

Department of Planning, Housing and Infrastructure

Reference: SSD-7698-PA-35

Amanda Minard
Environmental Compliance Manager
BENEDICT RECYCLING PTY LIMITED
24/09/2026

Sent via the Major Projects Portal only

Subject: Mayfield West Recycling Facility - IEA Report Dec 2025 and RAR

Dear Ms Minard

I refer to your Independent Environmental Audit (IEA) report and Response to Audit Recommendations (RAR) for the period 1 November 2022 to 31 October 2025, submitted as required by Schedule 2, Condition C13 of SSD-7698, as modified (the consent) to the NSW Department of Planning, Housing and Infrastructure (the Department) on 7 January 2026.

The Department considers the IEA report to generally satisfy the reporting requirements of the consent and the Department's *Independent Audit Post Approval Requirements* (2026).

However, under the provisions of Schedule 2, Condition A3 of the consent, I, as nominee of the Planning Secretary, require the following information to be included in the next IEA (2028):

1. Audit Period – the next IEA period must commence on 22 October 2025 and end on or around 22 October 2028 and coincide with the final inspection date of the audit.

Please note:

- The Department's acceptance of this IEA report is not an endorsement of the compliance status of the project.
- In accordance with Schedule 2, Condition C15, please publish the IEA report and RAR on the project website. Please also notify the stakeholders consulted as part of the audit process, as identified in the report, when the documents are published and provide them with a link to the published reports.
- A status update for all actions provided in the RAR is to be reported in the next Annual Review, until all actions are completed.
- Following submission of the Independent Environmental Audit you are required to review, and if necessary, revise the strategies, plans, and programs required under this consent/approval, in accordance with Schedule 2, Condition C8 of the consent.

Should you wish to discuss the matter further, please contact Ann Hagerthy, (Senior Compliance Officer) on 02 6575 3407 or email compliance@planning.nsw.gov.au

Department of Planning, Housing and Infrastructure

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader - Hunter
Compliance

As nominee of the Planning Secretary

Benedict Recycling Newcastle Facility
1A McIntosh Drive, Mayfield West

2025 INDEPENDENT ENVIRONMENTAL AUDIT

Final | 15 DECEMBER 2025



IAN SWANE &
ASSOCIATES

Benedict Recycling Newcastle Facility, 1A McIntosh Drive, Mayfield West

INDEPENDENT ENVIRONMENTAL AUDIT

Document title: Benedict Recycling Newcastle IEA

Document no. 1

Revision: Final

Date: 15 December 2025

Prepared by: Dr Ian Swane

File name: https://d.docs.live.net/d13c7702bd1fbdf1/Documents/IS^0A/Projects/Mayfield_2025/2_Deliverables/Mayfield_251019_Audit Report.docx

Ian Swane & Associates Pty Ltd
ABN 51 102 396 565
PO Box 359 Mortdale NSW 2223
Australia



Tel: +61 (0) 418 867 112

Email: iswane@bigpond.com

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1. Executive Summary

Benedict Recycling Pty Limited is the operator of the Benedict Recycling Newcastle Facility (SSD 7698) located at 1A McIntosh Drive, Mayfield West (the 'Facility'). Benedict was granted development consent for the Facility by the DPHI on 13 March 2018, which was modified on:

- 27 October 2021 to allow an increased processing capacity from 90,000 tonnes per year to 315,000 tonnes per year of GSW (non-putrescible); and then again on
- 18 February 2025 by a modification to the consent to allow the relocation of the approved ASS receiveal and processing from the main processing building to an existing vacant building (Mag Shed) on the site.

Operations at the Facility commenced on 25 September 2018.

This report documents the results of a three yearly **IEA** of the Facility that fulfills the requirements of Condition C13 of the Consent. The audit was undertaken in accordance with the DPE (2020) "*Independent Audit Post Approval Requirements*".

The Audit was commissioned on 15 September 2025 and undertaken by Dr Ian Swane from Ian Swane & Associates. The site inspection was undertaken by Dr Swane on 21 October 2025. The audit covered the period from 1 November 2022 to 31 October 2025.

The Auditor considers the weight of evidence provided in this IEA supports the conclusions that:

- No non-compliances with the Facility's environmental statutory obligations were identified at the end of the Audit Period;
- Operations at the site have improved since the previous IEA with the introduction of new practices and technologies (e.g. increased use of recycled surface water for dust suppression, ASS treatment and installation of an a Near Infrared Optical sorter);
- The outcome of the audit is that the Auditor identified no significant non-compliances during the Audit Period for the Facility, with all audit issues having a negligible risk level;
- Operations at the site have been well managed over the Audit Period and an acceptable level of environmental performance achieved; and
- The overall recovery rate achieved by the Benedict operation is likely to represent current best practice for waste streams being recycled in NSW.

The Auditor considers there are no improvements that need to be made to address non-compliances in environmental performance at the Facility, since there was a low risk of non-compliance at the end of the Audit Period. Nevertheless, the Auditor considers there exist environmental improvement opportunities for the site corresponding to:

- Identify new recycling opportunities for waste received at the Facility;
- Use of technological advances in recycling processes (e.g. will AI be able to improve the waste separation process?);
- Continue to upgrade equipment when feasible; and
- Other opportunities identified through regular review of site operations.

2. Introduction

2.1 Purpose & Audit Period

Benedict Recycling Pty Limited (**Benedict**) is the operator of the Benedict Recycling Newcastle Facility (SSD 7698) located at 1A McIntosh Drive, Mayfield West (the 'Facility'). Benedict was granted development consent for the Facility by the Department of Planning, Housing and Industry (DPHI)¹ on 13 March 2018, which was modified on:

- 27 October 2021 to allow an increased processing capacity from 90,000 tonnes per year to 315,000 tonnes per year of general solid waste (non-putrescible), hereafter referred to as **GSW**; and then again on
- 18 February 2025 (the **Consent**)² to allow the relocation of the approved acid sulfate soil (**ASS**) receipt and processing from the main processing building to an existing vacant building (Mag Shed) on the site.

Operations at the Facility commenced on 25 September 2018. A recent aerial photo of the Facility is provided in **Figure 2-1**.

This report documents the results of a three yearly independent environmental audit (**IEA**) of the Facility that fulfills the requirements of Condition C13 of the Consent. The audit was undertaken in accordance with the DPE (2020) "Independent Audit Post Approval Requirements".

The Audit was commissioned on 15 September 2025 and undertaken by Dr Ian Swane from Ian Swane & Associates (**ISAA**). The site inspection was undertaken by Dr Swane on 21 October 2025. The IEA covered the period from 1 November 2022 to 31 October 2025 (**Audit Period**). The previous independent audit covered the period 1 October 2019 to 31 October 2022.

2.2 Audit Requirements

Condition C13 of the Consent states that:

"Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:

- a) *be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) *include consultation with the relevant agencies;*
- c) *assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);*
- d) *review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and*

¹ Formerly known as the Department of Planning and Environment

² Department of Planning Industry and Environment (27 October 2021) 'Consolidated Consent SSD 76987 for 1a McIntosh Drive, Mayfield West, Lot 1 DP 874109'. Prepared for Benedict Recycling Pty Ltd

Figure 2-1 Site Locality Aerial Photo

(Source: Six Maps NSW)



- e) *recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.*

Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.

Condition C14 of the Consent states that:

“Within three months of commissioning the audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the Audit Report.

The requirements of the Consent considered relevant to this IEA cover:

- Administrative conditions (Consent Part A);
- Environmental performance and management (Consent Part B); and
- Environmental management, reporting and auditing (Consent Part C).

The Facility operates under an Environment Protection Licence (**EPL**) issued by the EPA number 20771. The requirements of the Consent that are considered relevant to this IEA cover:

- Administrative conditions (EPA Part 1 of the EPL);
- Discharges to air and water and applications to land (EPL Part 2);
- Limit conditions (EPL Part 3);
- Operating conditions (EPL Part 4);
- Monitoring and recording conditions (EPL Part 5); and
- Reporting conditions (EPL Part 6).

2.3 Audit Team

The Audit Team was led by Dr Ian Swane, a Senior Principal environmental & civil engineer with over 40 years professional experience specialising in the environmental and waste audits, the investigation, remediation and management of contaminated sites, health & ecological risk assessments, waste management. He has investigated and remediated many of the largest contaminated sites in Australia & been a technical adviser to Government agencies on key projects. He is also an EPA Site Auditor and completed over 300 site audits.

Dr Swane is also a DPHI approved Independent Environmental Auditor and an EPA approved Protection of the Environment Operations (**POEO**) Act Waste Auditor. Dr Swane has a BE (Hons 1st Class) and a PhD from Sydney University. Ian is also a Certified Practicing (Civil) Engineer (**CPEng**) and a Site Contamination Specialist (Rego No: SC40103).

Recent independent audits undertaken or in the process of being completed for the NSW Government include:

- Independent Environmental Audits under the EP&A Act for the Benedict Recycling for Smeaton Grange Facility (2025), Menangle Quarry (2025) and the Newcastle Facility at Mayfield West (2023);

- EPA statutory site audits for the Department of Planning Argle Terrace Upgrade Project (ongoing), NSW Department of Housing affordable housing projects at 17-31 Cowper St, 2A-2D Wentworth Park Glebe, 82 Wentworth Park Rd Glebe, M6 Motorway for TfNSW, Landcom Scheduled Lands at Riverstone (2017 – 2024), NSW Police Force Dubbo Police Station (2022 – 2024), NSW Police Force Parramatta Police Station (2022 – 2024);
- EPA waste audit under the POEO Act for the 7 Star Tyres Sefton facility (2022), Benedict Recycling Chipping Norton facility (2023), Benedict Recycling Unanderra facility (2023).

Dr Swane has been a Government-appointed technical adviser on major contaminated site projects.

Dr Swane completed all work required by the IEA, since his technical expertise and experience covers all technical aspects required by the audit. The DPHI approved Dr Swane as the Auditor for this IER on 15 September 2025, with a copy of the DPHI auditor endorsement letter provided in **Appendix B**.

2.4 Audit Scope

The scope of work undertaken by the Auditor for the IER involved:

- Consulted with NSW Government agencies relevant to the IEA (e.g. DPHI, EPA, Newcastle City Council, Fire and Rescue NSW [FRNSW]);
- Reviewed documentation provided by Benedict and Government agencies relevant to the IEA;
- Prepared detailed audit checklists (spreadsheets) to assess and track compliance;
- Online meetings between the Auditor, Benedict Site Manager and Compliance Team;
- Facility inspection and on-site meeting conducted on 21 October 2025; and
- Auditor report preparation.

2.5 Facility Description

The Facility at 1A McIntosh Drive Mayfield West is located on land legally defined as Lot 1 DP874109. The main features of the Facility are:

- A sealed access road from McIntosh Drive that leads to a wheel wash, weighbridge and administrative area;
- The main processing shed located in the south-west (**SW**) part of the site;
- A segregated heavy waste processing and stockpiling area located in the northern part of the site;
- Screening equipment located towards the centre of the site;
- A generator and diesel tank in the central part of the site;
- A public waste unloading shed in the southern part of the site;
- A workshop and equipment maintenance shed in the southern part of the site;
- Sealed internal roadways;
- Perimeter drains inside the site boundaries with a final sedimentation basin located in the NW corner that discharges validated stormwater to the Hunter River;

- Water holding tanks and automated dust suppression water sprays; and
- Security fencing around the property boundaries with lockable gates and signage.

Plans of the Facility are provided in **Figures 2-2 to 2-8**, with copies of photos taken by the Auditor on 21 October 2025 showing current site conditions provided in **Appendix F**.

Changes made to the Facility since the previous Audit Period (1/10/19 – 31/10/22) were associated with modifications approved by the MOD-3 Consent issued on 18 February 2025. These changes were:

- Constructing an ASS storage and processing facility in the Mag Shed area over a 1.61 ha area; and
- Retaining a 2.13 ha area for Ancillary Services in the south-east (**SE**) corner of the Facility.

The areas where these changes occurred are shown in **Figure 2-2**, with a layout plan for the ASS storage and treatment facility provided in **Figure 2-6**.

2.6 EPL 20771

The Facility operates under EPL 20771. The EPA POEO Register records:

- 8 licence variations since 2016, the latest variation dated 11 June 2025;
- The Facility is licensed for 'recovery of general waste', 'contaminated soil treatment', and waste storage - other types of waste;
- The Pollution Incident Management Plan was last tested on 29/11/24;
- The current environmental risk level is 1;
- Annual returns have been submitted since 2016;
- No penalty notices were issued over the Audit Period and after 2018; and
- There have been no reported non-compliances over the Audit Period and after 2021.

The NSW EPA POEO register available on their website³ shows that Benedict provided the EPA with copies of EPL 20771 annual reports for the years 2022, 2023 and 2024, which cover the Audit Period. The register advises that there were no non-compliances.

3

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20771&option=licence&range=POEO%20licence&searchrange=>

Figure 2-2 Facility Layout Plan

(Source: Appn A, MOD-3 Consent)

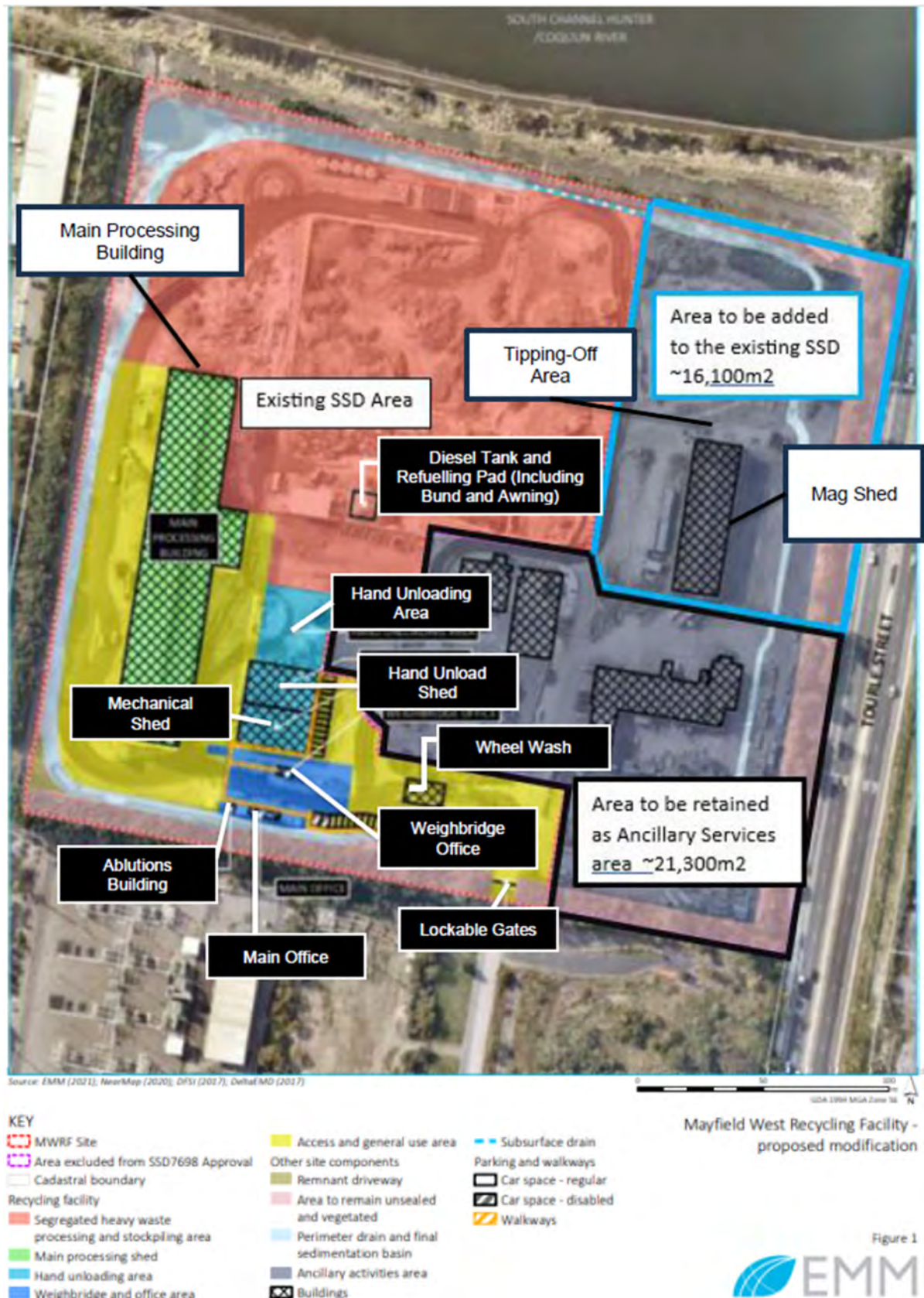


Figure 2-3 Historical Facility Layout Plan (pre 2021)

(Source: Appn A, MOD-2 Consent)

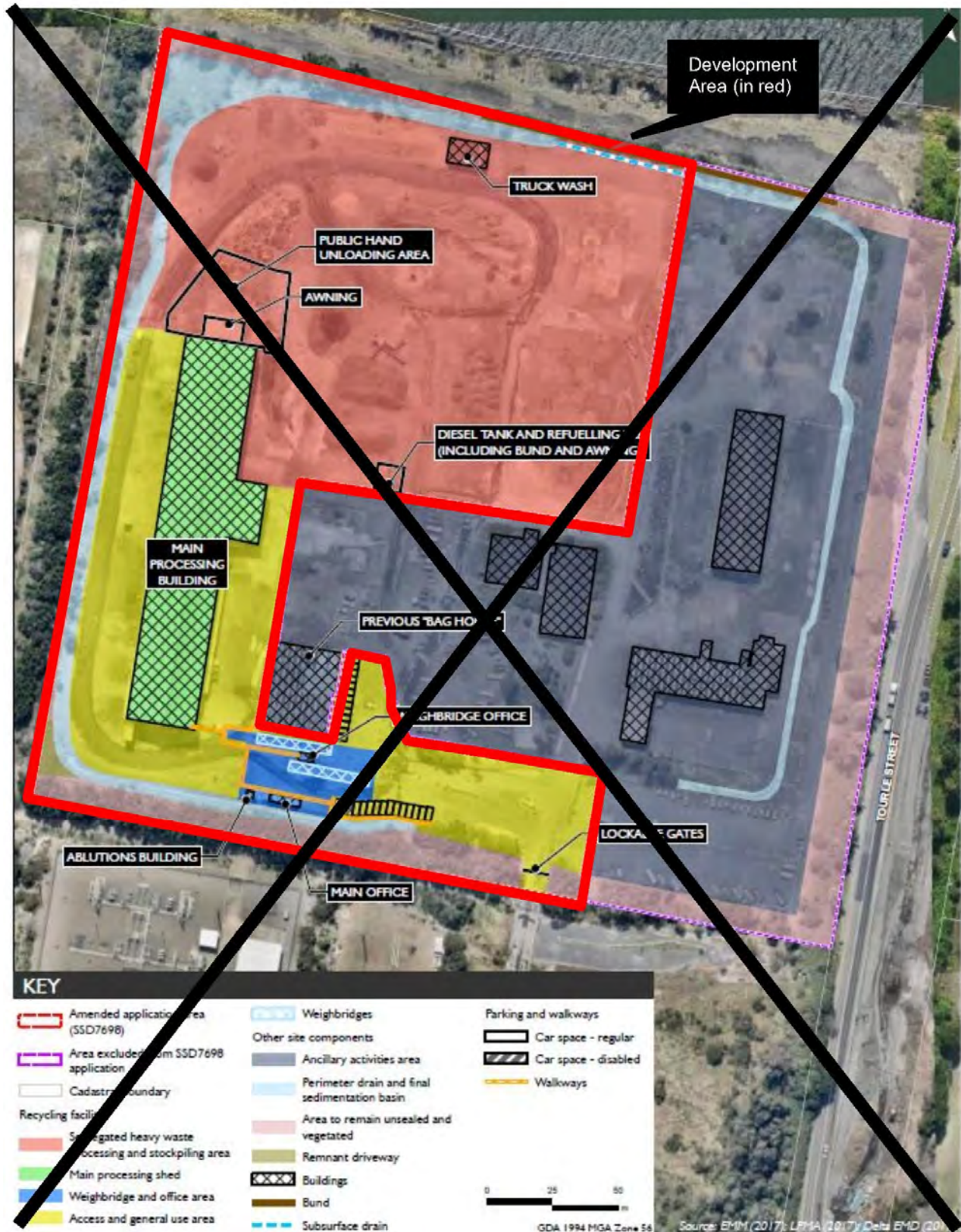


Figure 2-4 Location of Surface Water Infrastructure

(Source: Appn A, MOD-3 Consent)

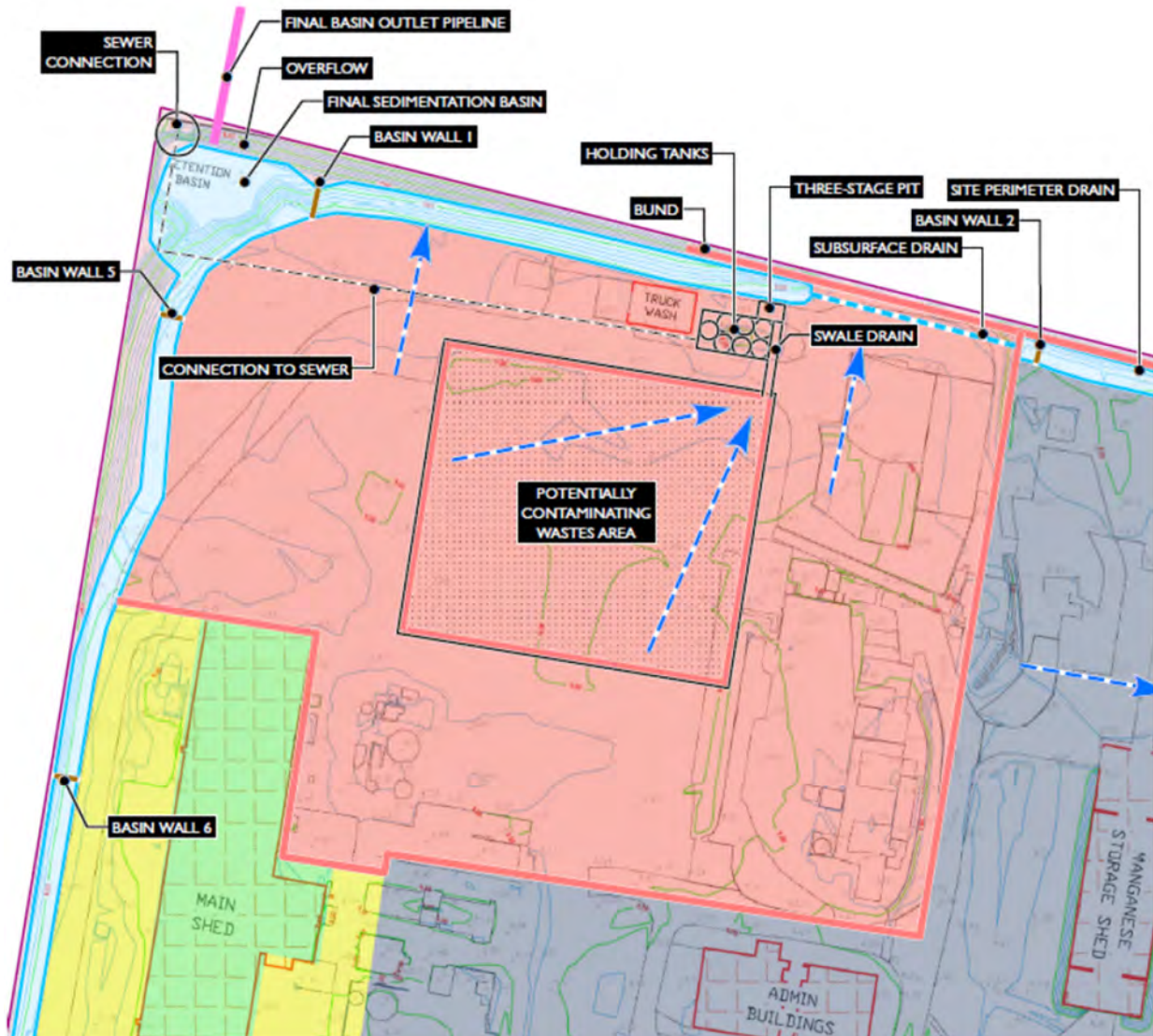


Figure 2-5 Locations of Crusher, Shredder and Screens

(Source: Appn A, MOD-3 Consent)



Figure 2-6 ASS Processing Layout Plan

(Source: Appn A, MOD-3 Consent)

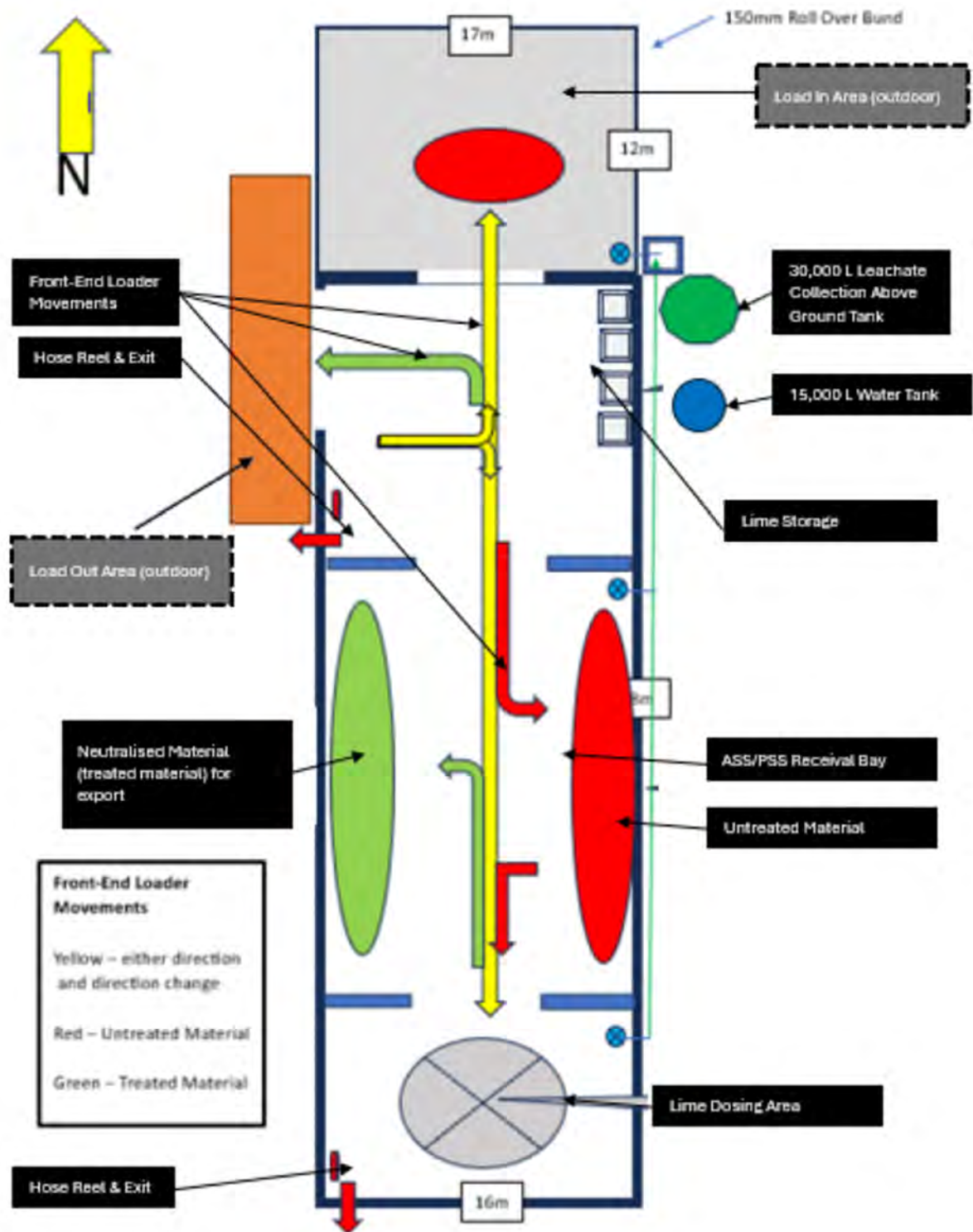


Figure 2-7 Truck Circulation Plan

(Source: Appn A, MOD-3 Consent)



Figure 2-8 Sensitive Receptor Locations

(Source: Consent SSD 7698)



2.7 Abbreviations

AQMP	Air quality management plan
ASS	Acid sulfate soil
BCA	Building Code of Australia
CDMP	Conceptual Decommissioning Management Plan
CEMP	Construction Environmental Management Plan
DPHI	NSW Department of Planning, Housing and Industry
DPI	NSW Department of Primary Industries
EIS	Environmental impact statement
EMS	Environmental management system
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
ESIP	Emergency Services Information Package
FRNSW	Fire and Rescue NSW
GSW	General solid waste
IEA	Independent environmental audit
LMP	Landscape management plan
NCC	National Construction Code
NSW	New South Wales
OEH	Office of Environment and Heritage
OEMP	Operational environmental management plan
ORP	Odour Response Plan
OTPMP	Operational traffic and pedestrian management plan
PCA	Principal Certifying Authority authorised under Section 6.17 of the EP&A Act
PIRMP	Pollution incident response management plan
POEO Act	Protection of the Environment Operations Act 1997
RFI	Request for Information
RRF	Resource Recovery Facility
RTS	The Applicant's response to issues raised in submissions received in relation to the application for consent for the development under the EP&A Act, titled Mayfield West Recycling Facility Response to Submissions, prepared by EMM, dated 20 July 2017

SSD	State significant development
SE	South-east
SW	South-west
SWCMP	Surface Water Characterisation and Mitigation Plan
SWVR	Surface Water Validation Report
WMP	Waste Management Plan

3. Audit Methodology

3.1 Selection and Endorsement of Audit Team

Refer **Section 2.3**.

