticket: 10036511 (18 April 2023) – 1 st truck (06:12) Ticket: 10040581 (18 April 2023) – Last truck (16:40) Ticket: 11223401 (10 September 2024) – 1 st truck (06:40) Ticket: 11225321 (10 September 2024) – Last truck (17:32) Ticket: 11546191 (1 May 2025) – 1 st truck (06:21) Ticket: 11548211 (1 May 2025) – Last truck (19:11)	The Proponent was able to demonstrate that the operating hours were being undertaken in accordance with the condition with records of the first and last trucks entering and leaving the site within the approved hours of operation.	Compliant	
Activity	Day	Hours																												
Construction	Monday to Friday	7am to 6pm																												
	Saturday	8am to 1pm																												
	Sunday & Public Holidays	Nil																												
Oxy-acetylene torch cutting	Monday to Saturday	9am to 3pm																												
	Sunday & Public Holidays	Nil																												
Cleaning & Maintenance	Monday to Saturday	9pm to 6am																												
	Sunday & Public Holidays	24 hours																												
All other operational activities	Monday to Saturday	6am to 9pm																												
	Sunday & Public Holidays	Nil																												
L5.2	Condition L5.2 does not apply to the delivery of material outside the hours of operation permitted by condition L5.2, if that delivery is required by police or other authorities for safety reasons. In such circumstances, prior notification must be provided to the EPA and affected residents as soon as possible or within a reasonable period in the case of emergency.	The Proponent advised that there has been no requirement for delivery of material to the site outside those listed in Condition L5.2.	The Proponent advised that there has been no requirement for delivery of material to the site outside those listed in Condition L5.2.	Compliant																										
L6	Potentially offensive odour																													
L6.1	<div>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.</div> <div>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</div>	<div>Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).</div> <div>Email: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (NSW EPA, 3 July 2025).</div> <div>Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Department of Planning, Housing and Infrastructure, 1 July 2025).</div> <div>Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Blacktown City Council, 5 July 2025).</div>	<div>The Department, NSW EPA or BCC did not raise any issues in relation to Condition B15 in consultation regarding the development of this audit scope.</div> <div>No offensive odours were noted during the time of the audit.</div>	Compliant																										
L7	Other limit conditions																													
	Airblast Overpressure																													

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
L7.1	The airblast overpressure level from explosions on the Premises must not exceed 120dB (Lin Peak) when measured at Monitoring Point 11.	<p>Monitoring Results (https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p> <p>NSW EPA EPL Register website for EPL No. 11555 Annual Return (19-Apr-2022 - 18-Apr-2023) Annual Return (19-Apr-2023 - 18-Apr-2024) Annual Return (19-Apr-2024 - 18-Apr-2025)</p>	Sell & Parker noted exceedances of the 120dB (Lin Peak) associated with the Development in the last three Annual Returns supplied to the NSW EPA and available on their EPL Register website.	Non-compliant	SSD5041_IEA04_NC01
L7.2	The licensee must measure airblast overpressure at the boundary of the premises whilst any activities are being carried out at the premises.	<p>Nexus system (online platform).</p> <p>Monitoring Results (https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p> <p>NSW EPA EPL Register website for EPL No. 11555 Annual Return (19-Apr-2022 - 18-Apr-2023) Annual Return (19-Apr-2023 - 18-Apr-2024) Annual Return (19-Apr-2024 - 18-Apr-2025)</p>	<p>The licensee was able to demonstrate that the airblast overpressure was being monitored. The real time online monitoring system Nexus was sighted by the Auditor.</p> <p>The monitoring unit was sighted during the site inspection.</p>	Compliant	
L7.3	The licensee shall undertake all reasonable and feasible measures necessary to prevent explosions from occurring at the premises.	<p>Complaints Register on website (Kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p> <p>EPL Reporting: Email: REF-NO-30487 Report to NSW EPA (NSW EPA, 5 June 2024). Email: RE: REF-NO-30487 (Sell & Parker, 19 July 2024) - Official Report.</p> <p>Internal Awareness: Environmental Communications - Accumulators (Sell & Parker, File date: 23 April 24). Environmental Communications - Airblast Overpressure (Sell & Parker, File date: 22 October 2024).</p> <p>Damstra Online Sell & Parker Safety System: Airblast Overpressure - signed off by Sell & Parker workers (22 October 2024). Toolbox Meeting Form - Enviro Communication Accumulators (26 April 2024).</p> <p>External Awareness: Environmental Compliance Communication - Supplier</p>	<p>During consultation to develop the audit scope, the NSW EPA identified concerns with the exceedances of the air blast overpressure levels.</p> <p>The following observations were made through the audit: EPL reporting: The airblast overpressure events were appropriately reported by Sell & Parker in accordance with Condition R2 of the EPL No. 11555.</p> <p>Controls and awareness: The Noise Management Plan (NMP) identifies controls aimed at excluding waste items being delivered to the premises and ending up in processing machinery that may lead to an airblast overpressure event.</p> <p>This includes all parties involved in the process (waste generators and Sell & Parker operators) being made aware of the materials that are not accepted on the site</p>	Compliant	

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
		<p>Information Batteries (Sell & Parker, 23 October 2023). Environmental Compliance Communication - Supplier Information Gas Bottles (Sell & Parker, 17 June 2024).</p> <p>Implement Disincentive: Noise Management Plan - Rev E (Arcadis, 12 September 2019). Email: FW: Scrap Assist Ticket: 11603181 (Sell & Parker, 10 July 2025). Email: FW: Express waste deduction - Gas Tanks (Sell & Parker, 10 June 2025).</p> <p>Investigation: Sell and Parker - EPA Licence Monitoring Data.</p>	<p>and the processes to follow should they be identified on site (including appropriate segregation for appropriate management and disposal). The awareness is provided to relevant parties via internal and external Sell & Parker developed communications (see evidence sighted).</p> <p>Sell & Parker also implements a disincentive process, whereby the waste generator has a portion of the overall tonnage of their load deducted and therefore their payment due to the inclusion of unacceptable waste. Evidence of this was sighted by the auditor showing process of "Deductions" being implemented. This included identifying gas bottles within a delivery that were set aside by the Sell & Parker weighbridge operator.</p> <p>Monitoring and event investigation The GEM provided an in-depth understanding the process that is followed by Sell & Parker to monitor airblast overpressure and the process where a potential airblast overpressure event has been flagged by the monitoring.</p> <p>Sell & Parker implement an online real time monitor (EPL Monitoring Point 11) which provides text message alerts for a potential airblast overpressure event (i.e., >120dB (Lin Peak). All potential events are investigated by the GEM and recorded for appropriate reporting.</p> <p>General It is noted by the Auditor that although there were 2 events reporting in the last EPL Annual Return, neither of these events corresponded to a noise complaint from the community.</p> <p>Site inspection The site inspection confirmed this process was being followed through conversations with Sell & Parker operators and the</p>		

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>sighting of segregated waste (including an area for placement of gas bottles identified on site, containing segregated gas bottles).</p> <p>Clear and legible signage stating unacceptable materials were noted during the site inspection, including the key locations of the public waste drop-off point and the truck weighbridge entrance to the site.</p> <p>As noted above, Sell & Parker appear to be undertaking all reasonable and feasible measures necessary to prevent explosions occurring at the premises.</p>		
L7.4	The licensee must prepare and implement an Air Blast Overpressure Management Plan. The Plan must include, but not be limited to, a description of all reasonable and feasible measures that will be implemented to achieve the noise limits in condition L7.1 such as: - All petrol tanks and other dangerous chemical containers removed from scrap metal prior to shredding; - Any potentially explosive devices including gas cylinders, not entering the shredder.	Air Blast Overpressure Sub Plan - Doc No.:BT-ENV-PRO-ABO-25A (Sell & Parker, 5 May 2025).	The Proponent was able to demonstrate that they were implementing the Air Blast Overpressure Sub Plan (See L7.3 above for further details).	Compliant	
4	Operating conditions				
O1	Activities must be carried out in a competent manner				

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Outcomes of the site inspection.	During the site inspection the following observations were made by the Auditor to verify the activities were being undertaken in a competent manner. This included: - The workers interviewed onsite demonstrating an understanding of the processes and in particular for waste segregation. - Material processing, handling, movement and storage was observed throughout the site including: - loads being brought through the gate and weighbridge, - inspection and direction by traffic controllers to appropriate areas for unloading, - operators sorting, placing and segregating materials, - movement and processing of recyclable metal from the waste product (floc), - clear segregation of waste types and dangerous items (such as gas bottles).	Compliant	
O2	Maintenance of plant and equipment				
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	FIIX maintenance system (online). PC and Phone App Service Record Spreadsheet (Sell & Parker, 2025) F-93 Battery Forklift: Daily Pre-start (10 July 2025) Service Report (Linde, 1 May 2025) Scheduled Maintenance for 500hrs. L-9 Danieli Shear Work Instruction: Blade Change (Sell & Parker, March 2022) Daily Pre-start (16 June 2025). Blacktown Maintenance Repair Contact Flowchart (Sell & Parker, not dated)	Sell & Parker were able to demonstrate a thorough maintenance system, which includes the use of a proprietary online maintenance system (FIIX), which is accessed via mobile application or via a computer. The system includes both preventative (an onboarding process and scheduled maintenance triggered by hours and/or time of service) and reactive maintenance (triggered by observations, such as pre-start checklists) of their mobile and fixed plant and equipment. These maintenance processes were observed during the audit through: - discussion with the maintenance team (Maintenance Administrator and	Compliant	

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>Maintenance Manager) and an operator (Storeperson).</p> <ul style="list-style-type: none"> - the random selection of a mobile plant (ID: F-93 Linde Forklift R165) and fixed plant (ID: L-9 Danieli Shear) during the site inspection to verify Sell & Parkers processes. - Sighting the FIIX system, the associated service tracking spreadsheet and the Blacktown Maintenance Repair Contact Flowchart. <p>During the site walk, an Operator was able to demonstrate their knowledge of Sell & Parkers maintenance process and their competence in using maintenance system (FIIX). They were able to demonstrate they could access the FIIX app on their mobile phone by scanning the affixed QR code (the plant identification) and showing the Auditor the completed pre-start process for F-93 for that day.</p> <p>The Maintenance Administrator was able to demonstrate to the Auditor the broader maintenance system using the F-93 Linde Forklift R165 and L-9 Danieli Shear as examples. This included:</p> <ul style="list-style-type: none"> - Confirming the effectiveness of the daily pre-start process using the L-9 Danieli Shear. This included providing an example of an "inspection fail" which was identified in the Daily Pre-Start (16 June 2025). This triggered a work order to the maintenance team. The FIIX records show that the rectification work was completed on 25 June 2025. - Providing records of the preventative maintenance undertaken on the F-93 Linde Forklift R165, which has a scheduled maintenance set at 500 hours or 1 year (whichever comes first). This was last performed by the supplier (Linde) 1 May 2025. <p>In addition to the FIIX system the Maintenance Administrator uses a Service Tracking Spreadsheet for all Sell & Parker</p>		

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			<p>plant and equipment use to assist the process of tracking the business maintenance requirements.</p> <p>The maintenance team also have a Blacktown Maintenance Repair Contact Flowchart to assist their workers to understand the maintenance process used at the site. During the site inspection the Flowchart was sighted on display on the workplace noticeboard found in the Non-ferrous Processing Building. It was also displayed within the Maintenance Administrators work cubicle.</p>		
O3	Dust				

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise emission of dust from the premises.	<p>Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p> <p>Email: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (NSW EPA, 3 July 2025).</p> <p>Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Department of Planning, Housing and Infrastructure, 1 July 2025).</p> <p>Email: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development (Blacktown City Council, 5 July 2025).</p> <p>Outcomes of the site inspection.</p>	<p>The Department, NSW EPA or BCC did not raise any issues in relation to dust in consultation regarding the development of this audit scope.</p> <p>During the site inspection the following controls were noted:</p> <ul style="list-style-type: none"> - ECS servicing the hammermill was in place and operational - A single oxy-acetylene torch was being operated between the approved hours, within an area set up with block walls to minimise wind impacts and with a misting cannon wetting down the process. - Enclosed conveyors were observed throughout the site. - Water sprayers and misters were observed in operation at multiple operational working areas. - The roads were sealed and maintained. - Each of the boundaries was screened by significant structures. - A road sweeper was located onsite and was observed maintaining the cleanliness of the internal roads. - The wheelwash was in place and operational prior to the truck site exit. - The surfaces of the entrance and exit roads was clear of tracked materials, including sediment or oil. - Although the wind speed was moderate to strong at the time of the inspection there was no evidence of visible/fugitive dust being generated on the site. - there was no fugitive dust being generated at the stockpiles of scrap metal and processed material which were all being actively worked on at the time of the audit. 	Compliant	
O3.2	The licensee must manage stockpiles of scrap metal and processed material to ensure air emissions are minimised.	Outcomes of the site inspection.	During the site inspection there was no fugitive dust being generated at the stockpiles of scrap metal and processed material which were all being actively worked on at the time of the audit.	Compliant	

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
O3.3	All areas on the premises must be maintained, at all times, in a condition which effectively minimises the emission of wind-blown or traffic-generated dust.	Outcomes of the site inspection.	See details in O3.1 above.	Compliant	
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked onto public roads from the premises.	Outcomes of the site inspection.	See details in O3.1 above.	Compliant	
O3.5	Ambient real time PM10 Dust Monitors must be installed and operated in accordance with the information supplied to the EPA in the report by ERM, <i>Waste Metal Recovery, Processing and Recycling Facility 45 and 23-43 Tattersall Road, Kings Park, Blacktown, Air Quality Assessment, Sell & Parker Pty Ltd, September 2015.</i>	Online PM10 monitor. File name: 26 June (screen grab of air monitoring online system). Dust Monitoring Spreadsheet 2024, BT-ENV-FOR-DRS (Sell & Parker).	The Auditor sighted the real time PM10 monitoring data provided via the online system. Sell & Parker were able to demonstrate that the data was being used to actively manage potential air quality impacts from the site activities. This was captured in the dust monitoring spreadsheet, which documents Sell & Parkers review of data, investigation into elevated readings and actions required if identified.	Compliant	
O3.6	The licensee must keep a legible record of when dust generating activities are reduced or ceased as a result of the dust monitoring required by Condition O3.4 including: a) the date and time that dust generating activities were reduced or ceased; and b) what activities were reduced or ceased. These records must be made available to the EPA on request.	Dust Monitoring Spreadsheet 2024, BT-ENV-FOR-DRS (Sell & Parker).	Sell & Parker were able to demonstrate that the data was being used to actively manage potential air quality impacts from the site activities. This was captured in the dust monitoring spreadsheet, which documents Sell & Parkers review of data, investigation into elevated readings and actions required if identified.	Compliant	
O4	Emergency response				
O4.1	The licensee must develop, implement, maintain and test a Pollution Incident Response Management Plan (PIRMP) in accordance with the requirements under Part 5.7A of the <i>Protection of the Environment Operations Act 1997</i> and its regulations.	Pollution Incident Response Management Plan, v1.9 (Sell & Parker, 20 March 2019) (https://www2.sellparker.com.au/about/environmental-social-and-governance/) PIRMP Exercise Report (Sell & Parker, 14 February 2024) Environmental Communication Fuel Tank Breach (Sell & Parker, undated)	The Proponent has a PIRMP for the premises and it can be found on the Sell & Parker website. The PIRMP is maintained on an annual basis (i.e. reviewed). The PIRMP is tested annually, with the last test undertaken on 14 February 2024. This test included a scenario of an "Unknown chemical leak". Evidence was sighted that the recommendations from the PIRMP test were closed out by the Proponent.	Compliant	
	Fire Control				
O4.2	There must be no burning or incineration of waste at the premises.	Outcomes of the site inspection	There was no burning or incinerating of waste evident at the premises noted during the site inspection. See Condition B35 of the Approval (SSD	Compliant	

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			5041) for more detail on the management of fires at the site.		
04.3	The height of any stockpile of shredder floc must not exceed 4 metres.	Outcomes of the site inspection	During the site inspection the following was noted in relation to fire management: - The stockpiles of the shredder floc did not exceed 4 metres.	Compliant	
05	Processes and management				
05.1	The licensee must ensure that any waste generated and/or stored at the Premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	NSW EPA WARRP Site online report: WARRP 2021-2022, 2022-2023, 2023-2024 Report (Online) Notice of Facility under Clause 12(7)(b): Notification of specified waste facilities generating residual waste directly from the shredding of scrap metal (NSW EPA, 27 September 2019). Government Gazette No. 110 (State of New South Wales, 27 September 2019).	Shredder floc waste has been sent to landfills and has been reported to the NSW EPA through the Annual Waste Summary Report which is submitted to the EPA via the Waste and Resource Reporting Portal (WARRP).	Compliant	
05.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Outcomes of the site inspection.	During the site inspection it was noted that waste for recycling (metals) were being stored separately from other waste.	Compliant	
05.3	The Licensee must store all chemicals, fuels and oils at the Premises in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's <i>Storing and Handling Liquids: Environment Protection - Participant's Manual 2007</i> .	Outcomes of the site inspection.	During the site inspection it was noted that: <ul style="list-style-type: none"> The operational work areas that present the highest risk from the potential release of chemicals are effectively self-contained, with all water in these areas captured and treated onsite. Water is reused onsite or disposed of in accordance with Sydney Water Trade Waste Agreement. Spill response kits were available across the site. One was low on stock (but not empty). Chemical storage lockers were located across the site. The gensets and lube station were self-bunded. The retractable hoses for dispensing the product at the lube station sits within a small, covered shed. There is evidence of staining in and adjacent to the concrete bund below the hoses. An IBC of hypochlorite solution was located on a bund adjacent to the water treatment area with a deluge safety shower and 	Compliant	SSD5041_IEA04_REC01

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
			<p>eyewash located in close proximity. The bund and IBC is located on an unlevel concrete slab which would reduce its effective storage capacity. The chemical is also stored within a trafficable area without any protection from potential mechanical damage. These present a risk of potential uncontrolled discharge to the self-contained site.</p> <ul style="list-style-type: none"> The oil store is a covered and concrete bunded area. IBCs and smaller containers of mixed chemicals are stored within the bunded and covered area. There was some evidence of staining on the concrete outside the bund and there was damage to the raised lip of the bund (noting that there is a sump area below the raised lip of the bund). Spill response kits were located adjacent to the oil store. <p>Recommendation</p> <ul style="list-style-type: none"> The spill response kits should be inspected and re-stocked as appropriate. The lube station dispensing area is inspected and appropriately cleaned. Review chemical storage against the requirements of the relevant Australian Standards and the NSW EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007. The Proponent is to take appropriate action based on the outcomes of the review 		
O6	Other operating conditions				
O6.1	The hammermill must be serviced by a emission collection system consisting of a wet scrubber and cyclone or other pollution control equipment capable of achieving equivalent emission control performance. The use of alternate control equipment must be approved in writing by the EPA prior to installation.	<p>Kings Park Environmental Audit Report Rev 0.1 (JBS&G, 15 December 2022).</p> <p>Outcomes of the site inspection.</p>	<p>This item was closed out in the previous independent audit.</p> <p>The emission collection system was operational during the site inspection.</p>	Compliant	
O6.2	<p>a) Oxy-cutting must be undertaken under wet conditions.</p> <p>b) Oxy-cutting must be undertaken by only one oxy-cutter at a time.</p>	Outcomes of the site inspection.	<p>During the site inspection the following controls were noted:</p> <p>- A single oxy-acetylene torch was being operated between the approved hours, within an area set up with block walls to minimise wind impacts and with a misting cannon wetting down the process.</p>	Compliant	

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
O6.3	Truck unloading of raw materials and output from pre-shredder onto stockpiles must be completed with a water spray suppression control.	Outcomes of the site inspection.	During the site inspection water sprayers and misters were observed in operation at multiple operational working areas, including the truck unloading of raw materials and output from pre-shredder onto stockpiles.	Compliant	
O6.4	By-product stockpiles, including all automotive shredder residue (floc), must be stored in an enclosed structure.	Outcomes of the site inspection.	During the site inspection the stockpiles of shredder floc were enclosed within the Post-shredder Processor Building.	Compliant	
O6.5	All conveyors and conveyor transfer points must be fully enclosed.	Outcomes of the site inspection.	During the site inspection the conveyors were fully enclosed.	Compliant	
O6.6	All enclosures required by conditions O6.4 and O6.5 must be designed and operated to minimise the release of fugitive emissions.	Outcomes of the site inspection.	During the site inspection it was noted that there were no fugitive emissions from the enclosure of the shredder floc or the conveyor systems.	Compliant	
5	Monitoring and Recording Conditions				
M1	Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted.	Noted.	Compliant	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	(https://www2.sellparker.com.au/about/environmental-social-and-governance/).	The Auditor sighted evidence of records being kept in a legible form and had been kept for at least 4 years.	Compliant	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Annual Emission Testing Report, Report Number R016827, Ektimo, 4 June 2024. Letter: Re: Ektimo Emissions Report R018494, Solid Particle Results - Ref: R018494-1 (9 May 2025).	The Auditor sighted evidence that the required records were being kept in respect to the samples being collected.	Compliant	
M2	Requirement to monitor concentration of pollutants discharged				
	Air Monitoring Requirements				

