



ORICA KURRI KURRI ANE PLANT

ANNUAL ENVIRONMENTAL MANAGEMENT REPORT

JULY 2018



Revision	Date	Description	Author	Approver
0		2018 Annual Environmental Report	D Horne Kurri ANE Plant Senior Supervisor	Richard Powell Downstream Manufacturing Manager

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ATTACHMENTS:

Pollution Solutions Report – September 2017

Pollution Solutions Report – December 2017

Pollution Solutions Report – March 2018

Pollution Solutions Report – June 2018

Biodiversity Offset Area Final

Biodiversity Management Plan 201819

ABBREVIATIONS

ANE	Ammonium Nitrate Emulsion
ANS	Ammonium Nitrate Solution
CEMP	Construction Environmental Management Plan
CSS	Construction Safety Study
DPI	Department of Planning and Infrastructure
EA	Environmental Approval
EMSO	Environmental Management Strategy Operations
EPL	Environment Protection Licence
FHA	Final Hazard Analysis
FSS	Fire Safety Study
HAZOP	Hazard and Operability Study
ktpa	kilo tonnes per annum
OEH	Office of Environment and Heritage
SHEC	Safety, Health, Environment and Community
SHES	Safety, Health, Environment and Security

1 Introduction

In October 2010 Orica Australia Pty Ltd commenced construction of an Ammonium Nitrate Emulsion (ANE) manufacturing facility located at its Kurri Kurri Technical Centre, NSW. The facility will produce a maximum of 250,000 tonnes of ANE per annum once in full production (**Figure 1**). This plant has been developed to meet an increasing demand for ANE product and projected growth in the mining and quarry / construction sectors in South Eastern Australia. Approval for this project was granted in July 2010 by the Minister for Planning.

The facility began the commissioning process in October, 2011 and began production in February 2012.

This document has been prepared to comply with the requirement of the Project Approval (09_0090) as modified that an Annual Environmental Management Report be prepared for the project and relates to August 2017 – July 2018



Figure 1: ANE Plant layout

1.2 Facility Description

The facility activities include the following:

- ANE production of up to 250,000 tonnes of product per annum;
- Maintenance of access roads and relevant services infrastructure;
- Operation of storage for raw materials used in the manufacturing process including ammonium nitrate solution (ANS), solid ammonium nitrate, fuel blend ingredients such as palm olein, yubase 3 and diesel oil, thiourea, urea, acetic acid, caustic soda and water;
- Transport truck weighing, loading and unloading facilities and management;
- Management of the facility office, control room, switch room and quality control laboratory;
- Management of contractors and visitors.

2 Facility Requirement

As a condition of the project consent, this facility is required to prepare an Annual Environmental Management Report.

This report includes the following:

1. *This facility Annual Environmental Report (AEMR) will include the following;*
 - a) *identify the standards and performance measures for the facility;*
 - b) *describe the works carried out in the past 12 months and the works to be carried out in the next 12 months;*
 - c) *include a summary of complaints received in the past year and provide comparison with previous years;*
 - d) *report results of monitoring required by the approval and EPL for this facility;*
 - e) *provide analysis of monitoring results in the context of relevant criteria and limits, previous monitoring results and the predictions made in the EA;*
 - f) *identify any trends in monitoring results over the life of the facility; and*
 - g) *report on compliance with the project approval, summarise non-compliances in the previous 12 months and report on actions taken to rectify non-compliances.*

3 Facility Standards and Performance Measures

This facility meets the standards and conditions detailed in the following documents:

- Project Approval 09-0090 dated 26 July 2010;
- Modification Application MP 09_0090 MOD 1;
- Modification Application MP 09_0090 MOD 2;
- Schedules 2 to 4 of Project Approval;
- Environmental Approval dated December 2009;
- Response to Submissions report dated March 2010;
- Independent Environmental Audit March 2016.