3.2 Independent Audit Scope Development

The audit scope was developed through the Auditor undertaking:

➤ **Task 1 Early work** that involved:

- Reviewing the DPE (May 2020) audit guideline;
- Reviewing the audit report prepared for the previous Audit Period;
- Reviewing data provided by Benedict for the Audit Period;
- Reviewing data available on the POEO Public Register⁴ and search for any applications, notices, convictions, civil proceedings, enforceable undertakings, and penalty notices concerning the Facility;
- Initial consultation with agencies (comprising DPHI, EPA, Newcastle City Council, and FRNSW) involving email requests for information; and
- Preparing two detailed audit checklists (spreadsheets) to assess and track compliance with the Consent and the EPL. Copies of these checklists were sent to Benedict for review and comment prior to Task 2.

➤ **Task 2 Site inspection and on-site meeting** involved:

- Inspecting the Facility in the company of the Benedict Site Manager (Heath Nowlan) and the Benedict Business Manager (Dayne Steggles). The Auditor examined conditions within the Facility and adjacent to site boundaries. Copies of photos of the Facility taken by the Auditor are provided in **Appendix F**.
- The Auditor holding an on-site meeting with the Benedict Site Manager and Business Manager to:
 - i. discuss observations of site conditions and environmental practices made by the Auditor;
 - ii. discuss audit documentation provided by Benedict; and
 - iii. discuss non-compliances (if any) identified during the site inspection.

➤ **Task 3 Data assessment** involved:

- Further consultation with agencies as may have been required to collect additional data;
- Data assessment;
- Further discussions with the Benedict compliance team; and
- Preparation of Independent Audit Tables, with final copies provided in **Appendix A**.

⁴ <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers>

- **Task 4 Reporting** involved preparing the audit report. The Auditor initially prepared a draft audit report that was sent to Benedict for review and comment. A follow-up online meetings was then held to discuss the report's findings and recommendations. The report was then finalised and issued in accordance with Audit requirements.

3.3 Compliance Evaluation

The audit process was used to determine the compliance status of environmental operations undertaken at the Facility over the Audit Period. Conclusions made by the audit were based on a weight of evidence approach that used data collected from multiple sources, such as:

- Findings of the previous IEA;
- NSW Government agencies relevant to the audit (e.g. DPHI, EPA, Newcastle City Council, FRNSW);
- Documentation provided by Benedict and Government agencies relevant to the IEA;
- Facility inspection and on-site meeting conducted on 21 October 2025; and
- Subsequent discussions with Benedict and Government agencies.

3.4 Interviews with Benedict Personnel

Discussions with on-site Benedict personnel and Benedict management were conducted prior to, during and after the site inspection on 21 October 2025. These Benedict personnel included:

- The Benedict Site Manager: Heath Nowlan;
- The Benedict Business Manager: Dayne Steggles; and
- The Benedict Project Manager: Ewen McKenzie.

The interviews involved:

- Obtaining feedback and information from the Benedict personnel addressing issues raised by the checklists;
- Discussion of site conditions as observed during the site inspection;
- Review of the checklists on-site and obtaining additional verbal information following the site inspection; and
- The Auditor obtaining feedback from Benedict personnel in response to the release of a draft version of the audit report.

3.5 Site Inspection

The site inspection was conducted by the Auditor on 21 October 2025. All accessible areas of the Facility were inspected by the Auditor and the Auditor was not refused entry to any part of the Facility. The site inspection involved a walkover with Benedict site personnel, which included the observation of:

- Site access and security;
- Weighbridge, wheel wash, weather station and admin area;
- The ASS storage and processing area;

- The main waste processing shed;
- Waste receival areas;
- Waste sorting areas;
- Waste storage stockpiles;
- Fuel and dangerous goods storage areas;
- Equipment maintenance shed; and
- Surface water and dust control management infrastructure.

Copies of photos taken by the Auditor during the site inspection showing current site conditions are provided in **Appendix F**.

3.6 Consultation

3.6.1 Overview

Consultation undertaken by the Auditor for the IEA involved a request for inputs from stakeholders. These stakeholders comprised the DPHI, EPA, Council and FRNSW.

Emails were initially sent to each of the above agencies on 30 September 2025 advising them of the audit and its scope and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Follow up emails were then sent on 19 October 2025. Copies of inputs from stakeholders are provided in **Appendix C** with a summary of stakeholder inputs provided in **Table 3-1**.

Table 3-1 Summary of Stakeholder Inputs

Stakeholder	Contact	Date of Input	Stakeholder Input	Auditor Response
DPHI	Ann Hagerthy – Senior Compliance Officer	8/10/25	Review compliance with consent conditions, management plans, waste types and limits, crusher operation and surface water management	Refer Section 4.7.1
EPA	Adam Plant – Operations Officer	30/09/25 & 19/10/25	None	--
Council	Daniel O'Brien – Senior Environment Protection Officer	21/10/25 & 29/10/25	Review effectiveness of pollution controls & daily discharge monitoring in EPL	Refer Section 4.7.2
Fire and Rescue NSW	Richard Jay – A/Team Leader Fire Safety	1/10/25	No addition requirements	--

3.6.2 Department of Planning, Housing and Infrastructure

In an email sent on 8/10/25 (**Appendix C**), the DPHI advised that in addition to the consent requirements and an adequacy review of management plans required by the consent, please pay additional focus to waste types and relevant management of those, limits, crusher operation, and surface water management. The Auditor's review of these issues is provided in **Section 4.11.1**.

3.6.3 Newcastle City Council

In an email sent on 29/10/25 (**Appendix C**), Council requested the Auditor to review the following matters:

- The effectiveness of pollutant controls for both air and water in relation to impacts to the estuary. Particularly whether there is any flow path other than the tested final sediment basin noted on the EPL; and
- Consideration of advice to the EPA to close the loop on daily discharge monitoring which does not appear to have triggers identified in the EPL for raising reporting.

The Auditor's review of these issues is provided in **Section 4.11.2**.

3.7 Compliance Status Descriptors

The meaning of compliance status descriptors used by the Independent Audit tables in **Appendix A** is summarised in **Table 3-2**. Risk levels for each non-compliance identified have been assessed in accordance with **Table 3-3**.

Table 3-2 Compliance Assessment Matrix

Assessment	Criteria
Compliance	Compliance: - The Facility complies with the requirements of applicable pre-operational Consent conditions - A judgement made by the Auditor that the activities undertaken and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.
Likely compliance	Likely compliance: - During the IEA, the Facility implemented an interim measure to address an operational issue identified by the Auditor. - During the IEA, the Facility submitted up-dated documentation to the DPHI / EPA that addressed an operational issue identified by the Auditor. - The interim measure to become permanent following approval of up-dated documentation by the DPHI / EPA
Non-compliance	Non-compliance: - Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit - Site displays little or no evidence of compliance with the requirements of the regulatory documentation. Note: Where the Auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.
Not triggered	Not applicable / not triggered The respective condition / requirement was not activated within the scope of the audit.
Noted	A statement or fact where no assessment of compliance is required.

Table 3-3 Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur
Negligible	General compliance
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

4. Audit Findings

4.1 Approval and Document List

The main documentation reviewed for this IEA comprised:

1. Terras Landscape Architects (9 September 2015) '*Landscape Plan, Mayfield West Recycling Facility*'. Plan No. 10944.5 prepared for Benedict Recycling
2. NSW EPA (December 2017) '*Compliance Audit Handbook*'
3. Centurion Survey (26 July 2018) '*WAC Site Layout Plan, Benedict Recycling Newcastle, 1A McIntosh Drive Mayfield West Recycling Facility*'. Drawing No. 0011WAC01, 5 sheets
4. NSW Department of Planning and Environment (July 2018) '*Independent Audit – Post Approval Requirements Fact Sheet*'. 3 pages
5. EMM (30 July 2018) '*Operational Traffic And Pedestrian Management Plan, Mayfield West Recycling Facility*'. Prepared for Benedict Recycling
6. Barnett & May (21 February 2020) "*Benedict Waste Recycling Facility Mayfield West Independent Environmental Audit*". Revision 1 prepared for Benedict Recycling Pty Ltd
7. Benedict Recycling (2 March 2020) "*Benedict Recycling's Response to Independent Environmental Audit 2019*". Revision 1
8. EMM (2 March 2020) '*Groundwater Monitoring Program, Mayfield West Recycling Facility*'. Document No. J14152 20 prepared for Benedict Recycling
9. NSW Department of Planning, Industry and Environment (May 2020) "*Independent Audit, Post Approval Requirements*"
10. VGT (30 June 2020) '*Surface Water Audit for Benedict Mayfield West Recycling Facility*'
11. Benedict Recycling (4 September 2020) '*Benedict Recycling's response to Independent Surface Water Audit 2020*'
12. EMM (12 August 2022) '*EPL 20771 - Water management update*'. Prepared for Benedict Recycling
13. City of Newcastle (9 September 2022) '*Modification Application No. MA2022/00157 for Development Application No. DA2015/0291 for Lot 1 DP 874109, 1A McIntosh Drive Mayfield West NSW 2304, Development: Ancillary waste activities, construction of truck wash facilities, and associated site work*'
14. NSW Department of Planning, Housing and Industry (13 June 2023) "*Modification of Development Consent, Application Number SSD-7698-Mod 2, Benedict Recycling Pty Ltd, 1a McIntosh Drive, Mayfield West*"
15. NSW EPA (22 August 2023) "*Notice of Variation of Licence No. 20771*". 3 pages
16. Benedict Recycling (29 November 2024) '*Pollution Incident Response Management Plan (PIRMP), Mayfield West*'. Revision 13
17. NSW Department of Planning, Housing and Industry (18 February 2025) "*Consolidated Consent, Application Number SSD 7698, Benedict Recycling Pty Ltd, 1a McIntosh Drive, Mayfield West*"

18. EMM (30 April 2025) '*Mayfield West Recycling Facility, Addendum to Operational Traffic and Pedestrian Management Plan*'. Prepared for Benedict Recycling
19. EMM (30 April 2025) '*Mayfield West Recycling Facility, Air Quality Management Plan*'. Version 3 prepared for Benedict Recycling
20. EMM (30 April 2025) '*Mayfield West Resource Recycling Facility, Conceptual Decommissioning Management Plan*'. Version 4 prepared for Benedict Recycling
21. EMM (30 April 2025) '*Mayfield West Recycling Facility, Groundwater Monitoring Program*'. Version 4 prepared for Benedict Recycling
22. Benedict Recycling (30 April 2025) '*Operational Environmental Management Plan, Mayfield West*'. Revision 7
23. Benedict Recycling (30 April 2025) '*Waste Management Plan, Mayfield West*'. Revision 6
24. NSW EPA (25 May 2025) '*Environment Protection Licence Number 207711, Benedict Recycling Mayfield West, 1A McIntosh Drive, Mayfield West NSW 2304*'
25. NSW EPA (11 June 2025) '*Notice of Variation of Licence No. 20771*'. 2 pages
26. EMM (4 July 2025) '*Mayfield West Recycling Facility, Surface Water Characterisation and Mitigation Plan*'. Version 4 prepared for Benedict Recycling
27. Benedict Recycling (August 2025) Monthly Resource Recovery Rate Summary Reports for the Period October 2022 to August 2025
28. Benedict Recycling (1 December 2025) Email providing responses and data addressing Auditor queries
29. Benedict Recycling (9 December 2025) Email providing responses and data addressing Auditor queries
30. EMM (19 November 2024) '*Mayfield West Recycling Facility - Crushing operations, Air quality report - Crushing monitoring program - Campaign 1*'. Document No: J14152 RP30, version 2 prepared for Benedict Recycling
31. EMM (19 November 2024b) '*Mayfield West Recycling Facility - Crushing operations, Air quality report - Crushing monitoring program - Campaign 2*'. Document No: J14152 RP31, version 2 prepared for Benedict Recycling
32. EMM (19 November 2024c) '*Mayfield West Recycling Facility - Crushing operations, Air quality report - Crushing monitoring program - Campaign 3*'. Document No: J14152 RP32, version 2 prepared for Benedict Recycling
33. Benedict Recycling (2023) '*Annual Review (Condition C9), Mayfield West Recycling Facility (SSD 7698), 01 January 2022 - 31 December 2022*'
34. Benedict Recycling (2024) '*Annual Review (Condition C9), Mayfield West Recycling Facility (SSD 7698), 01 January 2023 - 31 December 2023*'
35. Benedict Recycling (2025) '*Annual Review (Condition C9), Mayfield West Recycling Facility (SSD 7698), 01 January 2024 - 31 December 2024*'
36. Ian Swane & Associates (23 January 2023) '*Benedict Recycling Newcastle Facility, 1A McIntosh Drive, Mayfield West, Independent Environmental Audit*'. Prepared for Benedict Recycling Pty Limited

37. Benedict Recycling (2023) 'Mayfield West Recycling Facility (EPL 20771), R4 Annual Water Management Review, Reporting Period 25/05/2022 – 24/05/2023'
38. Benedict Recycling (2024) 'Mayfield West Recycling Facility (EPL 20771), R4 Annual Water Management Review, Reporting Period 25/05/2023 – 24/05/20243'
39. Benedict Recycling (15 December 2025) Email providing responses and data addressing Auditor queries

4.2 Compliance Performance - Overview

4.2.1 Compliance Assessed by Benedict and DPHI

The Benedict Annual Review reports issued to the DPHI over the Audit Period advised:

- 2022 Annual Review⁵: Benedict reported no non-compliance occurred between 1/11/22 and 31/12/22, which is the part of the year that fell within the Audit Period;
- 2023 Annual Review⁶: Benedict reported that:
 - 16 May 2023: DPHI issued a further Show Cause notice emanating from a site inspection conducted by DPHI on 19/05/22 alleging a breach of Consent Condition B11 – response due 9 June 2023;
 - 9 June 2023: Benedict Recycling provided a response to the Show Cause and disagreed with the allegations;
 - 28 July 2023: Benedict Recycling received an Official Caution for the storage of waste in the hand unload area. Further, an Official Warning was issued for several of the site Management Plans being out of date and not including the MOD 1 Consent references. These plans were to be upgraded by 13 September 2023. The OEMP v5 and appendices were subsequently updated by Benedict Recycling with the assistance of EMM.
 - 13 September 2023: Benedict Recycling emailed DPHI with the revised OEMP and Management Plan documentation and included MOD 1 and MOD 2 references.
 - 6 December 2023: DPHI alleged that Benedict Recycling had not lodged the required documents. It was then conceded that they had been received in September but should have been loaded into the portal, which was not articulated in the Request for Information (RFI);
 - 7 December 2023: Benedict Recycling uploaded the documents to the Major Projects Portal and this was confirmed by DPHI as being received; and
 - 12 December 2023: DPHI sought some clarity on one of the document lodgements. In the 2023 Annual report, Benedict advised that they were awaiting further feedback from DPHI at the date the report was issued.
- 2024 Annual Review⁷: Benedict reported no non-compliance.

DPHI feedback to the Benedict Annual Reviews that covered the Audit Period comprised:

⁵ Section 6.1, Ref [33]

⁶ Section 10.3, Ref [34]

⁷ Section 3, Ref [35]

- 2022 Annual Review: Feedback no available
- 2023 Annual Review: In their 6/08/24 letter, the DPHI advised that the report generally satisfied the reporting requirements of the consent. DPHI requested that future Annual Reviews needed to generally follow the format of NSW Planning's Compliance Reporting Post Approval Requirements (May 2020), in order to better convey the information and clearly demonstrate that the development complies with the conditions of consent.
- 2024 Annual Review: In their 16/05/25 letter, the DPHI advised that the report generally satisfied the reporting requirements of the consent. The only comment made was that for future Annual Reviews, under the provisions of Condition A3 of the consent, additional information needed to be included in Section 2 Previous Actions consisting of a separate table to provide an update on actions from the most recent IEA.

The Auditor considered that the available information indicates that no non-compliances were identified by Benedict or DPHI involving recycling and waste management operations at the Facility during the Audit Period. Issues identified by DPHI concerned documentation provided by management plans and Annual Reports. The Auditor notes that these issues appear to have been addressed by Benedict:

- Revising the format and scope of information provided in their later annual reviews;
- Issuing revised management plans in 2024 – 2025 that included:
 - 29/11/24 PIRMP by Benedict (Reff [16]);
 - 30/04/25 Addendum to OTPMP by EMM (Ref [18]);
 - 30/04/25 Air Quality Management Plan (**AQMP**) by EMM (Ref [19]);
 - 30/04/25 Conceptual Decommissioning Management Plan by EMM (Ref [20]);
 - 30/04/25 OEMP v7 by Benedict (Ref [22]);
 - 30/04/25 Waste Management Plan by Benedict (Ref [23]); and
 - 4/07/25 SWCMP by EMM (Ref [26]).

4.2.2 Compliance Identified by Previous IER

The previous IER covered the period 1/10/19 to 31/10/22, with the results documented in a report prepared by Dr Swane dated 23/01/23 (Ref [36]). The Auditor did not identify any non-compliances with the Facility's environmental statutory obligations for the previous audit period. The Auditor considered there were no improvements that needed to be made to address non-compliances in environmental performance at the site, since there was a low risk of non-compliance at the end of the audit period. Nevertheless, the Auditor considered there existed environmental improvement opportunities for the site, these being:

- Assessing the practicality of using recycled water for dust suppression;
- Use of technological advances in recycling processes;
- Continue to upgrade equipment when feasible; and
- Other opportunities identified through regular review of site operations.

The subsequent Benedict Annual Review reports issued to the DPHI over the Audit Period described the environmental improvement measures that were being undertaken. The advice given in the Benedict 2022 Annual Review⁸ is summarised in **Table 4-1**.

Table 4-1 Proposed Environmental Improvement Measures from 2022 Annual Review

IER Improvement Opportunities	Benedict Response
Assessing the practicality of using recycled water for dust suppression	There has been extensive and ongoing consideration of the use of recycled water. The recent submission of the SWVR that has been accepted by the EPA and DPHI involves the reusing of water onsite through a new fixed water suppression system. It is a stepwise improvement to manage water quality at the premises with the purpose being to reduce the number of potential overflow events annually.
Use of technological advances in recycling processes	Benedict Recycling is always looking for ways to improve efficiencies onsite, upgrade plant and equipment onsite and improve processes onsite. This will always be a focus. We are in the process of a plant upgrade that will utilise a Near Infrared Optical sorter which will increase our recovery of desired recyclables.
Continue to upgrade equipment when feasible	Benedict Recycling is always looking for ways to improve efficiencies onsite, upgrade plant and equipment onsite and improve processes onsite and as per the comment above are doing so.
Other opportunities identified through regular review of site operations	Benedict Mayfield West will continue its ongoing commitment to adhere to all management strategies and control measures as outlined in the Operational Environmental Management Plan, SSD and EPL including regular review of site operations.

The Auditor considers that these improvements were being made over the Audit Period, as evidenced by:

- The submission of the SWVR dated 4/07/25 (Ref [26]);
- The preparation of other revised plans as mentioned in Section 4.2.1, above;
- The installation of an a Near Infrared Optical sorter, which was mentioned during the Auditor's site inspection; and
- Obtaining a variation to the Consent and EPL that provided the Facility with the capability to treat ASS.

⁸ Section 4.1, Ref [33]

4.2.3 Compliance Assessed by Auditor During Audit Period

As previously discussed in **Section 3.2**, the Auditor prepared two detailed audit checklists (spreadsheets) to assess and track compliance with the Consent and the EPL. A copy of these checklists was sent to Benedict for review and comment prior to Task 2.

The data used by the Auditor to assess compliance of the Benedict Recycling Newcastle Facility with the requirements of the Consent and EPL comprised:

- Documentation provided by Benedict;
- Discussion of site conditions as observed during the site inspection;
- Observations made by the Auditor during the site inspection;
- Review of the checklists on-site and obtaining additional verbal information following the site inspection;
- Feedback provided by stakeholders;
- Data provided by the EPA public registers; and
- The Auditor obtaining feedback from Benedict personnel in response to the release of a draft version of the audit report.

Detailed documentation of the checklist results is provided in **Appendix A**, with a summary of statutory compliance outcomes from the IEA provided in **Table 4-2**.

Table 4-2 Summary of Statutory Compliance

Statutory Approval / Licence	Number of Conditions	Compliance	Likely compliance	Non-compliance	Not triggered
Consent SSD 7698	143	115	0	0	28
EPL 20771	82	64	0	0	18
Total	225	171	0	0	48

The outcome of the IEA was that the Auditor identified no significant non-compliances during the Audit Period for the Facility, with all audit issues having a negligible risk level.

4.2.4 Adequacy of Management Plans

The Facility operates under eight environmental management plans, which are summarised in **Table 4-3**. The Auditor considers the weight of evidence supports the conclusion that these plans meet the requirements of the MOD-3 consent because:

- The eight plans cover the environmental matters needing to be managed under the MOD=3 Consent;
- Five of the plans were prepared by suitably qualified and experienced environmental professionals from the environmental consultancy EMM, while the other three were prepared by suitably qualified and experienced operational and environmental management personnel from Benedict;

Table 4-3 Features of Environmental Management Plans for Benedict Newcastle Facility

Reference No.	Title	Author	First Issued	Current Issue	Revision Number	Review Agency	No. of Pages	Notes
16	Pollution Incident Response Management Plan (PIRMP), Mayfield West	Benedict	25/05/2016	29/11/2024	13	EPA	20	
18	Mayfield West Recycling Facility, Addendum to Operational Traffic and Pedestrian Management Plan	EMM	31/08/2023	30/04/2025	3	DPHI	65	
19	Mayfield West Recycling Facility, Air Quality Management Plan	EMM	8/09/2023	30/04/2025	3	DPHI	21	First issued by Ramboll in 2018
20	Mayfield West Resource Recycling Facility, Conceptual Decommissioning Management Plan	EMM	8/09/2023	30/04/2025	3	DPHI	21	First issued by Ramboll in 2018
21	Mayfield West Recycling Facility, Groundwater Monitoring Program	EMM	2/03/2020	30/04/2025	3	DPHI	19	
22	Operational Environmental Management Plan, Mayfield West	Benedict	24/03/2016	30/04/2025	7	DPHI	85	
23	Waste Management Plan, Mayfield West	Benedict	7/02/2028	30/04/2025	6	DPHI	34	
26	Mayfield West Recycling Facility, Surface Water Characterisation and Mitigation Plan	EMM	11/09/2023	4/07/2025	4	DPHI	106	

- Practically all the plans are subject to review by the DPHI, with the one exception subject to review by the EPA;
- Between three and thirteen versions of the plans have been prepared with all plans having been updated within the past 12 months; and
- Implementation of the plans has allowed operations at the Facility to meet the requirements of the MOD-3 consent and the EPL over the Audit Period.

4.2.5 Waste Description and Quantities

Waste Types Received

The facility accepts wastes for recycling on Monday to Friday 6am – 5.30pm and Saturday 6am – 2pm. The wastes accepted include building and demolition wastes (both commercial and domestic); green wastes; soils and clean fills; paper and cardboard wastes; and metals. The various waste types accepted by the facility are summarised in **Table 4-4**.

The wastes are separated for reuse and recycling. The facility also has a range of recycled sands, aggregates and mulch products for sale. The Facility's promotional flier provided on the Benedict website advises customers, among other things, that:

- All vehicles are weighed in and out on our fully certified weighbridges to calculate the net weight disposed;
- All waste will be inspected at each site by a Waste Inspector both before and during unloading;
- All goods invoiced as per signed weighbridge docket. No classification disputes will be accepted;
- Benedict Recycling does not accept any non-conforming or hazardous materials that do not appear on our EPA licence, including but not limited to: liquid waste, asbestos or putrescible waste; and
- Benedict's recycled products meet the conditions of the relevant resource recovery orders issued under the POEO (Waste) Regulation 2014. Customers are advised to consult the "BENEDICT" guide to customers for Product Selection and Use at www.benedict.com.au/products and the EPA website at www.epa.nsw.gov.au for advice on the appropriate use of natural and recycled materials.

Annual and Monthly Report Data

Annual reports for 2022 – 2024 reported that:

- For the 2022 calendar year:
 - 184,945.94 tonnes of GSW was received/processed on site;
 - The amount of waste stored on site at any one time did not exceed 53,733 tonnes;
 - No crushing occurred on site;
 - No timber was shredded on site;
 - No ASS was received; and
 - The recycling rate was 90%.

Table 4-4 Waste Types Accepted at the Facility (Sheet 1 of 2)

(Source: Benedict website)

Waste Type as of 1 August 2025	Prod. Code
Mixed Building & Demolition Waste May contain man made rubbish such as plastic, paper/cardboard, cloth, metal, brick & concrete, timber, etc.	DEMOT
General Solid Waste Recyclable Soils/Wastes from Infrastructure projects. Tipping subject to test reports being supplied and approved.	GSREC
Clean Segregated Concrete Clean Straight Concrete - Building & Demolition Waste - must not contain any other material. Less than 700mm x 700mm in size.	CONCC
Clean Segregated Concrete - Large Clean Straight Concrete - Building & Demolition Waste - must not contain any other material. Greater than 700mm x 700mm in size.	CONCCL
Clean Segregated Brick Clean Straight Brick - must not contain any other material.	BRICC
Mixed Brick & Concrete Mixed Brick & Concrete - must not contain any other material.	CONBK
Rubble (No Light Rubbish) Building & Demolition Waste consisting of a mixture of soil / clay, brick, concrete, asphalt. Must not contain any other material incl. light rubbish.	RUBBL
Asphalt Clean segregated asphalt - must not contain any other material.	ASPHA
VENM (Certified) Certified only - Virgin Excavated Natural Material Soil, clay, shale, sandstone, sand - must not contain any other material.	VENM
Timber Must not contain chemically treated timber - must not contain any other material	TIMBE
Vegetation Full Loads – Garden/Green Waste Only – No Stumps.	VEGET
Non-Recyclable Waste Loads which contain 50% or more by volume of carpet/underlay, vegetation, astro turf, kopper logs, MDF, glass, horsehair plaster, heavy clay with rubbish.	NRECW
Non-Recyclable Waste - Light Polystyrene, plastics, insulation, foam packaging. Loads that contain 50% or more by volume of one or a mixture of any of the listed wastes.	NRECWL
C&I Waste Commercial and Industrial Waste	CIWASTE
Gyprock Clean Gyprock - must not contain any other material including horsehair plaster.	GYPROCK
Cardboard Clean segregated loads of cardboard and paper - must not contain any other material.	CBOARD
Car & Light Utility Tyres	TYREC
Truck & Forklift Tyres	TYRET

Table 4-4 Waste Types Accepted at the Facility (Sheet 2 of 2)

(Source: Benedict website)

Mattresses	MATTR
Stumps (Exceeding 500mm diameter)	STUMP

- For calendar year 2023:
 - 285,644.08 tonnes of GSW were received/processed on site;
 - The amount of waste stored on site at any one time did not exceed 53,733 tonnes;
 - No crushing occurred on site;
 - No timber was shredded on site;
 - No ASS was received; and
 - The recycling rate was 92.9%.
- For calendar year 2024:
 - 169,865.58 tonnes of GSW were received/processed on site;
 - The amount of waste stored on site at any one time did not exceed 53,733 tonnes;
 - 8,312 tonnes of material were crushed on-site;
 - No timber was shredded on site;
 - No ASS was received; and
 - The recycling rate was 91%.