Environmental Protection Licence –EPL No. 11555																																													
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																																								
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.	Annual Emission Testing Report, Report Number R012570, Ektimo, 10 June 2022. Annual Emission Testing Report, Report Number R014713, Ektimo, 5 July 2023. Annual Emission Testing Report, Report Number R016827, Ektimo, 4 June 2024.	The annual emission reports were sighted by the Auditor to verify that EPL Point 3 was being monitored in accordance with Condition M2.2 and using selection of the sampling position using sampling method TM-1 (Condition M2.3).	Compliant																																									
M2.2	Air Monitoring Requirements POINT 3 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Yearly</td><td>TM-23</td></tr><tr><td>Moisture</td><td>percent</td><td>Yearly</td><td>TM-22</td></tr><tr><td>Molecular weight of stack gases</td><td>grams per gram mole</td><td>Yearly</td><td>TM-23</td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-15</td></tr><tr><td>Temperature</td><td>Celsius</td><td>Yearly</td><td>TM-2</td></tr><tr><td>Type 1 substance</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-12</td></tr><tr><td>Type 2 substance</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-13</td></tr><tr><td>Velocity</td><td>metres per second</td><td>Yearly</td><td>TM-2</td></tr><tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Yearly</td><td>TM-2</td></tr></table>	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	See details in Condition M2.1.	See details in Condition M2.1	Compliant	
Pollutant	Units of measure	Frequency	Sampling Method																																										
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Velocity	metres per second	Yearly	TM-2																																										
Volumetric flowrate	cubic metres per second	Yearly	TM-2																																										
M2.3	The selection of sampling positions for the above air monitoring condition must be selected in accordance with sampling method TM1.	See details in Condition M2.1	See details in Condition M2.1	Compliant																																									
M3	Testing methods - concentration limits																																												
	Air Emissions																																												
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Protection of the Environment Operations (Clean Air) Regulation 2021 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	See details in Condition M2.1	See details in Condition M2.1	Compliant																																									
M4	Weather monitoring																																												

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Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID																																													
M4.1	<p>At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.</p> <p>POINT 12</p> <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Siting</td><td>AM-1</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Sigma Theta</td><td>AM-2 & AM-4</td><td>Degrees</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Temperature at 2 metres</td><td>AM-4</td><td>Kelvin</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Temperature at 10 metres</td><td>AM-4</td><td>Kelvin</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Total Solar Radiation</td><td>AM-4</td><td>Watts per square metre</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>Degrees</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Rainfall</td><td>AM-4</td><td>millimetres per hour</td><td>1 hour</td><td>Continuous</td></tr></table>	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	<p>Ambient Air Quality Monitoring Validated Report - Report No.: DAT22374 (Acoem Australasia, 28 February 2025).</p> <p>Maintenance Report for Sell and Parker Blacktown (Acoem, 1 July 2024).</p>	<p>Monthly report confirms the met station is operational.</p> <p>The bimonthly maintenance report confirms that the equipment is being maintained.</p> <p>During the site inspection one of the met sensors was noted attached to the southern side of the site office.</p>	Compliant	
Parameter	Sampling method	Units of measure	Averaging period	Frequency																																														
Siting	AM-1	-	-	-																																														
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Rainfall	AM-4	millimetres per hour	1 hour	Continuous																																														
M4.2	<p>The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in Condition M4.1 except during specified maintenance periods. Written notification must be submitted to the EPA not later than 24 hours prior to any time periods that continuous monitoring will be interrupted due to any specified maintenance.</p>	<p>Email: EPL11555 M4.2 notification (Sell & Parker, 6 August 2024).</p>	<p>Sell & Parker provided the NSW EPA written notification via email to info@epa.nsw.gov.au for the planned maintenance of the meteorological weather station.</p>	Compliant																																														
M5	<p>Recording of pollution complaints</p>																																																	
M5.1	<p>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</p>	<p>Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p>	<p>The licensee was able to demonstrate that they kept a legible record of all complaints made. The complaints register was sighted by the Auditor.</p>	Compliant																																														
M5.2	<p>The record must include details of the following:</p> <p>a) the date and time of the complaint;</p> <p>b) the method by which the complaint was made;</p> <p>c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</p> <p>d) the nature of the complaint;</p> <p>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the licensee, the reasons why no action was taken.</p>	<p>Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).</p>	<p>Notes:</p> <p>a) date is included, time is included</p> <p>b) method of complaint included</p> <p>c) personal details or note included</p> <p>d) nature of the complaint included</p> <p>e) action taken included</p> <p>f) reason no action was taken included</p>	Compliant																																														

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).	Public complaints register has data from 2014, which is greater than the 4 year requirement.	Compliant	
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).	Available on the public website.	Compliant	
M6	Telephone complaints line				
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Complaints Register on website (kings Park Facility - Monitoring Results: https://www2.sellparker.com.au/about/environmental-social-and-governance/).	A telephone complaints line (8212 9561) was noted on the site entrance signage and also on the complaints register.	Compliant	
		Outcomes of the site inspection. FIIX Work Order: WO 50975 Raised 8 July 2025 Closed 10 July 2025	The FIIX system is used to monitor and maintain the complaints line. The system generates a work order to prompt the GEM to test the phonenumber.		
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	See EPL Condition M6.1	See EPL Condition M6.1	Compliant	
M6.3	The preceding two conditions do not apply until one month after the date of the issue of this licence.	N/A	N/A	Not triggered	
M7	Other monitoring and recording conditions				
	Airblast overpressure				
M7.1	An airblast overpressure monitor must be operated continuously whilst any activities are being carried out at the premises to measure and electronically record airblast overpressure levels.	Nexus system (online platform) Monitoring Results (https://www2.sellparker.com.au/about/environmental-social-and-governance/).	The licensee was able to demonstrate that the airblast overpressure was being monitored. The real time online monitoring system Nexus was sighted by the Auditor.	Compliant	
		NSW EPA EPL Register website for EPL No. 11555. Annual Return (19-Apr-2022 - 18-Apr-2023). Annual Return (19-Apr-2023 - 18-Apr-2024). Annual Return (19-Apr-2024 - 18-Apr-2025).	The monitoring unit was sighted during the site inspection.		

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
M7.2	Instrumentation used to measure and record the airblast overpressure must meet the requirement of Australian Standard AS 2187.2-2006.	ETM Calibration Certificate #737420241125 (Texcel, 25 November 2024).	The ACO Flat 7052S/4052BL microphone system, which is listed on the calibration certificate, appears to meet or exceed the technical requirements for blast monitoring under Australian Standard AS 2187.2-2006.	Compliant	
M7.3	Explosions resulting in an airblast overpressure reading exceeding 120dB (Linear Peak) must be recorded and reported to the EPA's Environment Line within 24 hours of the explosion. The written record and report of the explosion must include: a) the time and date of the explosion; and b) the airblast overpressure for the explosion.	EPL Reporting: Email: REF-NO-30487 Report to NSW EPA (NSW EPA, 5 June 2024). Email: RE: REF-NO-30487 (Sell & Parker, 19 July 2024) - Official Report	The Auditor was able to validate that the Licensee was recording and reporting the explosions resulting in an airblast overpressure reading exceeding 120dB (Linear Peak).	Compliant	
6	Reporting Conditions				
R1	Annual return documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	NSW EPA EPL Register website for EPL No. 11555. Annual Return (19-Apr-2022 - 18-Apr-2023). Annual Return (19-Apr-2023 - 18-Apr-2024). Annual Return (19-Apr-2024 - 18-Apr-2025).	The Annual Returns were provided by the Licensee to the EPA for each year of the audit period.	Compliant	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	See R1.2 detailed above.	See R1.2 detailed above.	Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	NSW EPA EPL Register website for EPL No. 11555.	The licence has not been transferred to a new licensee within the audit period.	Not triggered	

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	NSW EPA EPL Register website for EPL No. 11555.	The licence has not been surrendered within the audit period.	Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	NSW EPA EPL Register website for EPL No. 11555. Annual Return (19-Apr-2022 - 18-Apr-2023). Annual Return (19-Apr-2023 - 18-Apr-2024). Annual Return (19-Apr-2024 - 18-Apr-2025).	The Annual Returns were provided by the Licensee to the EPA for each year of the audit period within the requirements of Condition R1.5.	Compliant	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	NSW EPA EPL Register website for EPL No. 11555. Annual Return (19-Apr-2021 - 18-Apr-2022). Annual Return (19-Apr-2022 - 18-Apr-2023). Annual Return (19-Apr-2023 - 18-Apr-2024). Annual Return (19-Apr-2024 - 18-Apr-2025).	The Auditor verified the licensee has retained copies of the Annual Returns for at least 4 years.	Compliant	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	NSW EPA EPL Register website for EPL No. 11555. Annual Return (19-Apr-2021 - 18-Apr-2022). Annual Return (19-Apr-2022 - 18-Apr-2023). Annual Return (19-Apr-2023 - 18-Apr-2024). Annual Return (19-Apr-2024 - 18-Apr-2025).	The Auditor verified the licensee has met the requirements of Condition R1.7.	Compliant	
R2	Notification of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	N/A	No notifications of environmental harm have been made during the audit period.	Compliant	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	N/A	No notifications of environmental harm have been made during the audit period.	Compliant	
R3	Written report				

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Request R3 Report - Fire Incident - Sell & Parker - EPL 11555 (DOC22/1046496, NSW EPA 25 January 2023). Request for Report under Condition R3 – Sell & Parker Pty Ltd – Environment Protection Licence no. 11555 (DOC24/279241, NSW EPA 18 April 2024).	Two R3 requests were made by the NSW EPA during the audit period.	Compliant	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Request R3 Report - Fire Incident - Sell & Parker - EPL 11555 (DOC22/1046496, NSW EPA 25 January 2023). Request for Report under Condition R3 – Sell & Parker Pty Ltd – Environment Protection Licence no. 11555 (DOC24/279241, NSW EPA 18 April 2024).	The Licensee provided the reports within the requested timeframe.	Compliant	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Request for further information - R3 Report - Fire Incident Sell & Parker Pty Ltd - EPL 11555 (Sell & Parker, 7 February 2023). R3 Report Request (Overpressures Feb and April 2024), (Sell& Parker, 28 July 2023).	Based on the EPAs request for a written report of the event in accordance with Condition R3.1, Sell & Parker issued the written reports with the required information and within the timeframes requested by the EPA.	Compliant	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not triggered.	Not triggered.	Not triggered	
R4	Other reporting conditions				

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
R4.1	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year commencing in 2016/17, comprising the following information: 1. Amount of waste received and removed from the Premises (in tonnes); 2. Waste stream (Municipal, Commercial and Industrial, Construction and Demolition or Other) and waste type (Refer to Table 3.1 of the NSW EPA's Waste Levy Guidelines); and 3. Amount of waste processed to a Resource Recovery Order (RRO), if applicable.	See details in Condition R4.1 below.	See details in Condition R4.1 below.	Compliant	
R4.2	The Annual Waste Summary Report must be submitted to the EPA via the Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	NSW EPA WARRP Site online report: WARRP 2021-2022, 2022-2023, 2023-2024 Report (Online).	The Annual Waste Summary Report which must be submitted to the EPA via the Waste and Resource Reporting Portal (WARRP) was viewed at the time of the audit and submission was confirmed.	Compliant	
Annual Shredder Floc Performance Report					
R4.3	The Licensee must provide an Annual Shredder Floc Performance Report to the EPA within 60 days of the end of each financial year period up to and including 30 June 2024. The report must detail for the previous financial year period: a) performance against the shredder floc benchmark of an annual recovery rate of 77.5% from the facilities scrap metal infeed and a maximum shredder floc generation rate of 22.5% from this same infeed material; b) The quantity in tonnes for each calendar month of: i. scrap metal infeed received, ii. shredder floc disposed offsite, including the name of the waste disposal facility accepting the shredder floc, iii. scrap metal removed offsite, iv. any waste including shredder floc, that was transported off the premises under a Resource Recovery Order. v. the waste types (determined in accordance with the Waste Levy Guidelines) of waste received at the premises. c) Measures taken to improve the resource recovery rate of scrap metal and reduce the amount of shredder floc generated and disposed of at scheduled waste disposal facilities. The Annual Shredder Floc Performance Report must be submitted to RegOps.MetroRegulations@epa.nsw.gov.au	Email: Annual Shredder Floc Performance Report, Sell & Parker, 30 August 2022. Email: Reports from PhD student, Sell & Parker, 19 July 2022. Email: Sell & Parker - Annual Shredder Floc Performance Report, Sell & Parker, 30 August 2023. Email: Annual Shredder Floc Performance Report EPL 11555, condition R4.3, Sell & Parker, 30 August 2024.	The Annual Shredder Floc Performance Reports for the Audit period were submitted to the EPA within 60 days of the end of each financial year period up to and including 30 June 2024.	Compliant	
R4.4	The following records must be kept for 6 years and made available to the EPA on request: a) information required to compile the Annual Shredder Floc Performance Report, as specified in Condition R4.3.	Sell & Parker Electronic Filing System	The Proponent was able to demonstrate that they were keeping records. The Auditor sighted electronic filing records back to 2014-15.	Compliant	

Environmental Protection Licence –EPL No. 11555					
Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status	NC & REC ID
R4.5	For conditions R4.3 and R4.4: a) Shredder Floc means residual waste generated directly from the shredding of scrap metal. b) financial year period means the period of 12 months commencing on 1 July in any year.	Email: Annual Shredder Floc Performance Report, Sell & Parker, 30 August 2022. Email: Reports from PHD student, Sell & Parker, 19 July 2022. Email: Sell & Parker - Annual Shredder Floc Performance Report, Sell & Parker, 30 August 2023. Email: Annual Shredder Floc Performance Report EPL 11555, condition R4.3, Sell & Parker, 30 August 2024.	The Shredder Floc reports showed the residual waste generated directly from the shredding of scrap metal at the site. They also captured data for each financial year.	Compliant	
7	General Conditions				
G1	Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	EPL No. 11555.	A copy of the EPL was stored at the GEMs workspace and was also available online through the Sell & Parker website and the NSW EPA EPL Register.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted.	Noted.	Compliant	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	EPL No. 11555.	A copy of the EPL was stored at the GEMs workspace and was also available online through the Sell & Parker website and the NSW EPA EPL Register.	Compliant	

Appendix B

Planning Secretary Audit Team Agreement



NSW Planning ref: SSD-5041-PA-12

The Proper Officer
SELL & PARKER PTY LTD
11 Meadow Way
Banksmeadow New South Wales 2019
17/06/2025

Sent via the Major Projects Portal only

Kings Park RRF – Independent Environmental Auditor Endorsement request – SSD 5041

I refer to your request, (SSD-5041-PA-12), for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Kings Park Resource Recovery Facility (**Project**), submitted as required by Schedule 2, Condition C9(a) of SSD-5041 as modified (**consent**) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 21 May 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Wayne Duffy of WD Environmental Consulting to prepare the 2022-2025 Independent Environmental Audit for the Project.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to endorse an alternate auditor or audit team for future audits.

Please note, the Lead Auditor must attend the site inspection/s.

Should you wish to discuss the matter further, please contact Gabriel Peters Shaw, A/Team Lead on 0288376395 or email compliance@planning.nsw.gov.au

Yours sincerely

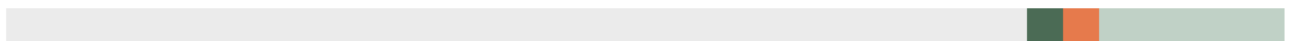
A handwritten signature in black ink, appearing to read "G. Peters Shaw".

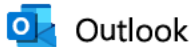
Gabriel Peters Shaw
A/Team Leader - Metro
Compliance

As nominee of the Planning Secretary

Appendix C

Consultation





Outlook

RE: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

From Gabriel Peters Shaw <gabriel.petersshaw@dpie.nsw.gov.au>

Date Tue 2025-07-01 3:59 PM

To Wayne Duffy <wayne.duffy@wdenvironmental.com.au>

Cc Howard Richards <howardr@sellparker.com.au>

Hi Wayne,

Thanks for your email, please see my responses below to your consultation request.

- Are there any key issues related to post-approval requirements and compliance that should be examined beyond those already outlined in Section 3.3 of the IAPAR or Condition C9? **Due to previous noise complaints, please review the operational noise impact/s and compliance with operational hours for the reporting period.**
- Are there any additional parties or agencies the Department recommends consulting? **No, you have identified the other agencies/parties that should be consulted.**
- Is there any feedback from the previous Independent Audit that should be incorporated into this audit? **No.**

Please attach this to the IEA report as evidence of consultation the NSW Planning.

If you have any questions please don't hesitate to contact me.

Regards,

Gabriel Peters Shaw

A/Team Leader – Metro Compliance

Planning & Assessment | Department of Planning, Housing and Infrastructure

T 02 8837 6395 | M 0499421171 | E gabriel.petersshaw@dpie.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au

Working days Monday to Friday 9:00am - 5:00pm



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

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

From: Wayne Duffy <wayne.duffy@wdenvironmental.com.au>

Sent: Wednesday, 25 June 2025 6:01 PM

To: Gabriel Peters Shaw <gabriel.petersshaw@dpie.nsw.gov.au>

Cc: Howard Richards <howardr@sellparker.com.au>

Subject: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

Hi Gabriel,

As the Department of Planning, Housing and Infrastructure's (the Department) approved Independent Auditor for Kings Park Waste Facility ([SSD-5041](#)) (the Project), and in accordance with the Department's correspondence (SSD-5041-PA-12, 17/06/2025), I am seeking the Department's input on the scope of the upcoming audit.

This audit will assess post-approval requirements and compliance during the operation phase of the Project. It will be conducted in line with Condition C9 of Schedule 2 (Part C) of the Planning Approval (SSD-5041), and the Department's 2020 Independent Audit Post Approval Requirements (IAPAR).

Audit Scope

As outlined in Section 3.3 of the IAPAR and Condition C9, the audit will include an assessment of:

- Each relevant condition for operation
- All post-approval documents prepared to satisfy the conditions of approval
- Implementation of relevant Environmental Management Plans and Sub-plans
- Compliance with the requirements in the consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals)
- Complaints data
- Relevant approvals and environmental protection licences

Consultation

In addition to consulting the Department, I am also seeking input from:

- Blacktown City Council
- NSW EPA

Request for Input

To assist in finalising the audit scope, I would appreciate the Department's feedback on the following:

- Are there any key issues related to post-approval requirements and compliance that should be examined beyond those already outlined in Section 3.3 of the IAPAR or Condition C9?
- Are there any additional parties or agencies the Department recommends consulting?
- Is there any feedback from the previous Independent Audit that should be incorporated into this audit?

The site inspection component of the audit is currently scheduled to commence on Thursday 10 July 2025. To support audit scope preparation, I would appreciate receiving the Department's input by Thursday 3 July 2025.

If you are not the appropriate contact for this matter, please forward this email to the relevant person within the Department.

Please don't hesitate to contact me if you have any questions or require further information.

Regards



Wayne Duffy

M +61 421 941 563

E wayne.duffy@wdenvironmental.com.au

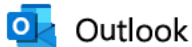
W www.wdenvironmental.com.au



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RE: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

From Rebecca Whiteside <Rebecca.Whiteside@epa.nsw.gov.au>

Date Thu 2025-07-03 3:38 PM

To Wayne Duffy <wayne.duffy@wdenvironmental.com.au>

Cc Hamish Campbell <Hamish.Campbell@epa.nsw.gov.au>

Dear Mr Duffy,

I refer to your email to the Environment Protection Authority (EPA) received on 26 June 2025 seeking input on the scope of an upcoming independent environmental audit (IEA) for Sell & Parker Pty Ltd's Kings Park Waste Facility at 23-43 and 45 Tattersall Road, Kings Park NSW 2148 (the premises). The EPA understands that WD Environmental Consulting has been approved as the auditor to undertake audits in accordance with Condition C9 of SSD-5041 (Consent).

As you are aware, Sell & Parker Pty Ltd (licensee) holds Environment Protection Licence No. 11555 (licence) to undertake scrap metal processing and waste storage at the premises as permitted by the licence.

A review of EPA records shows that for the 2024-2025 annual reporting period, there was one licence non-compliance reported by the licensee in its annual return. This was a non-compliance of licence condition L7.2 on two occurrences with an exceedance of the air blast overpressure level. The EPA received several complaints about alleged noise coming from the premises from members of the community during this reporting period.

The EPA has no specific comment regarding the IEA but directs you to the EPA's public register at <https://app.epa.nsw.gov.au/prpoeoapp/> to view the licence and regulatory history for the premises.

If you have any further questions about this matter, please contact me on 9995 6846 or via email at info@epa.nsw.gov.au.