The key standards and performance measures for the operating facility include:

	Standard	Performance Measure	Comment
Noise Management	Noise generated from the operation of the facility does not exceed 35dB (A) at nearest residential receptor at any time.	Proponent shall conduct a Noise Audit for the premises within 3 months of the commencement of operation of the ANE Facility or as otherwise agreed by the Director-General.	Large buffer area around plant. Noise controls have been incorporated into design and equipment selection. The Noise Audit has been completed and submitted to the DPI, no actions were required from the audit.
Air Quality	Dust	All trucks leaving or entering the facility with loads have their loads covered; Trucks movements associated with the facility do not track dirt onto the public road network.	Requirement incorporated into the Environmental Management Plan.
Soil and Water Discharges	Section 120 of the <i>Protection of the Environment Operations Act 1997</i>	Bunding to comply with all relevant Australian Standards and the OEH's Storing and Handling Liquids: Environmental Protection, Participants Manual.	Facility is designed to meet bunding requirements.
Lighting	Australian Standard AS4282(INT)-Control of Obtrusive Effects of Outdoor Lighting	Facility Lighting complies with the requirements of the standard.	Lighting compliance has been assessed during the design phase.
Production Limits	Production not to exceed prescribed levels.	ANE – 250ktpa	Production limits are monitored and documented weekly. Limits not exceeded.

4 Facility Status

4.1 Facility Progress Review

During the previous 12 months covered by this report normal production activities have been undertaken and include:

- 0.44% production increase over reporting year;
- Plant operating at 49% of Licence Limit of 250,000 T/pa;
- Traffic management and site access;
- Production of ANE, cooled ANE, and Companion Solution.
- Unloading of raw materials;
- Loading tankers with ANE;
- Maintenance management and associated activities;
- Contractor & Visitor Induction and Management;
- Roster change implemented;

- Commenced replacement of all perimeter street lighting with LED to reduce power consumption and emissions.

4.2 Planned Facility Progress

- Minor Increase in ANE production tonnage as per EA document;
- As per RTP proportional heavy vehicle movements to support raw materials and production schedule.

4.3 Significant Activities Undertaken in the Reporting Period

- Nil

4.4 Important Initiative Planned in the Next Reporting Period

- Negotiation of new Enterprise Agreement
- Complete changeout of street lighting to LEDs

5 Environmental Monitoring and Complaints Summary

5.1 Environmental Monitoring

Following the commissioning of the ANE Plant, monitoring is undertaken to assess compliance with relevant conditions as outlined in the Project Approval and the EPL.

5.2 Community Complaints

27.07.2010 – 26.07.2011	27.07.2011 – 26.07.2012	27.07.2012 – 26.07.2013
No Complaints	One unsubstantiated complaint	No Complaints
27.07.2013 – 26.07.2014	27.07.2014 – 26.07.2015	27.07.2015 – 26.07.2016
No Complaints	No Complaints	No Complaints
27.07.2016 – 26.07.2017	27.07.2017 – 26.07.2018	27.07.2018 – 26.07.2019
No Complaints	No Complaints	

6 Facility Compliance

A review of the status of compliance with the operation of this facility is detailed in the table below.

SUMMARY OF KEY FACILITY COMPLIANCE ACTIVITIES

Issue	Condition	Requirement	Compliance Status
Schedule 3: Specific Environmental Conditions	1	Undertake the following studies and submit to DPI Director-General for approval:	
		a) • Fire Safety Study (FSS)	Complied. The FSS was submitted on 9 February 2011 and a response was received from Fire Rescue NSW (FRNSW) on 3 May 2011. Formal review completed by SHERPA 17.11.2017 minor changes with no impact on fire scenarios.
		b) • Hazard & Operability Study	Complied. The HAZOP was submitted to the DPI 15 February 2011. DPI approved the study on 18 February 2011. Hazop Actions completed.
		c) • Final Hazard Analysis	Complied. The Phase 1 FHA was submitted to the DPI on 8 February 2011. DPI approved the study on 18 March 2011.
	d) • Construction Safety Study	Complied. The Construction Safety Study was submitted to DPI on 8 February 2011. Approval was obtained from DPI on 18 February 2011.	
	2	Undertake the following studies and submit to DPI Director-General for approval: <ul style="list-style-type: none"> • Emergency Plan (update) • Safety Management Plan 	Completed
	6	Comply with the requirements of the Director-General in relation to conditions 1-5.	Complied
	10	Prepare a Road Transport Protocol prior to the commencement of construction and operation.	Complied.