Monthly Resource Recovery Rate Summary Reports were also provided by Benedict for the Newcastle Facility for the period October 2022 to August 2025. Copies of these reports are provided in **Appendix G**, with an example from October 2022 provided in **Figure 4-1**. The reports show that the total resource recovery rate varied from 81 to 96 %, with most monthly rates being greater than or equal to 90%.

Benedict also provided a monthly tracker of stockpile capacity for the period 1/11/22 to 31/10/25 (Ref [29]). The tracker consisted of monthly plots of stock on hand, receival capacity, projected closing stock and % authorised amount. A copy of the data is provided in **Table 4-5**. The data shows the stockpile capacity was maintained at all times below the authorised amount generally at 30 - 80%, with a 55% average.

Figure 4-1 Resource Recovery Rate Summary Report for October 2022 (Source: Ref [27])

Resource Recovery Rate Summary Report

Site: Newcastle

Period: October 2022

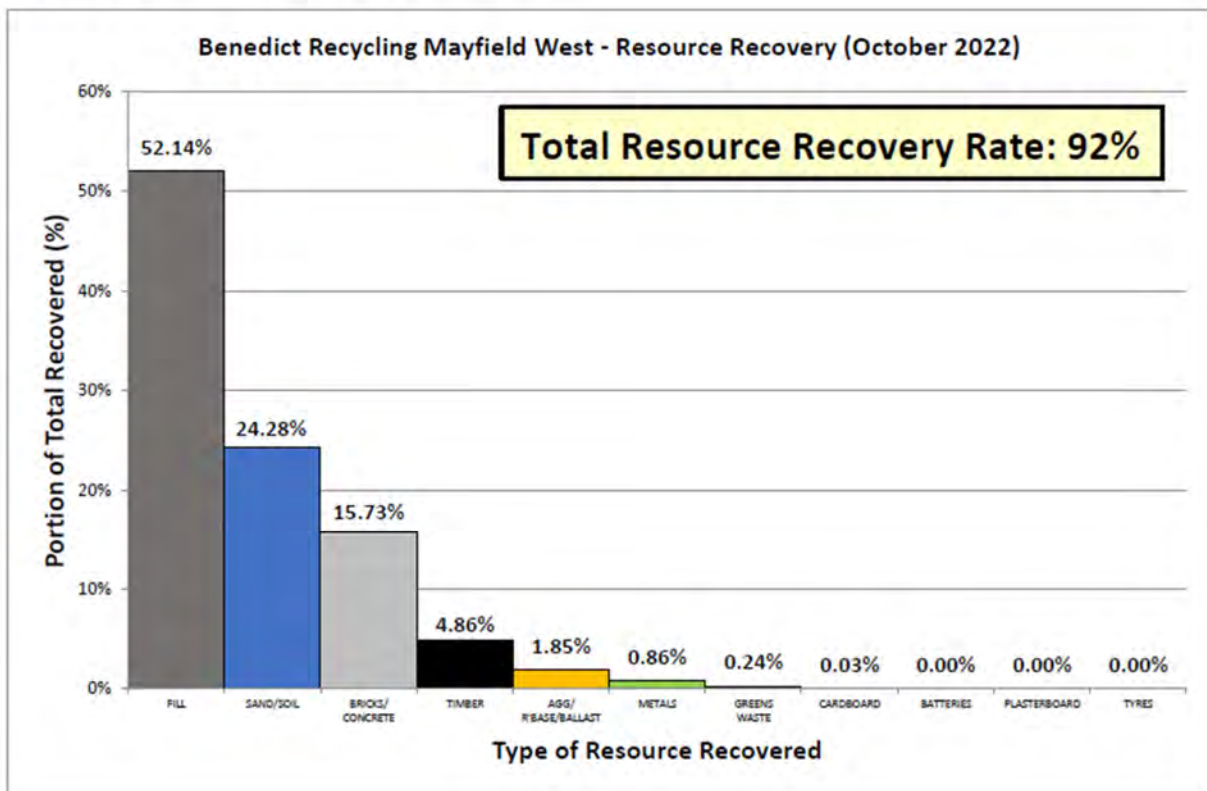


Table 4-5 Monthly Tracking Data of Stockpile Capacity for 1/12/22 to 31/10/25 Period

Month/Year	Authorised Stockpile	Stock on Hand	Capacity	Authorised Stock Capacity %
Nov-22	53733	18537	35196	65.5
Dec-22	53733	14936	38797	72.2
Jan-23	53733	11624	42109	78.4
Feb-23	53733	15256	38477	71.6
Mar-23	53733	8206	45527	84.7
Apr-23	53733	11714	42019	78.2
May-23	53733	42530	11203	20.8
Jun-23	53733	42760	10973	20.4
Jul-23	53733	49971	3762	7.0
Aug-23	53733	42553	11180	20.8
Sep-23	53733	48840	4893	9.1
Oct-23	53733	33681	20052	37.3
Nov-23	53733	46189	7544	14.0
Dec-23	53733	35306	18427	34.3
Jan-24	53733	23435	30298	56.4
Feb-24	53733	28056	25677	47.8
Mar-24	53733	20699	33034	61.5
Apr-24	53733	24531	29202	54.3
May-24	53733	30385	23348	43.5
Jun-24	53733	33815	19918	37.1
Jul-24	53733	34084	19649	36.6
Aug-24	53733	33615	20118	37.4
Sep-24	53733	19388	34345	63.9
Oct-24	53733	13802	39931	74.3
Nov-24	53733	4051	49682	92.5
Dec-24	53733	2226	51507	95.9
Jan-25	53733	9960	43773	81.5
Feb-25	53733	10026	43707	81.3
Mar-25	53733	5695	48038	89.4
Apr-25	53733	4747	48986	91.2
May-25	53733	17892	35841	66.7
Jun-25	53733	24085	29648	55.2
Jul-25	53733	26608	27125	50.5
Aug-25	53733	28225	25508	47.5
Sep-25	53733	30744	22989	42.8
Oct-25	53733	30129	23604	43.9
			Minimum	7.0
			Maximum	95.9
			Average	54.6

Auditor Review

The Auditor considers the annual and monthly reporting data support the following conclusions:

- The waste types received at the Facility over the Audit Period were limited to those permitted under EPL 20771;
- The total quantity of waste received over the Audit Period has not exceeded the annual limit of 315,000 tonnes permitted under the MOD-3 Consent and EPL 20771;
- The quantity of waste stored at the Facility at any one time over the Audit Period has not exceeded the limit of 53,733 tonnes under the MOD-3 Consent and EPL 20771;
- The stockpile capacity was maintained at all times below the authorised amount generally at 30 - 80%, with a 55% average;
- The quantity of ASS received over the Audit Period has not exceeded the annual limit of 30,000 tonnes permitted under the MOD-3 Consent and EPL 20771; and
- The quantity of ASS stored at the Facility at any one time has not exceeded the limit of 500 tonnes permitted under the MOD-3 Consent and EPL 20771.

4.2.6 Waste Management Plan

A waste management plan (**WMP**) was developed for the Facility and documented in the Operational Environmental Management Plan (**OEMP**)⁹ prepared by Benedict dated 30 April 2025. An early version of the OEMP that also included the WMP, was approved by the DPHI in a letter dated 21 October 2019 (Ref [4]). Version 7 of the OEMP was approved by DPHI in a letter dated 30 July 2025 (Ref [28]). A summary of the procedures documented in the WMP¹⁰ for handling / managing waste at the Facility include, among others:

1. Each load presented at the facility is to be inspected and classified prior to the material being deposited on site. The methodology for waste load inspections is detailed and illustrated in the Tip Inspecting Safe Work Procedure;
2. All waste accepted at the facility shall be recorded on MWRF's weighbridge system and a customer docket/receipt produced;
3. Waste material that is unacceptable or specified prohibited from entering the site shall be refused entry and diverted when possible to an appropriately licensed facility (Note: Benedict¹¹ further advised that the Facility actually does not divert these loads, as they are NOT at any stage accepted by Benedict, and therefore assume no responsibility for them other than ensuring the customer removes the rejected material from the Mayfield site, as per EPA & Workcover requirements);
4. Each load presented at the facility is to be directed to the appropriate storage area by the site staff. All waste on site is to be loaded and unloaded within the designated loading and unloading areas and be stored wholly within the designated waste stockpile areas. Wherever possible raw materials are to be sorted at the source and directed into segregated stockpiles on-site;

⁹ Section 4.2 & Appendix D, Ref [22]

¹⁰ Section 3 & 4, Benedict WMP (Version 7)

¹¹ Ref [39]

5. Unsorted materials are to be spread on the ground on-site, sorted into the various categories and formed into segregated stockpiles. The sorted waste material may be subject to processing depending on its category and presentation;
6. All hand unloading activities are carried out in the hand unloading area. All waste unloaded at the hand unloading area are unloaded and stockpiled in the hand unload shed or hand unloading area;
7. Processing on site may include screening, grinding and crushing as preparation aspects. The processed material is to be stockpiled into its various processed categories for return to the market as product(s); and
8. A 150 mm high bund has been constructed around the perimeter of the tipping-off area and doorways of the shed designated for receiving ASS. During ASS treatment, Benedict Recycling will capture any excess water from the misting of the ASS storage and treatment area and transfer it to a holding tank for removal off site to a licensed facility or in accordance with a trade waste agreement.

In order to manage non-conforming waste, the WMP requires:

1. Each incoming load of waste presenting at the facility is to be inspected for hazardous and other waste which is not permitted prior to the material being deposited on site;
2. All staff directly involved in the inspection and classification of waste must be capable of identifying wastes that are not permitted to be disposed of at the facility. As such, basic internal training is carried out as required together with asbestos awareness training conducted by an external party which is scheduled annually as well as ad-hoc from time to time should there be any significant turnover of site staff;
3. Where waste is deemed to be non-conforming, the load is either rejected or re-loaded for removal from the site. Waste material specifically prohibited from entering the site shall be refused entry and diverted where possible to the appropriate facility or alternatively directed to contact the EPA for advice;
4. Details of any non-conforming waste loads are captured on a Notification of Non Conforming Waste Form, which is sent to the customer and filed on site;
5. A log of all non-conforming loads is maintained in a central register;
6. Non-conforming waste material that is found to have been deposited on the site and listed as prohibited waste shall cause: the prohibited waste to be isolated and the area closed to public access; the site Leading Hand/Supervisor and the Site Manager to be notified immediately; the site is to be closed should the Site Manager or delegate deem the hazard to be such as to warrant such action;
7. Should an incident occur in relation to a non-conforming waste, which poses a threat to the environment, the EPA is to be advised as soon as practical after the incident occurs; and
8. Arrangements are to be made for the removal of the waste for disposal at an appropriate facility.

4.2.7 Receipt and Treatment of ASS

Condition B6(A) of the MOD-3 Consent requires Benedict to only receive ASS with a pH range of between 4.5 and 5.5. Benedict¹² advised that this requirement is met by managing the waste in accordance with their obligations under the EPL. This is achieved by using the waste classification reports provided by competent persons under the NSW EPA Waste Classification Guidelines, in conjunction with the Benedict Waste Reports Assessment Team under the guidance of the Environmental Compliance Manager & approval protocols.

Benedict also advised that no ASS material had been accepted for treatment over the Audit Period and the operational area had yet to receive any material for treatment. Treatment when it occurs will be done through the normal course of Site Operational Management, including appropriate approval and pre-booking requirements and associated site planning, resource allocation and supervision delivered by line management, as per applicable statutory & regulatory requirements.

4.3 Review of Crusher Operation & Dust Mitigation Measures

4.3.1 Crusher Operation

The MOD-3 Consent required the crusher operation to meet the following conditions:

- (Condition B55c): Water sprinklers at the crushing and screening plant must be utilised at all time when the plant is operational.
- (Condition B55f): Crushing occurs for no more than 46 days per year in total.
- (Condition B55g): Crushing does not occur during adverse meteorological conditions.
- (Condition B59): The Applicant must carry out Air Quality Monitoring and Reporting of the Development for the first three crushing events following the commencement of the operations to the satisfaction of the Planning Secretary. The monitoring and reporting must:
 - a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary;
 - b) monitor the dust emissions whilst the Development is in operation and crushing [as described section 3.5 of the Response to Submissions (**RTS**)] is occurring;
 - c) include a summary of air emission related complaints and any actions that were carried out to address the complaints;
 - d) validate the Development against air quality predictions in the RTS;
 - e) review design and management practices of the Development against industry best practice for dust emissions; and
 - f) include an action plan that identifies and prioritises additional dust mitigation measures that may be necessary to reduce emissions.
- (Condition B60): Within three months of each monitoring event, the Applicant must submit a copy of the Air Quality Monitoring Report (Condition B59) to the Planning Secretary, together with its response to any recommendations.
- (Condition B67): The crusher and shredder are only permitted to be operated in the segregated heavy waste processing and stockpiling area, no further south than 130 m from

¹² Ref [28]

the northern site boundary (as per the “location of crusher, shredder and screens” plan in the SSD Consolidated Consent (27 October 2021) – refer **Figure 2-5**.

- (Condition B68): The mobile screens in the segregated heavy waste processing and stockpiling area must not be operated simultaneously with the crusher or shredder.

The Annual Reports prepared by Benedict recorded that no crushing occurred on-site in the 2022 and 2023 calendar years. Trial crushing occurred in 2024 for 15 days (January - April) when 8,312 tonnes was crushed, then again in September Sept when 486 tonnes were crushed as part of three air quality assessments. In 2025, 13,109 tonnes of raw feed had been crushed up to end of October. The data indicates that less than the Condition A7 limit of 71,000 tonnes of waste were crushed on-site in any year during the Audit Period. Benedict also advised that the crusher, shredder and screen units were located on-site north of the southern limit line, as shown in **Figure 4-2**.

Figure 4-2 Crusher Location in 2024

(Source: Ref [29])



Benedict also advised (Ref [29]) that:

- Water sprinklers used at the crushing and screening plant at all times when the plant was operational (Consent Condition B55c);
- Typically crushing was done only on dry and calm days; and
- No complaints were received regarding the on-site crushing operation

Air quality monitoring was conducted during the three crushing events that occurred during September and October 2024 (8 days Event 1), (8 days Event 2), (11 days Event 3). The air quality monitoring was conducted by EMM and the results documented in three reports dated 19/11/24 (Refs [30] – [32]), with all these reports sent to the DPHI. The reports advised that:

- No exceedances of the 24 hour PM₁₀ criterion of 50 µg/m³ were recorded at either of the on-site monitoring locations;

- No exceedances of the 24 hour PM_{2.5} criterion of 25 µg/m³ were recorded at either of the onsite monitoring locations;
- The PM₁₀ concentrations at the MWRF were generally comparable with the concurrent measurements at the DCCEEW Mayfield AQMS for the same period;
- The PM_{2.5} concentrations at MWRF were generally comparable to those recorded at the DCCEEW Mayfield AQMS;
- When upwind and downwind concentrations were considered, the contribution from the crushing campaign did not result in an exceedance of the adopted criteria; and
- The air monitoring data was validated against air quality predictions given in the RTS.

EMM concluded that the bivariate plots indicated that the crushing campaigns did not significantly alter the recorded particulate matter concentrations relative to periods when crushing was not occurring.

4.3.2 Dust Mitigation Measures

The three EMM air quality monitoring reports¹³ advised that during site visits that took place on 30/08/24 and 30/09/24, EMM observed the following dust mitigation measures being implemented at the Newcastle Facility:

- Water trucks were being utilised along haul routes;
- A street sweeper was utilised to clean internal roads;
- Trucks delivering and receiving materials utilised sealed haul routes;
- Site boundary fences near to haul routes and processing activities were fitted with shade cloths;
- The irrigation sprinkler system was functional and in use across the site;
- Site activities (including crushing) were restricted during periods of adverse weather conditions (i.e. high winds); and
- A wheel wash in the weighbridge area was utilised by vehicles leaving the site.

The Auditor observed the same dust mitigation measures being implemented during the site inspection conducted on 21/10/25, with copies of photos taken provided in **Appendix F**.

4.4 Review of Surface Water Management

4.4.1 Documentation

Detailed information on the surface water management system and its operation is provided in the Surface Water Characterisation and Mitigation Plan (**SWCMP**) prepared by EMM dated 4 July 2025 (Ref [26]).

The SWCMP¹⁴ advises that the water management plans and studies completed in consultation with the EPA since the Development Consent was originally granted on 13 March 2018 are:

¹³ Section 6.2, Ref [30]; Section 6.2, Ref [31]; Section 6.2, Ref [32]

¹⁴ Section 1.3, SWCMP

- An initial SWCMP (EMM 2018) prepared to address Condition B33 of the Consent.
- A Surface Water Validation Report (SWVR) was prepared by EMM in 2020 to address Condition B35 of the Consent. This report included a commitment to update the site water balance and undertake a further review of the water management system once the water balance was finalised.
- A water balance update was prepared by EMM in 2022 to address the commitments made in the SWVR. The update was submitted to the EPA, who requested a further review of the water management system.
- A water management update was prepared by EMM later in 2022 to document the water management review requested by the EPA. This document included commitments to:
 - install a fixed sprinkler system;
 - undertake a routine water quality monitoring program, and
 - prepare an operational water management plan.

The EPA endorsed the water management approach proposed by EMM and varied EPL 20771 accordingly.

4.4.2 System Description

The SWCMP¹⁵ advises that surface water at the Facility is managed separately in the following areas:

- Area 1 – is a 0.52 ha bunded area where GSW considered to have a higher risk of contaminating stormwater is stockpiled and processed (the ‘potentially contaminating waste area’). The bund has been formed by a concrete berm (approximately 0.3 m high) constructed around the perimeter of Area 1. Runoff from Area 1 is managed by:
 - Draining to a sump (referred to as the two-stage pit). Water from the sump is pumped to a series of holding tanks (the Area 1 tanks). Pumping is controlled by a float switch in the pit, which is triggered when the pit is approximately 50% full. The Area 1 tanks comprise five connected 50-kL tanks, providing a total storage capacity of 250 kL; and
 - Water in the Area 1 tanks is used for dust suppression following each rainfall event. Water spills into the Area 2 water management system when the tanks are full.
- Area 2 – refers to the remainder of the lot which has a 7.4 ha area and includes site buildings, haul roads, stockpiles of material with low contamination risk and buildings, storage of empty customer bins and laydown areas that are not part of the recycling facility. Runoff from Area 2 is managed by:
 - Runoff is conveyed to a sedimentation basin (the basin) in the north-western corner of the lot. The basin has a volume of 2.8 ML.
 - Water collected in the basin is used for dust suppression following each rainfall event; and
 - When full, the basin will discharge via overflow. This overflow is referred as Point 1 in EPL 20771. Overflows are estimated to occur approximately 2.9 time per year (on average) when the five-day rainfall depth exceeds 92 mm.

¹⁵ Section 2.1, SWCMP

Figure 4-3 shows the conceptual framework of the water management system, while **Figure 4-4** shows the layout of the surface water management system for the site, and **Figure 4-5** provides a detailed view of the system in the NW part of the Facility.

Figure 4-3 Conceptual Framework of Surface Water System

(Source: Fig 2.1, Ref [26])

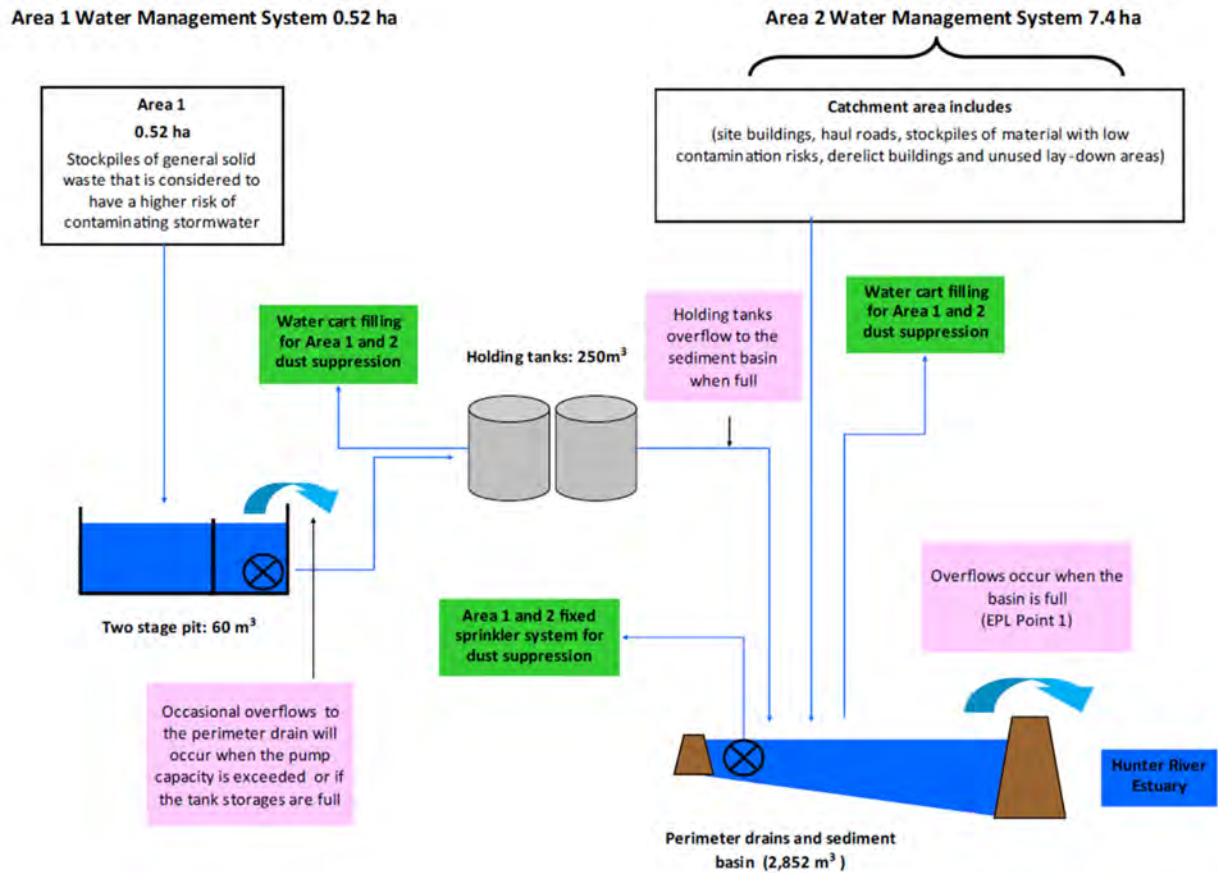


Figure 4-4 Layout Plan of System Water System

(Source: Fig 2.2, Ref [26])

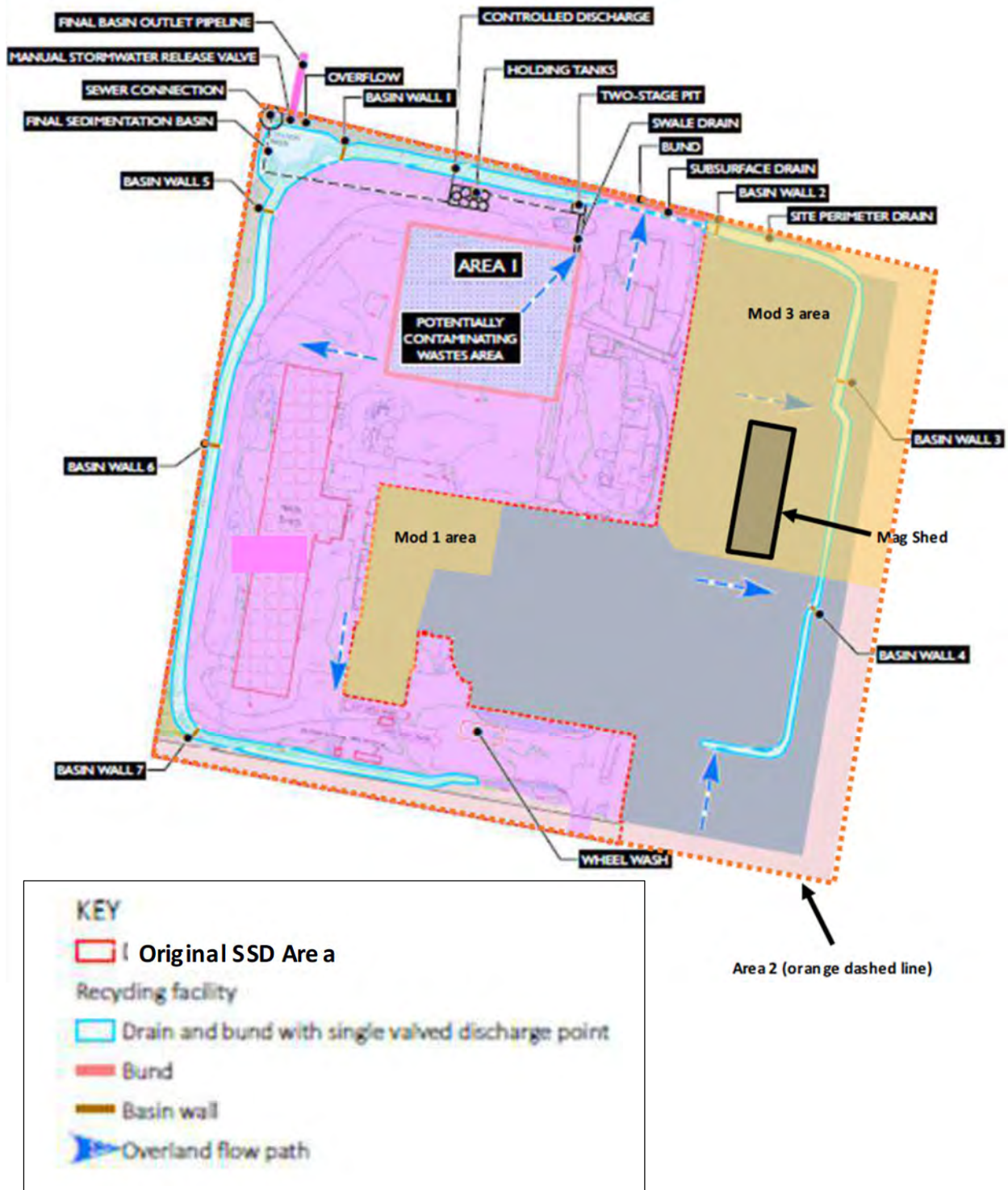
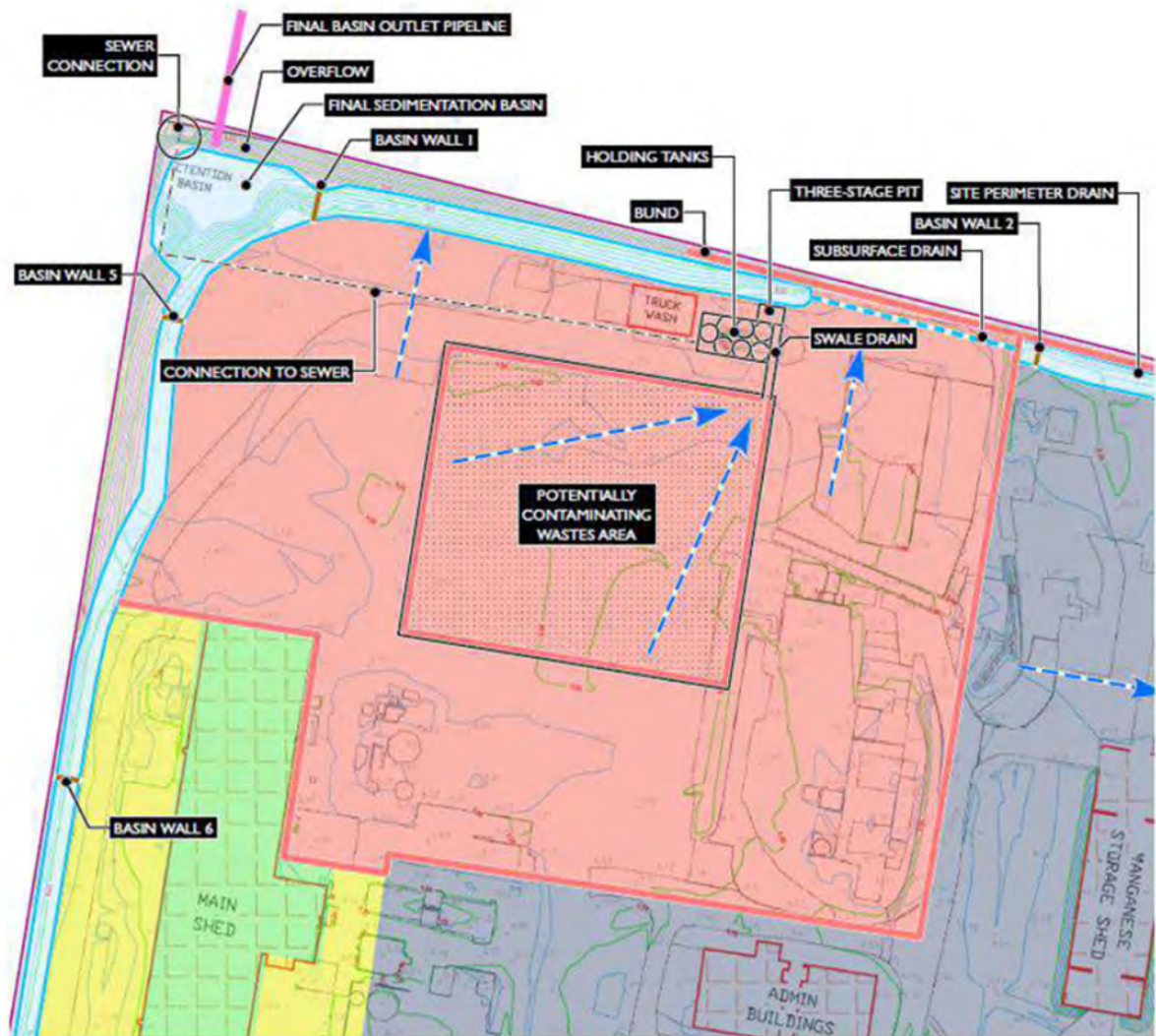


Figure 4-5 NW Corner Surface Water System Layout

(Source: Fig 2.3, Ref [26])



The OEMP¹⁶ describes the surface water management system as involving:

- The site is sloped so that runoff flows from the centre to the perimeter channel around the boundary of the site. The asphalt lined, v-shaped perimeter channel varies in depth from 0 to 2 m and is 3 to 10 m wide;
- The perimeter drain has been divided into seven basins as a part of the SSD approved construction works through the installation of 8 rock bunds along the channel. The channel drains into a final sedimentation basin in the north-west corner of the site;
- The basin drains to an invert of the outlet chamber which has controlled discharge to the Hunter River;
- Runoff from external areas is directed away from the site by the presence of a bund wall along the southern site boundary and adjacent land levels;

¹⁶ Section 3.4, OEMP

- The leachate collection tank has been increased from 15,000L to 30,000L to allow for any leachate collected from the bunded AASS/PASS tipping area;
- The soil and water management strategy for the site is based on Managing Urban Stormwater: Soils & Construction (Landcom 2004) (the “Blue Book”). The Blue Book defines a required storage volume based on the storage and treatment of runoff over the 5 days following the design storm. This allows 5 days for the treatment and discharge of water to provide an empty system to accommodate runoff from the next storm;
- The approximate storage volume in the perimeter channel is 3,080m³. There is no runoff onto the site from external areas; and
- The final sedimentation basin has a storage volume of approximately 2.8 ML to the invert of the outlet chamber. The basin can contain all the rainfall and runoff volume from the catchment for a 90th percentile rainfall event over any consecutive 5-day period, while maintaining an adequate freeboard.