Kind regards

Rebecca

Rebecca Whiteside

Senior Operations Officer - Operations

NSW Environment Protection Authority

D 02 9995 6846 M 0458 098 935



www.epa.nsw.gov.au @NSW_EPA

*The EPA acknowledges the traditional custodians
of the land and waters where we work. As part of the
world's oldest surviving culture, we pay our respect
to Aboriginal elders past, present and emerging.*

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

From: Environment Line <info@environment.nsw.gov.au>

Sent: Thursday, 26 June 2025 3:26 PM

To: EPA Delivery Hub Mailbox <EPA.DeliveryHub@epa.nsw.gov.au>

Subject: FW: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development [ref:!00D7F06iTix.!500Mn0vfhYH:ref]

----- Forwarded Message -----

From: Wayne Duffy [wayne.duffy@wdenvironmental.com.au]

Sent: 26/06/2025 14:33

To: info@epa.nsw.gov.au

Cc: hamish.campbell@epa.nsw.gov.au

Subject: EPL no. 11555 - Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

Hi Hamish

As the Department of Planning, Housing and Infrastructure's (the Department) approved Independent Auditor for Kings Park Waste Facility ([SSD-5041](#)) (the Project), and in accordance with the Department's correspondence (SSD-5041-PA-12, 17/06/2025), I am seeking the NSW EPAs input on the scope of the upcoming audit.

This audit will assess post-approval requirements and compliance during the operation phase of the Project. It will be conducted in line with Condition C9 of Schedule 2 (Part C) of the Planning Approval (SSD-5041), and the Department's 2020 Independent Audit Post Approval Requirements (IAPAR).

Audit Scope

As outlined in Section 3.3 of the IAPAR and Condition C9, the audit will include an assessment of:

- Each relevant condition for operation
- All post-approval documents prepared to satisfy the conditions of approval
- Implementation of relevant Environmental Management Plans and Sub-plans
- Compliance with the requirements in the consent, and any other relevant approvals and relevant EPL/s - [EPL No. 11555](#) (including any assessment, plan or program required under the approvals)
- Complaints data
- Relevant approvals and environmental protection licences

Consultation

In addition to consulting the NSW EPA, I am also seeking input from:

- The Department
- Blacktown City Council

Request for Input

To assist in finalising the audit scope, I would appreciate the EPAs feedback on the following:

- Are there any key issues related to post-approval requirements and compliance that should be examined beyond those already outlined in Section 3.3 of the IAPAR or Condition C9?

The site inspection component of the audit is currently scheduled to commence on Thursday 10 July 2025. To support audit scope preparation, I would appreciate receiving the EPAs input by Thursday 3 July 2025.

If you are not the appropriate contact for this matter, please forward this email to the relevant person within the NSW EPA.

Please don't hesitate to contact me if you have any questions or require further information.

Regards
Wayne



Wayne Duffy

M +61 421 941 563

E wayne.duffy@wdenvironmental.com.au

W www.wdenvironmental.com.au



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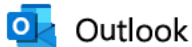
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RE: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

From Luke Cook <Luke.Cook@blacktown.nsw.gov.au>

Date Thu 2025-07-03 4:35 PM

To Wayne Duffy <wayne.duffy@wdenvironmental.com.au>

Cc Ali Baburi <Ali.Baburi@blacktown.nsw.gov.au>

Hi Wayne,

Thank you for your email.

I have reviewed the scope of the Independent Environmental Audit for Kings Park Waste Facility.

I am satisfied with the highlighted points, in particular the review of complaint data and response.

Regards,



Luke Cook
Coordinator Development and Contaminated Land

9839 6391

PO Box 63 Blacktown NSW 2148

blacktown.nsw.gov.au

**We acknowledge the Dharug as the
First People of the Blacktown City region**

Follow us on social media

From: Wayne Duffy <wayne.duffy@wdenvironmental.com.au>

Sent: Wednesday, 25 June 2025 6:07 PM

To: Ali Baburi <Ali.Baburi@blacktown.nsw.gov.au>

Cc: Howard Richards <howardr@sellparker.com.au>

Subject: Kings Park Waste Facility (SSD-5041) - Independent Environmental Audit Scope Development

Hi Ali,

As the Department of Planning, Housing and Infrastructure's (the Department) approved Independent Auditor for Kings Park Waste Facility ([SSD-5041](#)) (the Project), and in accordance with the Department's correspondence (SSD-5041-PA-12, 17/06/2025), I am seeking the Blacktown City Council's input on the scope of the upcoming audit.

This audit will assess post-approval requirements and compliance during the operation phase of the Project. It will be conducted in line with Condition C9 of Schedule 2 (Part C) of the Planning Approval (SSD-5041), and the Department's 2020 Independent Audit Post Approval Requirements (IAPAR).

Audit Scope

As outlined in Section 3.3 of the IAPAR and Condition C9, the audit will include an assessment of:

- Each relevant condition for operation
- All post-approval documents prepared to satisfy the conditions of approval
- Implementation of relevant Environmental Management Plans and Sub-plans
- Compliance with the requirements in the consent, and any other relevant approvals and relevant [EPL/s](#) (including any assessment, plan or program required under the approvals)
- Complaints data
- Relevant approvals and environmental protection licences

Consultation

In addition to consulting the Blacktown City Council, I am also seeking input from:

- The Department
- NSW EPA

Request for Input

To assist in finalising the audit scope, I would appreciate the Councils feedback on the following:

- Are there any key issues related to post-approval requirements and compliance that should be examined beyond those already outlined in Section 3.3 of the IAPAR or Condition C9?

The site inspection component of the audit is currently scheduled to commence on Thursday 10 July 2025. To support audit scope preparation, I would appreciate receiving the Councils input by Thursday 3 July 2025.

If you are not the appropriate contact for this matter, please forward this email to the relevant person within the Council.

Please don't hesitate to contact me if you have any questions or require further information.

Regards

Wayne Duffy



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Appendix D

Independent Audit Declaration Form



Independent Audit Report Declaration	
Project Name	Kings Park Waste Facility
Consent Number	SSD 5041
Description of Project	The approved project (SSD 5041) as modified (Mod 1-3), includes increasing the processing capacity of the existing metal recycling facility, including reconfiguration and expansion of the facility into the adjoining site at 23-43 Tattersall Road, Kings Park.
Project Address	23-43 and 45 Tattersall Road, Kings Park Lot 2 DP 550522 and Lot 5 DP 7086)
Proponent	Sell & Parker Pty Ltd
Title of Audit	Independent Environmental Audit Report Kings Park Waste Facility – SSD 5041 Audit No. 4
Date	10/07/2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:




- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of

monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both) Sincerely,

Auditor Details	
Name of Auditor	Wayne Duffy
Signature	
Qualification	<p>Bachelor of Applied Science Certified Environmental Practitioner - General (No. 1859) Exemplar Global Certified Lead Auditor/Environmental Management Systems Auditor (Certificate No C-472516)</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div>
Company	<p>WD Environmental Consulting Pty Ltd ABN: 91 675 295 646</p>
Company Address	PO Box 4013, Guildford West NSW 2161

Appendix E

Technical Specialists Reports (not required)

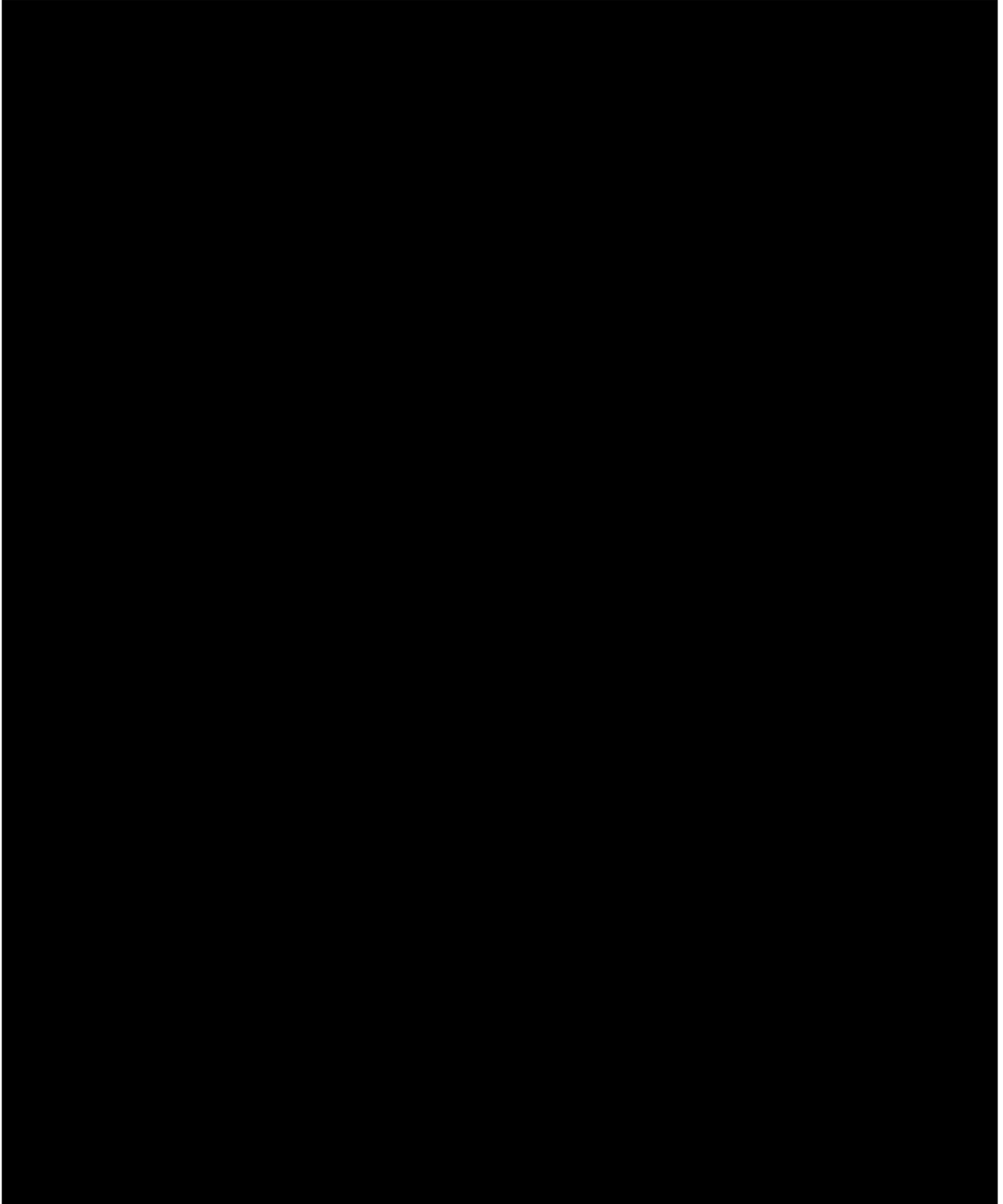


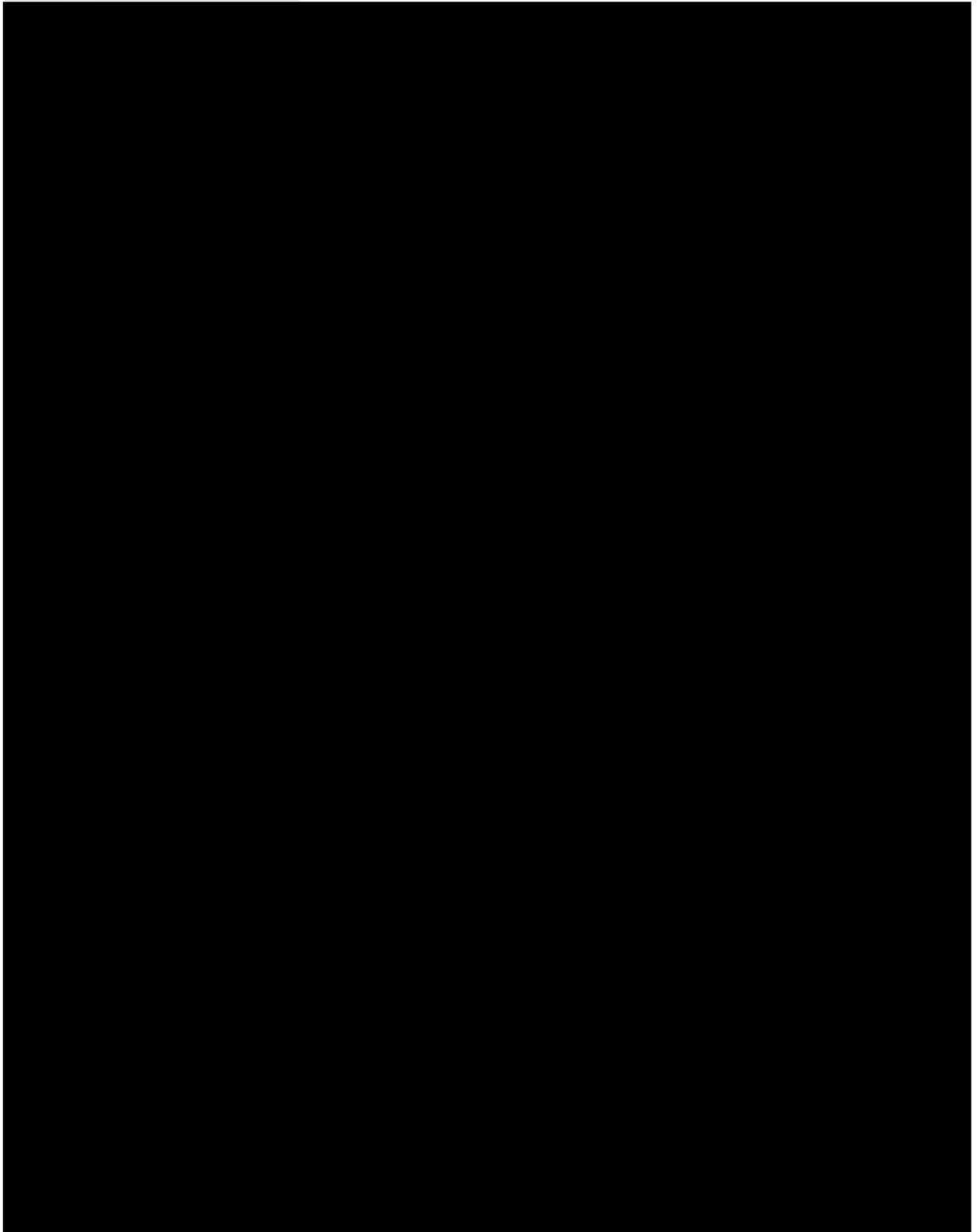
Appendix F

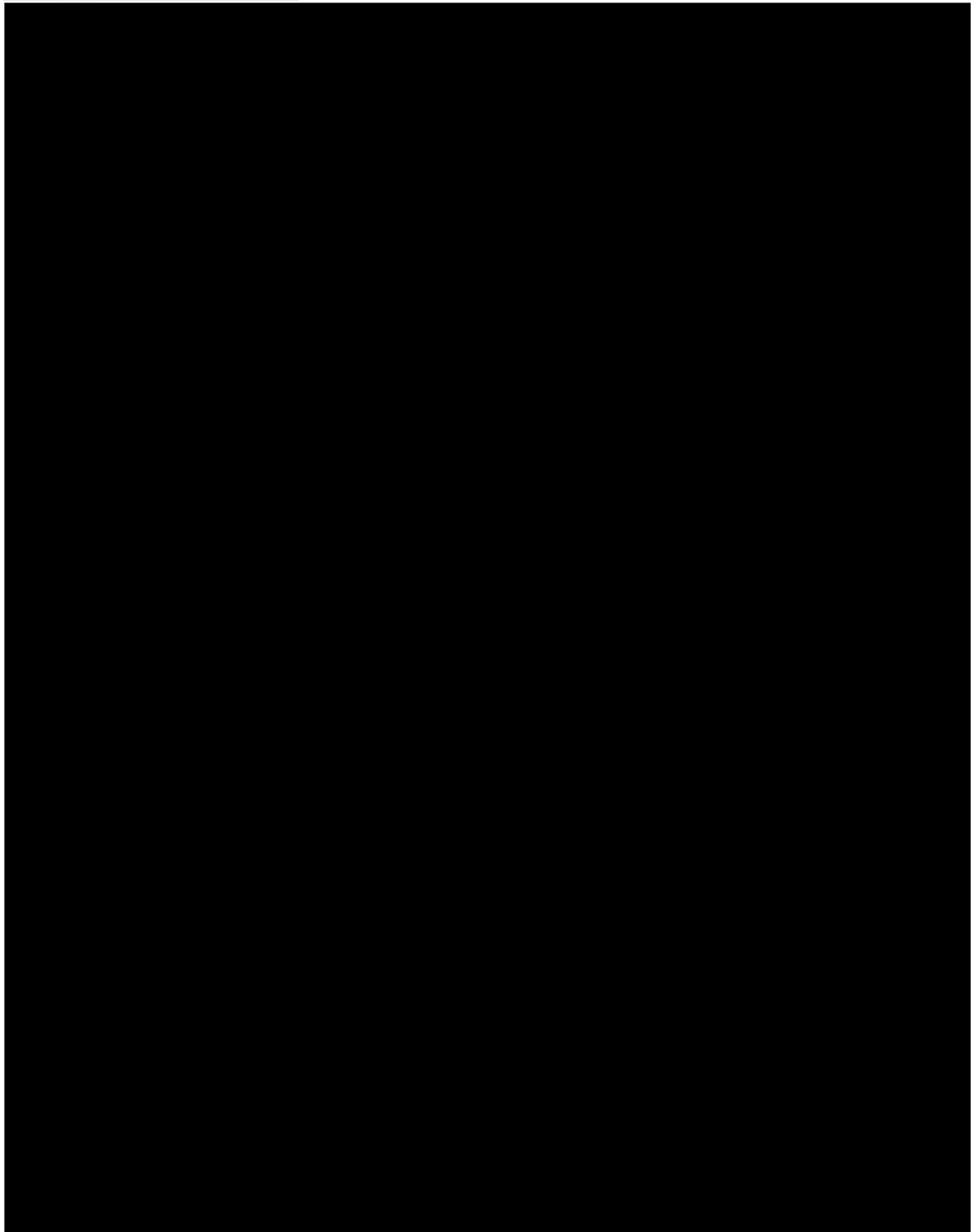
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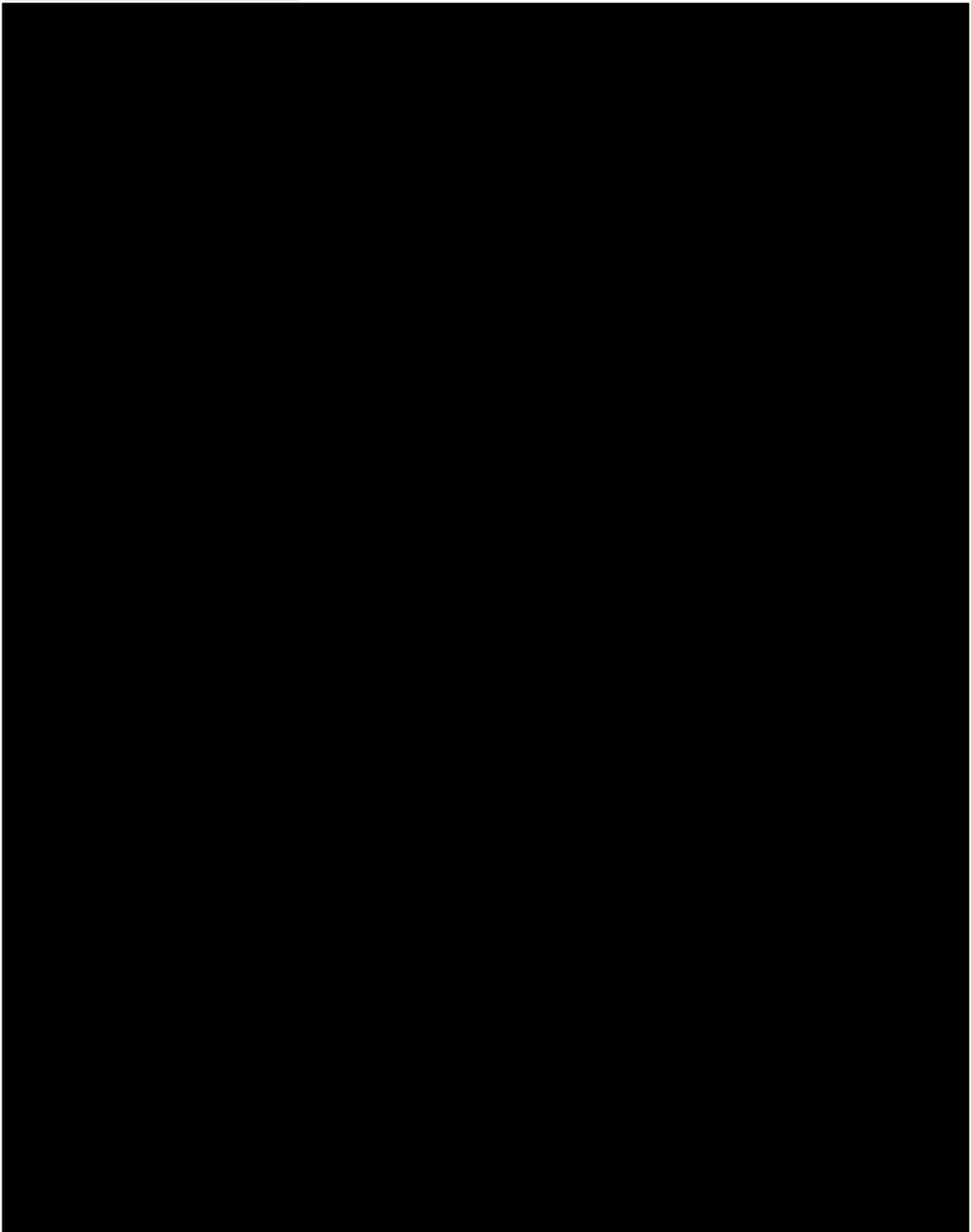