Issue	Condition	Requirement	Compliance Status
			A Road Transport Protocol was included in the EMSO. RTP revised and updated with Maps showing M15 freeway extension. Nil NON compliances
	12	Within 6 months of approval implement the offset strategy to the satisfaction of the director general	Complied An application was submitted to OEHL to enter into a Voluntary Conservation Agreement.
	15	Implement Vegetation Clearing Protocol	Complied Vegetation Clearing Protocol was included in the EMSO and followed for clearing of the site prior to the commencement of construction.
	16	Carry out all reasonable and feasible measures to minimise dust generated by the Project / Facility	Complied EMSO included measures to control dust. All road surfaces sealed for permanent operation.
	17	Trucks entering or leaving the Project site must have their loads covered and must not track dirt onto public roads	Complied. Measures for the control of dust were included in the CEMP.
	18	Noise generated from the construction and operation of the project shall not exceed 35dB(A) at nearest residential receptor	Complied. Post start up Noise Audit completed
	20	Implement the recommendations of the 'Bushfire Threat Assessment' included with the EA and also any additional bushfire hazard reduction measures outlines in the Submissions Report	Complied Requirements included in the design.
	21	Compliance with section 120 of Protection of the Environment Operation Act 1997	Annual Environmental Return submitted to EPA
	22	Ensure that all chemicals are stored in appropriately bunded areas	Complied. EMSO included requirements for management of materials. Design incorporates bunding requirements. Daily shift Housekeeping checks completed and documented.
	23	Prepare a Soil and Water Management Plan	Complied. Measures for the control of erosion and sediment were included in the Construction Environmental Management Plan.

Issue	Condition	Requirement	Compliance Status
			Operational Soil and Water management plan reviewed and revised 14.11.2017
	24	A Stormwater Management Plan must be included in the design	Complied. CEMP included these requirements, where applicable to construction. Operational Stormwater management plan incorporated into Soil and water management plan reviewed and revised 14.11.2017
	25	An Erosion and Sediment Control Plan is to be prepared	Complied. EMSO included an Erosion and Sediment Control Plan. Operational Erosion Control management plan incorporated into Soil and water management plan reviewed and revised 14.11.2017
	26	Ensure that lighting associated with the Project complies with the latest version of <i>Australian Standard AS 4282(INT)-Control of Obtrusive Effects of Outdoor Lighting</i>	Complied A consultant was engaged to provide a report on external lighting to ensure compliance.
	27	Waste to be classified in accordance with <i>DECCW Guidelines 2008</i> and disposed of to approved premises	Complied. Measures for the control of waste were included in the EMSO. Registered Waste disposal provider engaged for production operations
	28	In the event that skeletal remains, or an Aboriginal object is identified, all construction activities that will or would have the potential to impact on indigenous heritage item(s), shall cease until the DECCW is consulted and their directions complied with	Complied. CEMP and EMSO included requirements. Aboriginal groups were consulted during the construction period.
Schedule 4: Environmental Management, Reporting and Auditing	1	Prepare and implement an Environmental Management Strategy for the Facility to the satisfaction of the Director-General.	The Facility Environmental Management Strategy was submitted on 24 February 2012.
	2	Prepare an Annual Environmental Management Report and submit to the DPI Director-General <ul style="list-style-type: none"> a. Identify the standards & performance measures for the Facility b. Describe the works carried out in the past 12 months and the works to be carried out in the next 12 months c. Include a summary of complaints received in the past year and provide comparison with previous years d. Report results of all monitoring required by this approval and an EPL for the Facility 	Submission of this document is the fifth annual report <ul style="list-style-type: none"> a. See section 3 this report b. See section 4.3 and 4.4 above c. See section 5 this report d. See Appendix 1