Benedict advised (Ref [29]) that the surface water management system that operated at the Facility over the Audit Period was accurately described in the SWCMP (Ref [26]) and the OEMP (Ref [22], with no changes having been made to the system and its operation over the Audit Period. A review of water discharges from the surface water management system is provided in **Section 4.5.1**.

4.4.3 Water Application System

The SWCMP¹⁷ advises that the water application system is operated to suppress dust and to dewater the basin following rainfall to reduce the potential for site overflows to occur. The water application system includes:

- A fixed sprinkler system that applies water to approximately 3.4 ha of the site, and
- A 3.1 ha water cart application area.

Figure 4-6 shows the abovementioned areas.

Benedict advised (Ref [29]) that the water application system operated at the Facility over the Audit Period was accurately described in the SWCMP (Ref [26]) and the OEMP (Ref [22], with no changes having been made to the system and its operation over the Audit Period.

4.4.4 ASS Processing Area Surface Water Controls

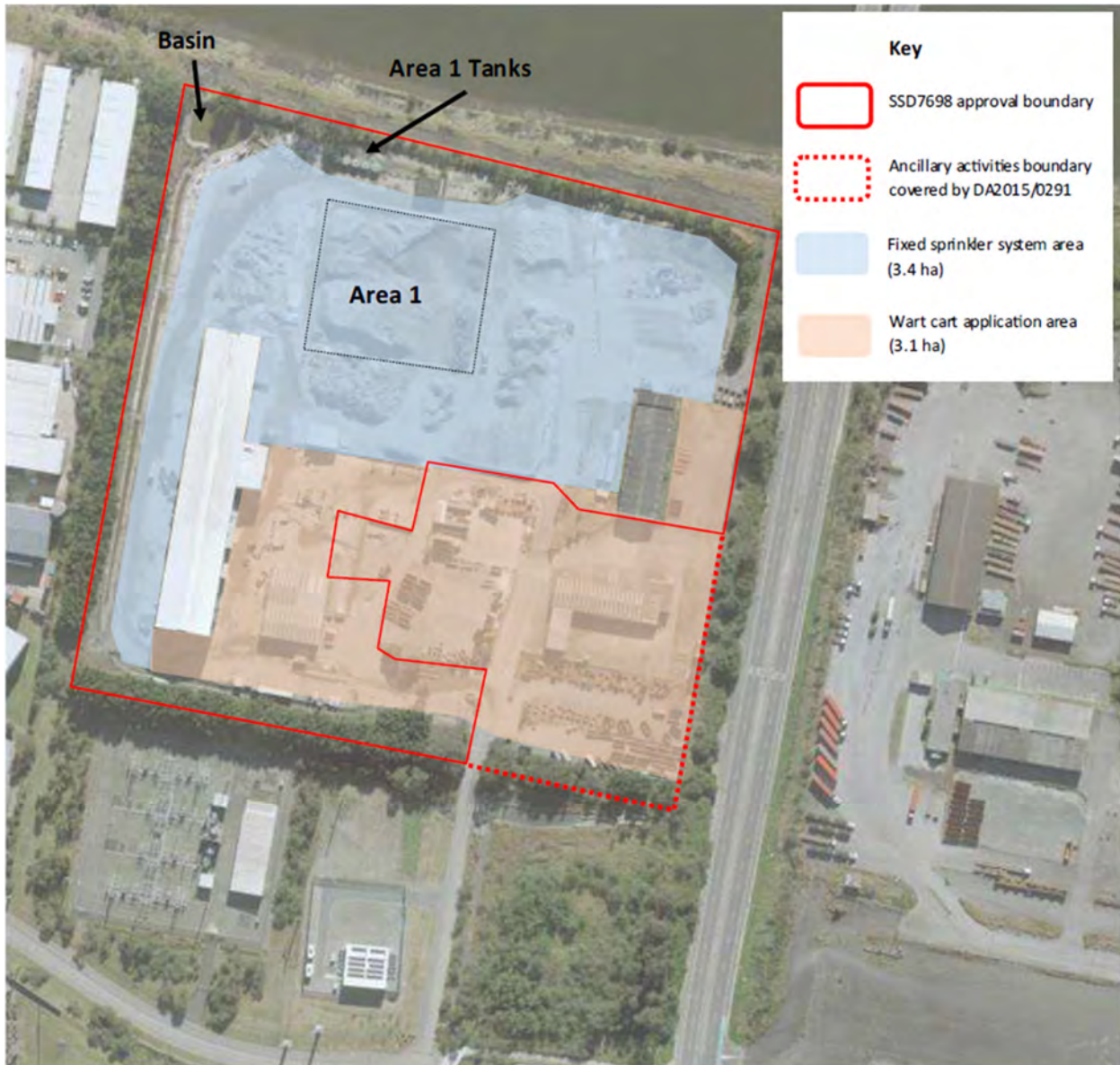
The SWCMP¹⁸ advises that following the approval of Modification 3 Consent, the approved ASS processing area was relocated from the main processing building to a previously existing vacant building (the Mag Shed). ASS will be received, treated and loaded within the Mag Shed by neutralising by lime dosing within 24 hours of receiving the soils on site. The receipt bays containing ASS must be equipped with fixed misting sprays (or similar systems), a mobile water cart and movable water cannons to keep the material damp at all times. There are no changes to water management approach due to the MOD-3 system from changes approved in the modification, since ASS material will continue to be received and processed in a covered and/or bunded area.

¹⁷ Section 2.2, SWCMP

¹⁸ Section 2.3, SWCMP

Figure 4-6 Water Application Areas

(Source: Fig 2.4, Ref [26])



In accordance with MOD-3 Consent Condition B76A, prior to accepting any ASS, a 150-mm tall bund will be constructed around the perimeter of the tipping-off area and doorways of the shed designated for receiving actual or potential ASS. On 28/08/25, Benedict provided written evidence to the satisfaction of the Planning Secretary who confirmed in a letter dated 10/09/25 that the bund wall had been constructed prior to receiving actual or potential ASS.

In accordance with Condition B76B, during treatment of ASS, water from within the bunded ASS treatment area will drain to a sump from where it will be transferred to a holding tank. Water in the tank will be removed to a licensed facility or in accordance with a trade waste agreement.

The OEMP¹⁹ describes the surface water management system in the ASS processing area as involving:

- The receipt, processing and export of ASS material will occur on bunded and sealed surfaces. The existing Mag Shed structure is roofed and has substantial and thick concrete walls and sheeted material on all sides to exclude the weather. A 150 mm tall roll over bund at the entry and exit doorways will give a theoretical emergency water storage of some 140 m³ (140,000 L);
- The tip off area for the untreated ASS material will be misted, enough to dampen the material but not enough to create runoff. This material will be misted until the material is removed for lime blending processing. Should there be any generation of runoff within the tip off area, this will be directed to a drain and gather in a sump before a float valve automatically pumps it into a 30,000 L above ground tank which can periodically be pumped out to tankers as required;
- The water to be utilised for misting within the shed will be site water that can be reused as part of the overall water re-use activities that already occur on site. It will be stored in a 15,000L tank. This will also reduce the volume of water entering the stormwater collection system.

Benedict advised (Ref [29]) that the surface water management system in the ASS processing area remains in the same area and is ready to treat ASS in the manner described in the SWCMP (Ref [26]) and the OEMP (Ref [22]), with no changes having been made to the system over the Audit Period. When it begins to treat ASS, the system will capture any runoff during processing.

Auditor Review

The Auditor considers the data provided by Benedict supports the following conclusions:

- The SWCMP (Ref [26]) and the OEMP (Ref [22]) accurately describes the surface water management system that operated at the Facility over the Audit Period;
- The SWCMP (Ref [26]) and the OEMP (Ref [22]) accurately describes the water application system used to suppress dust and to dewater the basin following rainfall over the Audit Period; and
- The SWCMP (Ref [26]) and the OEMP (Ref [22]) accurately describes the surface water management system that exists in the ASS processing area and is capable of successful operation when ASS treatment at the Facility commences.

¹⁹ Section 3.4, OEMP

4.5 Environmental Monitoring

4.5.1 Water Quality Monitoring

The Benedict website²⁰ provides copies of water monitoring results for discharges from the Facility. The 2022 – 2025 data shows:

- 2022: No discharges for practically all the year. Water samples collected on 2/03/22 and 3/03/22 during high rainfall event at the site. Samples collected from monitoring point 1 tested for analytes specified in the EPL²¹ with no exceedances.
- 2023: No discharges.
- 2024: No discharges for practically all the year. Water sample collected on 7/05/24 during high rainfall event at the site. Sample collected from monitoring point 1 tested for analytes specified in the EPL with no exceedances.
- 2025: No discharges for most of the year. Water samples collected on 27/04/25 and 28/04/25 during high rainfall event when 139.52mm of rain fell at the site. Samples collected from monitoring point 1 tested for analytes specified in the EPL with no exceedances. Water samples collected on 19/05/25, 21/05/25 – 23/05/25 during high rainfall event at the site. Samples collected from monitoring point 1 tested for analytes specified in the EPL with no exceedances. Water sample collected on 2/08/25 during high rainfall event at the site. Sample collected from monitoring point 1 tested for analytes specified in the EPL with no exceedances;

4.5.2 Noise Monitoring

The Benedict website²² provides copies of noise monitoring results for the Facility. The 2022 – 2025 data shows:

- 2022: Monitoring conducted on 30/06/22 at monitoring locations 5, 9 and 12 for day and night with no exceedances.
- 2023: Monitoring conducted on 4/05/23 at monitoring locations 5, 9 and 12 for day and night with no exceedances.
- 2024: Monitoring conducted on 29/05/24 at monitoring locations 5, 9 and 12 for day and night with no exceedances.
- 2025: Monitoring conducted on 12/05/25 at monitoring locations 5, 9 and 12 for day and night with no exceedances.

4.5.3 Dust Monitoring

The Benedict website²³ provides dust monitoring results for the Facility taken in 2025. The data shows that monitoring was conducted on a monthly basis, with the results summarised in **Table 4-6**.

²⁰ <https://www.benedict.com.au/about/policies-compliance/>

²¹ Oil and grease, pH, Total Suspended Solids, turbidity, aluminium, chromium, copper, lead, zinc, ammonia, nitrite, nitrate, nitrite+nitrate, Total Kjeldahl Nitrogen, total nitrogen, total phosphorus, reactive phosphorus

²² <https://www.benedict.com.au/about/policies-compliance/>

²³ <https://www.benedict.com.au/about/policies-compliance/>

Table 4-6 2025 Dust Monitoring Data

Sample Date	Sample Point	Ash (g/m ²)	Combustible Matter (g/m ²)	Total Particulates (g/m ²)
31/01/2025	1	1.4	0.8	2.2
	2	1.5	1	2.5
	3	0.5	0.2	0.7
	4	0.5	0.3	0.8
28/02/2025	1	0.7	0.2	0.9
	2	1	0.2	1.2
	3	0.5	0.4	0.9
	4	0.8	0.4	1.2
31/03/2025	1	0.4	0.1	0.5
	2	0.7	0.3	1
	3	0.2	0.2	0.4
	4	0.4	0.3	0.7
30/04/2025	1	0.5	0.5	1
	2	0.6	0.3	0.9
	3	0.9	0.6	1.5
	4	0.6	0.4	1
31/05/2025	1	0.6	1.2	1.8
	2	0.2	0.2	0.4
	3	0.3	0.5	0.8
	4	0.3	0.4	0.7
30/06/2025	1	0.6	0.3	0.9
	2	0.2	0.2	0.4
	3	0.5	0.2	0.7
	4	0.9	0.3	1.2
31/07/2025	1	0.6	0.6	1.2
	2	0.1	<0.1	0.1
	3	0.5	0.4	0.9
	4	0.4	<0.4	0.4
30/06/2025	1	0.2	0.2	0.4
	2	0.2	0.1	0.3
	3	0.2	0.2	0.4
	4	0.2	0.2	0.4

The data indicate that dust levels at the site are consistently low for a construction site.

4.6 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

The Auditor is not aware of any agency notices, order, penalty notices or prosecutions against the Facility during the Audit Period. The EPA public registers for EPL 20771 showed that for the Audit Period (1/11/22 – 31/10/25):

- No penalty notices were issued;
- 20/01/23: A s.58 licence variation was issued (Application & Notice No: 1623853);
- 20/07/23: An annual return for the period 25/05/22 – 24/05/23 was received by the EPA with no non-compliances being recorded.
- 22/08/23: A s.58 licence variation was issued (Application & Notice No: 1630059);
- 18/07/24: An annual return for the period 25/05/23 – 24/05/24 was received by the EPA with no non-compliances being recorded.
- 11/06/25: A s.58 licence variation was issued (Application & Notice No: 1648360);
- 22/07/25: An annual return for the period 25/05/24 – 24/05/25 was received by the EPA with no non-compliances being recorded.

4.7 Likely Compliances

The outcome of the IEA was that the Auditor identified no significant non-compliances during the Audit Period for the Facility, with all audit issues having a negligible risk level (**Section 4.2.3**). No likely compliance issues were identified.

4.8 Non-compliances

The outcome of the IEA was that the Auditor identified no significant non-compliances during the Audit Period for the Facility, with all audit issues having a negligible risk level (**Section 4.2.3**). No non-compliance issues were identified.

4.9 Previous Audit Recommendations

Condition C14 of the Consent required Benedict to submit a copy of the previous audit report prepared by Dr Swane for the 1/10/19 – 31/10/22 period (Ref [36]) to the DPHI together with its response to any recommendations contained in the audit report.

The 2022 Annual Report²⁴ prepared by Benedict provided the required feedback. The Auditor reviewed how Benedict addressed these recommendations and considers that these improvements were being made over the Audit Period for the reasons given in **Section 4.2.2** above.

4.10 EMP, Sub-plans and Compliance Documents

Refer **Sections 4.1. – 4.2.**

²⁴ Section 4.1, Ref [33]

4.11 Stakeholder Consultation Outcomes

The Auditor considered that all stakeholder inputs to this IEA, as described in **Section 3.6**, have been addressed for the reasons given in the following sub-sections.

4.11.1 DPHI

The issues raised by the DPHI (**Section 3.6.2**) have been addressed by the Auditor in this IEA report as follows:

- Compliance with the MOD-3 consent requirements: Refer **Section 4.2.1** and spreadsheet in **Appendix A**;
- Adequacy of management plans: Refer **Section 4.2.2**;
- Review waste types and relevant management limits: Refer **Section 4.2.3**;
- Review crusher operation: Refer **Section 4.3**; and
- Review surface water management : Refer **Section 4.4**.

The Auditor considers that the weight of evidence generated by the above reviews supports the conclusion that operations at the Facility over the Audit Period complied with the Consent requirements.

4.11.2 Council

The issues raised by Council (**Section 3.6.3**) have been addressed by the Auditor in this IEA report as follows:

- Review the effectiveness of pollutant controls for both air and water in relation to impacts to the estuary. Particularly whether there is any flow path other than the tested final sediment basin noted on the EPL: Refer **Section 4.4**; and
- Daily discharge monitoring that does not appear to have triggers identified in the EPL for raising reporting: Refer **Section 4.4**.

The Auditor considers that the weight of evidence generated by the above reviews supports the conclusion that operations at the Facility over the Audit Period complied with the Consent requirements.

4.12 Complaints

Copies of monthly complaint registers for the Facility were provided on the Benedict website for the years 2018 – 2025, which covered the Audit Period. The registers recorded that few complaints were received. The Annual Reports submitted by Benedict also recorded and assessed complaints received from neighbours / general public and from regulatory authorities following site inspections. The complaints that were received over the Audit Period are summarised in **Table 4-8**.

Table 4-8 Summary of Complaints Recorded Between 1/11/22 and 31/10/25

No.	Date	Description	Action Taken
--	Nov – Dec 2022		None
--	2023		None
1	5/12/23	DPHI observed some tracked material onto the public road	Issue corrected to satisfaction of DPHI during their February 2024 site inspection
2	13/12/24	Neighbour rang regarding dust deposited on their car	Site has been using dust suppression onsite and will continue to use
3	19/02/25	Complaint from neighbour regarding dust on their car	Water cart was running all day, all sprinklers were operational throughout day. Plant was shut down early before COB
--	Feb – Aug 2025		None

The Benedict 2024 Annual Report²⁵ advised that from 2018 – 2024 the common trend was an annual dust complaint from a neighbour in Laurio Place. During this time the site has closed in parts of the main processing shed, put an extra water tank in to supply water to the newly upgraded dust sprinklers along the western perimeter of the site. The site also has a water cart which operates around the site daily.

The Auditor considers the weight of evidence supports the conclusion that reasonable steps have been taken by Benedict during the Audit Period to minimise dust generation risks at the Site. This evidence includes:

- Dust management systems observed by the Auditor included a misting system installed at the public unloading shed, an automated water spray system that covers all operational parts of the site, stockpiles are limited in height, practically all roads are sealed and a water tank is present on-site;
- Dust levels were monitored at four locations across the site on a monthly basis in accordance with EPL 1924, with the results reported to the EPA. All concentrations were below the dust criteria;
- Practically no dust issues were raised by stakeholders limited to one complaint per 12-month period; and
- No dust was observed by the Auditor during the inspection - refer photos in **Appendix F**.

The Auditor considers the relatively small number of complaints made during the Audit Period supports the conclusion that operations at the site have been well managed.

²⁵ Section 6, Benedict 2024 Annual Report

4.13 Incidents

Benedict advised there were no incidents during the Audit Period, which was consistent with information provided in the Annual Reports

The Auditor considers the lack of incidents during the Audit Period supports the conclusion that operations at the Facility have been being well managed.

4.14 Environmental Performance

The Auditor considers the weight of evidence supports the conclusion that operations at the Facility have been well managed over the Audit Period and an acceptable level of environmental performance achieved. This is because:

- No significant non-compliances were identified during the Audit Period for the Facility, with all audit issued having a negligible risk level (**Section 4.2**);
- Crusher operations have been undertaken in a manner protective of the environment, with dust mitigation measures being implemented in compliance with good practice and statutory requirements (**Section 4.3**);
- The surface water management system continues to operate in a manner protective of the environment (**Section 4.4**);
- Environmental monitoring continues to be undertaken for surface water quality, noise and dust, with the measured results meeting environmental criteria (**Section 4.5**);
- The Auditor is not aware of any agency notices, order, penalty notices or prosecutions against the Facility during the Audit Period (**Section 4.6**);
- The Auditor did not identify any non-compliances with the Facility's environmental statutory obligations for the Audit Period (**Section 4.8**);
- Previous audit recommendation have been implemented (**Section 4.9**);
- EMP, management plans and compliance documents have met regulatory requirements (**Section 4.10**);
- Stakeholder requirements as notified to the Auditor have been met (**Section 4.11**);
- Only a minor number of complaints were received over the Audit Period, which were addressed (**Section 4.12**);
- There were no incidents during the Audit Period (**Section 4.13**); and
- Monthly Resource Recovery Rate Summary Reports provided by Benedict for the Newcastle Facility for the period October 2022 to August 2025 show that the total resource recovery rate varied from 81 to 96 %, with most monthly rates being greater than or equal to 90% (**Section 4.2.5, Appendix G**). The Auditor considers the recovery rate achieved by Benedict is likely to represent current best practice for the waste streams being recycled in NSW.

4.15 Improvement Opportunities

The Auditor considers there were no improvements that need to be made to address non-compliances in environmental performance at the site, since there was a low risk of non-compliance at the end of the Audit Period. Nevertheless, the Auditor considers there exist environmental improvement opportunities for the site corresponding to:

- Identify new recycling opportunities for waste received at the Facility;
- Use of technological advances in recycling processes (e.g. will AI be able to improve the waste separation process?);
- Continue to upgrade equipment when feasible; and
- Other opportunities identified through regular review of site operations.

5. Conclusions & Recommendations

The Auditor considers the weight of evidence provided in this IEA supports the conclusions that:

- No non-compliances with the Facility's environmental statutory obligations were identified at the end of the Audit Period;
- Operations at the site have improved since the previous IEA with the introduction of new practices and technologies (e.g. increased use of recycled surface water for dust suppression, ASS treatment and installation of an a Near Infrared Optical sorter);
- The outcome of the audit is that the Auditor identified no significant non-compliances during the Audit Period for the Facility, with all audit issues having a negligible risk level;
- Operations at the site have been well managed over the Audit Period and an acceptable level of environmental performance achieved; and
- The overall recovery rate achieved by the Benedict operation is likely to represent current best practice for waste streams being recycled in NSW.

The Auditor considers that no improvements need to be made to address non-compliances in environmental performance at the Facility, since there was a low risk of non-compliance at the end of the Audit Period. Nevertheless, the Auditor considers there exist environmental improvement opportunities for the Facility corresponding to:

- Identify new recycling opportunities for waste received at the Facility;
- Use of technological advances in recycling processes (e.g. will AI be able to improve the waste separation process?);
- Continue to upgrade equipment when feasible; and
- Other opportunities identified through regular review of site operations.

6. Other Relevant Information

This IEA report relates to the environmental performance of the Benedict Recycling Newcastle Facility at 1A McIntosh Drive, Mayfield West. The IEA has been prepared in accordance with DPHI and EPA audit requirements. Opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions.

The audit report has been prepared for Benedict Recycling (the 'Client'), the DPHI and EPA for the purposes nominated in the report. The scope of work performed in connection with the audit may not be appropriate to satisfy the needs of any other person. Any other person's use of, or reliance on, the audit report and statement, or the findings, conclusions, recommendations or any other material presented in them, is at that person's sole risk.

The audit was, and this report is, limited by and relies on the scope of work undertaken for this audit, the information made available to the Auditor by the Client and their environmental consultants through the documents provided to us, and also on our observations of the site made during the Audit Period. The Auditor has taken this information to represent a fair and reasonable characterisation of operations at the site. Whilst all reasonable care has been taken, to the extent practical under normal auditing procedures, to assure adequacy of the information, the Auditor and Ian Swane & Associates cannot warrant that this is the case. If the information is subsequently determined to be false, inaccurate or incomplete, it is possible that the Auditor's conclusions, as expressed in the audit report may change.

It is not possible in an Audit Report to present all data that could be of interest to all readers of this report. Readers are therefore referred to the referenced documentation for further data.