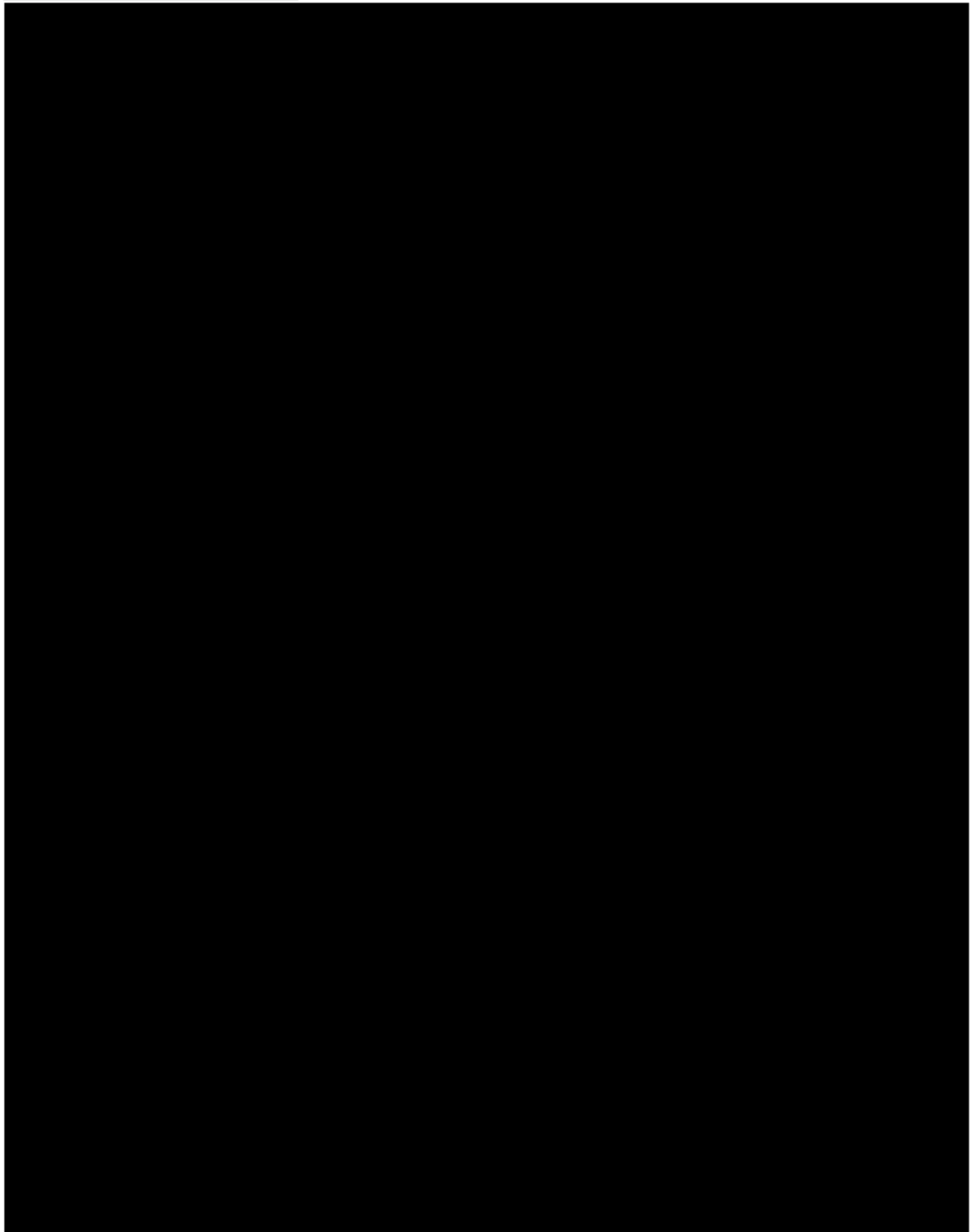
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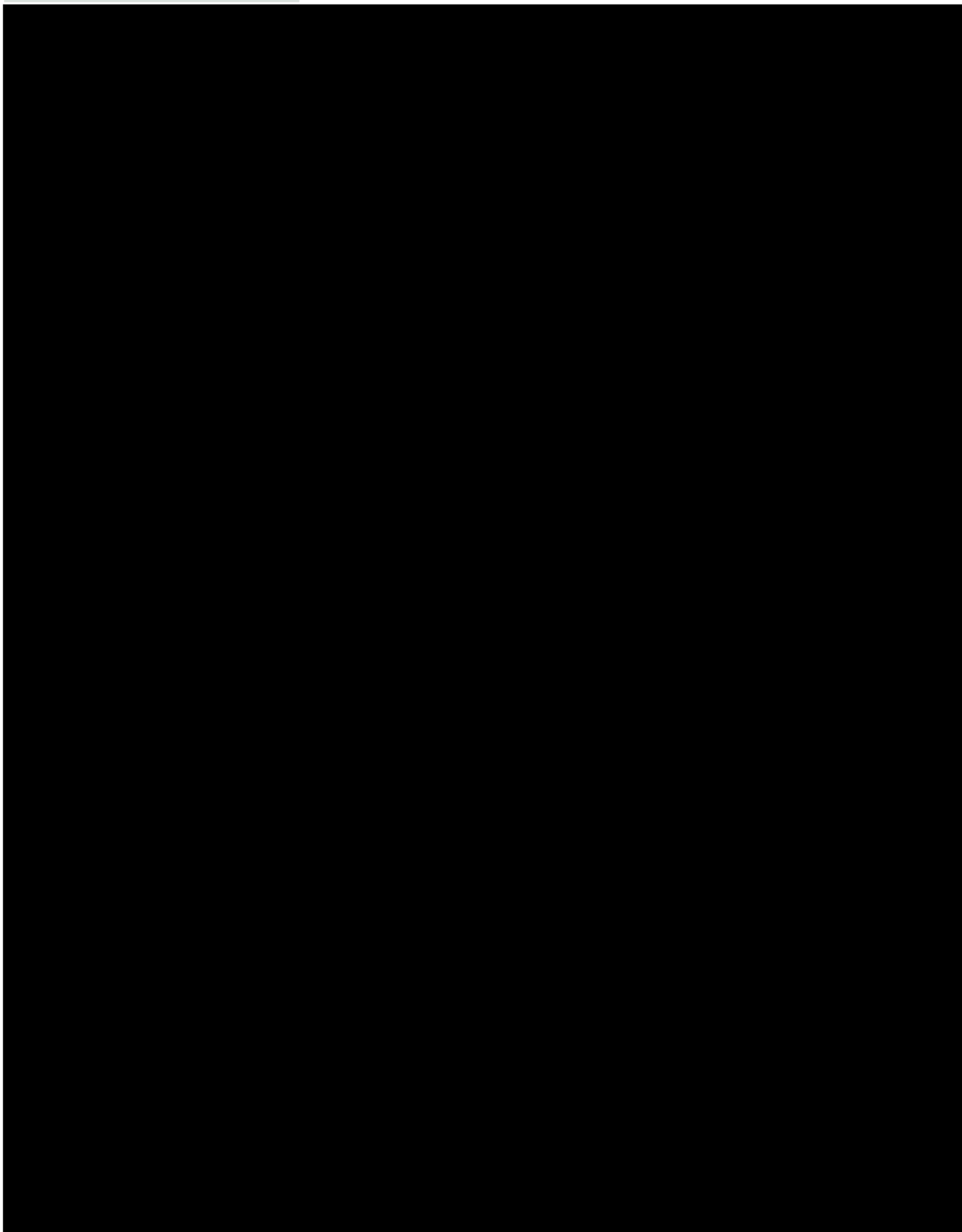