Issue	Condition	Requirement	Compliance Status
		e. Provide analysis of monitoring results in the context of relevant criteria and limits, previous monitoring results and the predictions made in the EA f. Identify any trends in monitoring results over the life of the Facility g. Report on compliance with the facility approval, summarise non-compliances in the previous 12 months and report on actions taken to rectify non-compliances	e. See Appendix 2 f. Monitoring Point 2. Results have shown a stable trend compared to previous reporting period. g. See Appendix 3
	3	Notify the Director-General and any other relevant agencies of any incident with actual or potential significant off-site impacts	There were no significant incidents relating to the facility during this reporting period that required reporting to the Director General
	4	An independent Environmental Audit within two years of commencement of operations at the ANE Facility and every 3 years thereafter. The audit will; <ul style="list-style-type: none"> a. Be conducted by a suitable, experienced and independent expert whose appointment has been endorsed by the Director General b. Assess the environmental performance of the Facility and its effect on the surrounding environment c. Assess whether the Facility is complying with the relevant standards, performance measures and statutory requirements d. Review the adequacy of any strategy / plan / program required under the approval; and if necessary, e. Recommend measures or actions to improve the environmental performance of the Facility and / or any strategy / plan / program required under the approval 	An independent Auditor was appointed and endorsed by the Director General to carry out the audit in the last quarter of 2016. Audit completed and submitted to DPE. Next Audit 2019
	5	The following information regarding the Facility is included on the website: <ul style="list-style-type: none"> • Copy of all current statutory approvals; • Copy of the current environmental management strategy and associated plans and programs; • Copy of any Annual Reports (over the last 5 years); • Copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and Any other matter required by the Director-General	Copies of information relating to the facility are included on the Orica Mining Services website (www.oricamining.com)

Appendix 1: DISCHARGE & MONITORING POINT 1 and POINT 2**DISCHARGE & MONITORING POINT 1 as at 27.07.2012 -- 26.07.2013**

Discharge to Utilisation Area.

Low	Average	High
5250L/day	6875L/day	8500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2013 – 26.07.2014

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6350L/day	8500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2014 – 26.07.2015

Discharge to Utilisation Area.

Low	Average	High
4625L/day	6063L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2015 – 26.07.2016

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2016 – 26.07.2017

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

DISCHARGE & MONITORING POINT 1 as at 27.07.2017 – 26.07.2018

Discharge to Utilisation Area.

Low	Average	High
4500L/day	6000L/day	7500L/day

Max Limit 16800L/day

Appendix 1 (cont.)**DISCHARGE & MONITORING POINT 2 as at 27.07.2017 – 26.07.2018**

Wet weather discharge, overflow pipe from water treatment systems 'Stormseptom System' (Pit 17) located at the south-eastern corner of the Ammonium Nitrate Emulsion Production Facility.

POLLUTANT	UNIT OF MEASURE	NO. OF SAMPLES REQUIRED BY LICENCE	NO. OF SAMPLES YOU COLLECTED AND ANALYSED	LOWEST SAMPLE VALUE	MEAN OF SAMPLE	HIGHEST SAMPLE VALUE
AMMONIA	Milligrams per litre	20	20	0.2	0.62	1.92
CONDUCTIVITY	Micro Siemens per centimetre	20	20	16	71.85	205
NITROGEN (TOTAL)	Milligrams per litre	20	20	0.6	1.94	5.4
OIL & GREASE	Visible	20	20	NIL	NIL	NIL
PH	PH	20	20	6.33	7.22	9.41
TOTAL DISSOLVED SOLIDS	Milligrams per litre	20	20	17	62.15	132
TOTAL SUSPENDED SOLIDS	Milligrams per litre	20	20	<5	47.75	155