Yours faithfully



Dr Ian C Swane (CPEng)
Accredited EPA Site Auditor in NSW and NT
IEA and POEO Waste Auditor
Director, Ian Swane & Associates Pty Ltd

Appendix A. Independent Audit Compliance Tables

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
PART A: ADMINISTRATIVE CONDITIONS				
	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT			
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Noted	Not triggered	--
	TERMS OF CONSENT			
A2	The Development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with the directions of the Planning Secretary; (c) in accordance with the EIS, RTS and Amended Application; (d) in accordance with the Modification Assessments; (e) in accordance with development layout plans and drawings in the RTS and Amended Application; and (f) in accordance with the management and mitigation measures.	Noted	Not triggered	--
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in (a) above.	Noted	Not triggered	--
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c), A2(d) and A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), A2(d) and A2(e) the most recent document prevails to the extent of the inconsistency, ambiguity or conflict. <i>Note: For the purposes of this condition, there will be an inconsistency between documents if it is not possible to comply with both documents, or in the case of a condition of consent or direction of the Planning Secretary, and a document, if it is not possible to comply with both the condition or direction, and the document.</i>	Noted	Not triggered	--
	LIMITS OF CONSENT			
A5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before that date.	Noted	Not triggered	--

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
A6	The Applicant must not receive or process on site more than 315,000 tonnes per year of general solid waste (non-putrescible).	Refer data provided in Benedict Annual report. Also, Benedict provided a monthly tracker of stockpile capacity for the period 1/11/22 to 31/10/25 (refer Section 4.2.3, IER). The tracker consisted of monthly plots of stock on hand, receival capacity, projected closing stock and % authorised amount. Data shows the stockpile capacity was maintained at all times below the authorised amount generally at 30 - 80%, with a 55% average.	Compliance achieved	Negligible
A7	The Applicant must not: (a) crush more than 71,000 tonnes per year of waste; and (b) shred more than 5,400 tonnes per year of timber.	(a) No crushing in 2022 and 2023. Trial crushing from in 2024 for 15 days (Jan-Apr) when 8,312 tonnes was crushed, then again in Sept when 486 tonnes were crushed as part of three air quality assessments. In 2025, 13109 tonnes of raw feed crushed up to end Oct. (b) No timber shredding was done during the audit period as it is done at the Benedict Chipping Norton Facility. Auditor confirmed absence of crusher during site inspection - refer photos in Appendix F	Compliance achieved	Negligible
A8	The amount of waste stored on site at any one time must not exceed 53,733 tonnes	Refer observation for Condition A6 above	Compliance achieved	Negligible
A8(a)	No more than 500 tonnes of actual or potential Acid Sulfate Soils may be stored on the site at any one time.	No ASS had been received and/or treated at the Facility at the time of the Auditor's site inspection - refer photos in Appendix F. Also refer Benedict weekly tracker of stockpile capacity data.		
A9	This consent does not permit any areas of the site to be leased to third parties for storage purposes or approval of any portion of the site as a storage premises.	Benedict advised that no part of site is leased. Auditor found no evidence of subleasing at time of site inspection	Compliance achieved	Negligible
A10	The Applicant shall aim to achieve a recycling rate of 95% of all waste and a disposal rate of not more than 5% to landfill.	Benedict provided monthly resource recovery rate summary reports for the period October 2022 - August 2025. The reports show that the total resource recovery rate varied from 81 to 96 %, with most monthly rates being greater than or equal to 90%. The Auditor considered the recovery rate achieved by Benedict represented current best practice for the waste streams being recycled	Compliance achieved	Negligible
A11	Stockpiles of waste and recycled product on-site must not be more than seven (7) metres in height when measured from the finished ground level of the site.	Stockpile markers used to manage stockpile heights. Auditor observed compliance during site inspection - refer photos in Appendix F	Compliance achieved	Negligible
A12	Heavy vehicles are not permitted to access Werribi Street.	Noted on OTPM plan. Copy of updated driver induction form provided. Access restriction also indicated on sign at front gates	Compliance achieved	Negligible
NOTIFICATION OF COMMENCEMENT				
A13	The date of commencement of each of the following phases of the Development must be notified to the Department in writing, at least one month before that date: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.	(a) and (b) done previously as shown by copies of emails from DPE provided by Benedict. Benedict advised that site operations were not ceasing in the foreseeable future	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
A14	If the construction or operation or decommissioning of the Development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the Development to be carried out in that stage.	Not relevant	Not triggered	--
	STAGING, COMBINING & UPDATING STRATEGIES, PLANS OR PROGRAMS			
A15	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the Development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the Development).	Noted	Not triggered	--
A16	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Noted	Not triggered	--
A17	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Noted	Not triggered	--
	REQUEST FOR INFORMATION			
A18	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the Development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or the EPA.	Refer observation for Condition A6 above	Compliance achieved	Negligible
A19	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the Development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	Refer observation for Condition A6 above	Compliance achieved	Negligible
	EVIDENCE OF CONSULTATION			

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
A20	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) a description of how matters raised by those consulted have been resolved to the satisfaction of both the Applicant and the party consulted; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Noted	Not triggered	--
STATUTORY REQUIREMENTS				
A21	The Applicant must ensure that all licences, permits and approval/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 approval/consents.	Noted	Not triggered	--
STRUCTURAL ADEQUACY				
A22	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the Development, must be constructed in accordance with the relevant requirements of the BCA.	Auditor observed no new buildings and structures were constructed outside those approved by the Consent	Compliance achieved	Negligible
A23	Prior to the commencement of the operations, the Applicant must obtain a Building Information Certificate from Council in accordance with Division 6.7 of the Environmental Planning and Assessment Act 1979	Not relevant	Not triggered	--
UTILITIES AND SERVICES				
A24	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.	Not relevant	Not triggered	--
PROTECTION OF PUBLIC INFRASTRUCTURE				
A25	Before the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of the dilapidation report to the Planning Secretary and Council.	Not relevant for current audit period. Dilapidation report previously submitted by Benedict, with a copy provided on their website at https://www.benedict.com.au/wp-content/uploads/A25-Dilapidation-Report.pdf	Not triggered	--

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
A26	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	Noted	Not triggered	--
	COMPLIANCE			
A27	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the Development.	Noted in Section 5.2, OEMP (version 7). All new employees are induced and trained; copy of recently completed induction & training register form provided by Benedict	Compliance achieved	Negligible
	SECTION 7.12 CONTRIBUTIONS TO COUNCIL			
A28	Prior to the commencement of the operations, a contribution must be paid to Council in accordance with Section 7.12 of the EP&A Act, in particular the City of Newcastle Section 94A Development Contributions Plan 2009 (Updated July 2017) (adjusted on a quarterly basis (from the date of this consent), to account for movements in the Australian Bureau of Statistics Consumer Price Index – Building Construction (NSW)). A receipt for the payment to Council of the Section 7.12 Levy Contributions must be submitted to the Planning Secretary prior to the commencement of the operations.	Not relevant for the audit period	Not triggered	--
	OPERATION OF PLANT AND EQUIPMENT			
A29	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Benedict advised that all machines were serviced every 500 hours by suppliers who hold maintenance records. Auditor observed all site equipment was operational - refer photos in Appendix F	Compliance achieved	Negligible
	MODIFICATION OF CONSENT			
A30	Prior to the commencement of operations and 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 must modify DA2015/0291 (described in Table 1) pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1979 and Clause 97 of the Environmental Planning and Assessment Regulation 2000 such that the recycling facility including acceptance of up to 90,000 tonnes per annum of waste (pre-classified general solid wastes (nonputrescible waste)) is removed from the development consent.	Noted	Not triggered	--
A31	Within 12 months of the commencement of SSD-7698-MOD-1 and 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 must modify DA2015/0291 pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1979 and Clause 97 of the Environmental Planning and Assessment Regulation 2000 to amend the DA2015/0291 boundary to remove those areas to be included within the site under SSD-7698-MOD-1.	For the previous IEA, Benedict provided copy of a Consent from Council dated 9/09/22 for modification application MA2022/00157 to construct ancillary waste facilities, construction of truck wash facility and associated site works	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
A31A	Within 12 months of the commencement of SSD-7698-MOD-3, and 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 must modify DA2015/0291 and MA2022/00157 pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1979 and Clause 67 of the Environmental Planning and Assessment Regulation 2000 to amend the boundaries of DA2015/0291 and MA2022/00157 to exclude the areas that will be incorporated within the site under SSD-7698-MOD-3.	Benedict made this application in October 2025 on the NSW Planning Portal and is awaiting assessment response from Newcastle Council. A copy of a letter from Council dated 29/10/25 was provided	Compliance achieved	Negligible
PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT				
	WASTE MANAGEMENT			
	Statutory Requirements			
B1	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed - refer photos in Appendix F	Compliance achieved	Negligible
B2	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL.	Refer observation for Condition B1 above	Compliance achieved	Negligible
B3	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Refer observation for Condition B1 above	Compliance achieved	Negligible
B4	The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of the EPA.	Benedict advised that all data is sent to the Benedict Environmental Compliance Officer (AC) for filing and storage	Compliance achieved	Negligible
B5	No biochar production or storage is approved under the terms of this consent.	Benedict advised that no such material received at site. Waste tracking data showed no such material was received at site. Auditor found no evidence of this material at site - refer photos in Appendix F	Compliance achieved	Negligible
	Receipt, Storage & Handling of Waste			
B6	The Applicant must only receive waste on site that is authorised for receipt by an EPL.	Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed - refer photos in Appendix F	Compliance achieved	Negligible
B6A	The Applicant must only receive Actual or Potential Acid Sulfate Soils on the site with a pH range of between 4.5 and 5.5.	No ASS had been received and/or treated at the Facility at the time of the Auditor's site inspection - refer photos in Appendix F. Details on how Benedict plan to meet this requirement provided in Section 4.2.5	Compliance achieved	Negligible
B6B	Actual or Potential Acid Sulfate Soils must be neutralised via lime dosing within 24 hours of receiving the soils on site.	Refer observation for Condition B6A above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B6C	The receival bays containing Actual or Potential Acid Sulfate Soils must be fitted with misting sprays equipped with fixed misting sprays, a mobile water cart and movable water cannons to keep the material damp at all times.	The Auditor observed this equipment at the receival bays and at the Facility - refer photos in Appendix F	Compliance achieved	Negligible
B7	The Applicant must ensure any waste generated on the site during construction and from general office activities is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept the waste.	Benedict advised that no construction work had occurred at site during audit period that generated waste. Auditor found no evidence of construction work - refer photos in Appendix F	Compliance achieved	Negligible
B8	Loads predominantly containing glass are not permitted to be crushed at the site.	Benedict advised that there was no glass crushing onsite. Auditor found no evidence of this activity - refer photos in Appendix F	Compliance achieved	Negligible
B9	The Applicant must: (a) implement auditable procedures to: (i) ensure the site does not accept wastes that are prohibited; and (ii) screen incoming waste loads. (b) ensure that: (i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; (ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation; (iii) details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Secretary when requested; and (iv) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed - refer photos in Appendix F. Protocols used to recognise and handle any hazardous or other prohibited waste including asbestos were given by the Benedict Safe Work Procedures (Tip Inspector - Bi-Annual or if a change), Asbestos Awareness Training (Yearly), and Accepted Waste Stream Document (Bi-Annual or if a change). Maintaining a log of non-conforming loads, with an example of the register provided for 12/03/25 to 21/05/25 when 13 non-conforming loads were rejected.	Compliance achieved	Negligible
B10	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	Benedict advised that no liquid waste was accepted on-site. All waste received was GSW from known sources and tracked. Data captured by weighbridge system and managed by the waste recording system. Auditor observed all waste materials were being properly managed - refer photos in Appendix F	Compliance achieved	Negligible
B11	All waste must be: (a) stored wholly within the designated waste stockpile areas (b) loaded and unloaded within the designated loading and unloading areas	Auditor observed all waste materials were being properly managed - refer photos in Appendix F	Compliance achieved	Negligible
Waste Monitoring Program				

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B12	From the commencement of operations, the Applicant must implement a Waste Monitoring Program for the Development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operations; (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; (ii) type of waste and the material crushed and shredded on site; (iii) quantity, type and quality of the outputs produced on site; and (iv) number of days crushing has occurred per calendar year. (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 to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Refer Benedict OEMP (version 7) approved by DPHI 30/07/25.	Compliance achieved	Negligible
	Waste Management Plan			
B13	Prior to the commencement of operations, the Applicant must prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The WMP must: (a) detail the type and quantity of waste to be received during operation of the Development; (b) include details of stockpile limits in the incoming waste receival area and waste storage areas; (c) include procedures for ensuring no build-up of waste will occur in the incoming waste receival area during unexpected machinery breakdown and 24-hour waste receival for major infrastructure projects; and (d) details the requirements for non-conforming waste handling and removal.	WMP approved under earlier IEA with a copy of the DPE approval letter dated 25/09/18 provided. Updated plan (version 7) issued on 30/04/25 to include ASS management	Compliance achieved	Negligible
B14	The Applicant must: (a) not commence the operations until the Waste Management Plan required by Condition B13 is approved by the Planning Secretary; and (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.	Refer observation for Condition B13 above	Compliance achieved	Negligible
	Pests, Vermin and Noxious Weed Management			
B15	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Benedict advised that these measures are checked weekly. Copies of completed 'Environmental Inspection Checklists' were provided to the Auditor for 3/10/25, 10/10/25, 17/10/25, 24/10/25, 31/10/25, 7/11/25, 14/11/25, 21/11/25. Practically all the site was concrete sealed. Auditor observed site was well maintained - refer photos in Appendix F	Compliance achieved	Negligible
	SOILS, WATER QUALITY AND HYDROLOGY			
	Erosion and Sediment Control			

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B16	Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.	Benedict advised that these works were done in an earlier audit period and the current system is well maintained and improved. Auditor observed site was well maintained - refer photos in Appendix F	Compliance achieved	Negligible
	Pollution of Waters			
B17	The Development must comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	Noted	Not triggered	--
B18	Any discharge or water quality criteria specified under the EPL must be complied with.	Water monitoring results are provided on Benedicts website at https://www.benedict.com.au/about/policies-compliance/ for 2020 - 2025. Benedict advised that it was very rare for water from the final sedimentation pond to be discharged. The water quality reports indicated only four discharge events during audit period, with test data compliance achieved.	Compliance achieved	Negligible
B19	Surface water must only be discharged from the location specified in the EPL.	Confirmed by Auditor's site inspection - refer photos in Appendix F	Compliance achieved	Negligible
B20	Overland flow from the Development must be contained within the sealed areas of the site.	Yes, site inspection, perimeter drain around whole site - refer photos in Appendix F	Compliance achieved	Negligible
B21	Any spills must be contained and disposed of at a licenced facility.	Auditor observed all relevant areas bunded with spill kits provided - refer photos in Appendix F. No evidence of spills found. Copy of the Benedict spill procedure provided in Section 4.13, OEMP. Benedict Annual Reports recorded no spills during audit period.	Compliance achieved	Negligible
B22	Any servicing or repair work on motor vehicles or mobile plant is to be carried out within a sealed area that has environmental controls appropriate for servicing or repair work. This must include bunding where there this work could result in liquids being spilled.	Benedict advised this work was done in on-site workshop. Auditor observed this workshop - refer photos in Appendix F	Compliance achieved	Negligible
	Truck and Wheel Wash			
B23	The floor of the truck wash is to be suitably graded and or bunded across the external door openings to prevent the escape of stored materials, process water or spilt liquids.	Concrete structure. Auditor observed truck wash structure met Consent condition - refer photos in Appendix F	Compliance achieved	Negligible
B24	All excess water from the truck wash and wheel wash is to be discharged into suitable holding tanks and removed from the facility for treatment at an appropriately licensed facility or via trade waste.	Benedict advised that they never have excess water - always needing to top water up. Auditor observed truck wash structure met Consent condition - refer photos in Appendix F	Compliance achieved	Negligible
	Surface Water Management System			

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B25	Prior to the commencement of operations, the Applicant must design, install and operate a surface water management system for the Development. The system must: (a) be designed and constructed by a suitably qualified and experienced person(s) endorsed by the Planning Secretary; (b) be generally in accordance with the conceptual design in the RTS, the letter titled Mayfield West Recycling Facility (SSD 7698) – Water Assessment, dated 8 September 2017 prepared by EMM and applicable Australian Standards; (c) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997);	Benedict advised that this work was done in an earlier audit period and approved. Auditor observed the system is being well maintained with a sprinkler system installed - refer photos in Appendix F	Compliance achieved	Negligible
B25	(d) include detention basins with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5 day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills (Department of Environment and Climate Change NSW, 2008). The wet weather capture capacity requirements of the sediment basins and water treatment system may be modified by the EPL subject to the required surface water characterisation (Condition B33); (e) ensure vegetation within the sediment basin and perimeter drain has been removed and the surface water infrastructure has been sealed to prevent surface water infiltration to groundwater; and	Benedict advised that this work was done in an earlier audit period and approved. Auditor observed the system is being well maintained with a sprinkler system installed - refer photos in Appendix F	Compliance achieved	Negligible
B25	(f) bund any potentially contaminating waste, any surface water leaving this area must be directed to the three-stage pit or equivalent for treatment, the water must then be directed to holding tanks for testing and depending on its quality either discharged to the perimeter drain or sewer as trade waste see Appendix A	Benedict advised that this work was done in an earlier audit period and approved. Auditor observed the system is being well maintained with a sprinkler system installed - refer photos in Appendix F	Compliance achieved	Negligible
B26	The Applicant must provide a Compliance Certificate to the Planning Secretary prior to the commencement of operations, that confirms the surface water management system has been designed and installed as per the requirements of Condition B25 and the alterations will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties.	Work completed during an earlier audit period with a compliance certificate issued by Tooker & Associates on 22/06/18	Compliance achieved	Negligible
B27	Prior to the commencement of operations, works-as-executed drawings signed by a registered surveyor must be submitted to the certifying authority demonstrating that the stormwater drainage and finished ground levels have been constructed as approved.	Work completed during earlier audit period with copies of as constructed drawings dated 26/07/18 provided to Auditor for previous audit	Compliance achieved	Negligible
B28	The surface water management system must be operated and maintained for the duration of the Development.	Noted	Not triggered	--

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B29	The Applicant must maintain the surface water management system to minimise the infiltration of surface water to groundwater. This includes inspecting the infrastructure monthly for cracking and vegetation break through, removing the vegetation and sealing the infrastructure. Any maintenance on the surface water management system must be undertaken by a suitably qualified and experienced person(s), a record of these works must be kept for the life of the Development.	Refer observation for Condition B15 above	Compliance achieved	Negligible
B30	The Applicant must maintain the surface water detention basins on site with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5-day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills. The Managing Urban Stormwater series of document relate to clean sediment and therefore the wet weather capture and storage capacity requirements of the sediment basins and treatment systems may be modified by the EPL based on the required surface water characterisation (Condition B33).	Auditor observed the original system is being maintained - refer photos in Appendix F. A height marker was present in the dam	Compliance achieved	Negligible
B31	The Applicant must ensure that a visible marker is installed in the sediment detention basin in a position that shows the freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 90th percentile rainfall event over any consecutive 5-day period.	Auditor observed height marker in dam - refer photos in Appendix F	Compliance achieved	Negligible
B32	All hand unloading activities must be carried out in the hand unloading area as shown on the Development Layout Plan in Appendix A. All waste unloaded at the hand unloading area must be unloaded and stockpiled in the hand unload shed or hand unloading area as shown on the Development Layout Plan in Appendix A.	Auditor inspected shed for unloading small loads brought to site by the general public - refer photos in Appendix F	Compliance achieved	Negligible
B32A	The Applicant must not commence the external unloading or storing of hand unload waste in the hand unloading area as shown on the Development Layout Plan in Appendix A prior to the Surface Water Validation Report (SWVR) in Condition B35 being provided to the satisfactory of the Planning Secretary.	Auditor inspected shed for unloading small loads brought to site by the general public - refer photos in Appendix F. Copy of approval from DPE dated 2/09/22 provided to Auditor for previous IEA	Compliance achieved	Negligible
B32B	The hand unloading shed shown on the Development Layout Plan in Appendix A must be fitted with an internal dust suppression system.	Auditor inspected new misting system at entrance of unloading shed - refer photos in Appendix F	Compliance achieved	Negligible
	Surface Water Characterisation and Mitigation Plan			