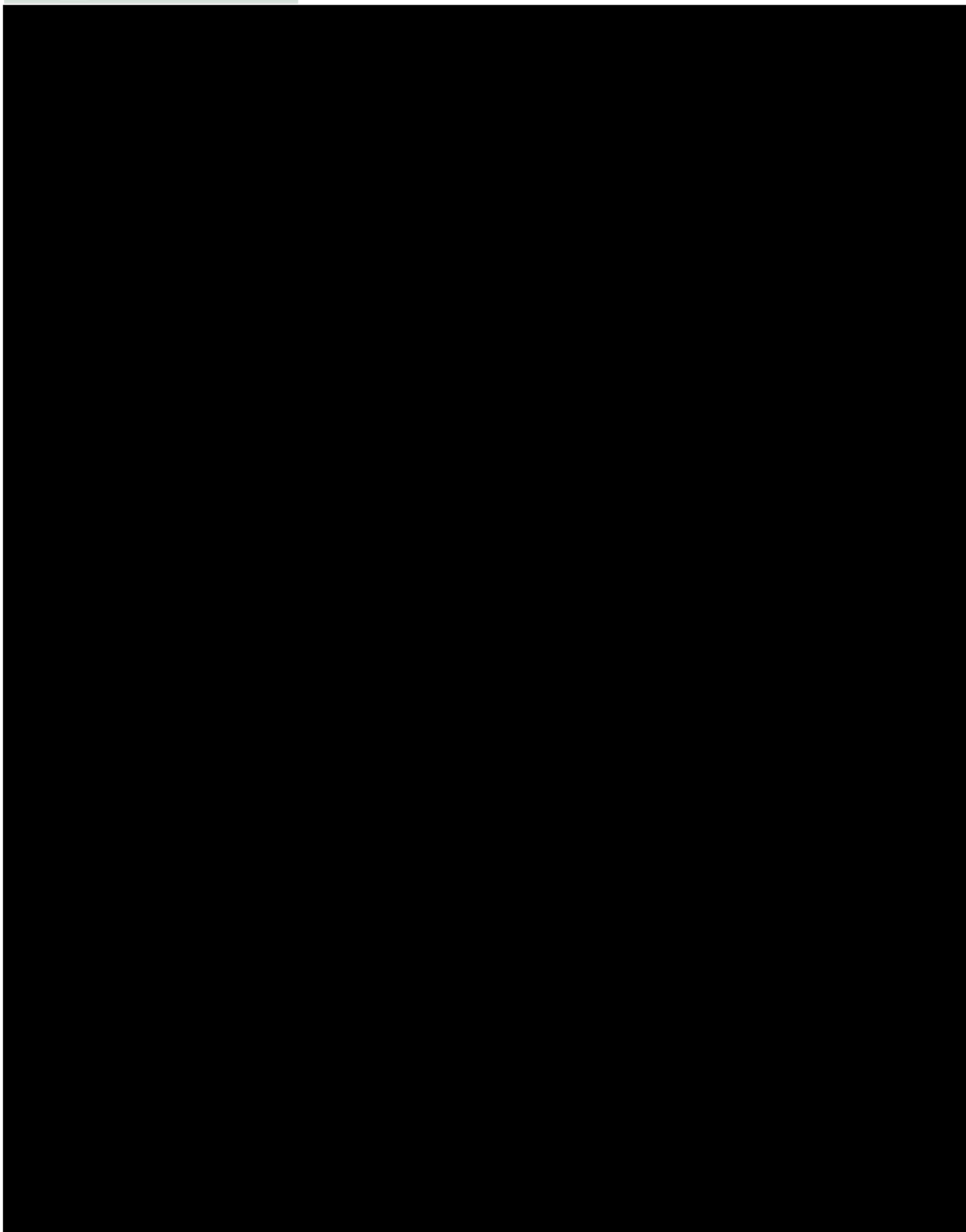


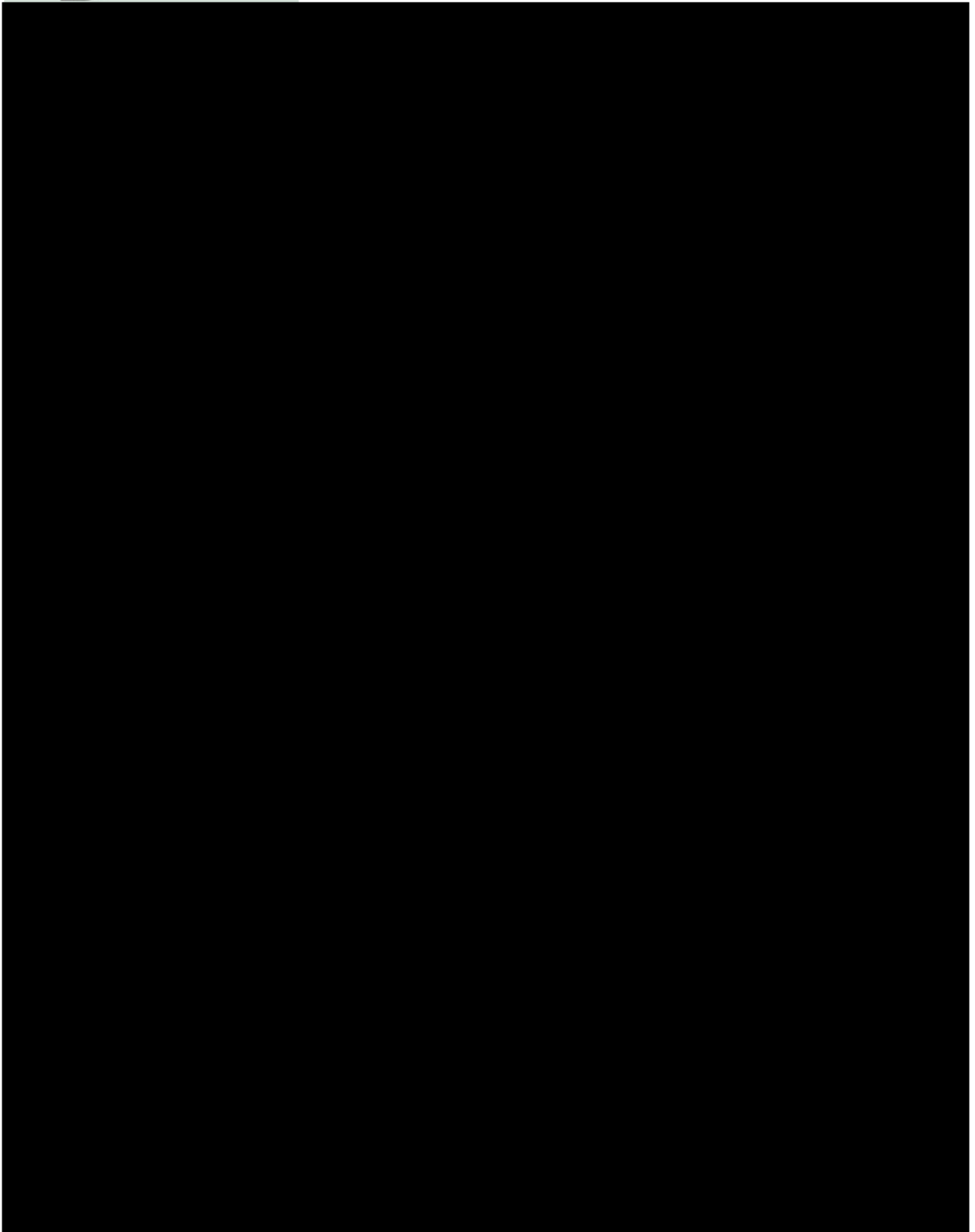


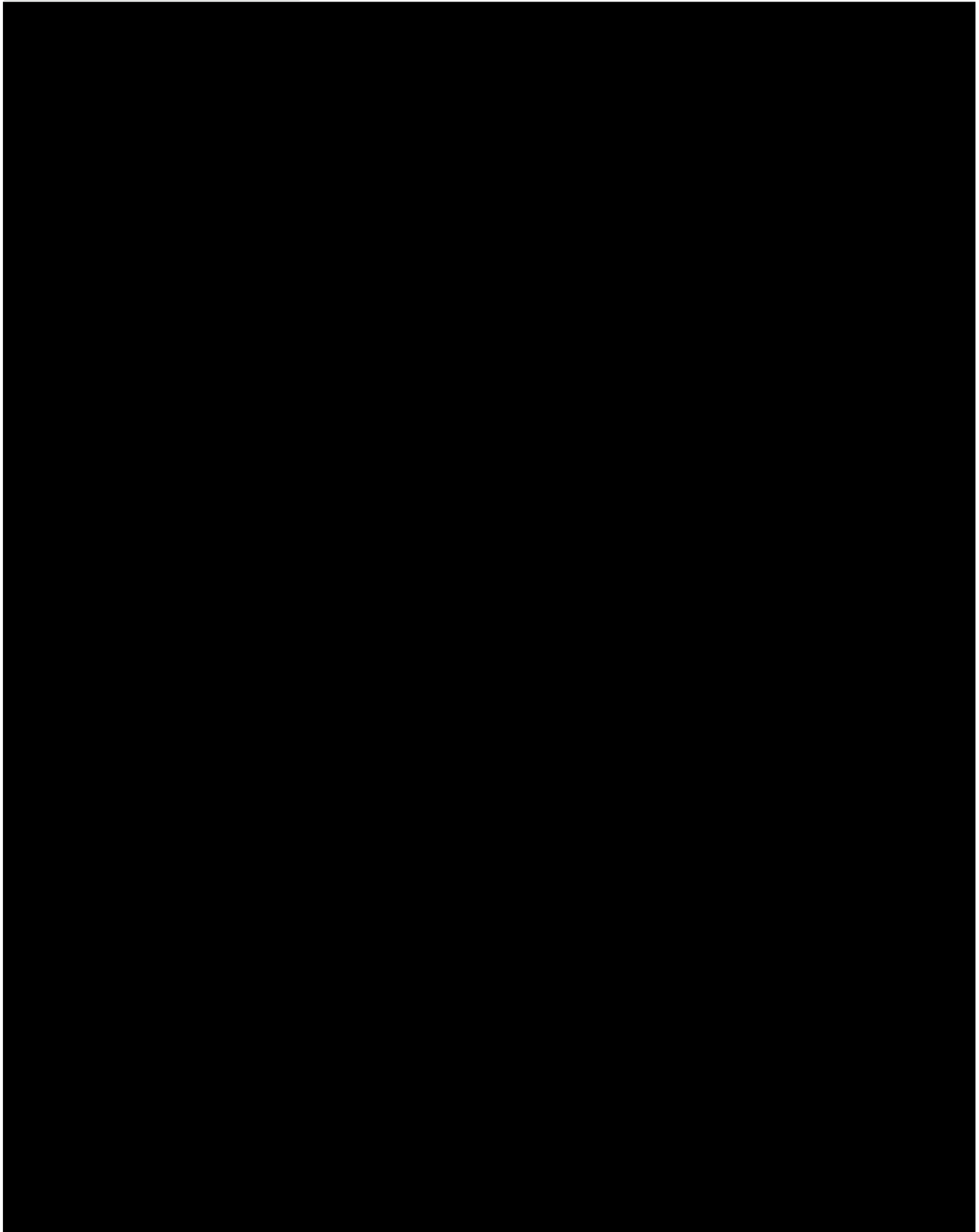


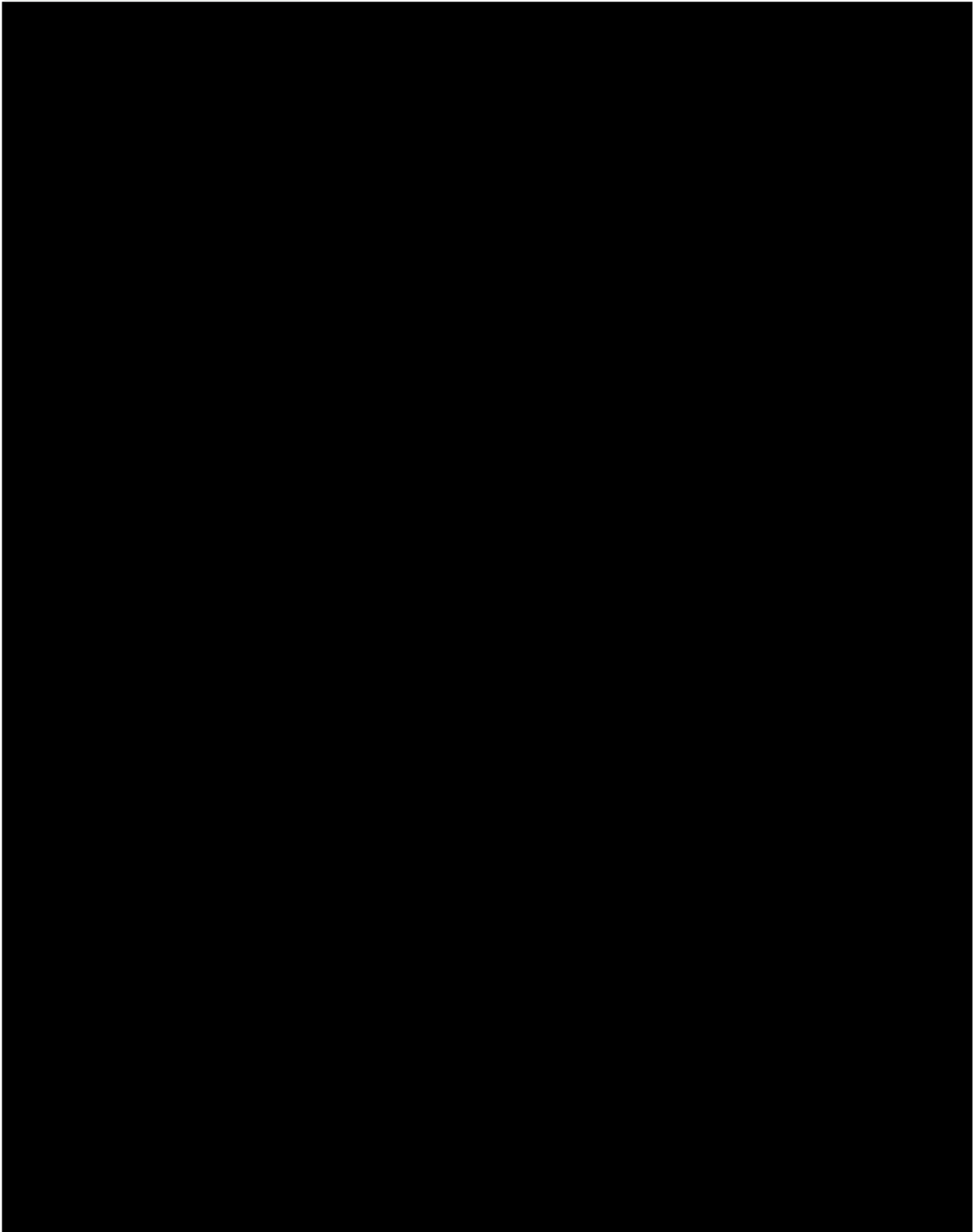


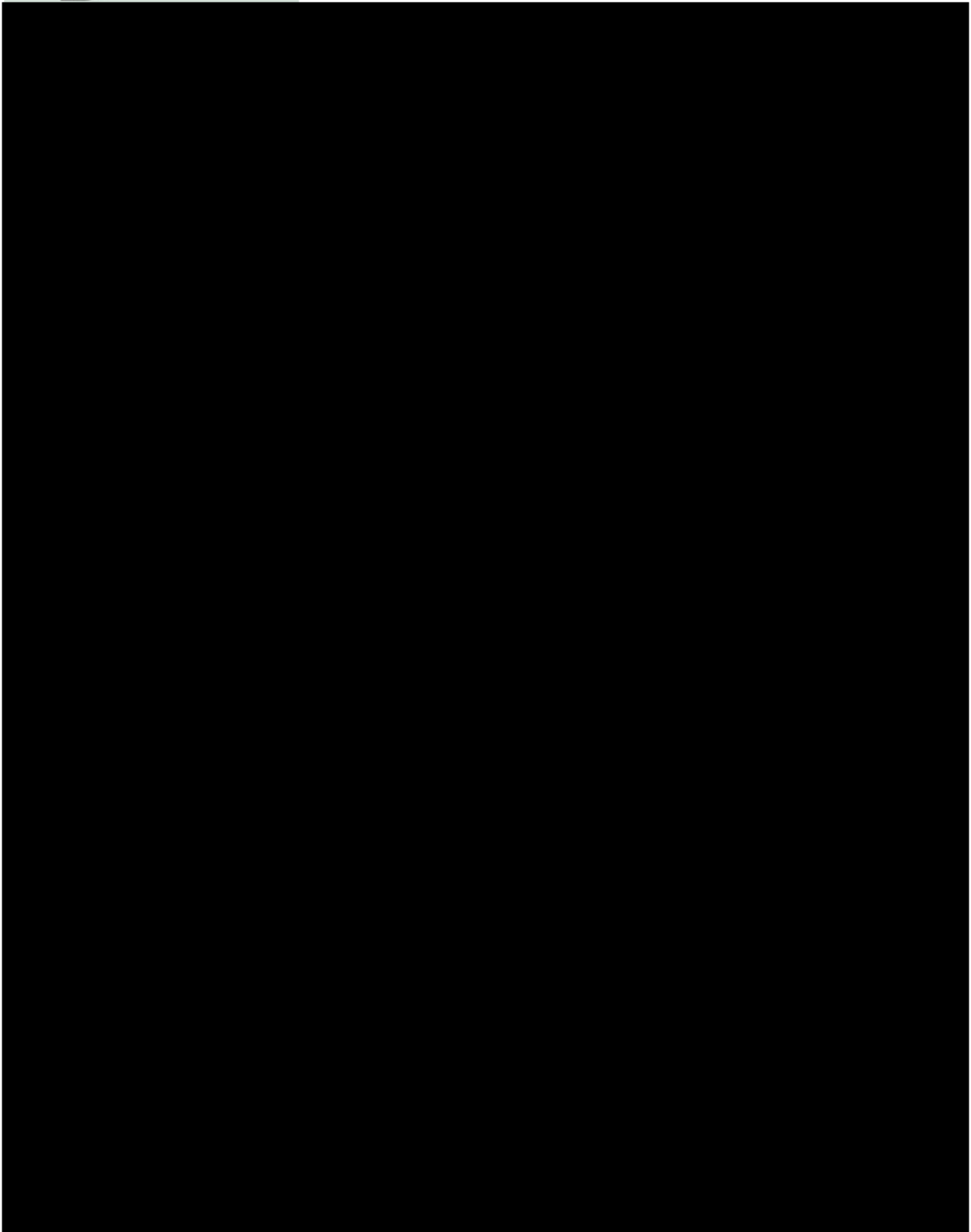


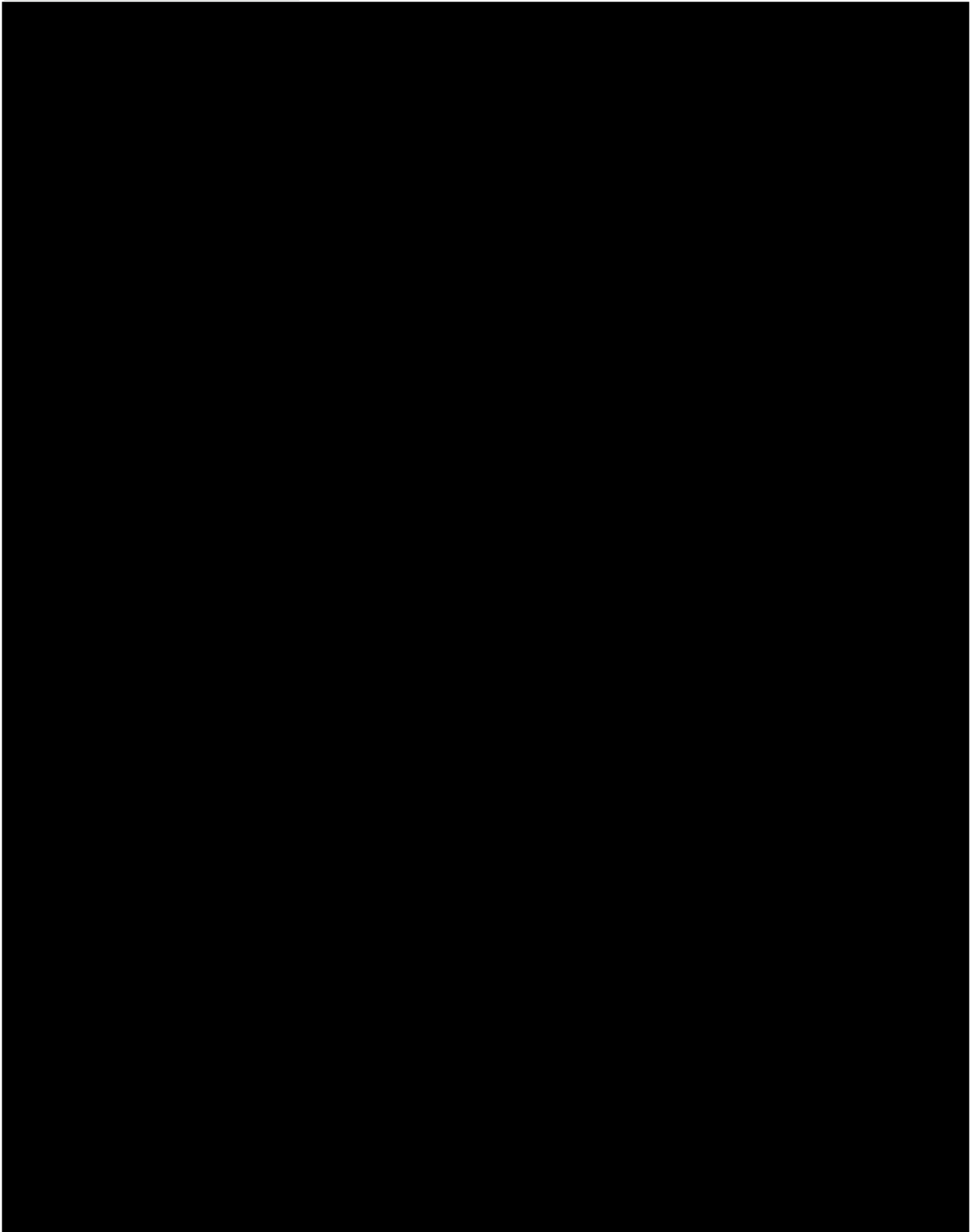


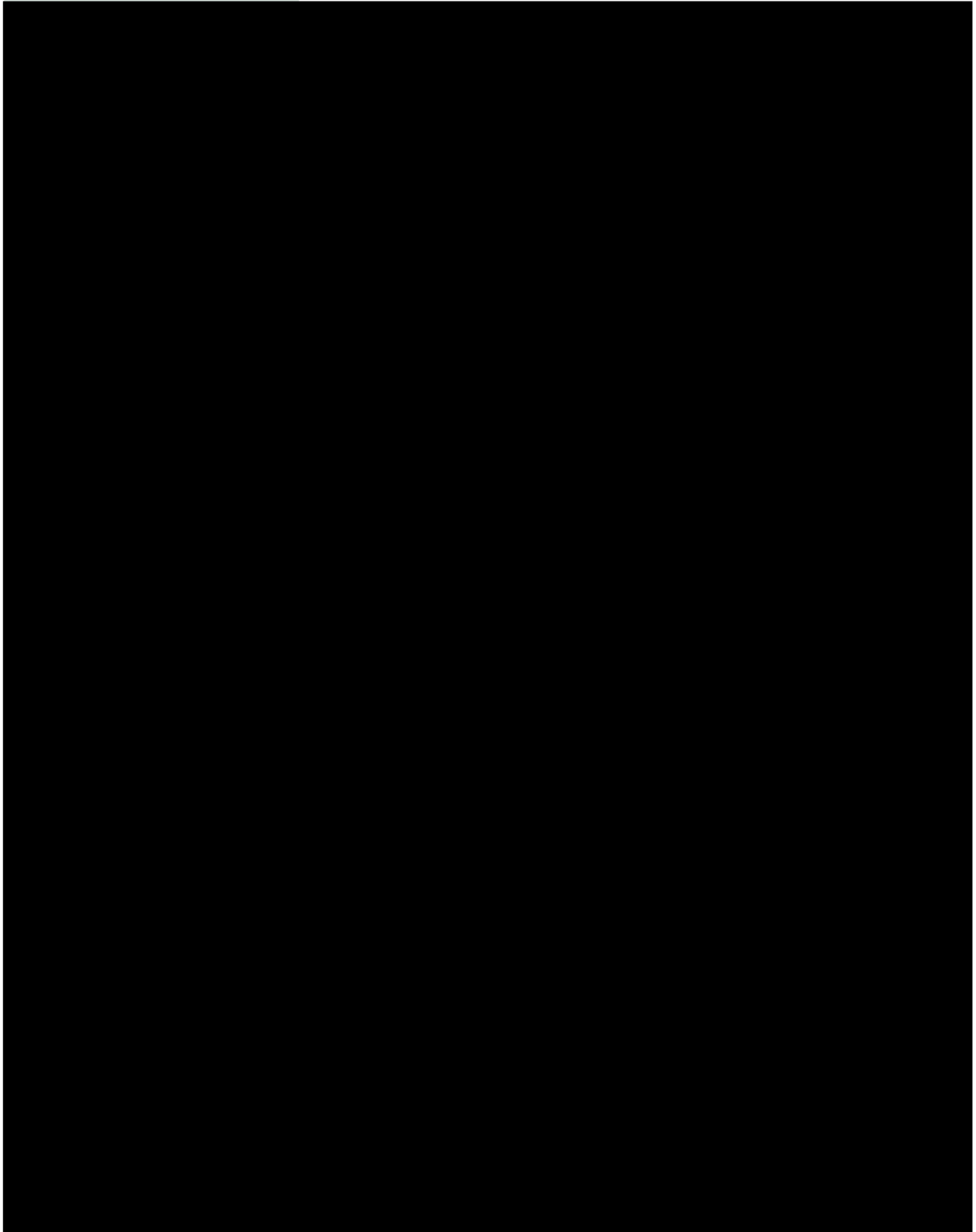


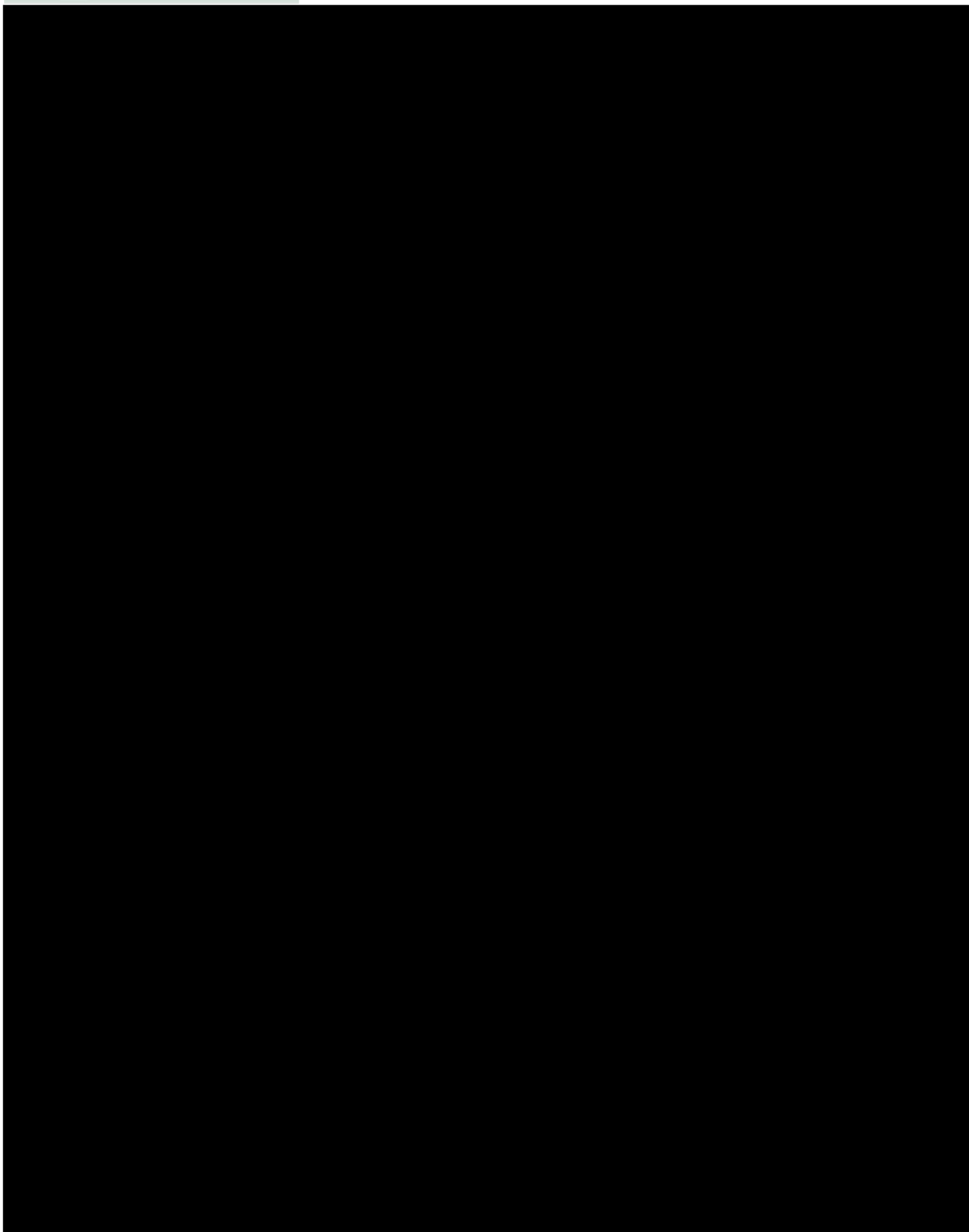


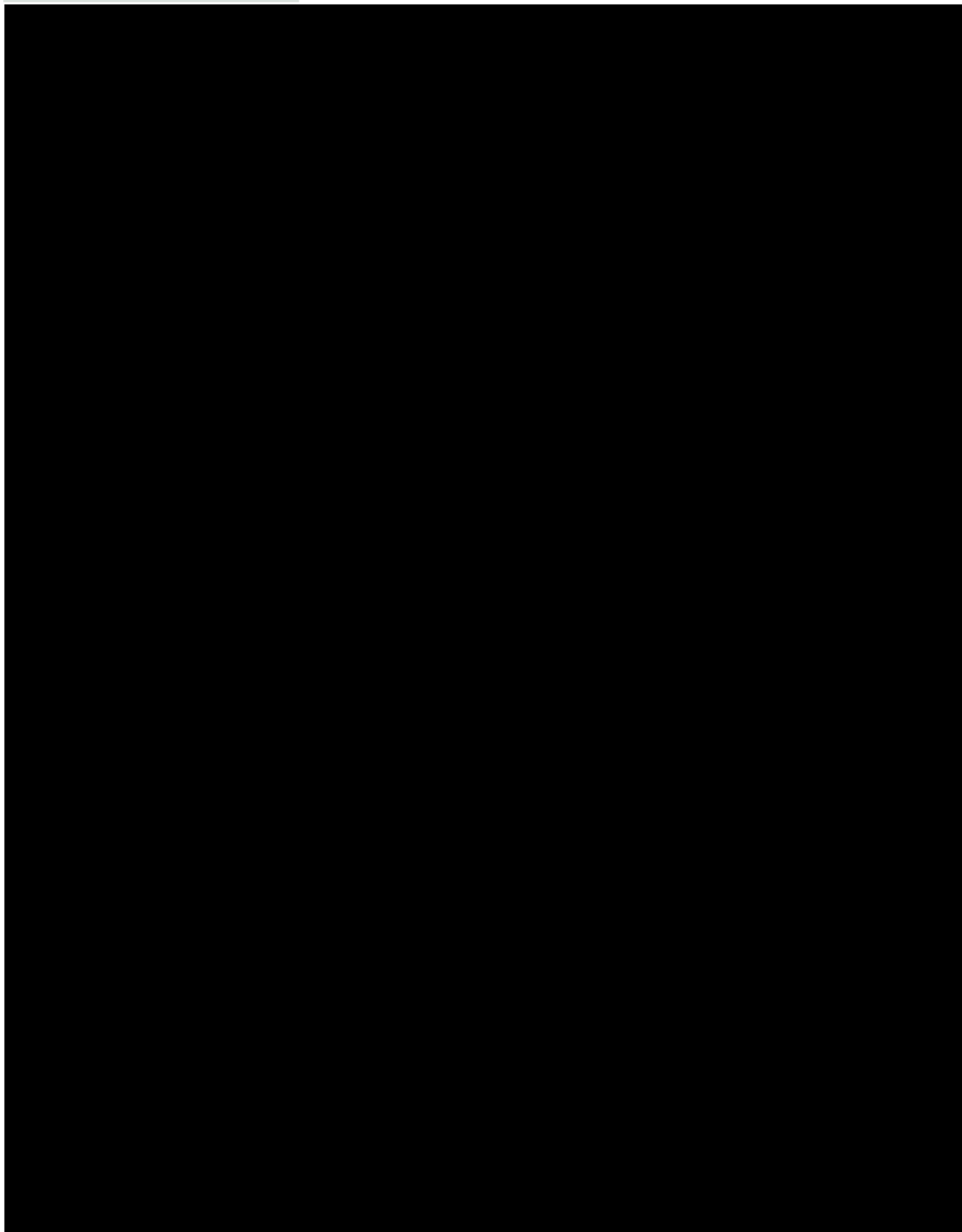


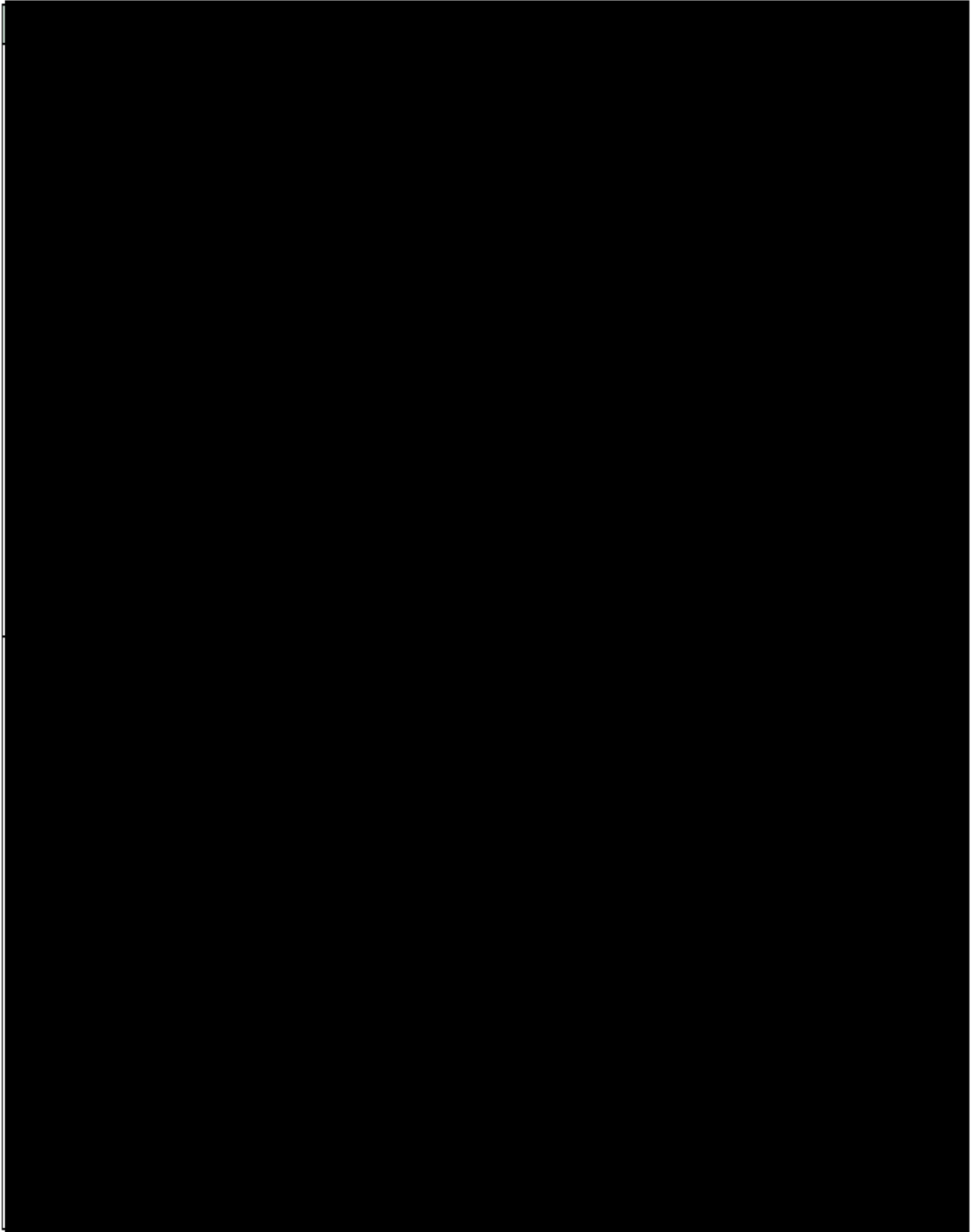


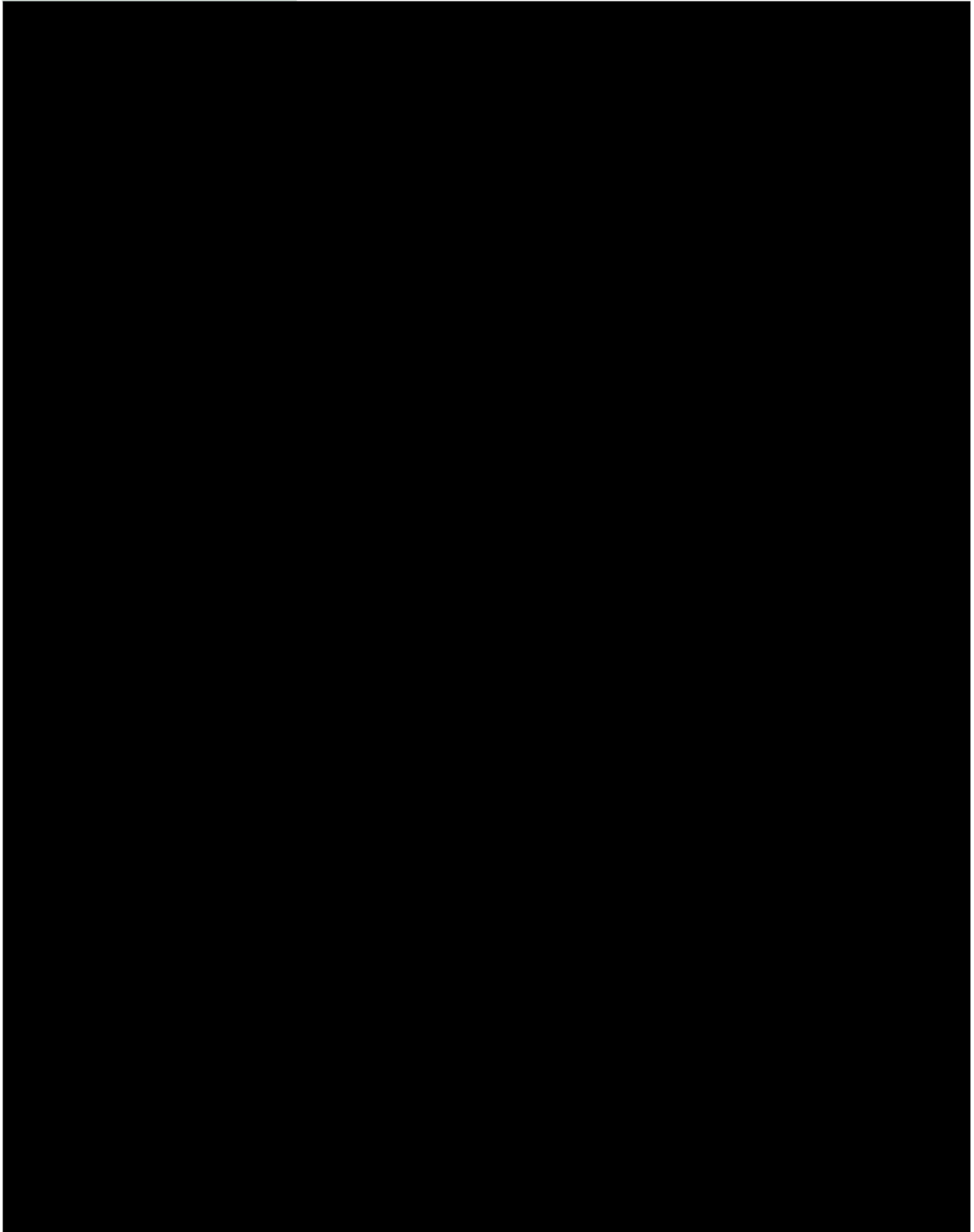


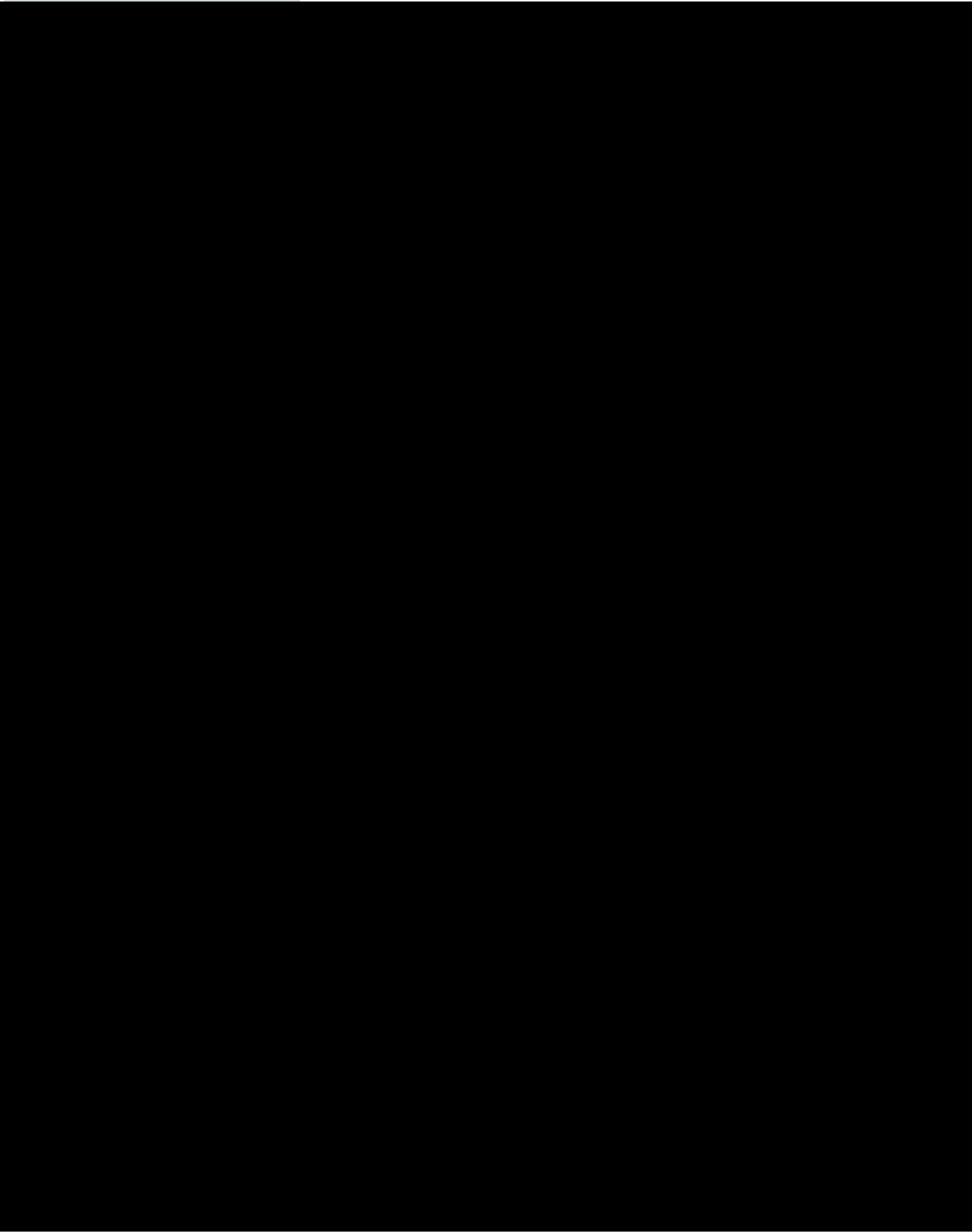


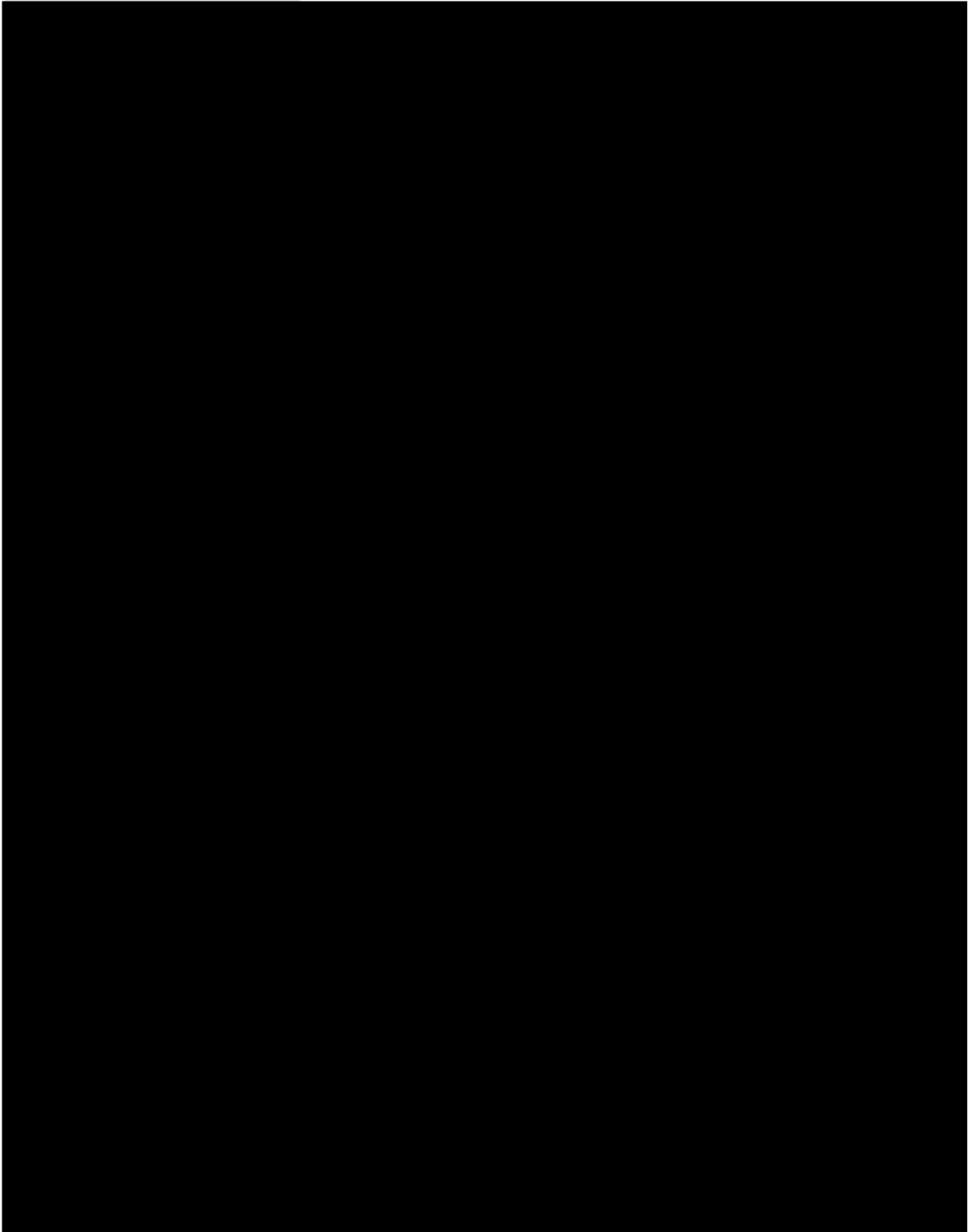


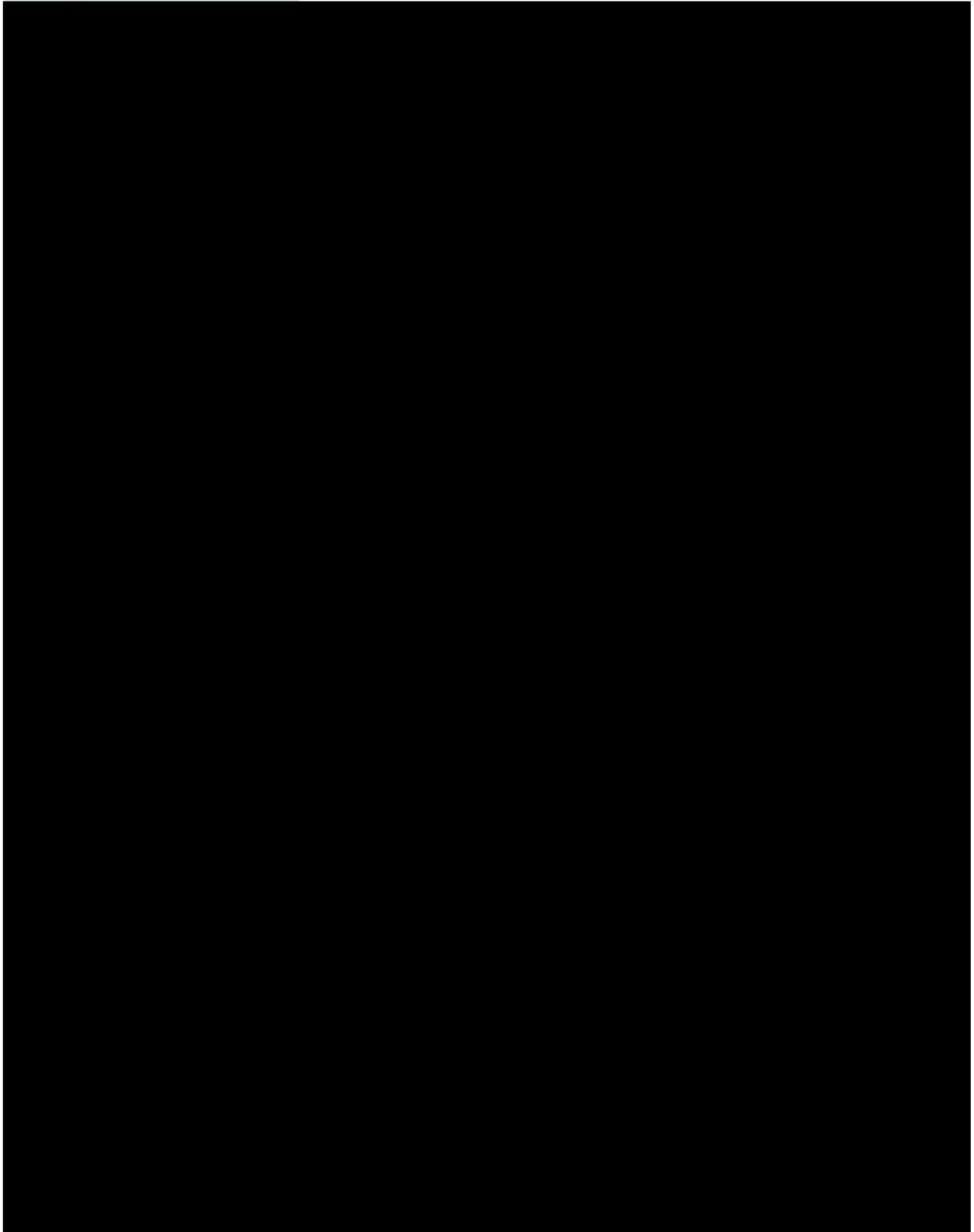


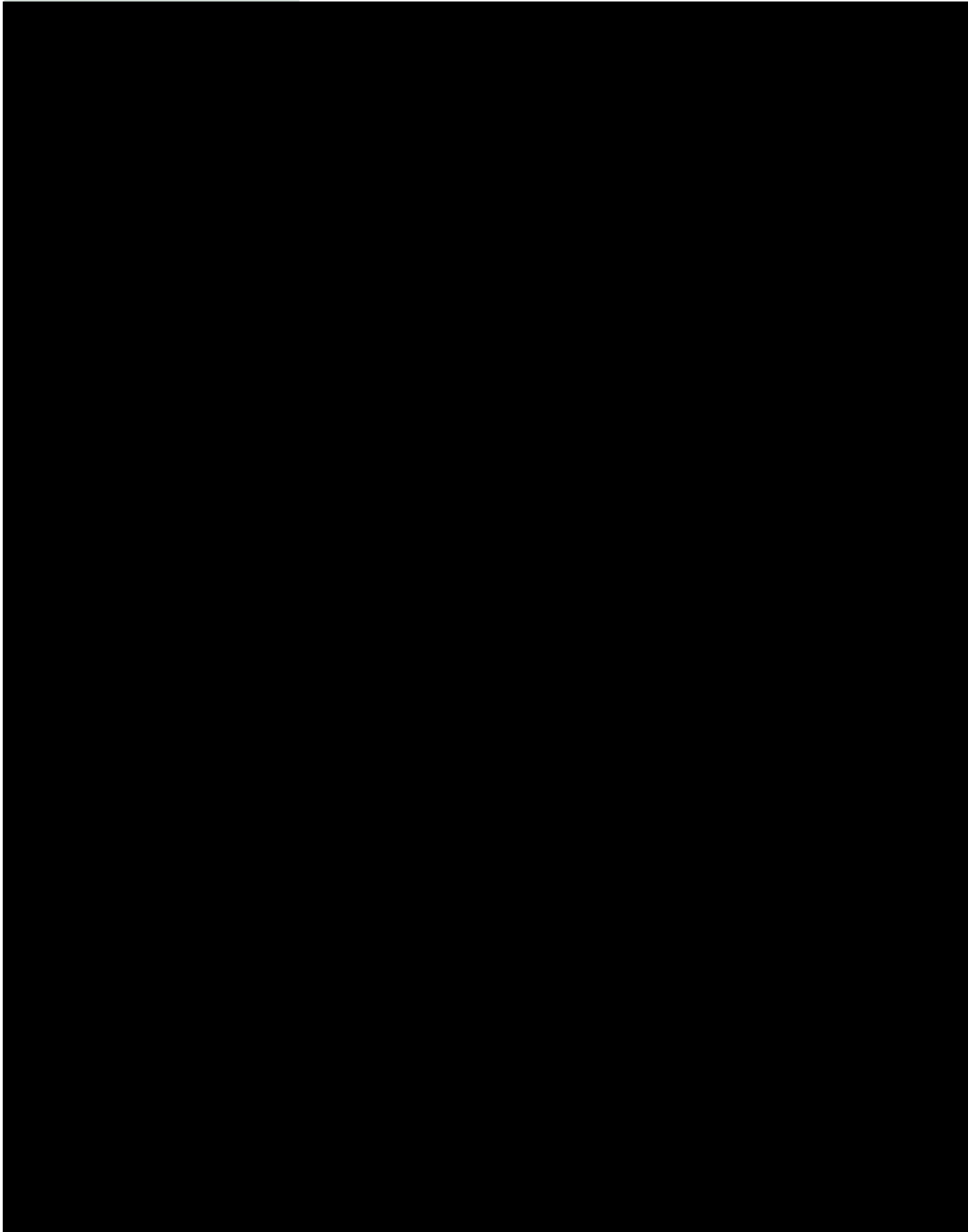


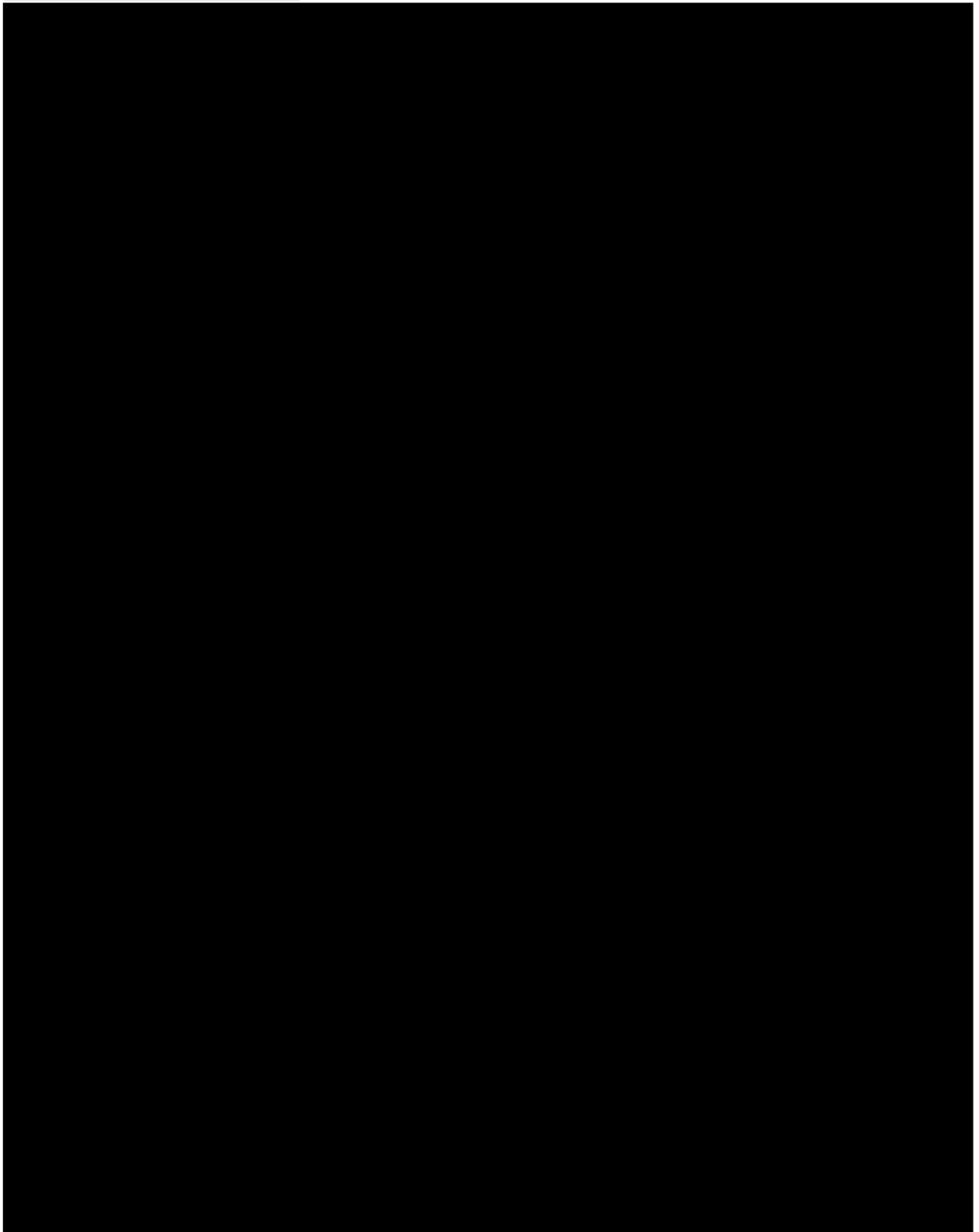


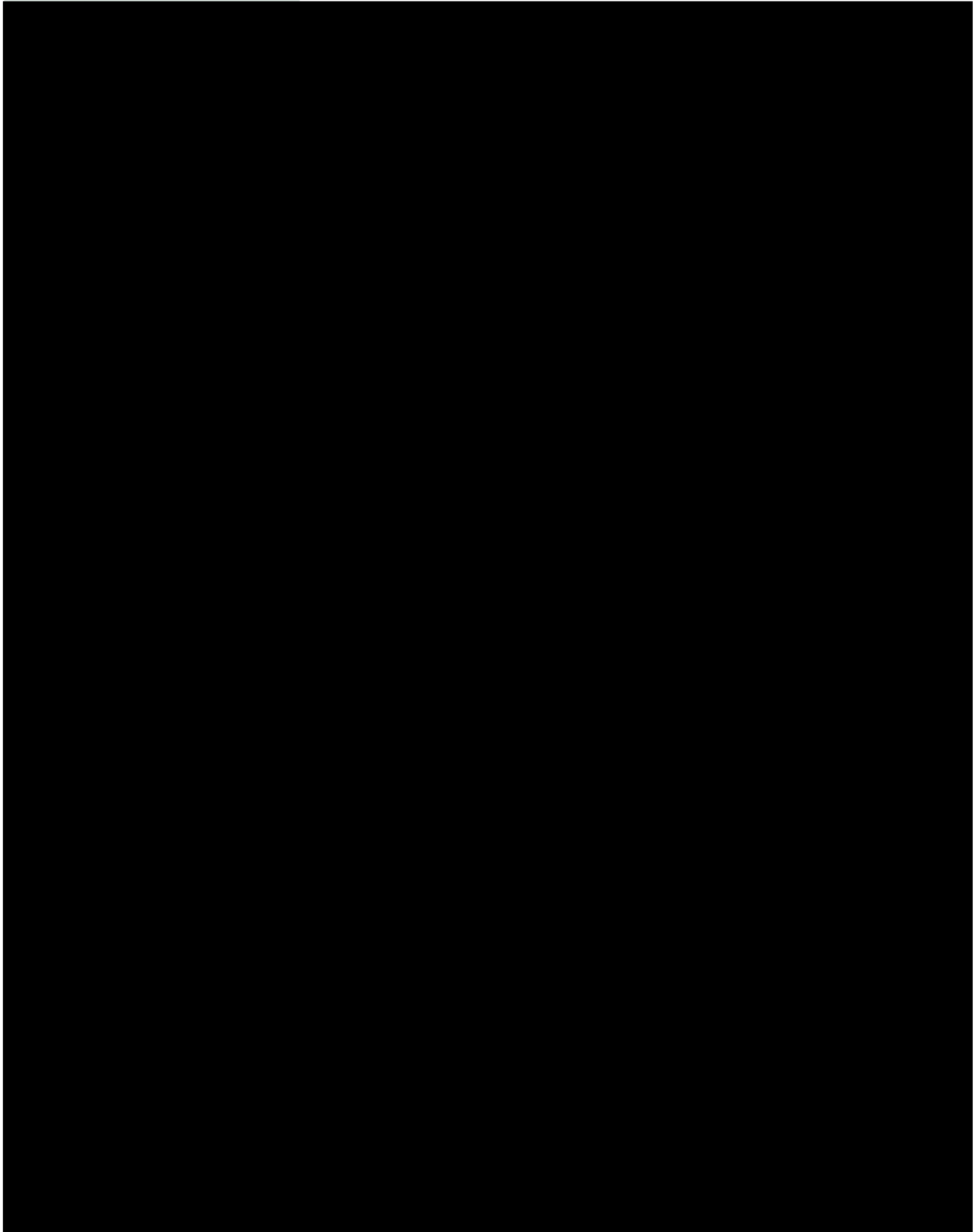


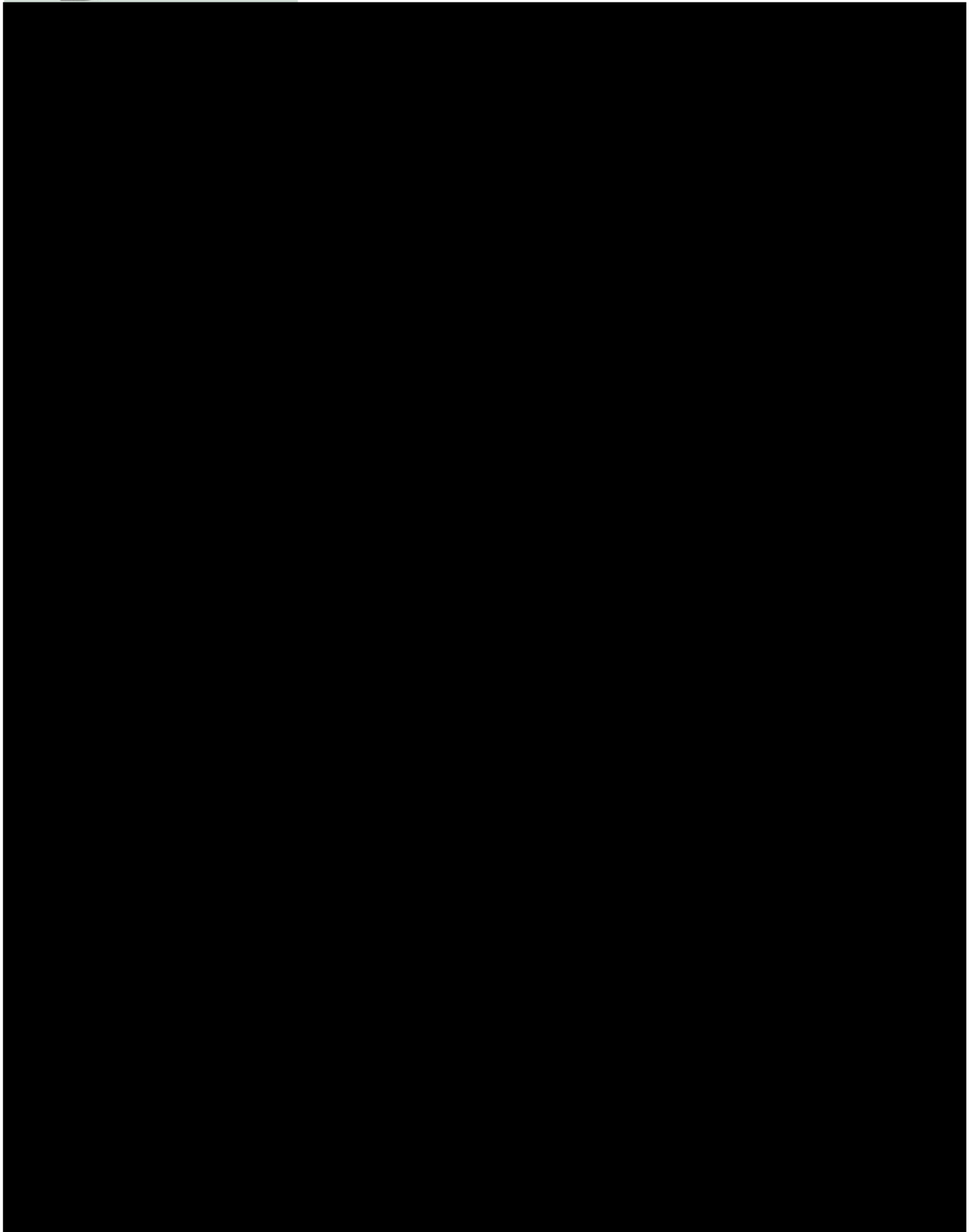


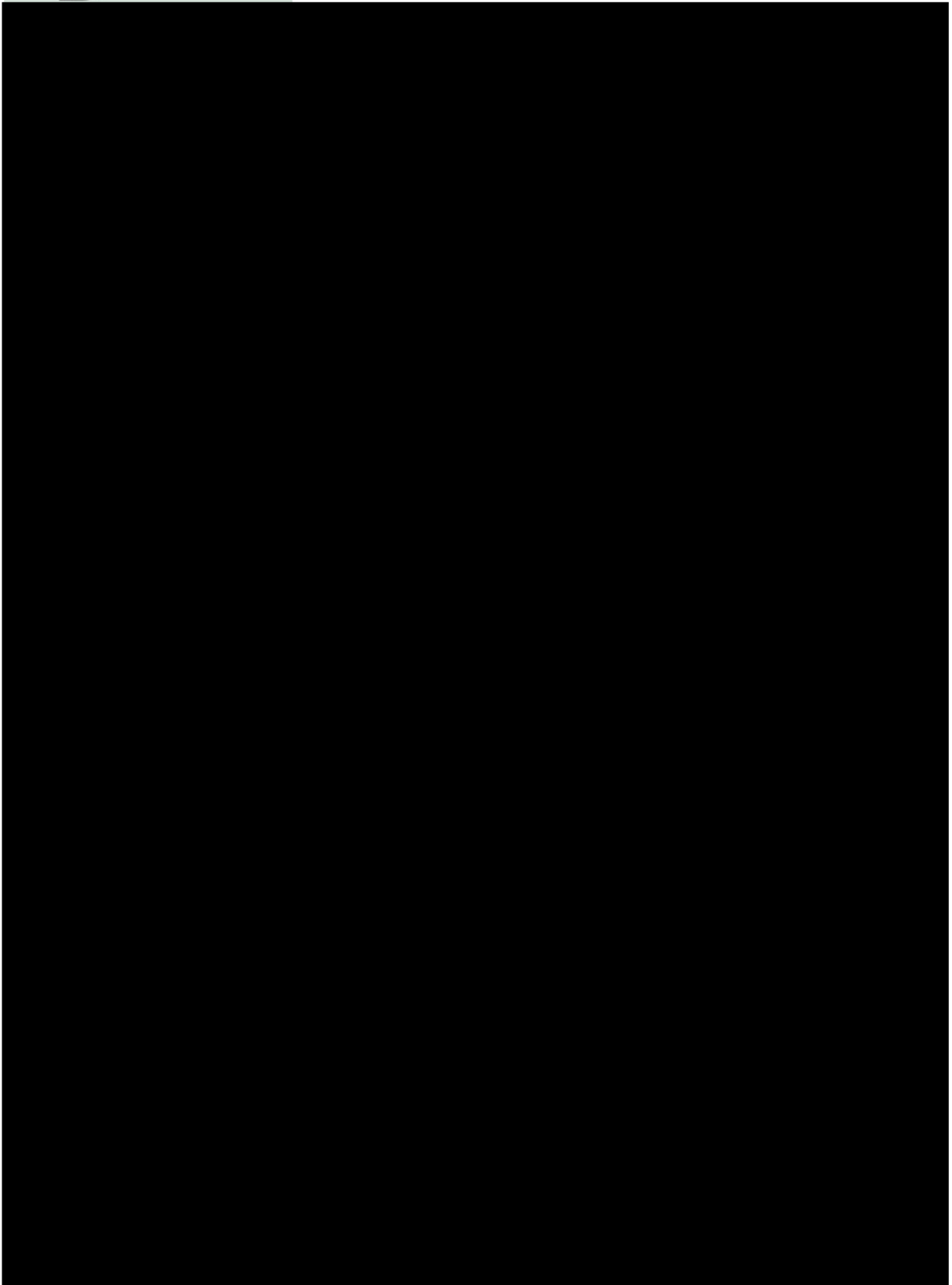


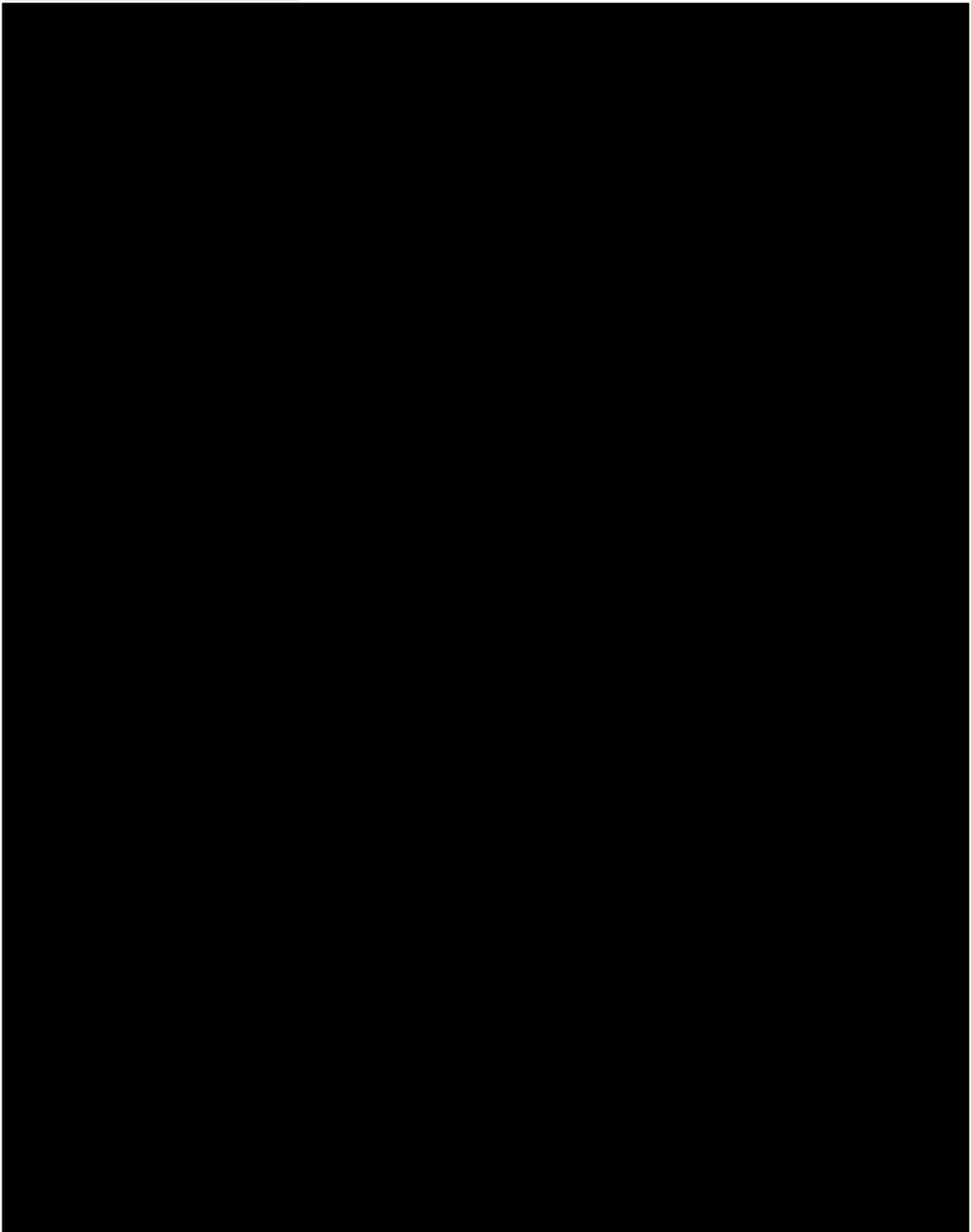


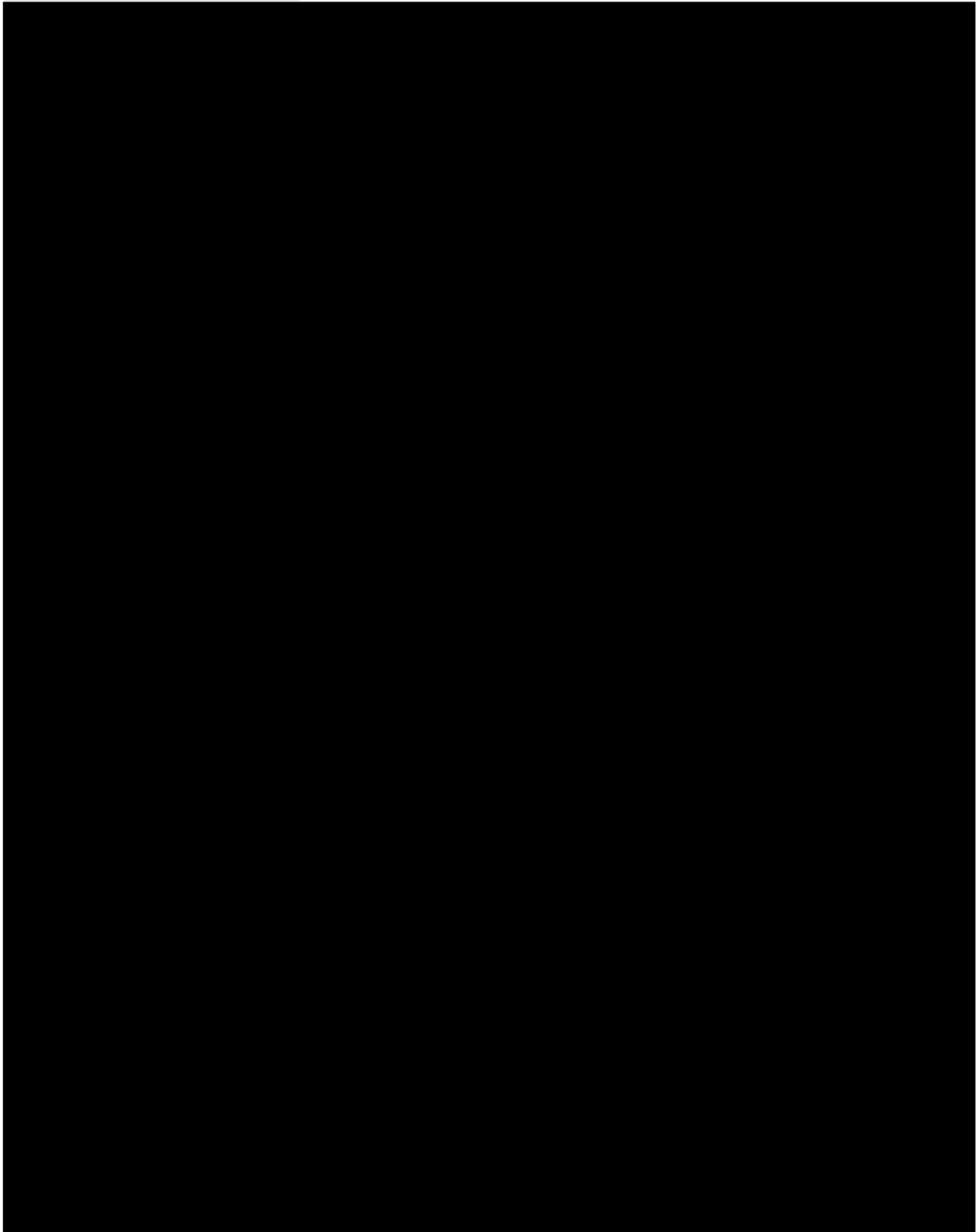




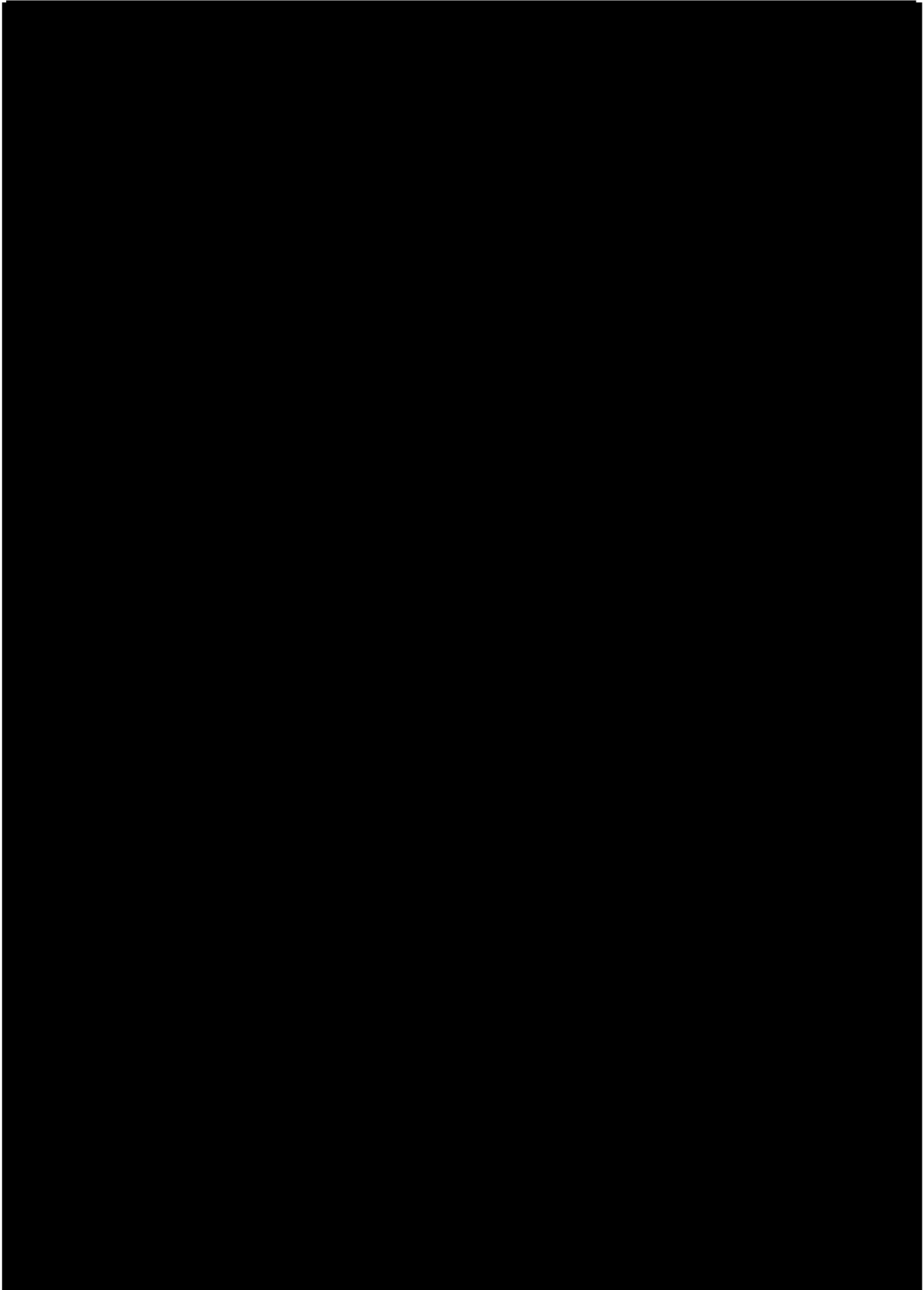


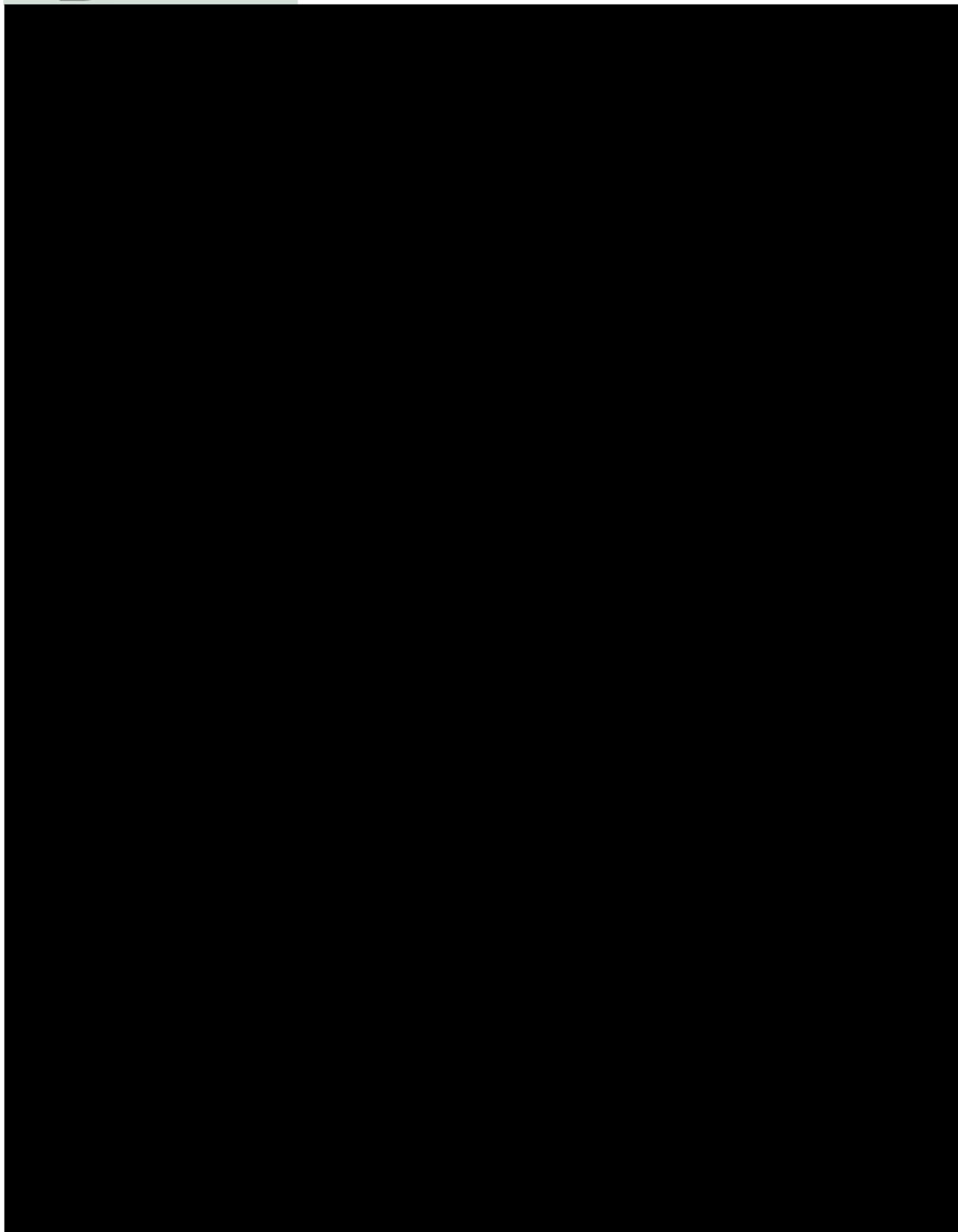


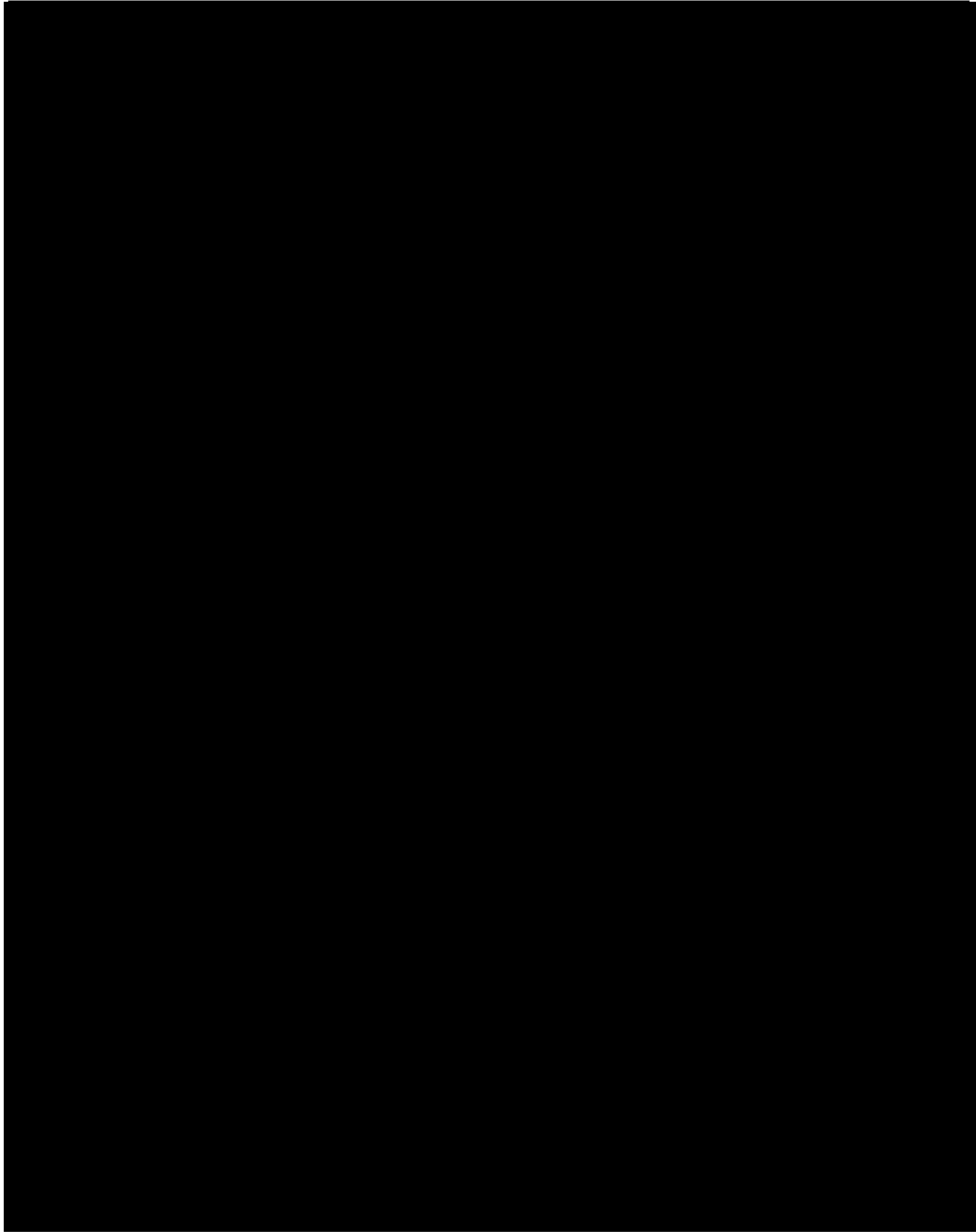


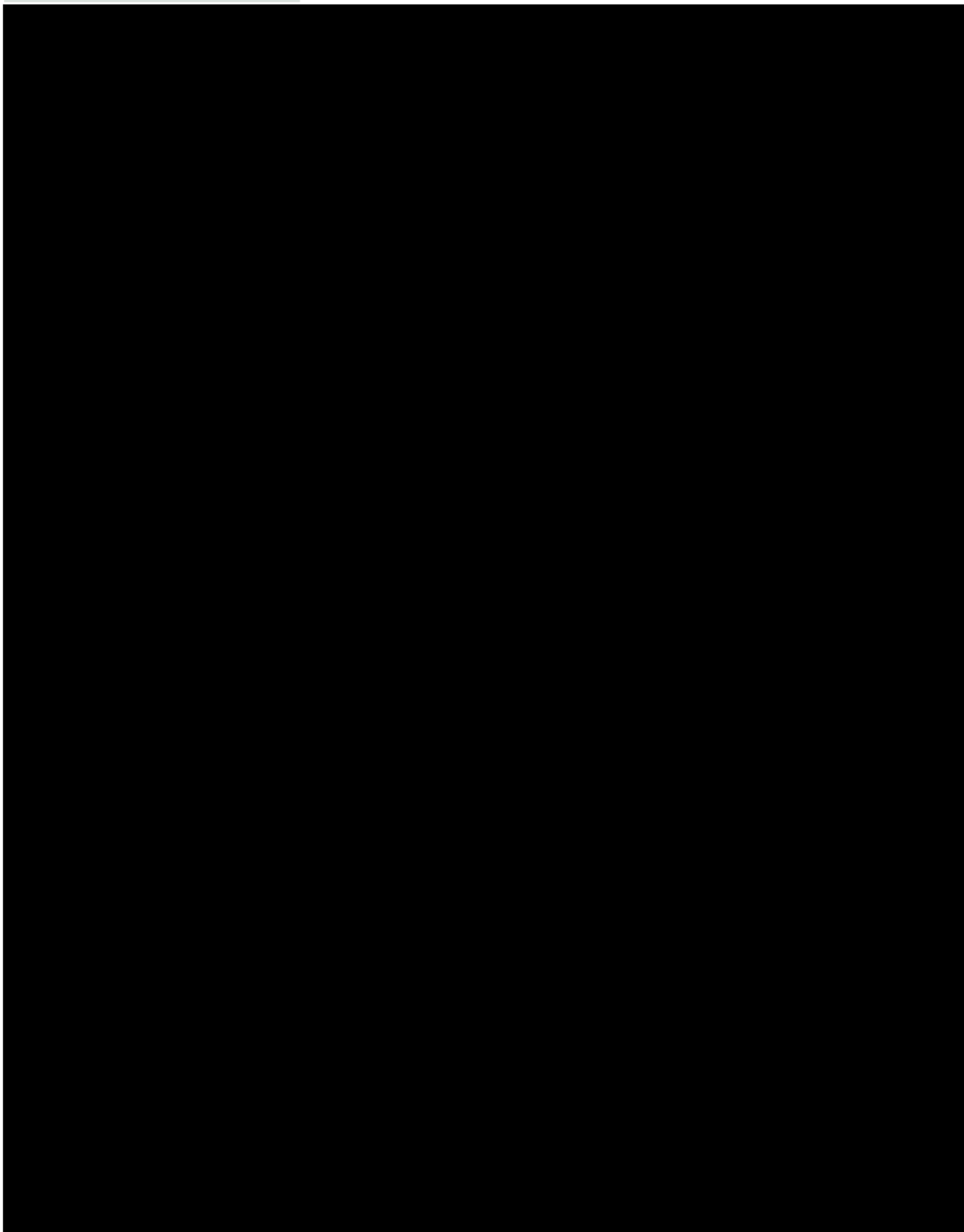












17 September 2025

Planning Secretary
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

To the Planning Secretary,

**Independent Environmental Audit Report - Kings Park Waste Facility (SSD-5041) Audit No. 4
Sell & Parker Pty Ltd Response to Recommendation and Non-Compliances**

We refer to the abovementioned Independent Environmental Audit Report (IEA) dated 16 September 2025 prepared by WD Environmental Consulting Pty Ltd (WDEC) for the site located at 23-43 and 45 Tattersall Road, Kings Park NSW 2148 (Site).