Appendix 2: EXTRACTS from QUALITY ASSURANCE DOCUMENT within the EPL

L2 Volume and Mass Limits

Pollution Solutions Report – September 2017

Pollution Solutions Report – December 2017

Pollution Solutions Report – March 2018

Pollution Solutions Report – June 2018

(Refer to attached reports)

The Orica Australia Technical Centre is compliant with condition L2 and its subsection.

To ensure condition L2 of the sites licence is conformed with, quarterly assessments on the sites treatment plant by a NATA accredited company are undertaken. Part of this quarterly assessment includes the review on the quantity of discharge. From this review an average daily output is identified of which is approximately 50% below the current daily licence limit.

Quantity of discharge amount was consistent with previous year.

L3 Noise Limits

The Orica Australia Technical Centre is compliant with condition L3 and all of its subsections.

A noise survey conducted on April 2012 by independent consult Umwelt during production phase identified compliance with condition L3. No complaints have been received relating to noise generated by the site.

For the period of this report there have been no breach of noise limits and no complaints received.

This survey is readily accessible if an authorised officer of the EPA requests it.

L4 Potentially Offensive Odour

The Orica Australia Technical Centre is compliant with condition L4 and its subsection.

No potentially offensive odours were identified at the site.

Appendix 3: Projected ANE Annual Tonnages between 2011 and 2023 with total daily truck movements

Year	Total Truck Movements - Projected	Total Truck Movements – Actual Average / day	Total Tonnes - Projected	Total Tonnes - Actual
2011	50	1	125,000	0
2012	55	26	137,500	40,657
2013	60	34	150,000	111,310
2018	80	50	200,000	123,007
2023	100		250,000	

Appendix 4: Audit Actions

Recommendations from the Independent Environmental Audit 2017

- Response to Recommendations – 6th February 2017
- Revised Response as requested by DPE – 28th July 2017

Table 9.1 – Consolidated Audit Recommendations

Source	Reference	Commitment	Recommendation	Orica Response	Progress
Project Approval	Schedule 3 – Hazards, condition 4.1	Within 3 months of the approval of Modification 2. or further time agreed with SafeWork NSW, the applicant shall update the current MHF Safety Case for the facility and provide the relevant information of SafeWork NSW.	To remain compliant, Orica will need to submit the updated Safety Case to SafeWork NSW on or before 27 April 2017	Action No: 2017-AP00046848 Action Description: Submit the updated Safety Case to SafeWork NSW prior to 27 April 2017. Due Date: 27/04/2017	Action No: 2017-AP00050799 Raised to replace original action number Safety Case submitted 26 th April 2017 Action Complete
Project Approval	Schedule 3 – Hazards, condition 5	Twelve months after the commencement of operations of the proposed ANE Facility and every three years thereafter, or at such intervals as the	To meet consent time frames, the next Hazard Audit is due to be conducted by 7 February 2019, and the report due to be submitted to the Director-General by 7 March 2019.	Accepted	Action No. 2017-AP00064777

Source	Reference	Commitment	Recommendation	Orica Response	Progress
		<p>Director-General may agree, the Proponent shall carryout a comprehensive Hazard Audit of the site and within one month of each audit submit a report to the Director-General.</p> <p>a) The audits shall be carried out at the Proponent's expense by a qualified person or team, independent of the overall site, approved by the Director-General prior to commencement of each audit. Hazard Audits shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No.5, 'Hazard Audit Guidelines'.</p> <p>b) The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented.</p>			Due Date: 07.02.2019
Project Approval	Schedule 3 – Independent	Independent Traffic Audits must have the verification component of the audit	As requested by DPE in their letter to Orica (23.10.16) future ITAs must clearly state that the verification	Action No:	Action Complete 30.03.2017