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B33	Prior to the commencement of operations, the Applicant must prepare a Surface Water Characterisation and Mitigation Plan (SWCMP) to the satisfaction of the Planning Secretary to characterise the surface water and implement a mitigation plan, the SWCMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The SWCMP must: (a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with the EPA; (c) detail the triggers of when the pump which transfers surface water from the three-stage pit to the holding tanks would be activated;	Completed and part of OEMP	Compliance achieved	Negligible
B33	(d) detail the type and size of the bunding around the potentially contaminating waste area; (e) detail the frequency of overflows from the three-stage pit and sediment basin; (f) collect representative samples, including a minimum of four surface water samples from the sediment basin and the three-stage pit. The surface water samples must be analysed for the analytical suite identified in Table 3.16 of the RTS; (g) characterise the surface water for the entire development and detail the potential impact of discharges on receiving surface waters with reference to ANZECC (2000) assessment criteria;	Completed and part of OEMP	Compliance achieved	Negligible
B33	(h) be based on the results of the surface water characterisation, investigate all practical alternatives to discharge and whether sediment basin sizing, at-source pollution controls, tertiary water treatment, water treatment plants and other treatment and reuse options are appropriate; (i) provide the Planning Secretary with a timeframe for and implement the measures identified in sub-clause (h); (j) consider the human health risks associated with the surface water reuse process at the site; (k) include details of the maintenance procedures of the sediment basins and surface water infrastructure;	Completed and part of OEMP	Compliance achieved	Negligible
B33	(l) describe the procedures for maintaining vegetation along the perimeter drain and sediment basin; (m) establish an ongoing surface water monitoring program to validate the proposed mitigation measures. The surface water monitoring program must provide monitoring details of surface water flows, quality, storage and discharge limits; (n) identify measures for managing pollutant exceedances; and (o) identify contingency options to account for any mitigation measures that do not adequately address the site water pollution risks.	Completed and part of OEMP	Compliance achieved	Negligible
B34	The Applicant must: (a) not commence the operations until the SWCMP required by Condition B33 is approved by the Planning Secretary; and (b) implement the most recent version of the SWCMP approved by the Planning Secretary for the duration of the development.	Work completed during an earlier audit period with a compliance certificate issued by DPE dated 25/09/18. An updated SWCMP was issued by EMM dated 4/07/25 (v4)	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
	Water Quality Validation			
B35	Within six months of the commencement of operations and following the management measures being implemented as per SWCMP (Condition B33), the Applicant must provide a Surface Water Validation Report (SWVR) to the satisfaction of the Planning Secretary. The SWVR must: (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with the EPA; (c) collect a minimum of four surface water samples from the sediment basin and four from the three-stage pit system; (d) characterise the surface water data (samples) and detail the potential impact of discharges on receiving surface waters with reference to ANZECC (2000) assessment criteria;	Work completed during earlier audit period with the SWVR prepared by EMM dated 12/08/22. The DPE approval of the SWVR was provided in a letter dated 2/09/22. An updated SWVR was issued by EMM dated 4/07/25 (v4)	Compliance achieved	Negligible
B35	(e) compare the results with the surface water characterisation in the SWCMP (Condition B33); (f) ensure surface water is being managed in accordance the EPL; (g) provide an assessment of the effectiveness of implemented mitigation measures; (h) if necessary, provide additional mitigation measures to control and/or treat all pollutants to ensure the ANZECC (2000) assessment criteria can be met including further storage or the installation of a water treatment plant; and (i) update the SWCMP to reflect any changes to the surface water management system.	Refer observation for Condition B35 above	Compliance achieved	Negligible
B36	Any alterations to the surface water management system identified in the SWVR must be implemented prior to any further controlled discharges occurring to the satisfaction of the Planning Secretary.	Noted	Not triggered	--
B37	The Applicant must comply with any amended surface water quality criteria and discharge limits identified in the EPL.	Noted	Not triggered	--
	Surface Water Audit			
B38	Within 18 months of the commencement of operations, the Applicant must commission an independent Surface Water Audit of the Development to the satisfaction of the Planning Secretary. The audit must: (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary; (b) be conducted in consultation with the EPA; (c) audit the Development whilst it is in operation; (d) validate the development against the SWCMP required by Condition B33; (e) include a summary of any EPL water quality exceedances;	A copy of the surface water audit was provided to the Auditor. The report was VGT (30 June 2020) 'Surface Water Audit for Benedict Mayfield West Recycling Facility'. A copy of the report is also provided on the Benedict website at https://www.benedict.com.au/wp-content/uploads/8905_BEN_Mayfield_SWA_2020_Final.pdf	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B38	(f) review the design and management practices of the Development against industry best practice for surface water; (g) include an action plan that identifies and prioritises additional surface water mitigation measures and/or treatment options that may be necessary to reduce surface water impacts; and (h) provide a further program of monitoring to address water quality issues that may emerge over time.	Refer observation for Condition B38 above	Compliance achieved	Negligible
B39	Within three months of commissioning this audit, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report. The Applicant must comply with any reasonable requirement(s) of the Planning Secretary arising from the Surface Water Audit.	Benedict prepared a report titled 'Benedict Recycling's response to Independent Surface Water Audit 2020' dated 2/07/20, with a final version dated 4/09/20. The documents were submitted to DPE	Compliance achieved	Negligible
	Groundwater			
B40	Within 12 months of the commencement of operations the Applicant must conduct a Groundwater Monitoring Program to the satisfaction of the Planning Secretary. The program must: (a) be carried out by a suitably qualified and experienced expert in consultation with the EPA; (b) ascertain the potential for leakage of the sediment basin and perimeter drain to groundwater; (c) detail baseline data, groundwater levels and groundwater quality against the relevant criteria; (d) provide mitigation and contingency measures to prevent the sediment basins from leaking; and (e) identify a program for ongoing groundwater monitoring and reporting.	Completed as part of earlier IEA	Not triggered	--
B41	Within three months of the completion of the Groundwater Monitoring Program, the Applicant must submit a copy of the Groundwater Monitoring Program as identified in Condition B40 to the Planning Secretary and the EPA.	Completed as part of earlier IEA	Not triggered	--
	Diesel Tank Management			
B42	As a minimum, the Applicant must ensure the 40,000 litre self-bunded diesel tank is managed as follows: (a) the tank must be installed in the centre of the site in accordance with Figure 3.1 of the RTS; (b) the tank must be installed in accordance with the relevant Australian Standards, must be above ground and be protected against impact from heavy vehicles; (c) the refuelling area must be covered with an awning to minimise dirty water run-off; (d) overfilling of the tank must be prevented through gauging and monitoring of the tank's contents;	Auditor inspected diesel tank facility and considered it complied with Consent requirements - refer photos in Appendix F	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B42	(e) hoses used for transfer of diesel must be inspected weekly; (f) in an emergency, flow of liquid from the storage tank to a consuming device must be immediately shut off; (g) the shut off valve must comply with the relevant Australian Standard and be fire resistant; (h) the diesel tank and re-fuelling area must be bunded within an area of impervious hardstand; and (i) a diesel spill kit must be stored in the refuelling area and deployed in the event of a spill.	Auditor inspected diesel tank facility and considered it complied with Consent requirements - refer photos in Appendix F	Compliance achieved	Negligible
	Chemical Spills and Fire Water Containment			
B43	To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of operations and to the satisfaction of FRNSW, the Applicant must ensure: (a) a stormwater isolation valve is installed, the stormwater isolation valve must be closed at all times unless stormwater is being discharged and its closure must be monitored weekly; (b) during an incident, the stormwater isolation valve must remain in the closed position until manually opened upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste; and (c) the location of the stormwater isolation valve and any associated controls must be clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan prepared as part of the OEMP as required by Condition C7.	In a letter dated 4/09/20, FRNSW provided 3 comments on the Benedict Emergency Plan, these being: • FRNSW was satisfied that the emergency plan was consistent with the requirements of Australian Standard AS 3745-2010 Planning for emergencies in facilities; • Benedict satisfied its obligations under Condition B43 of the Consent; • Provide future revised copies of the plan to FRNSW; and • Implement and make plan available to staff. Benedict also advised that the discharge point can be opened manually if required. The value is checked weekly as part of the weekly environmental checklist	Compliance achieved	Negligible
	TRAFFIC AND ACCESS			
	Traffic and Access			
B44	The Applicant must implement all reasonable and feasible measures to minimise the impact on the site's access road and any impacts on 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249).	Benedict advised there had been no reported accidents at entrance	Compliance achieved	Negligible
B45	Prior to the commencement of operations, the vehicular entrance and exit driveways and the direction of traffic movement within the site are to be permanently marked on the pavement surface.	Auditor inspection considered these traffic and access requirements were met - refer photos in Appendix F	Compliance achieved	Negligible
B46	All customers are not permitted to leave their vehicles anywhere on the site other than the public unloading area and to access the pedestrian walkways between marked car parking spaces and the weighbridge and office area.	Part of induction form and instructions provided by weighbridge	Compliance achieved	Negligible
B46A	The Applicant must ensure a tipping inspector is present in the hand unloading area as shown on the Development Layout Plan in Appendix A when vehicles or customers are present.	Benedict advised that 3 tipping inspectors are present on-site at all times. The Auditor observed these inspectors during the site inspection - refer photos in Appendix F	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B46B	Prior to the commencement of operations under Modification application SSD 7698 MOD 1, the Applicant must amend the bay wall in the heavy waste processing and stockpiling area shown on the Development Layout Plan in Appendix A to accommodate the largest vehicle entering the site to travel unobstructed through the heavy waste processing area.	Completed in an earlier audit period. Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible
	Parking			
B47	Prior to the commencement of operations, the Applicant must provide and mark 25 on-site parking spaces (including two accessible spaces) for staff and visitors to ensure that traffic associated with the Development does not utilise public and residential streets or public parking facilities. Parking areas are to be constructed in accordance with the latest version of Australian Standard 2890. All parking associated with the Development must be contained on site.	Completed in an earlier audit period. Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible
B48	Parking is only permitted within the designated parking spaces.	Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible
	Operating Conditions			
B49	The Applicant must ensure: (a) all vehicular movement to and from the site must be in a forward direction; (b) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are maintained in accordance with the latest version of Australian Standard 2890.1 and Australian Standard 2890.2; (c) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (d) the Development does not result in any vehicles queuing on the public road network or along the sites access road owned known as 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249) which is subject to a right of carriageway;	Benedict advised that marking, signage, instructions direct vehicles to move in one direction. The Benedict Traffic Management Map also supported this requirement. Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible
B49	(e) heavy vehicles and bins associated with the Development are not to be parked on local roads or footpaths in the vicinity of the site; (f) only light vehicles and trailers are permitted within the public unloading area, no heavy vehicles are permitted within the public unloading area; (g) all vehicles are wholly contained on site before being required to stop; (h) all loading and unloading of materials is carried out on-site in designated areas; (i) the different activities such as unloading (public and contractor), processing and stockpiling areas at the site are clearly marked and separated by physical barriers to ensure safety is maintained;	Benedict advised that marking, signage, instructions direct vehicles to move in one direction. The Benedict Traffic Management Map also supported this requirement. Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B49	(j) signage must be erected to direct the public and contractors to the designated unloading and loading areas; (k) public and contractor unloading areas are kept separate; (l) pedestrian access paths are clearly marked and interactions between pedestrians and vehicles must be minimised; (m) an outbound wheel wash must be installed behind the exit weighbridge as per Figure 3.9 of the RTS; (n) signage is erected and vehicles at the site do not exceed a speed of 20 km/h; (o) vehicle manoeuvring areas must always be kept clear of any obstacles, including parked cars; and (p) the turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Benedict advised that marking, signage, instructions direct vehicles to move in one direction. The Benedict Traffic Management Map also supported this requirement. Auditor also observed this requirement had been met - refer photos in Appendix F	Compliance achieved	Negligible
	Operational Traffic and Pedestrian Management Plan			
B50	Prior to the commencement of operations, the Applicant must prepare an Operational Traffic and Pedestrian Management Plan (OTPMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The OTPMP must: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council; (c) detail the measures that would be implemented to ensure road safety and network efficiency during operation; (d) detail measures to ensure public safety is maintained at all times including marking pedestrian access ways and signage to direct the public to the public unloading area;	The OTPMP is part of the Benedict (July 2018) OEMP approved by DPE 25/09/18. Copy provided to Auditor and available on facility website at https://www.benedict.com.au/wp-content/uploads/Benedict-Mayfield-Resource-Recovery-Facility-OEMP-Version-6.pdf . An addendum to the OTPMP was issued by EMM dated 30/04/25, available on the Benedict website at https://www.benedict.com.au/wp-content/uploads/MWRF_OTPMP_v3_comp.pdf	Compliance achieved	Negligible
B50	(e) detail how the public unloading area will be barricaded from the contractor unloading areas and processing areas to ensure safety is maintained; detail measures to minimise the potential for conflicts between light vehicles entering and exiting the hand unloading area as shown on the Development Layout Plan in Appendix A and heavy vehicles and mobile plant; (f) detail how traffic exiting the main processing building will give way to traffic exiting the segregated heavy waste processing and stockpiling area to ensure vehicles safely exit the site; (g) detail heavy vehicle routes, access and parking arrangements;	Refer observation for Condition B50 above	Compliance achieved	Negligible
B50	(h) include a Driver Code of Conduct to: (i) minimise the impact on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; and (iv) ensure truck drivers use Steel River Boulevard and McIntosh Drive (the use of Murray Dwyer Circuit is not permitted); (v) ensure truck drivers use specified routes (i) include a program to monitor the effectiveness of these measures; and (j) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	Refer observation for Condition B50 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B51	The Applicant must: (a) not commence the operations until the OTPMP required by Condition B50 is approved by the Planning Secretary; and (b) implement the most recent version of the OTPMP approved by the Planning Secretary for the duration of the development.	Refer observation for Condition B50 above	Compliance achieved	Negligible
	AIR QUALITY			
	Meteorological Station			
B52	Before the commencement of the operations, the Applicant must install a suitable meteorological station on the site that complies with the requirements in the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> .	The meteorological station is located at the office near the weighbridge. The Auditor observed the station and confirmed it is operational - refer photos in Appendix F	Compliance achieved	Negligible
B53	The Applicant must maintain the meteorological station to the satisfaction of the EPA for the life of the development.	The meteorological station is located at the office near the weighbridge. The Auditor observed the station and confirmed it is operational - refer photos in Appendix F	Compliance achieved	Negligible
	Dust Minimisation			
B54	All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.	Dust management systems observed by the Auditor included sorting inside sheds, a misting system installed at the public unloading shed, an automated water spray system that covers all operational parts of the site, stockpiles are limited in height, practically all roads and sealed and a water tank is present on-site. No dust was observed by the Auditor during the inspection - refer photos in Appendix F. The Auditor considered all reasonable steps were being undertaken by Benedict to minimise dust.	Compliance achieved	Negligible
B54A	During the operation of the development, the Applicant must ensure that: (a) dust-prone areas and operations are regularly and lightly watered to suppress dust (note: excess watering must be avoided to prevent damage and erosion); and (b) operations are altered or ceased during periods of high wind to prevent dust generation.	Refer observation to Condition B54 above	Compliance achieved	Negligible
B55	The Applicant must ensure that: (a) all on-site roads and car parking areas are sealed with concrete or asphalt; (b) all operating, storage, unloading and loading areas must be sealed with concrete, asphalt or other impervious barrier(s) of the same or greater quality; (c) water sprinklers at the crushing and screening plant must be utilised at all time when the plant is operational; (d) dust suppressants must be used to prevent particulate emissions from stockpiles and other dust generating sources; (e) trucks and vehicles entering and leaving the Development that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading;	Auditor observed that these requirements are being met - refer photos in Appendix F	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B55	(f) crushing occurs for no more than 46 days per year in total; (g) crushing does not occur during adverse meteorological conditions; (h) all operations and activities occurring at the Development must be carried out in a manner that minimises the emissions of air pollutants from the Development; (i) trucks associated with the Development do not track dirt onto the public road network; (j) public roads used by these trucks are kept clean; and (k) any works are carried out progressively on site to minimise exposed surfaces.	Auditor observed that the other requirements are also being met - refer photos in Appendix F. (f) No crushing in 2022 and 2023. Trial crushing from in 2024 for 15 days (Jan-Apr), then again in 2-14 Sept for 8 days. In 2025, 13,109 tonnes crushed up to end Oct '25. (g) Crushing typically done only on dry and calm days.	Compliance achieved	Negligible
	Air Quality Discharges			
B56	Equipment must be installed and operated in accordance with best practice to ensure that the development complies with all load limits, air quality criteria, air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Dust management systems observed by the Auditor included a misting system installed at the public unloading shed, an automated water spray system that covers all operational parts of the site, stockpiles are limited in height, practically all roads and sealed and a water tank is present on-site. No dust was observed by the Auditor during the inspection - refer photos in Appendix F. No dust issues raised by stakeholders. No requirement for dust monitoring in EPL	Compliance achieved	Negligible
	Air Quality Management Plan			
B57	Prior to the commencement of operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The AQMP must: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with the EPA; (c) detail and rank all emissions from all sources of the Development, including particulate emissions and odour; (d) describe the measures that will be implemented to minimise the potential risks to adverse air quality in the area including:	The AQMP is part of the Benedict (July 2018) OEMP approved by DPE 25/09/18. Copy provided to Auditor and available on facility website at https://www.benedict.com.au/wp-content/uploads/Benedict-Mayfield-Resource-Recovery-Facility-OEMP-Version-6.pdf . An updated AQMP was prepared by EMM dated 30/04/25 available on the Benedict website at https://www.benedict.com.au/wp-content/uploads/MWRF_AQMP_v3.pdf	Compliance achieved	Negligible
B57	(i) the management and mitigation measures to be employed at the site; (ii) plant and equipment being maintained to ensure that it is in good order; (iii) how the air quality impacts of the development will be minimised during adverse meteorological conditions or extraordinary events; (iv) identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; (v) compliance with the relevant conditions of this consent;	Refer observation to Condition B57 above	Compliance achieved	Negligible
B57	(e) identify the control measures that will be implemented for each emission source; and (f) define what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents.	Refer observation to Condition B57 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B58	The Applicant must: (a) not commence the operations until the AQMP required by Condition B57 is approved by the Planning Secretary; and (b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development.	Refer observation to Condition B57 above	Compliance achieved	Negligible
	Air Quality Monitoring and Reporting			
B59	The Applicant must carry out Air Quality Monitoring and Reporting of the Development for the first three crushing events following the commencement of the operations to the satisfaction of the Planning Secretary. The monitoring and reporting must: (a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) monitor the dust emissions whilst the Development is in operation and crushing (as described section 3.5 of the RTS) is occurring;	Three air quality assessment of crushing operation occurred 2-14 Sept when 486 tonnes were crushed over 8 days. Assessment results documented in three EMM reports dated 19 Nov. 2024 (Refs [30]-[32])	Compliance achieved	Negligible
B59	(c) include a summary of air emission related complaints and any actions that were carried out to address the complaints; (d) validate the Development against air quality predictions in the RTS; (e) review design and management practices of the Development against industry best practice for dust emissions; and (f) include an action plan that identifies and prioritises additional dust mitigation measures that may be necessary to reduce emissions.	Refer observation to Condition B59 above. (c) No complaints received. (d) Response to Submissions documented in Section 6.3 of EMM assessment reports.	Compliance achieved	Negligible
B60	Within three months of each monitoring event, the Applicant must submit a copy of the Air Quality Monitoring Report (Condition B59) to the Planning Secretary, together with its response to any recommendations.	The three air quality monitoring reports were submitted to DPHI on 21/11/24 and approved by DPHI with a copy of the approval provided (Ref [29])	Compliance achieved	Negligible
	Odour			
B61	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Benedict advised that no odorous waste was received at site - odorous material is rejected. Auditor observed this was the case and found no objectionable odours at site. No odour complaints during audit period	Compliance achieved	Negligible
	Odour Management			
B61A	During operations the Applicant must implement the mitigation measures outlined in the Odour advice prepared by EMM Consulting and dated 30 September 2022.	Copy of EMM 30/09/22 odour advice provided. Latest EMM odour management plan provided dated 22/07/24. No ASS imported to the site for treatment during the audit period	Compliance achieved	Negligible
B61B	During operations the Applicant must implement the mitigation measures outlined in the Odour Assessment prepared by EMM Consulting and dated 22 July 2024.	Refer observation to Condition B61A above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level																																		
B61C	Prior to the commencement of operations, the Applicant must prepare an Odour Response Plan (ORP) to the Satisfaction of the Planning Secretary. The ORP must include a detailed odour response procedure to effectively manage any potential odours from Actual or Potential Acid Sulfate Soils material. The ORP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7.	ORP provided in Sections 2.6 and 2.7, AQMP prepared by EMM dated 30/04/25, which forms part of the OEMP	Compliance achieved	Negligible																																		
	NOISE																																					
	Hours of Work																																					
B62	The Applicant must comply with the hours detailed in Table 2. <table><tr><th colspan="3">Table 2: Hours of Work</th></tr><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="3">Construction</td><td>Monday to 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 and Public Holidays</td><td>Not Permitted</td></tr><tr><td rowspan="3">Waste Reveal</td><td>Monday to Friday</td><td>6 am to 6 pm</td></tr><tr><td>Saturday</td><td>6 am to 5 pm</td></tr><tr><td>Sundays and Public Holidays</td><td>7 am to 3 pm</td></tr><tr><td rowspan="3">Waste Processing</td><td>Monday to Friday</td><td>6 am to 6 pm</td></tr><tr><td>Saturday</td><td>6 am to 5 pm</td></tr><tr><td>Sundays and Public Holidays</td><td>Not Permitted</td></tr><tr><td rowspan="3">Waste Dispatch</td><td>Monday to Friday</td><td>6 am to 6 pm</td></tr><tr><td>Saturday</td><td>6 am to 5 pm</td></tr><tr><td>Sunday and Public Holidays</td><td>Not Permitted</td></tr></table>	Table 2: Hours of Work			Activity	Day	Time	Construction	Monday to Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday and Public Holidays	Not Permitted	Waste Reveal	Monday to Friday	6 am to 6 pm	Saturday	6 am to 5 pm	Sundays and Public Holidays	7 am to 3 pm	Waste Processing	Monday to Friday	6 am to 6 pm	Saturday	6 am to 5 pm	Sundays and Public Holidays	Not Permitted	Waste Dispatch	Monday to Friday	6 am to 6 pm	Saturday	6 am to 5 pm	Sunday and Public Holidays	Not Permitted	Benedict advised that this requirement was met with working hours listed on website and maingate. Auditor noted that noise was not raised by stakeholders as an issue	Compliance achieved	Negligible
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B63	Works outside of the hours identified in Condition B62 may be undertaken in the following circumstances: (a) the works are inaudible at the nearest sensitive receivers; (b) for the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Benedict advised that this requirement was met with working hours listed on website and maingate. Auditor confirmed working hour information and noted that noise was not raised by stakeholders as an issue	Compliance achieved	Negligible																																		
B64	Waste reveal is permitted on a 24-hour per day basis on limited occasions to facilitate major infrastructure projects. Limited occasions is defined as: (a) no greater than six times per year; and (b) only for a period of less than two weeks in length for each occasion.	Benedict advised that after hours tipping was used on one occasion during the Audit Period on 3/06/25. This was done by Transport for NSW. A copy of the notification sent to neighbours was provided (dated 28/05/25)	Compliance achieved	Negligible																																		
B65	The Planning Secretary, Council and all adjacent landowners must be notified no later than 48 hours prior to each of the 24-hour waste reveal periods referred to in Condition B64 along with a description of the major infrastructure projects which necessitate the 24-hour operations.	Refer observation to Condition B64 above	Compliance achieved	Negligible																																		
B66	During the 24-hour waste reveal period (as stipulated in Condition B64), the number of heavy vehicles accessing the site from 6pm to 6am must not exceed 12.	Refer observation to Condition B64 above	Compliance achieved	Negligible																																		
	Noise Management																																					

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level																																																																																					
B67	The crusher and shredder are only permitted to be operated in the segregated heavy waste processing and stockpiling area, no further south than 130 m from the northern site boundary (see Appendix A).	The crusher was located at the site on 10/03/24 north of southern limit (refer Figure 4-2, IER)	Compliance achieved	Negligible																																																																																					
B68	The mobile screens in the segregated heavy waste processing and stockpiling area must not be operated simultaneously with the crusher or shredder.	Benedict advised that the mobile screens in the segregated heavy waste processing and stockpiling area were not operated simultaneously with the crusher or shredder (Ref [29])	Compliance achieved	Negligible																																																																																					
B69	The Applicant must: (a) implement best practice, including all reasonable and feasible noise management and mitigation measures to 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 emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	Noise controls specified in Section 4.8, OEMP. Auditor observed that site operations were well managed with equipment being well maintained and operated. Auditor noted that noise was not an issue raised by any of the stakeholders	Compliance achieved	Negligible																																																																																					
	Operational Noise Limits																																																																																								
B70	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 3. Table 3: Noise Limits dB(A) <table> <tr> <th>Location</th><th>Day LAeq(15 minute)</th><th>Evening LAeq(15 minute)</th><th>Night LAeq(15 minute)</th><th>Night LA_{Max}</th></tr> <tr><td>R1</td><td>48</td><td>40</td><td>40</td><td>51</td></tr> <tr><td>R2</td><td>49</td><td>41</td><td>41</td><td>52</td></tr> <tr><td>R3</td><td>47</td><td>39</td><td>39</td><td>51</td></tr> <tr><td>R4</td><td>47</td><td>39</td><td>39</td><td>50</td></tr> <tr><td>R5</td><td>50</td><td>42</td><td>42</td><td>53</td></tr> <tr><td>R6</td><td>48</td><td>41</td><td>41</td><td>51</td></tr> <tr><td>R7</td><td>48</td><td>41</td><td>41</td><td>52</td></tr> <tr><td>R8</td><td>48</td><td>40</td><td>40</td><td>52</td></tr> <tr><td>R9</td><td>49</td><td>42</td><td>42</td><td>52</td></tr> <tr><td>R10</td><td>49</td><td>41</td><td>41</td><td>51</td></tr> <tr><td>R11</td><td>49</td><td>42</td><td>42</td><td>52</td></tr> <tr><td>R12</td><td>42</td><td>41</td><td>41</td><td>48</td></tr> <tr><td>R13</td><td>40</td><td>36</td><td>36</td><td>47</td></tr> <tr><td>Mayfield West Primary School</td><td colspan="4">Internal 35 dB(A) – Noisiest 1 hr period (when in use)</td></tr> <tr><td>Church of Christ</td><td colspan="4">Internal 40 dB(A) LAeq, period (when in use)</td></tr> <tr><td>Scout Hall</td><td colspan="4">External 55 dB(A) LAeq, period (when in use)</td></tr> </table>	Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA _{Max}	R1	48	40	40	51	R2	49	41	41	52	R3	47	39	39	51	R4	47	39	39	50	R5	50	42	42	53	R6	48	41	41	51	R7	48	41	41	52	R8	48	40	40	52	R9	49	42	42	52	R10	49	41	41	51	R11	49	42	42	52	R12	42	41	41	48	R13	40	36	36	47	Mayfield West Primary School	Internal 35 dB(A) – Noisiest 1 hr period (when in use)				Church of Christ	Internal 40 dB(A) LAeq, period (when in use)				Scout Hall	External 55 dB(A) LAeq, period (when in use)				Annual noise monitoring occurs with results on website at https://www.benedict.com.au/about/policies-compliance/ . The Auditor found that annual noise monitoring data were available on the website for 2022 - 2025, with all results over the audit period complying with the noise criteria	Compliance achieved	Negligible
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA _{Max}																																																																																					
R1	48	40	40	51																																																																																					
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AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B71	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures; and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006).	Vibration controls specified in Section 4.8, OEMP. Auditor observed that site operations were well managed with equipment being well maintained and operated. Auditor noted that vibration was not an issue raised by any of the stakeholders	Compliance achieved	Negligible
	FIRE MANAGEMENT			
B72	Prior to the commencement of operations, the final design of the development must be finalised in consultation with and to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series. In particular, the following matters must be addressed: (a) Clauses E1.10 and E2.3 of Volume One of the NCC be complied with to the meet the operational requirements of FRNSW; (b) the stockpile storage within any building and/or open yard storage on the allotment be limited in size and volume and arranged to minimise fire spread; (c) the arrangement of stockpiles of combustible material, stored externally, on the allotment be sufficiently separated to permit FRNSW vehicle access between stockpiles;	Benedict provided copies of: • Fire safety statements from DPHI dated 1/04/25; • Elite Fire Training certificate of completion dated 15/07/25 for Benedict Recycling Newcastle for warden / chief warden training, building excavation training, and use of portable fire fighting equipment; and • An approved plan of the fire fighting system for the main processing shed dated 20/06/18. The Auditor also observed the stockpiled materials were well managed in terms of fire risk and fire fighting equipment was present - refer photos in Appendix F	Compliance achieved	Negligible
B72	(d) the site must be serviced by a fire hydrant system that has a minimum water supply capable to extinguishing the sites largest fire load stockpile; (e) buildings which store recyclable material must include a smoke hazard system that facilitates FRNSW firefighting operations; (f) if deemed necessary by the Planning Secretary, by virtue of applying Clauses E1.10 and E2.3 to the Development, that any significant building used to process recyclable material is provided with an appropriate fire suppression system; and (g) the containment on-site of fire water run-off.	Refer observation to Condition B72 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B72A	Prior to accepting any actual or potential Acid Sulfate Soils at the site, the Applicant must: (a) install a fire hydrant system that is designed and installed in accordance with Australian Standard AS 2419.1-2021 and has an enhanced standard of performance appropriate to special hazards; (b) install a fire hose reel system that is two fire exit doorways and two fire hose reel systems that are designed and installed in accordance with Clause E1.4 of the National Construction Code, Building Code of Australia and Australian Standard AS 2411-2005 and has an enhanced standard of performance appropriate to special hazards; (c) review the existing on site road traffic plan to ensure safe, efficient and effective access for emergency vehicles as detailed in the FRNSW Fire Safety Guideline – Access for fire brigade vehicles and firefighters 2020. Aerial appliance access is to be provided as the facility is located in a fire district covered by an aerial appliance. (d) prepare an Emergency Services Information Package (ESIP) in accordance with FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans. The ESIP must be stored in an Emergency Information Cabinet located directly adjacent to the site's main entry point/s.	Benedict advised that the fire hydrant exists nearby as per the SEE document diagram. Two fire hose reels are being installed. One fire exit has been installed and the second is being installed. The SSD site has a perimeter road already. The Emergency Information Cabinet is in place at the entry with ESIP (see photo) 	Compliance achieved	Negligible
	ABORIGINAL HERITAGE			
	Unexpected Finds Protocol			
B73	If Aboriginal objects are uncovered during construction work in the immediate area, work must stop and the Regional Operations Group of the OEH, Council and the Registered Aboriginal Parties are to be consulted.	Not applicable	Not triggered	--
	HAZARDS AND RISK			
	Dangerous Goods			
B74	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Benedict advised that only very minor quantities were stored in the workshop. The Auditor observed this was the case - refer photos in Appendix F. Benedict also provided a copy of their Hazardous Substance and Dangerous Goods Procedure	Compliance achieved	Negligible
B75	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997). In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.	Benedict advised that all Dangerous Goods were placed in bunded areas. The Auditor observed this was the case - refer photos in Appendix F	Compliance achieved	Negligible
	Bunding			

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B76	The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (DECC, 2007) (as may be updated or replaced from time to time).	Benedict advised that all Dangerous Goods were placed in bunded areas. The Auditor observed this was the case - refer photos in Appendix F	Compliance achieved	Negligible
B76A	Prior to accepting any actual or potential Acid Sulfate Soils at the site, a 150 mm high bund must be constructed inside the perimeter of the processing area to be used for the storage and treatment of around the perimeter of the tipping-off area and doorways of the shed designated for receiving actual or potential Acid Sulfate Soils. The Applicant must provide written evidence to the satisfaction of the Planning Secretary confirming the bund wall has been constructed, prior to receiving actual or potential Acid Sulfate Soils on the site.	Benedict provided a copy of a letter from DPHI dated 10/09/25 confirming compliance with this condition	Compliance achieved	Negligible
B76B	During treatment of Actual or Potential Acid Sulfate Soils, the Applicant must capture water from the AASS treatment area and transfer it to a holding tank for removal off site to a licensed facility or in accordance with a trade waste agreement.	No ASS treated in Audit Period	Compliance achieved	Negligible
CONTAMINATION				
B77	Any works carried out on the site that involve the disturbance of (or contact with) soil or groundwater are to be carried out in accordance with the requirements of the report titled Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW. Ref: N4113204_SMP_Rev4_2Oct09, prepared by AECOM Pty Ltd, dated 2 October 2009.	Benedict advised that all the site was sealed so there was no disturbance to underlying soils / groundwater. The Auditor observed that this is the case - refer photos in Appendix F	Compliance achieved	Negligible
B78	Prior to the commencement of operations, the main processing building and segregated heavy waste processing and stockpiling area must be sealed with either asphalt or concrete to minimise infiltration of surface water to groundwater.	The Auditor observed that this work had been completed in the previous audit period - refer photos in Appendix F	Compliance achieved	Negligible
B79	Prior to the commencement of construction, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. The protocol must form part of the CEMP required by Condition C1 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to Council, prior to its removal from the site.	Not relevant for this audit since all construction work at the site had been completed and no new construction work commenced during the audit period.	Compliance achieved	Negligible
VISUAL AMENITY				
Landscaping				
B80	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Plan prepared by Terras Landscape Architects dated 9 September 2015 in Appendix A.	For the previous IEA, Benedict provided a copy of a landscape plan for the site prepared by Terras Landscape Architects dated 9/09/15. The Auditor observed that the landscaping had been established and is being maintained - refer photos in Appendix F	Compliance achieved	Negligible
Lighting				

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
B81	The Applicant must ensure the lighting associated with the Development: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network including at night; and (c) is not installed on the exterior of the Development and does not flash, chase or scintillate or contain promotional material of a visually intrusive nature.	Benedict advised that there had been no changes to the original lighting setup. The Auditor also noted that stakeholders did not raised lighting as an issue	Compliance achieved	Negligible
	SITE SECURITY			
B82	The Applicant must: (a) maintain the 1.8 m perimeter fence and security gates on the site in accordance with Council's requirements; and (b) ensure the security gates are locked whenever the site is not in operation or unattended.	Benedict advised that the entire site is surrounded by a security fence with lockable gates at the main entrance. The Auditor observed this is the case - refer photos in Appendix F	Compliance achieved	Negligible
	COMMUNITY ENGAGEMENT			
B83	The Applicant must consult with the community regularly throughout the Development, including consultation with the nearby, adjacent landowners, sensitive receivers, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	Community engagement information was provided on the Benedict website at https://www.benedict.com.au/about/policies-compliance/ . The information included a copy of complaints registers for the 2018 - 2025 period. The registers indicated 1 complaint for dust was received in 2023, 2024 and 2025. Complaints phone number advertised at main entrance. The Auditor considered community engagement was satisfactory	Compliance achieved	Negligible
	CONCEPTUAL DECOMMISSIONING PLAN			
B84	Prior to the commencement of operations, the Applicant must prepare a Conceptual Decommissioning Management Plan (CDMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C4. The CDMP must: (a) include a schedule for the decommissioning of the Development; (b) detail how the following would be achieved: (i) ensure the site is left in a safe, stable and non-polluting manner; (ii) removal of all waste from the site in a lawful manner; (iii) restoration of the site so that the contamination status is no worse than that described in the Site Audit Report -Former EMD Facility Mayfield West, prepared for Delta EMD, prepared by Environ Australia Pty Ltd, November 2009; and (iv) ensure public safety is maintained;	The CDMP was first prepared by EMM dated 20/04/18, with the latest version (V4) dated 30/04/25 available on the Benedict website at https://www.benedict.com.au/wp-content/uploads/MWRF_CDMP_v4.pdf	Compliance achieved	Negligible
B84	(c) include procedures for notification of the surrounding landowners; (d) include procedures for safe removal of any machinery and structures; (e) include measures to mitigate any environmental impacts associated with the removal of the Development; (f) include details of monitoring that would be undertaken during the decommissioning of the Development; and (g) be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.	Refer observation to Condition B84 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN			
C1	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must: (a) be approved by the Planning Secretary prior to the commencement of construction; (b) identify the statutory approvals that apply to the Development; (c) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages in particular how the sealing works will be staged and any associated impacts on operation, construction of surface water infrastructure must also be addressed;	Not relevant - no construction	Not triggered	--
C1	(d) outline all environmental management practices and procedures to be followed during construction works associated with the Development; (e) detail how unexpected finds, traffic, erosion and sedimentation and noise will be managed; (f) include a complaints handling procedure; (g) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; and (h) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development.	Not relevant - no construction	Not triggered	--
C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: (a) Erosion and Sediment Control Plan (see Condition B16); (b) Unexpected Finds Protocol (see Condition B79).	Not relevant - no construction	Not triggered	--
C3	The Applicant must carry out the construction of the Development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	Not relevant - no construction	Not triggered	--
	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN			
C4	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must: (a) be approved by the Planning Secretary prior to the commencement of operations; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the Development; (d) identify the statutory approvals that apply to the Development; (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	Refer Benedict (July 2018) OEMP approved by DPE 25/09/18. Updated version prepared by Benedict dated 1/04/25 (v7). Copy provided on Benedict website at https://www.benedict.com.au/wp-content/uploads/MWRF_OEMP_v7.pdf	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
C4	(f) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (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 and provide an updated Emergency Response Plan to incorporate the Modification Applications;	Refer observation to Condition C4 above	Compliance achieved	Negligible
C4	(g) include the following environmental management plans: (i) Waste Management Plan (see Condition B13); (ii) Surface Water Characterisation and Mitigation Plan (see Condition B33); (iii) Operational Traffic and Pedestrian Management Plan (see Condition B50); (iv) Air Quality Management Plan (see Condition B57); and (v) Conceptual Decommissioning Management Plan (see Condition B84).	Refer observation to Condition C4 above	Compliance achieved	Negligible
C5	The Applicant must carry out the operation of the Development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	Benedict advised that the development involved no construction work. The Auditor observed that no construction work had been undertaken during the audit period - refer photos in Appendix F	Compliance achieved	Negligible
COMPLIANCE REGISTER TABLE				
C6	The Applicant must submit a Compliance Register Table to the Planning Secretary with any Environmental Management Plans, which details where the relevant conditions have been addressed within the Environmental Management Plan.	The Compliance Register was included in the OEMP that was approved by DPE 25/09/18	Compliance achieved	Negligible
MANAGEMENT PLAN REQUIREMENTS				
C7	The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice 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; and (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; (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	Refer: Benedict Recycling (29 November 2024) 'Pollution Incident Response Management Plan (PIRMP), Mayfield West'. Revision 13; EMM (30 April 2025) 'Mayfield West Recycling Facility, Addendum to Operational Traffic and Pedestrian Management Plan'; EMM (30 April 2025) 'Mayfield West Recycling Facility, Air Quality Management Plan'. Version 3; EMM (30 April 2025) 'Mayfield West Resource Recycling Facility, Conceptual Decommissioning Management Plan'. Version 4; EMM (30 April 2025) 'Mayfield West Recycling Facility, Groundwater Monitoring Program'. Version 4; Benedict Recycling (30 April 2025) 'Operational Environmental Management Plan, Mayfield West'. Revision 7; Benedict Recycling (30 April 2025) 'Waste Management Plan, Mayfield West'. Revision 6; EMM (4 July 2025) 'Mayfield West Recycling Facility, Surface Water Characterisation and Mitigation Plan'. Version 4	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
C7	(d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; and (ii) effectiveness of any management measures (see (c) above) (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Development over time;	Refer observation to Condition C4 above	Compliance achieved	Negligible
C7	(g) 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 (h) a protocol for periodic review of the plan.	Refer observation to Condition C4 above	Compliance achieved	Negligible
	Revision of Strategies, Plans and Programs			
C8	Within three months of: (a) approval of a modification; (b) approval of an annual review under Condition C9; (c) submissions of an incident report under Condition C11; or (d) completion of an audit under Condition C13. The Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.	Work completed during previous audit period	Not triggered	--
	ANNUAL REVIEW			
C9	Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the planning Secretary. This review must: (a) describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; (b) provide a conditions compliance report which tracks the compliance of the development with the conditions of this approval; (c) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the: (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS;	Copies of annual reviews were provided for 2020 - 2024. Copies of annual reviews are also provided on the Benedict website at https://www.benedict.com.au/about/policies-compliance/ . Copies of annual returns also provided on EPA website for 2017 - 2025. The Auditor received no feedback from stakeholders regarding these annual reports	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
C9	(d) detail and provide evidence for the number of days crushing and the 24-hour waste receival operations has occurred; (e) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (f) identify any trends in the monitoring data over the life of the Development; (g) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (h) describe what measures will be implemented over the next year to improve the environmental performance of the Development.	Refer observation to Condition C9 above	Compliance achieved	Negligible
	REPORTING			
	Incident Reporting			
C10	The Applicant must notify the Planning Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the Development immediately after the Applicant becomes aware of the incident.	Benedict advised there were no incidents, which was consistent with information provided in the Annual Reports	Compliance achieved	Negligible
C11	Within seven days of the date of this incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.	Refer observation to Condition C10 above	Compliance achieved	Negligible
	Regular Reporting			
C12	The Applicant must 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.	Refer observation to Condition C9 above	Compliance achieved	Negligible
	AUDITING			
	Independent Environmental Audit			
C13	Within one year of the commencement of operations, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must 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 Planning Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);	Refer audit reports issued by Barnett & May (21/02/20), Ian Swane & Associates (23/01/23) and this report	Compliance achieved	Negligible