A summary of the Audit findings is provided as follows:

- There were 81 conditions of approval and 86 Environment Protection Licence (EPL) conditions assessed.
- There were two (2) non-compliances identified against the SSD-5041 conditions and one (1) against the EPL conditions. It is noted that the EPL non-compliance repeats the same aspect identified in the SSD conditions meaning there were two (2) discrete non-compliances identified.
- There was one (1) recommendation identified against the conditions of approval and the EPL in relation to chemical storage.
- Five (5) of the conditions of approval assessed were not triggered during the operational phase.
- 11 of the EPL conditions assessed were not triggered during the operational phase.
- Sell & Parker was compliant with the remaining 74 conditions of approval and 75 EPL conditions triggered during the operational phase.
- Sell & Parker has satisfactorily closed out all non-compliances and recommendations from the previous Independent Audit (Kings Park Environmental Audit Report Rev 0.1 JBS&G, 15 December 2022).

In accordance with Condition C10 of SSD-5041, below are Sell & Parker's responses to the recommendation and non-compliances contained in the IEA Report.

PROUDLY SUPPORTING

1. Recommendation ID SSD5041_IEA04_REC01

SSD Condition – B10

EPL Condition – O5.3

- *A site wide review of its chemical storage against the requirements of the relevant Australian Standards and the NSW EPA's Storing and Handling Liquids: Environmental Protection - Participant's Manual 2007. The Proponent is to take appropriate action based on the outcomes of the review.*