Source	Reference	Commitment	Recommendation	Orica Response	Progress
	Traffic Audit, condition 11a	undertaken without prior notice to the proponent.	component of the audit was undertaken without prior notice to the Proponent	2017-AP00046850 Action Description: Notify independent traffic auditor of requirements. Due Date: 30/06/2017	Action Completed Traffic Audit to be completed 31.08.2018 Previous auditor notified New Auditor Appointed and notified of the requirement
Project Approval	Schedule 3 – Independent Traffic Audit, condition 11f	Within 1 month of commissioning the audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, with a response to any of the recommendations contained in the audit report.	In future submissions of ITAs include a response to audit recommendations.	Accepted	
Emergency Plan	1.5.1 Document control and Distribution	This plan has been submitted to the Director-General NSW Department of Planning for approval and must be resubmitted for approval when there are	Check with DPE regarding their need to review. If not required, remove the requirement to submit to Director-General from the document. The Plan is submitted to NSW Fire and	Action No: 2017-AP00046851	Action No: 2017-AP00050804 Raised to replace original action number

Source	Reference	Commitment	Recommendation	Orica Response	Progress
		significant changes to the plan.	Rescue when external review is required.	Action Description: Check with DPE regarding their need to review the Emergency Plan. Due Date: 31/10/2017	Due Date 31/10/2017 Complete Requirement to submit to DPE Confirmed
Safety Management System	14.3.1 Specialist SH&E Training	Additionally, all principal Site Managers undergo a Site Manager's Competency Assessment, and preparation of a development plan at least every four years. The Engineering Shared Services team is responsible for scheduling the competency assessment.	We suggest that the document be updated to reflect new process.	No longer applicable. Orica to review Safety Management System and external audit checklist to be updated.	

Source	Reference	Commitment	Recommendation	Orica Response	Progress
Safety Management System	17.2 Letter of Assurance	The Letter of Assurance process is used to report SH&E Assurance annually to the Chief Executive Officer (CEO) of Orica Ltd. Letters of Assurance are prepared by each Site Manager, using information gained during audits conducted during the period, the results of investigations into incidents and reviews with the Site Management Team.	We suggest report is updated to reflect updated process	No longer applicable. Orica to review Safety Management System and external audit checklist to be updated.	Orica has introduced a SHES Assurance Program
Road Transport Protocol	1.3.2 Truck controls	Licensing of all vehicles by the relevant regulatory authority	It is recommended that the document be revised to put the responsibility back onto the contractor as Orica can't control this.	Action No: 2017-AP00046852 Action Description: Review and update Road Transport Protocol. Due Date: 31/10/2017	Action No: 2017-AP00050806 Raised to replace original action number Completed and submitted to DPE

Source	Reference	Commitment	Recommendation	Orica Response	Progress
Road Transport Protocol	3.2 Compliance	Drivers found to be non-compliant may be subjected to Orica's disciplinary process or prevented from delivering to site in the case of contract or delivery drivers.	We suggest that the document is revised to put the responsibility back onto the contractor as Orica can't control this.	<p>Action No: 2017-AP00046853</p> <p>Action Description: Review and update Road Transport Protocol.</p> <p>Dues Date: 31/10/2017</p>	<p>Action No: 2017-AP00050805</p> <p>Raised to replace original action number</p> <p>RTP revised and submitted to DPE</p>
Soil and Water Management Plan	Table 5.1	Maintain existing upslope diversion bunds. Maintain concentrated water channels adjacent to diversion bunds to prevent erosion and down slope sedimentation.	Undertake measures to reduce erosion in clean water diversion.	<p>Action No: 2017-AP00046854</p> <p>Action Description: Engage contractors to repair erosion.</p> <p>Due Date: 31/12/2017</p>	<p>Action No: 2017-AP00050808 Raised to replace original action number</p> <p>Repairs completed</p>