AUDIT CHECKLIST FOR CONSOLIDATED CONSENT FOR SSD 7698 - SCHEDULE 2 CONDITIONS

No.	Condition	Observation	Recommendation	Risk Level
C13	(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents. <i>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</i>	Refer audit reports issued by Barnett & May (21/02/20), Ian Swane & Associates (23/01/23) and this report	Compliance achieved	Negligible
C14	Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	Refer audit reports issued by Barnett & May (21/02/20), Ian Swane & Associates (23/01/23) and this report	Compliance achieved	Negligible
	ACCESS TO INFORMATION			
C15	The Applicant must: (a) make copies of the following publicly available on its website: (i) the documents referred to in Condition A2; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;	Copies of previous audit reports prepared in 2019 and 2022 are available on the Benedict website at https://www.benedict.com.au/about/policies-compliance/ . The Auditor received no feedback from stakeholders regarding these annual reports	Compliance achieved	Negligible
C15	(v) a complaints register updated on a monthly basis; (vi) the annual reviews of the Development; (vii) any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit; and (viii) any other matter required by the Planning Secretary (b) keep this information up to date, to the satisfaction of the Planning Secretary.	Refer observation to Condition C15 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level																								
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.	Noted	Not triggered	--																								
	L2 CONCENTRATION LIMITS																											
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ 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.	The results of surface water monitoring are provided at https://www.benedict.com.au/about/policies-compliance/ for 2020 - 2025. The data indicated few discharges with no exceedances	Compliance achieved	Negligible																								
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges	Refer observation for Condition L2.1 above	Compliance achieved	Negligible																								
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.	Refer observation for Condition L2.1 above	Compliance achieved	Negligible																								
L2.4	Water and/or Land Concentration Limits POINT 1 <table><thead><tr><th>Pollutant</th><th>Units of Measure</th><th>50 Percentile concentration limit</th><th>90 Percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr></thead><tbody><tr><td>Oil and Grease</td><td>milligrams per litre.</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5-8.5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></tbody></table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and Grease	milligrams per litre.				10	pH	pH				6.5-8.5	Total suspended solids	milligrams per litre				50	Noted	Not triggered	--
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																							
Oil and Grease	milligrams per litre.				10																							
pH	pH				6.5-8.5																							
Total suspended solids	milligrams per litre				50																							
	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. The permitted waste types are:	Benedict advised that only waste types allowed by the EPL are accepted at the Site, with any non-complying loads being rejected and not allowed on-site. The Auditor observed no evidence of waste non-compliance and this issue was not raised by stakeholders	Compliance achieved	Negligible																								

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
L3.1	All permitted waste types are GSW (non-putrescible), with the different waste and processing descriptions being: * ASS for contaminated soil treatment; * Basic oxygen slag, electric arc furnace slag, electric arc ladle slag, granulated blast furnace slag, rail ballast for resource recovery & waste storage; * ENM and GSW classified soils for resource recovery & waste storage; * Grit, sediment, litter and gross pollutants from stormwater / dewatering waste for resource recovery & storage; * Biosolids for resource recovery & waste storage; * Household waste for resource recovery & waste storage; * Cement fibre board for resource recovery & waste storage; * Concrete batch plant waste, paper / cardboard, glass, plastics, rubber, plasterboard, ceramics, brick, concrete, metal, wood / garden / asphalt waste, VENM, building & demolition waste for resource recovery & waste storage	Refer observation for Condition L3.1 above	Compliance achieved	Negligible
L3.2	The premises may accept up to 315,000 tonnes of general solid waste (non-putrescible) per annum	Refer data provided in Benedict Annual report. Also, Benedict provided a monthly tracker of stockpile capacity for the period 1/11/22 to 31/10/25 (refer Section 4.2.3, IER). The tracker consisted of monthly plots of stock on hand, receival capacity, projected closing stock and % authorised amount. Data shows the stockpile capacity was maintained at all times below the authorised amount generally at 30 - 80%, with a 55% average.	Compliance achieved	Negligible
L3.3	Notwithstanding any limit specified in the above table, the licensee shall not exceed the authorised amount specified in this licence. Where the authorised amount is less than the total of all wastes listed above, the authorised amount will take precedent.	Refer observation for Condition L3.2 above	Compliance achieved	Negligible
L3.4	The authorised amount of waste permitted on the premises cannot exceed 53,733 tonnes at any one time.	Refer observation for Condition L3.2 above	Compliance achieved	Negligible
L3.5	All waste stockpiles occurring as part of the operation at the premises must be no greater than 7.0 metres in height.	This requirement was achieved by stockpile height markers scattered across site, which were observed by the Auditor - refer photos in Appendix F	Compliance achieved	Negligible
L3.6	All waste activities, including unloading, loading, processing and stockpiling of wastes, is only permitted within the area as identified as the Development Area in the State Significant Development 7698 - Appendix A Plans - Development Layout Plan.	The Auditor observed no change to the approved layout - refer photos in Appendix F	Compliance achieved	Negligible
L4 NOISE LIMITS				
L4.1	Noise limits	Noted	Not triggered	--

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
L4.2	For the purpose of condition L4.1: - Day is defined as the period from 7 am to 6 pm Monday to Saturday and 8 am to 6 pm Sunday and Public Holidays; - Evening is defined as the period 6 pm to 10 pm; - Night is defined from 10 pm to 7 am Monday to Saturday and 10 pm to 8 am Sunday and Public Holidays.	Noted	Not triggered	--
L4.3	The noise limits set out in condition L4.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 m/sec at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 m/sec at 10 m above ground level; or c) Stability category G temperature inversion conditions.	Noted	Not triggered	--
L4.4	To determine compliance: a) the Leq(15 minute) noise limits in condition L4.1, the noise measurement equipment must be located: - approximately on the property, where any dwelling is situated 30 m or less from the property boundary closest to the premises; or - within 30 m of a dwelling façade, but not closer than 3 m, where any dwelling on the property is situated more than 30 m from the property boundary closest to the premises; or where applicable - within approximately 50m of the boundary of a National Park or Nature Reserve.	Annual noise monitoring occurs with results on website at https://www.benedict.com.au/about/policies-compliance/ . The Auditor found that annual noise monitoring data were available on the website for 2020 - 2025, with all results over the audit period complying with the noise criteria. Stakeholders did not raise noise as an issue of concern	Compliance achieved	Negligible
L4.4	b) with any LAmax in condition L4.1, the noise measurement equipment must be located within 1 m of a dwelling façade. c) with the noise limits in condition L4.1, the noise measurement equipment must be located: - 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 L4.4(a) or L4.4(b).	Refer observation for Condition L4.4 above	Compliance achieved	Negligible
L4.5	A non-compliance of conditions L4.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured: - at a location other than an area prescribed by conditions L4.4(a) and L4.4(b); and/or - at a point other than the most affected point at a location.	Noted	Not triggered	--
L4.6	For the purposes of determining the noise generated at the premises, the modification factors in Fact Sheet C - Corrections for Annoying Noise Characteristics of the NSW Noise Policy for Industry must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Noted	Not triggered	--
L4.7	The crusher and shredder are only permitted to be operated in the segregated heavy waste processing and stockpiling area, no further south than 130 m from the northern site boundary in accordance with the State Significant Development 7698 - Appendix A Plans - Location of Crusher, Shredder and Screens.	Noted	Not triggered	--

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
L4.8	The mobile screens in the segregated heavy waste processing area and stockpiling area must not be operated simultaneously with the crusher or shredder.	No timber shredding at Mayfield site as it's done at the Benedict Chipping Norton Facility. Auditor confirmed absence of timber shredding plant during site inspection - refer photos in Appendix F	Compliance achieved	Negligible
L5 HOURS OF OPERATION				
L5.1	Hours of operation	Noted	Not triggered	--
L5.2	Works outside the hours identified in condition L5.1 may be undertaken in the following circumstances: i. the works are inaudible at the nearest sensitive receivers; or ii. for the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or iii. where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Benedict advised that this requirement was met with working hours listed on website and maingate. Auditor confirmed working hour information and noted that noise was not raised by stakeholders as an issue	Compliance achieved	Negligible
L5.3	Waste receipt is permitted on a 24-hour per day basis on limited occasions to facilitate major infrastructure projects. Limited occasions is defined as: i) no greater than six times per year; and ii) only for a period of less than two weeks in length for each occasion.	Benedict advised that after hours tipping was used on one occasion during the Audit Period on 3/06/25. This was done by Transport for NSW. A copy of the notification sent to neighbours was provided (dated 28/05/25)	Compliance achieved	Negligible
L5.4	The EPA must be notified no later than 48 hours prior to each of the 24-hour waste receipt periods referred to in condition L5.3 along with a description of the major infrastructure projects which necessitate the 24-hour operations.	Refer observation for Condition L5.3 above	Compliance achieved	Negligible
L6 POTENTIALLY OFFENSIVE ODOUR				
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Benedict advised that no odorous waste was received at site - odorous material is rejected. Auditor observed this was the case and found no objectionable odours at site. No odour complaints during audit period	Compliance achieved	Negligible
L6.2	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. Note: Development Consent SSD 7698 requires that when handling AASS or PASS the mitigation measures outlined in the odour advice prepared by EMM Consulting dated 30 September 2022, must be adhered to. Notwithstanding these mitigation measures, all necessary actions need to be taken by the licence so as to comply with condition L6.1 above.	Benedict monthly Resource Recovery Reports for audit period show no ASS was imported to the Site. This was also mentioned by Benedict and the Auditor found no evidence of ASS storage or processing during site inspection - refer Appendix F photos	Compliance achieved	Negligible
4 OPERATING CONDITIONS				
O1 ACTIVITIES MUST BE CARRIED OUT IN A COMPETENT MANNER				

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
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.	Benedict advised that all employees are trained. The Auditor considered weight of evidence supports compliance because of observations made by site inspection, comprehensive management systems, no issues raised by stakeholders, annual inspections by EPA/Planning	Compliance achieved	Negligible
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.	Benedict advised that all machines were serviced every 500 hours by suppliers who hold maintenance records. Auditor observed all site equipment was operational - refer photos in Appendix F	Compliance achieved	Negligible
O3 DUST				
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Dust management systems observed by the Auditor included sorting inside sheds, a misting system installed at the public unloading shed, an automated water spray system that covers all operational parts of the site, stockpiles are limited in height, practically all roads and sealed and a water tank is present on-site. No dust was observed by the Auditor during the inspection - refer photos in Appendix F. The Auditor considered all reasonable steps were being undertaken by Benedict to minimise dust.	Compliance achieved	Negligible
O3.2	Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading.	Benedict advised this practice was followed. The Auditor also observed all truck loads entering and leaving site were covered - refer photos in Appendix F	Compliance achieved	Negligible
O3.3	No material, including sediment, is permitted to be tracked from the premises.	DPHI observed some tracked material onto the public road during inspection of 5/12/23. Issue corrected to satisfaction of DPHI during their February 2024 site inspection. Auditor observed site was being well managed with no evidence of material being tracked from the premises.	Compliance achieved	Negligible
O3.4	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Refer observation for Condition O3.1 above	Compliance achieved	Negligible
O3.5	Fixed water sprays must be maintained and operated at the premises in a manner that will minimise the generation and emission of dust from the premises.	Auditor observed that these requirements are being met - refer photos in Appendix F	Compliance achieved	Negligible
O4 EMERGENCY RESPONSE				

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
Note:	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the POEO Act 1997 and POEO regulations. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident.	The Benedict PIRMP is provided on their website at https://www.benedict.com.au/wp-content/uploads/Proc-270-PIRMP-Newcastle.pdf . The document is dated 29/11/24 and the document control sheet shows that it has been reviewed and updated annually since 1/12/16. Benedict advised that there were no emergencies during audit period, which is supported by the documentation provided in the annual reports that have been prepared by Benedict and reviewed by the EPA. A surface water characterisation and management plan and an emergency response plan are provided in Appendices E & K of the OEMP.	Compliance achieved	Negligible
O5 PROCESSES AND MANAGEMENT				
O5.1	A litter management program must be implemented, which includes litter patrol to ensure that the local amenity is not degraded.	Benedict advised that the collection of litter is included on the weekly environmental checklist, pickups are made as required, and litter control at the site is part of employees training. The Auditor considered these procedures were consistent with the observed well managed condition of the site - refer photos in Appendix F	Compliance achieved	Negligible
O5.2	All above ground tanks containing material capable of causing harm to the environment must be stored within a bund or within an alternative spill containment system that achieves the same outcome.	Auditor inspected diesel tank facility and considered it complied with Consent requirements - refer photos in Appendix F	Compliance achieved	Negligible
O5.3	Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.	Refer observation for Condition O5.2 above	Compliance achieved	Negligible
O5.4	A surface water management system must be operated and maintained at the premises at all times.	The system was managed using the OEMP approved by DPE 25/09/18. Auditor observed the surface water management system comprised a perimeter drain around the site, gravel dam filters, sedimentation tanks and a monitoring system, which was being well maintained - refer photos in Appendix F.	Compliance achieved	Negligible

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
O5.5	The surface water management system must be maintained to minimise the infiltration of surface water to groundwater. This includes inspecting the surface water infrastructure monthly for cracking and vegetation breakthrough, removing the vegetation and sealing the surface water infrastructure.	Benedict advised that these measures are checked weekly. Copies of completed 'Environmental Inspection Checklists' were provided to the Auditor for 3/10/25, 10/10/25, 17/10/25, 24/10/25, 31/10/25, 7/11/25, 14/11/25, 21/11/25. Practically all the site was concrete sealed. Auditor observed site was well maintained - refer photos in Appendix F	Compliance achieved	Negligible
O5.6	The final sediment basin must be maintained with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5-day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills.	Water monitoring results are provided on Benedicts website at https://www.benedict.com.au/about/policies-compliance/ for 2020 - 2025. Benedict advised that it was very rare for water from the final sedimentation pond to be discharged. The water quality reports indicated only four discharge events during audit period, with test data compliance achieved.	Compliance achieved	Negligible
O5.7	A visible marker must be installed and maintained in the final sediment basin in a position that shows freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 90th percentile rainfall event over any consecutive 5-day period.	Auditor observed a height marker in the final sedimentation dam located in the NW corner of the site - refer photos in Appendix F	Compliance achieved	Negligible
O5.8	Fixed water sprays must be maintained and operated at the premises in a manner that will maximise water reuse on site and minimise surface water discharges from the premises.	Auditor observed that these requirements are being met - refer photos in Appendix F	Compliance achieved	Negligible
O6 WASTE MANAGEMENT				
O6.1	All putrescible waste received at the premises must be: a) stored in an enclosed vessel; and b) disposed of, to a place that can lawfully receive that waste, within 24 hours of receipt.	Benedict advised that no putrescible waste was received. The Auditor observed no putrescible waste or odorous material at the site	Compliance achieved	Negligible
O6.2	Waste collected at the premises that is unable to be recycled, must not be stored at the premises and must be taken to a lawful waste facility at least once a week.	Benedict advised this waste is removed from site at least once a week. The Auditor observed no large quantities of unrecyclable waste at the site - refer photos in Appendix F	Compliance achieved	Negligible
O6.3	All co-mingled waste (to include but not limited to metals, shredded wood products, glass and non-recyclable residues) received at the Premises must be unloaded, processed and stockpiled within an enclosed processing shed.	The Auditor observed co-mingled waste was processed in the main processing shed	Compliance achieved	Negligible
O7 OTHER OPERATING CONDITIONS - GSW ASS Management				

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
O7.1	All General Solid Waste AASS / PASS material must be subject to an independent and certified waste classification report, as per the NSW EPA Waste Classification Guidelines.	Benedict monthly Resource Recovery Reports for audit period show no ASS was imported to the Site. This was also mentioned by Benedict and the Auditor found no evidence of ASS storage or processing during site inspection. The Auditor also observed that the ASS treatment facility had been established - refer Appendix F photos	Compliance achieved	Negligible
O7.2	The licensee must only receive General Solid Waste AASS / PASS on the site with a pH range between 4.5 and 5.5.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
O7.3	The General Solid Waste AASS / PASS material must be neutralised via lime dosing within 24 hours of receiving the soils on the premises.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
O7.4	The General Solid Waste AASS / PASS material must be kept damp prior to and during handling to avoid any oxidation.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
O7.5	All General Solid Waste AASS / PASS handling must occur within the dedicated area of Mag Shed, within an area that is appropriately bunded.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
O7.6	All excess water from the General Solid Waste AASS / PASS shed must be captured in the bunded area and must be removed from the facility for treatment at an appropriately licensed facility, or discharged via an approved trade waste disposal connection.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
O7.7	Processes AASS / PASS soil material must only be disposed at an appropriately approved facility or reused in a manner that complies with an EPA resource recovery exemption issued pursuant to Clause 93 of the Protection of the Environment (Waste) Regulation 2014.4.	Refer observation for Condition O7.1 above	Compliance achieved	Negligible
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.	All waste records are kept on the Benedict computer system and used to prepare weekly and monthly waste reports that were provided to the Auditor. The data is received by the Benedict Environmental Compliance Officer	Compliance achieved	Negligible
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.	Refer observation for Condition M1.1 above	Compliance achieved	Negligible

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
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.	Refer observation for Condition M1.1 above	Compliance achieved	Negligible
M2 REQUIREMENT TO MONITOR CONCENTRATION OF POLLUTANTS DISCHARGED				
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	The results of surface water monitoring are provided at https://www.benedict.com.au/about/policies-compliance/ for 2020 - 2025. The data indicated few discharges with no exceedances	Compliance achieved	Negligible
M2.2	Water and/ or Land Monitoring Requirements	Noted	Not triggered	--
M3 TESTING METHODS - CONCENTRATION LIMITS				
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	These requirements are documented in the Benedict (July 2018) OEMP approved by DPE 25/09/18. An updated plan was issued on 30/04/25 (Revision 7). Copy available on facility website at https://www.benedict.com.au/wp-content/uploads/MWRF_OEMP_v7.pdf	Compliance achieved	Negligible
M4 WEATHER MONITORING				
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	The meteorological station is located at the office near the weighbridge. The Auditor observed the station and confirmed it was operational - refer photos in Appendix F	Compliance achieved	Negligible
M5 RECORDING OF POLLUTION COMPLAINTS				
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Community engagement information was provided on the Benedict website at https://www.benedict.com.au/about/policies-compliance/ . The information included a copy of complaints registers for the 2018 - 2025 period. The registers indicated 1 complaint for dust was received in 2023, 2024 and 2025. Complaints phone number advertised at main entrance. The Auditor considered community engagement was satisfactory	Compliance achieved	Negligible

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Refer observation for Condition M5.1 above	Compliance achieved	Negligible
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Refer observation for Condition M5.1 above	Compliance achieved	Negligible
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted	Not triggered	--
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 phone number advertised at main entrance and on Benedict website.	Compliance achieved	Negligible
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.	Refer observation for Condition M6.1 above	Compliance achieved	Negligible
M6.3	The preceding two conditions do not apply until one month after the date of the issue of this licence.	Noted	Not triggered	--
M7 NOISE MONITORING				
M7.1	To assess compliance with the noise limits specified within this licence, the licensee must undertake operator attended noise monitoring at each specified noise monitoring point in accordance with the table below	Annual noise monitoring results provided on Benedict website. Auditor observed that site operations were well managed with equipment being well maintained and operated. Noise levels were low around site boundary waste processing was conducted within sheds and there was no crushing or shredding. The Auditor noted that noise was not an issue raised by any of the stakeholders	Compliance achieved	Negligible
M7.2	The noise monitoring required by the condition above must be conducted during a period of normal or above average throughput at the premises. The noise consultancy report generated as a result of the above noise monitoring must stipulate the activities being undertaken at the premises at the time of the noise monitoring and the daily throughput compared to average daily throughput.	Refer observation for Condition M7.1 above	Compliance achieved	Negligible
6 REPORTING CONDITIONS				
R1 ANNUAL RETURN DOCUMENTS				

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
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.	Copies of annual reviews provided for audit period. Copies of annual returns for 2020 - 2024 were also provided on the Benedict website at https://www.benedict.com.au/about/policies-compliance/ . Copies of annual returns also provided on EPA website for 2017 - 2024. The Auditor received no feedback from stakeholders regarding these annual reports	Compliance achieved	Negligible
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Refer observation for Condition R1.1 above	Compliance achieved	Negligible
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Not relevant	Not triggered	--
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not relevant	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').	Benedict advised the reports were submitted on time, which is consistent with the times received by the EPA as listed on their website	Compliance achieved	Negligible
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.	Copies of annual returns for 2020 - 2024 provided on the Benedict website at https://www.benedict.com.au/about/policies-compliance/	Compliance achieved	Negligible

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
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.	Refer observation for Condition R1.1 above	Compliance achieved	Negligible
	R2 NOTIFICATION OF ENVIRONMENTAL HARM			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. 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.	Benedict advised there were no incidents, which was consistent with information provided in the Annual Reports	Compliance achieved	Negligible
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.	Refer observation for Condition R2.1 above	Compliance achieved	Negligible
	R3 WRITTEN REPORT			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Noted	Not triggered	--
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.	Noted	Not triggered	--
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.	Noted	Not triggered	--

AUDIT CHECKLIST FOR ENVIRONMENT PROTECTION LICENCE 20771

No.	Condition	Observation	Recommendation	Risk Level
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.	Noted	Not triggered	--
	R4 OTHER REPORTING CONDITIONS			
R4.1	The licensee must prepare an annual Water Quality and Discharge Report that provides the following information for each Annual Return reporting period: a) the number of surface water overflows from the premises compared to the design overflow regime of 2.9 overflows per year, as provided in the memorandum titled 'EPL 20771 - Water management update' prepared by EMM Consulting dated 12 August 2022 (EPA reference DOC22/708750) (hereafter referred to as the Update Memo); b) a summary of the rainfall data that preceded and contributed to each surface water overflow; c) a review of the water balance model provided in the Update Memo, including design rainfall, against actual site conditions; and d) a review of any water quality data collected in accordance with the licence and the premises Water Management Plan as committed to in the Update Memo, including: a review of trends in water quality since monitoring began; a comparison of water captured in Area 1 Tanks to the Final Sedimentation Basin water for each pollutant parameter; and identification of any threshold exceedances of ANZG (2018) criteria for further investigation.	R4 Annual Water Management Review reports prepared by Benedict for the periods 25/05/22 - 24/05/23 and 25/05/23 - 24/05/24, which cover the Audit Period. Benedict advises that copies of these reports have been issued to the NSW EPA each year	Compliance achieved	Negligible
R4.2	The report required by the above condition must be submitted to the EPA with each years Annual Return.	Refer observation for Condition R4.1 above	Compliance achieved	Negligible

Appendix B. Planning Secretary Audit Team Agreement

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSD-7698-PA-34

Alycia O'Brien

Environmental Compliance Manager

BENEDICT RECYCLING PTY LIMITED

15/09/2025

Sent via the Major Projects Portal only

Subject: Mayfield West Recycling Facility - Auditor endorsement request - 2025

Dear Ms O'Brien

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit (IEA) of the Mayfield West Recycling Facility, submitted as required by Condition C13 of SSD-7698 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 3 September 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 Dr Ian C Swane as the Lead Auditor to prepare the 2025 IEA.

Please note:

- This correspondence must be appended to the IEA Report.
- The IEA must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above auditor is approved for the 2025 IEA only. Additional approval must be sought from the Planning Secretary for future IEAs of the development.
- Any changes or additions to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Ann Hagerthy on 02 6575 3407 or email compliance@planning.nsw.gov.au

Department of Planning, Housing and Infrastructure

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Appendix C. Stakeholder Consultation

From: Environment Line <info@environment.nsw.gov.au>
Sent: Tuesday, 30 September 2025 1:27 PM
To: iswane@bigpond.com
Subject: Thank you for your email. Your Reference Id is 01262299 (ref:!00D7F06iTix.!500Mn016943d:ref)



Thank you for your enquiry. Environment Line will process your request within 5 working days. If your matter is urgent, please call Environment Line on 131555 for the NSW EPA or 1300 361 967 for all other matters.

For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).

Where the EPA or DCCEEW is not the appropriate authority to manage your report, it will be forwarded to the appropriate authority. For example, commercial noise complaints for smaller factories, backyard workshops, smoke from residential backyard fires or chimneys or dumping in public areas are the responsibility of Local Councils; loud music or patron noise from public venues are the responsibility of Liquor & Gaming NSW, rubbish on major roads and highways is the responsibility of Transport for NSW. Any information provided regarding this type of pollution will be forwarded to those authorities for action.

If you do not consent to your report being forwarded, please reply to this email to advise that you would like to 'opt out' of any further action. You may also request that your details remain anonymous or confidential, however in certain circumstances this may limit our ability to deal with any complaint further. Details of our Privacy information can be found [here](#).

When sending further emails about this topic (Independent Environmental Audit for Benedict Recycling Newcastle Facility), please ensure the

following extended Reference Id appears anywhere in the email subject or body:

ref:!00D7F06iTix.!500Mn016943d:ref

From: Operational Liaison <OpsLiaison@fire.nsw.gov.au>
Sent: Wednesday, 1 October 2025 2:53 PM
To: iswane@bigpond.com
Cc: Operational Liaison
Subject: RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Good afternoon Dr. Swane,

Thank you for the invitation, however FRNSW have no comments / requirements or specific environmental issues the audit needs to target at this time.

Kind regards



STATION OFFICER RICHARD JAY
A/Team Leader
Fire Safety Liaison Unit | Fire and Rescue NSW
M: 0407 103 571 **E:** richard.jay@fire.nsw.gov.au
1 Amarina Avenue Greenacre NSW 2190

**PREPARED FOR
ANYTHING.**

www.fire.nsw.gov.au



Fire and Rescue NSW acknowledge the traditional custodians of the lands on which we stand and pay our respects to their Elders from the past and present.

From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Tuesday, 30 September 2025 1:40 PM
To: Info <Info@fire.nsw.gov.au>
Cc: Operational Liaison <OpsLiaison@fire.nsw.gov.au>
Subject: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Attention: The Appropriate Fire & Rescue NSW Officer

Dear Fire & Rescue NSW,

I have been approved by the Department of Planning, Housing and Infrastructure (**DPHI**) to undertake an independent environmental audit (**IEA**) for the Benedict Recycling Newcastle facility located at 1A McIntosh Drive, Mayfield West (the **Facility**). The audit is being undertaken to comply with Condition C13 of development consent SSD 7698 that was issued by the DPE on 13 March 2018 (the **Consent**). The audit covers a three-year period from 1 October 2022 to 30 September 2025.

The requirements of the Consent considered relevant to this IEA cover:

- Administrative conditions (Consent Part A);
- Environmental performance and management (Consent Part B); and
- Environmental management, reporting and auditing (Consent Part C).

The requirements of Environment Protection Licence (EPL) number 20771 considered relevant to this IEA cover:

- Administrative conditions (EPA Part 1 of the EPL);
- Discharges to air and water and applications to land (EPL Part 2);
- Limit conditions (EPL Part 3);
- Operating conditions (EPL Part 4);
- Monitoring and recording conditions (EPL Part 5); and
- Reporting conditions (EPL Part 6).