- *Inspect and re-stock spill response kits as appropriate across the site.*
- *Ensure areas where chemicals are in use or are dispensed, such as the lube station dispensing area are inspected and appropriately cleaned. This may form part of the review of chemical storage.*

Sell & Parker reviews the spill kits monthly as part of the monthly inspection process. Spill kits on site are not the primary source of spill containment material. Sell & Parker purchases spill pads and hydrocarbon absorbent material by the pallet, which are stored in centralised locations for use by all personnel on site and serve as the primary source of spill containment materials rather than spill kits.

The heavy yard and the black iron yard have specialised fuel containment collection systems which were viewed by the auditor. These are in place for high-risk fuel spill scenarios.

The lube station draws lubricants from double skin storage tanks for Sell & Parker's mobile plant maintenance program. It is currently checked monthly as part of the environmental inspection process.

In addition, the following changes have/are being implemented:

- (a) The monthly inspection form has been updated to specifically include the lube tanks; and
- (b) The bunded area for the dispensing area is being upgraded.

Sell & Parker are currently reviewing proprietary chemical management systems for safe storage and handling of all chemicals as part of its transition to SSD-10396. A document has been started in the 2025 audit folder in regards to the ongoing progress of this review and has been scheduled for review monthly until a final determination has been reached.

2. Non-Compliance ID SSD5041_IEA04_NC01

SSD Condition – B25

EPL Condition – L7.1

- *No further actions recommended, as noted in the Audit findings, the Proponent appears to be undertaking all reasonable and feasible measures necessary to prevent explosions occurring at the premises.*

Sell & Parker noted exceedances of the 120dB (Lin Peak) limit associated with the Development in the last three Annual Returns supplied to the NSW Environment Protection Authority (EPA) and available on their EPL Register website. As noted above, Sell & Parker appears to be undertaking all reasonable and feasible measures necessary to prevent explosions occurring at the premises.

3. Non-Compliance SSD5041 _IEA04 _NC02
SSD Condition – C12

- *The Proponent did not demonstrate they had undertaken a review, and if necessary, revise their strategies, plans, and programs required under this consent as triggered by the C7 fire incident report (2 December 2022).*
- *No evidence was presented by the Proponent to demonstrate a review of the relevant management plans was completed as a result of the C7 notification in 2022.*

There was a miscommunication between the auditor and the Group Environment Manager in regards to this requirement. All SSD-5041 management plans were reviewed on 11 January 2023. No changes were required to the management plans.

Should you have any queries or require any additional information, please don't hesitate to contact the undersigned.

Sincerely,



Neil Sher
Group General Counsel

Sell & Parker Pty Ltd
Phone: +61 2 9695 6846
Mobile: +61 405 828 772
Email: neils@sellparker.com.au