Source	Reference	Commitment	Recommendation	Orica Response	Progress
Soil and Water Management Plan	Table 6.1	Regular inspection of clean water diversions, especially following rainfall events. Carry out repairs as required to ensure they remain in good working condition.	Undertake measures to reduce erosion in clean water diversion.	Action No: 2017-AP00046854 Action Description: Carry out inspection as per SAP PM. Due Date: 31/12/2017	Action No: 2017-AP00050808 Raised to replace original action number Repairs completed
Soil and Water Management Plan	4.0 Legislative Requirements	In addition to Orica's legislative requirements detailed in Section 2.0 of the EMS-O, Orica will undertake stormwater, erosion and sediment management in accordance with: <ul style="list-style-type: none"> • Project Approval (09_0090); • Environmental Protection Licence (number 4121); • Protection of the Environment Operations Act 1997 (POEO Act), administered by the NSW Department of 	Undertake measures to reduce erosion in clean water diversion.	Action No: 2017-AP00046854 Action Description: Engage contractor to ensure legislative requirements are met.	Action No: 2017-AP00050808 Raised to replace original action number Repairs completed

Source	Reference	Commitment	Recommendation	Orica Response	Progress
		<p>Environmental and Heritage (OEH);</p> <ul style="list-style-type: none"> • Environmental Planning and Assessment Act 1979 (EP&A Act), administered by the NSW Department of Planning (DoP); • Water Management Act 2000, administered by the NSW Office of Water (NOW); • Operation phase commitments of the CSWMP; • Managing Urban Stormwater: Soils and Construction (the Blue Book) Volume 1 (Landcom, 2004); and • Managing Urban Stormwater: Harvesting and Reuse (DEC, 2006). 		<p>Due Date:</p> <p>31/12/2017</p>	
Environmental Management Strategy	2.1 Environmental Aspects	The Register [of Environmental Aspects] will be reviewed every two years, and changes to the identification of aspects, the assessment of risk, and the identification of control measures to reduce the risk will be implemented as required.	Schedule a biennial review the register of environmental aspects.	<p>Action No:</p> <p>2017-AP00046855</p> <p>Action Description:</p> <p>Schedule a biennial review of the register</p>	<p>Action No: 2017-AP00050809 Raised to replace original action number</p> <p>Action Complete</p>

Source	Reference	Commitment	Recommendation	Orica Response	Progress
				of environmental aspects. Due Date: 30/04/2017	
Environmental Management Strategy	2.2 Legal and Other Requirements	Should the scope of current operations change, or if a development application is to be lodged for alterations or extensions to the ANE Facility or its associated lands, applicable legislation and environmental planning instruments should be investigated, and this section should be updated, to ensure currency.	Include review of the legal register in the biennial review of the EMS.	Accepted	Update as required.
Environmental Management Strategy	2.3 Objectives and Targets	It is expected that these objectives and targets will be reviewed at least every two years to ensure they are actively achieving best practice in environmental management, and are still relevant to local conditions and the legislative framework. New objectives	Review the EMS objectives and targets during the biennial review.	Accepted	Bi-annual review completed

Source	Reference	Commitment	Recommendation	Orica Response	Progress
		may be determined and new targets set over time.			
Environmental Management Strategy	3.3.2.1 General enquiries, information and visitors	The contact numbers for the site are as listed below: - Orica Technology Centre enquiry line - (02) 4939 5200; and - ERS - 1800 033 111. These phone numbers will be listed in the White Pages, advertised via signage at the Orica Richmond Vale site entrance on George Booth Drive, and noted on relevant vehicles in the case of the ERS number in accordance with the Road Transport Protocol.	Suggestion for improvement to the document. Remove the ERS number. Add the complaints number. Remove requirement to list these in the white pages. Change to webpage. Advertised number on the signage at front of Orica should be the 1300 number advertised on the website.	The enquiry lines 4939 5200 and 1300 are linked to the same telephone reception.	
Environmental Management Strategy	3.3.2.6 Community Consultation and Support	The Technical Centre site will implement a community consultative group which will include representatives from local government, emergency services and local residents. This group will provide a communication conduit between the site and the local community and provide feedback on business performance and	Establish a consultative group in line with DPE guidelines.	Action No: 2017-AP00046857 Action Description: The Technical Centre to establish a consultative group in	Action No: 2017-AP000508010 Raised to replace original action number Complete Letter from DPE 24.08.2018 indicating that a Community Consultation Strategy would be sufficient to comply.

Source	Reference	Commitment	Recommendation	Orica Response	Progress
		discuss community concerns.		line with DPE guidelines. Due Date: 30/09/2017	
Environmental Management Strategy	4.1 Monitoring and Evaluation	the EMPs will be formally audited on an annual basis by the Technology Centre site Manager with the SH&E team representative.	Implement annual audit process for EMPs.	Action No. 2017-AP00046883 Action Description: Implement a six monthly PM audit process for EMPs. Due Date: 31/03/2017	Action No: 2017-AP00050811 Raised to replace original action number Complete 30/03/2017
Environmental Management Strategy	4.4.1 Internal Audits	The EMS shall be audited on two-yearly (biennial) basis. Biennial audits will also be conducted of the site-specific Management Plans referred to in this EMS.	Schedule a biennial internal audit of the EMS.	Action No. 2017-AP00046884 Action Description:	Action No: 2017-AP00050812 Raised to replace original action number

Source	Reference	Commitment	Recommendation	Orica Response	Progress
				<p>Schedule a biennial internal audit of the EMS in the Orica DMS system.</p> <p>Due Date: 30/04/2017</p>	Complete 24/04/2017
Environmental Management Strategy	4.4.1 Internal Audits	All auditing records will be maintained by the SH&E team. A formal audit report must be prepared for each audit undertaken.	Establish and maintain a system to record audit records.	<p>Action No. 2017-AP00046884</p> <p>Action Description: All auditing records from the audit to be recorded in the Orica DMS system.</p> <p>Due Date: 30/04/2017</p>	<p>Action No: 2017-AP00050812 Raised to replace original action number</p> <p>Complete 24/04/2017</p>

Source	Reference	Commitment	Recommendation	Orica Response	Progress
Environmental Management Strategy	6.2 Reuse and recycling	Recycling provisions in accordance with council requirements and the Waste Avoidance and Resource Recovery (WARR) Act. Check that any waste produced on site is taken to the appropriately labelled storage bin and taken to the appropriate licensed facility. Monthly via receipt of report from waste contractor.	We suggest a periodic audit of waste vehicles is undertaken to check compliance with weight records.	Accept	

Additional actions raised from correspondence from Department of Planning dated 11.07.2017 re: Independent Environmental Audit 2017 under Schedule2, Condition 4.

Source	Reference	Commitment	Orica Response	Progress
Request from DPE	Schedule 2, Condition 8.	Address compliance with BCA	Action No: 2017-AP00064786 Due Date: 30/09/2017	Complete Building Certificate issued 30.10.2017.
Request from DPE	Schedule 4, Condition 1	Update and implement the Environmental Management Strategy to address the non-compliances identified in the IEA	Action No: 2017-AP00064787 Due Date: 30/09/2017	Review and updates completed and submitted
Request from DPE	Schedule 4, Condition 5	Update and maintain the company website	Action No: 2017-AP00064788 Due Date: 31/08/2017	Updated documents uploaded to website

Source	Reference	Commitment	Orica Response	Progress
Request from DPE	Schedule 2, Condition 4	Review and revise as necessary any strategies/plans/programs in relation to the outcomes of the IEA.	Action No: 2017-AP00064791 Due Date: 30/09/2017	List of strategies, plans and programs compiled. Reviews completed