Fire & Rescue NSW is invited to provide me with comments / requirements or specific environmental issues the audit needs to target. Feedback would most conveniently be via email. In the interim, please don't hesitate to contact me by email or mobile should you require any further information regarding the audit.

Many thanks

Ian

Dr Ian C Swane (CPEng, CEnvP)

EPA Site Auditor

Ian Swane & Associates (mob: 0418 867 112)



FRNSW CONFIDENTIALITY NOTICE AND DISCLAIMER

The information in this transmission may be confidential and/or protected by legal professional privilege, and is intended only for the person or persons to whom it is addressed. If you are not the intended recipient of this message you must not read, forward, print, copy, disclose, use or store in any way the information in this e-mail or any attachment it may contain. Please notify the sender immediately and delete or destroy all copies of this e-mail and any attachment it may contain.

Views expressed in the message are those of the individual sender, and are not necessarily the views of Fire and Rescue NSW (FRNSW). Use of electronic mail is subject to FRNSW policy and guidelines. FRNSW reserves the right to filter, inspect, copy, store and disclose the contents of electronic mail messages, as authorised by law.

This message has been scanned for viruses.

From: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Sent: Wednesday, 8 October 2025 8:43 AM
To: iswane@bigpond.com
Subject: RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Hi Ian,

In addition to the consent requirements and an adequacy review of management plans required by the consent, please pay additional focus to waste types and relevant management of those, limits, crusher operation, and surface water management.

Thanks,

Ann Hagerthy

Senior Compliance Officer
Compliance | Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure

T (02) 6575 3407 E ann.hagerthy@planning.nsw.gov.au
516 High St, Maitland NSW 2320
dpie.nsw.gov.au



From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Tuesday, 30 September 2025 1:16 PM
To: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Cc: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Dear Ann,

I have been approved by the Department of Planning, Housing and Infrastructure (**DPHI**) to undertake an independent environmental audit (**IEA**) for the Benedict Recycling Newcastle facility located at 1A McIntosh Drive, Mayfield West (the **Facility**). The audit is being undertaken to comply with Condition C13 of development consent SSD 7698 that was issued by the DPE on 13 March 2018 (the **Consent**). The audit covers a three-year period from 1 October 2022 to 30 September 2025.

The requirements of the Consent considered relevant to this IEA cover:

- Administrative conditions (Consent Part A);
- Environmental performance and management (Consent Part B); and
- Environmental management, reporting and auditing (Consent Part C).

The requirements of Environment Protection Licence (**EPL**) number 20771 considered relevant to this IEA cover:

- Administrative conditions (EPA Part 1 of the EPL);
- Discharges to air and water and applications to land (EPL Part 2);

- Limit conditions (EPL Part 3);
- Operating conditions (EPL Part 4);
- Monitoring and recording conditions (EPL Part 5); and
- Reporting conditions (EPL Part 6).

The DPHI is invited to provide me with comments / requirements or specific environmental issues that the audit needs to target. Feedback would most conveniently be via email. In the interim, please don't hesitate to contact me by email or mobile should you require any further information regarding the audit.

Many thanks

Ian

Dr Ian C Swane (CPEng, CEnvP)

EPA Site Auditor

Ian Swane & Associates (mob: 0418 867 112)



From: Environment Line <info@environment.nsw.gov.au>
Sent: Sunday, 19 October 2025 5:44 PM
To: iswane@bigpond.com
Subject: Thank you for your email. Your Reference Id is 01265460 (ref:!00D7F06iTix.!500Mn0188PDp:ref)



Thank you for your enquiry. Environment Line will process your request within 5 working days. If your matter is urgent, please call Environment Line on 131555 for the NSW EPA or 1300 361 967 for all other matters.

For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).

Where the EPA or DCCEEW is not the appropriate authority to manage your report, it will be forwarded to the appropriate authority. For example, commercial noise complaints for smaller factories, backyard workshops, smoke from residential backyard fires or chimneys or dumping in public areas are the responsibility of Local Councils; loud music or patron noise from public venues are the responsibility of Liquor & Gaming NSW, rubbish on major roads and highways is the responsibility of Transport for NSW. Any information provided regarding this type of pollution will be forwarded to those authorities for action.

If you do not consent to your report being forwarded, please reply to this email to advise that you would like to 'opt out' of any further action. You may also request that your details remain anonymous or confidential, however in certain circumstances this may limit our ability to deal with any complaint further. Details of our Privacy information can be found [here](#).

When sending further emails about this topic (RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:!00D7F06iTix.!500Mn0188PDp:ref

From: Daniel O'Brien <dobrien@ncc.nsw.gov.au>
Sent: Monday, 20 October 2025 9:34 AM
To: iswane@bigpond.com
Subject: RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Hi Ian

Council has no comments we wish to provide in respect to the environmental operation of the premises. I reviewed our records for the premises address and did not identify any complaints lodged about the premises during the reporting period.

Regards

Daniel O'Brien | Senior Environment Protection Officer

City of Newcastle | Planning & Environment

Transport & Regulation | Environmental Health

E: dobrien@ncc.nsw.gov.au | T: +61249742534 | M: +61492132368



City of Newcastle acknowledges the Traditional Custodians of the land of the Newcastle LGA, the Awabakal and Worimi peoples.

From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Sunday, 19 October 2025 5:15 PM
To: Customer Service Information <Customerserviceinfo@ncc.nsw.gov.au>
Cc: Daniel O'Brien <dobrien@ncc.nsw.gov.au>
Subject: RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Some people who received this message don't often get email from iswane@bigpond.com. [Learn why this is important](#)

Dear Council,

I refer to the email I sent to Council below on 30/09/25. Just a reminder for Council to provide me with feedback, if any, regarding issues that Council would like me to consider as part of my Independent Environmental Audit of the Benedict Mayfield waste recycling facility. I will need to receive your feedback next week if Council wants me to consider your issues as part of my current audit.

Masny thanks

Ian

Dr Ian C Swane (CPEng, CEnvP)

EPA Site Auditor

Ian Swane & Associates (mob: 0418 867 112)



From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Tuesday, September 30, 2025 1:59 PM
To: 'Customerserviceinfo@ncc.nsw.gov.au' <Customerserviceinfo@ncc.nsw.gov.au>
Cc: 'Daniel O'Brien' <dobrien@ncc.nsw.gov.au>
Subject: RE: Independent Environmental Audit for Benedict Recycling Newcastle Facility

From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Tuesday, September 30, 2025 1:33 PM
To: 'mail@ncc.nsw.gov.au' <mail@ncc.nsw.gov.au>
Cc: 'Daniel O'Brien' <dobrien@ncc.nsw.gov.au>
Subject: Independent Environmental Audit for Benedict Recycling Newcastle Facility

Attention: The Appropriate Newcastle City Council Officer

Dear Council,

I have been approved by the Department of Planning, Housing and Infrastructure (**DPHI**) to undertake an independent environmental audit (**IEA**) for the Benedict Recycling Newcastle facility located at 1A McIntosh Drive, Mayfield West (the **Facility**). The audit is being undertaken to comply with Condition C13 of development consent SSD 7698 that was issued by the DPE on 13 March 2018 (the **Consent**). The audit covers a three-year period from 1 October 2022 to 30 September 2025.

The requirements of the Consent considered relevant to this IEA cover:

- Administrative conditions (Consent Part A);
- Environmental performance and management (Consent Part B); and
- Environmental management, reporting and auditing (Consent Part C).

The requirements of Environment Protection Licence (**EPL**) number 20771 considered relevant to this IEA cover:

- Administrative conditions (EPA Part 1 of the EPL);
- Discharges to air and water and applications to land (EPL Part 2);
- Limit conditions (EPL Part 3);
- Operating conditions (EPL Part 4);
- Monitoring and recording conditions (EPL Part 5); and
- Reporting conditions (EPL Part 6).

Council is invited to provide me with comments / requirements or specific environmental issues the audit needs to target. Feedback would most conveniently be via email. In the interim, please don't hesitate to contact me by email or mobile should you require any further information regarding the audit.

Many thanks

Ian

Dr Ian C Swane (CPEng, CEnvP)

EPA Site Auditor

Ian Swane & Associates (mob: 0418 867 112)



From: Geof Mansfield <gmansfield@ncc.nsw.gov.au>
Sent: Wednesday, 29 October 2025 2:46 PM
To: iswane@bigpond.com
Subject: RE: PB2025/00869- Benedict Recycling facility -1A McIntosh Drive Mayfield West

Hi Iain

I have just received the following belated comments from our Assets Services team:

- Effectiveness of pollutant controls for both air and water in relation to impacts to the estuary. Particularly whether there is any flow path other than the tested final sediment basin noted on the EPL.
- Consideration of advice to the EPA to close the loop on daily during discharge monitoring which does not appear to have triggers identified in the EPL for raising reporting.

Sorry for any inconvenience caused by the late notice after my previous email.

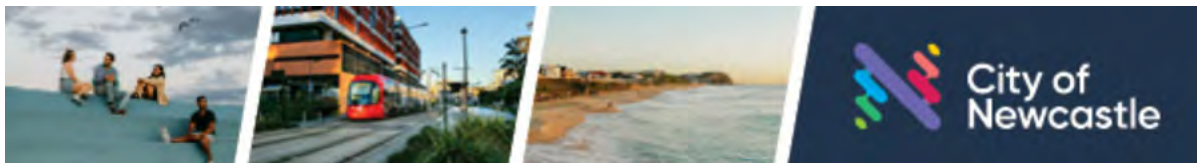
Regards

Geof Mansfield | Principal Development Officer (Planning)

City of Newcastle | Planning & Environment

Planning & Development | Development Assessment

E: gmansfield@ncc.nsw.gov.au | T: +61249742767 | M: +61407286899



City of Newcastle acknowledges the Traditional Custodians of the land of the Newcastle LGA, the Awabakal and Worimi peoples.

From: Geof Mansfield
Sent: Wednesday, 29 October 2025 11:20 AM
To: iswane@bigpond.com
Subject: RE: PB2025/00869- Benedict Recycling facility -1A McIntosh Drive Mayfield West

Hi Iain

It is advised City of Newcastle has no matters to raise for the required environmental review.

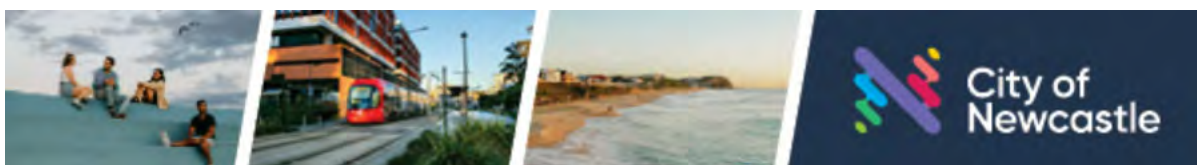
Regards

Geof Mansfield | Principal Development Officer (Planning)

City of Newcastle | Planning & Environment

Planning & Development | Development Assessment

E: gmansfield@ncc.nsw.gov.au | T: +61249742767 | M: +61407286899



City of Newcastle acknowledges the Traditional Custodians of the land of the Newcastle LGA, the Awabakal and Worimi peoples.

From: Geof Mansfield
Sent: Tuesday, 21 October 2025 4:35 PM
To: 'iswane@bigpond.com' <iswane@bigpond.com>
Subject: RE: PB2025/00869- Benedict Recycling facility -1A McIntosh Drive Mayfield West

Hi Iain

Thanks for the clarification.

I will consult with other teams to see if they have any comments to offer. Have been unable to respond sooner today because of IT network outage.

Regards

Geof Mansfield | Principal Development Officer (Planning)

City of Newcastle | Planning & Environment

Planning & Development | Development Assessment

E: gmansfield@ncc.nsw.gov.au | T: +61249742767 | M: +61407286899



City of Newcastle acknowledges the Traditional Custodians of the land of the Newcastle LGA, the Awabakal and Worimi peoples.

From: iswane@bigpond.com <iswane@bigpond.com>
Sent: Monday, 20 October 2025 9:05 AM
To: Geof Mansfield <gmansfield@ncc.nsw.gov.au>
Subject: RE: PB2025/00869- Benedict Recycling facility -1A McIntosh Drive Mayfield West

Geoff

Thanks for your feedback. I have had a look at the two emails I sent to Council on 30/09/25 and 19/10/25 and can't find a reference to an attached email. Anyway, in this email I attach a copy of the two previous emails I sent Council regarding an independent environmental audit I'm doing for the Department of Planning at the Benedict Mayfield recycling facility. If there is any matter that Council wants me to review, please advise me by the end of this week.

Kind regards

Ian

Dr Ian C Swane (CPEng, CEnvP)

EPA Site Auditor

Ian Swane & Associates (mob: 0418 867 112)



From: Geof Mansfield <gmansfield@ncc.nsw.gov.au>
Sent: Monday, October 20, 2025 8:56 AM

To: iswane@bigpond.com

Subject: PB2025/00869- Benedict Recycling facility -1A McIntosh Drive Mayfield West

Hi Ian

I refer to your recent enquiry advising your company is undertaking an Independent environmental audit of the Benedict Recycling facility on the above property. The enquiry refers to an attached email which was not provided. Please provide a copy. Thanks.

Regards

Geof Mansfield | Principal Development Officer (Planning)

City of Newcastle | Planning & Environment

Planning & Development | Development Assessment

E: gmansfield@ncc.nsw.gov.au | T: +61249742767 | M: +61407286899



City of Newcastle acknowledges the Traditional Custodians of the land of the Newcastle LGA, the Awabakal and Worimi peoples.

Appendix D. Independent Audit Declaration Form

Project Name: Benedict Recycling Newcastle Facility
Consent Number: SSD 7698
Description of Project: IER of Recycling Facility
Project Address: 1A McIntosh Drive, Mayfield West NSW 2304
Proponent: Benedict Recycling Pty Limited
Title of Audit: Benedict Recycling Newcastle Facility 1A McIntosh Drive, Mayfield West,
Independent Environmental Audit
Date: 15 December 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).



Name of Auditor: Dr Ian C Swane

Signature: _____

Qualifications: NSW EPA site auditor, BE (Hons), PhD, CPEng, CSCS, IEA and POEO Waste Auditor

Company: Ian Swane & Associates Company Address: PO Box 359, Mortdale NSW 2223

Appendix E. Technical Specialists Reports

Not required

Appendix F. Site Inspection Photographs

Site inspection 21/10/2025

Site entrance, weighbridge, wheel wash, roads and admin facilities



Photo 1 Site entrance showing sealed road, security gate and signage



Photo 2 Site entrance signage describing waste types accepted & opening hours



Photo 4 Automated weighbridge for incoming trucks and vehicles



Photo 5 Wheel wash for trucks leaving site



Photo 6 Automated weighbridge recording system



Photo 7 Admin area showing weighbridge, parking and site offices to right

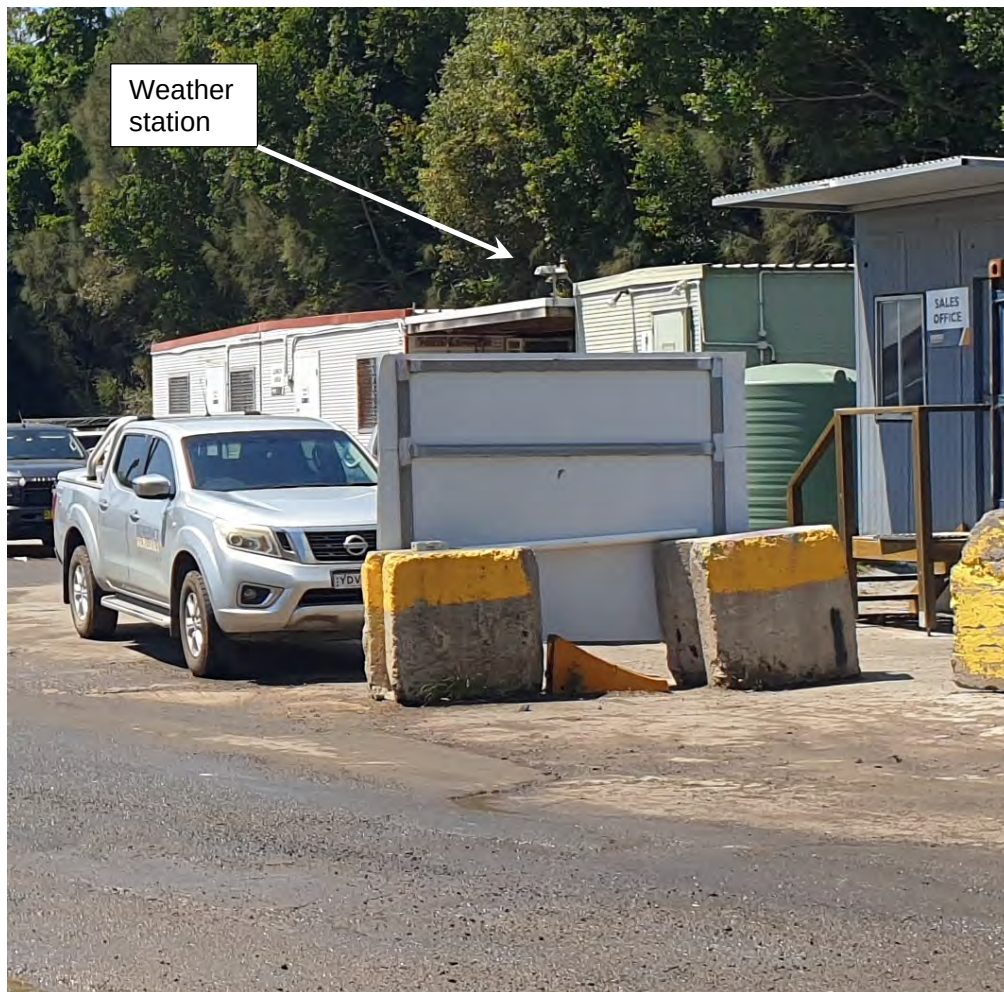


Photo 8 Weather station at admin area



Photo 9 Dust gauge at SW corner of Facility



Photo 10 Dust gauge at NW corner of Facility



Photo 11 Fire main in central area



Photo 12 Workshop



Photo 13 Fire pump at southern end of Facility



Photo 14 Sealed roads, kerb and gutters, fire mains and parking area at front area

Diesel AST



Photo 15 Self-contained 28,750 L diesel AST refuelling facility in bunded area



Photo 16 Refuelling details



Photo 17 Spill kit in AST bunded area

Site drainage and dust suppression controls



Photo 18 Concrete lined perimeter drain along southern side of Facility



Photo 19 Concrete lined perimeter drain along western side of Facility



Photo 20 Sprinkler located along western site road



Photo 21 Sprinkler system in operation along western site road



Photo 22 Dust suppression applied to western site road



Photo 23 Concrete lined perimeter drain along northern side of Facility



Photo 24 Two stage pit at northern end of Facility



Photo 25 Final Sedimentation Basin at NW corner of site



Photo 26 Water level gauge in Final Sedimentation Basin at NW corner of Facility



Photo 27 Water holding tanks used for dust suppression in northern end of Facility



Photo 28 Water sprays in operation to suppress dust



Photo 29 Water filling station for water cart located in northern end of Facility



Photo 30 Filling of water carty in southern part of Facility



Photo 31 Operation of water cart to suppress dust in central part of Facility



Photo 32 Operation of water cart and water sprays to suppress dust

ASS storage and treatment area in eastern side of Facility



Photo 33 Mag Shed warehouse to be used to store AA



Photo 34 ASS treatment area – concrete slab and perimeter bunds



Photo 35 ASS treatment area – surface water drainage pit and pump-out system to storage tanks



Photo 36 ASS treatment area – surface water storage tanks

Stockpiled materials at northern end and central part of Facility



Photo 37 Stockpile area at northern end of Facility



Photo 38 Stockpiling of different waste types in bins

Waste screening operations in centre Facility area



Photo 39 Mixed Waste stockpiles prior to screening



Photo 40 Front end loader used to feed screening plant with Mixed Waste and to manage screened materials



Photo 41 Screening plant in operation



Photo 42 Waste processing area in northern part of Facility

Domestic Waste manual unloading area



Photo 43 Undercover unloading area for Domestic Waste



Photo 44 Sprinkler system in Domestic Waste shed

Photo 45 CCTV in Domestic Waste shed

Waste separation operations in Main Processing Building



Photo 46 View of Main Processing Building

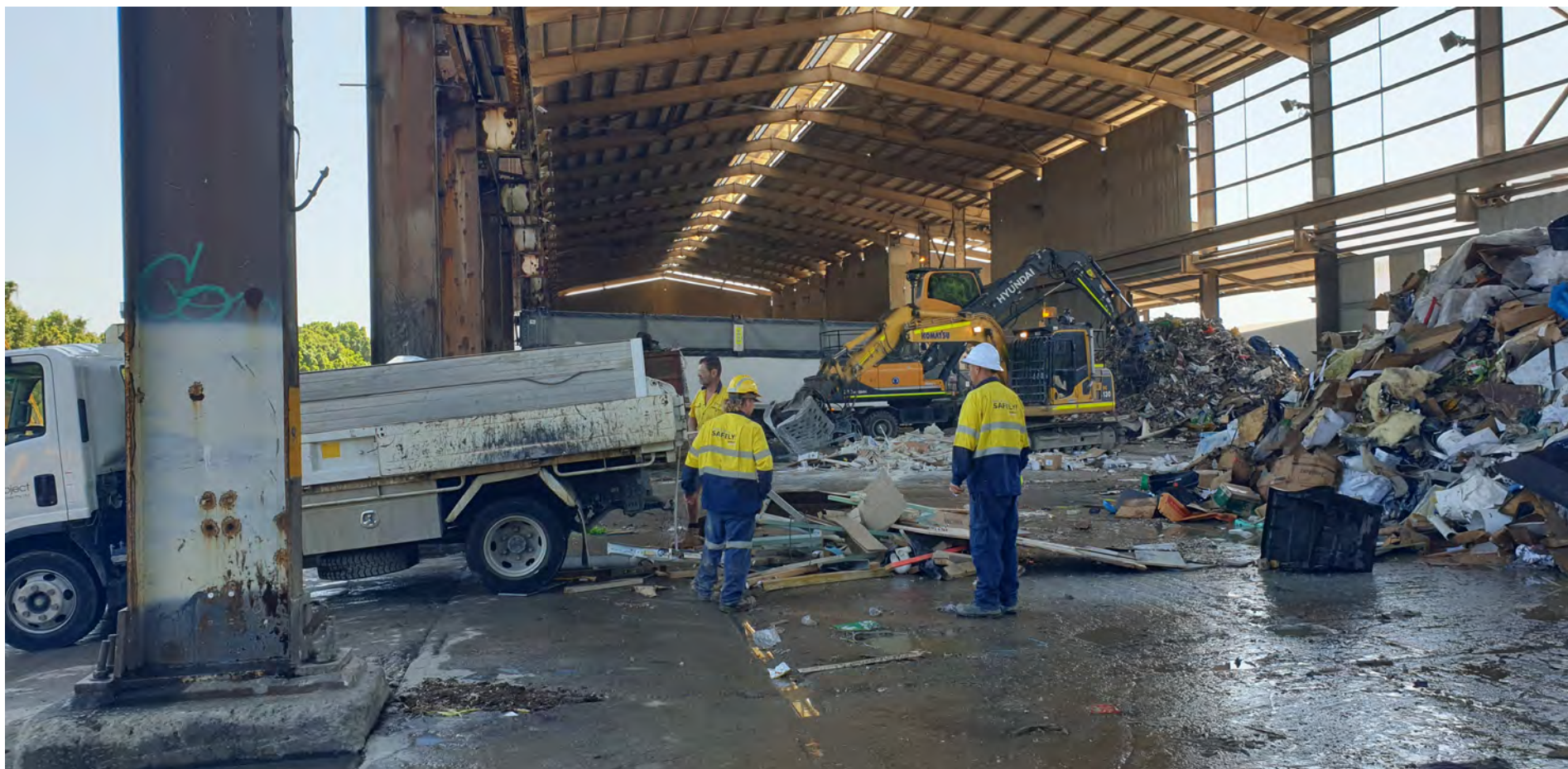


Photo 47 Unloading of waste at southern end of Main Processing Building



Photo 48 Unprocessed waste at southern end of Main Processing Building



Photo 49 Stockpiled waste at northern end of main building prior to separation and with dust suppression sprays operating



Photo 50 Main Processing Building looking south from northern end



Photo 51 Stockpile height marker at northern end of Facility



Photo 52 Storage of chemical waste on bunded pallets



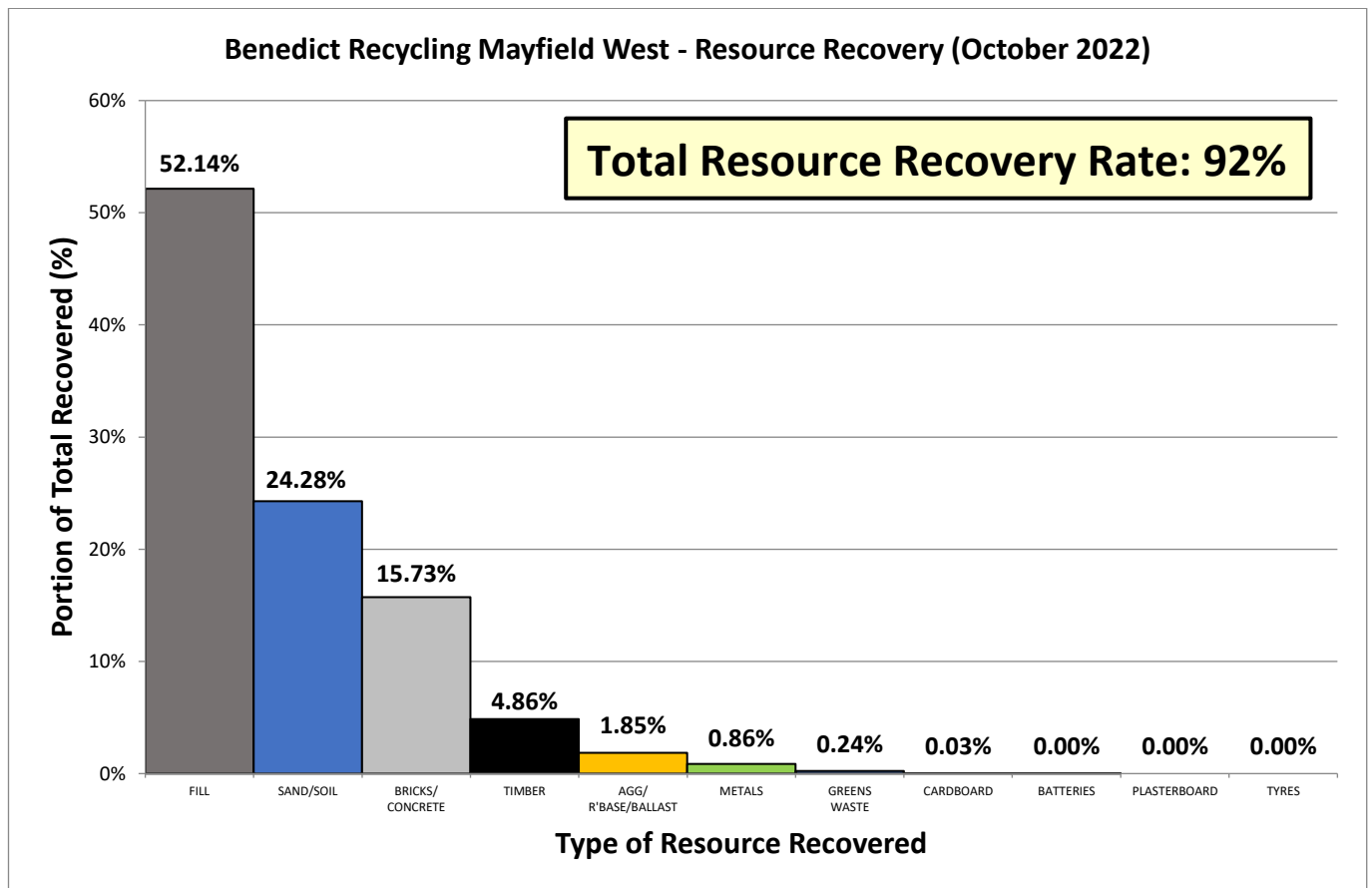
Photo 53 Spent battery storage on banded pallets

Appendix G. Monthly Resource Recovery Reports for Newcastle Facility Oct'22 – Aug'25

Resource Recovery Rate Summary Report

Site: Newcastle

Period: October 2022

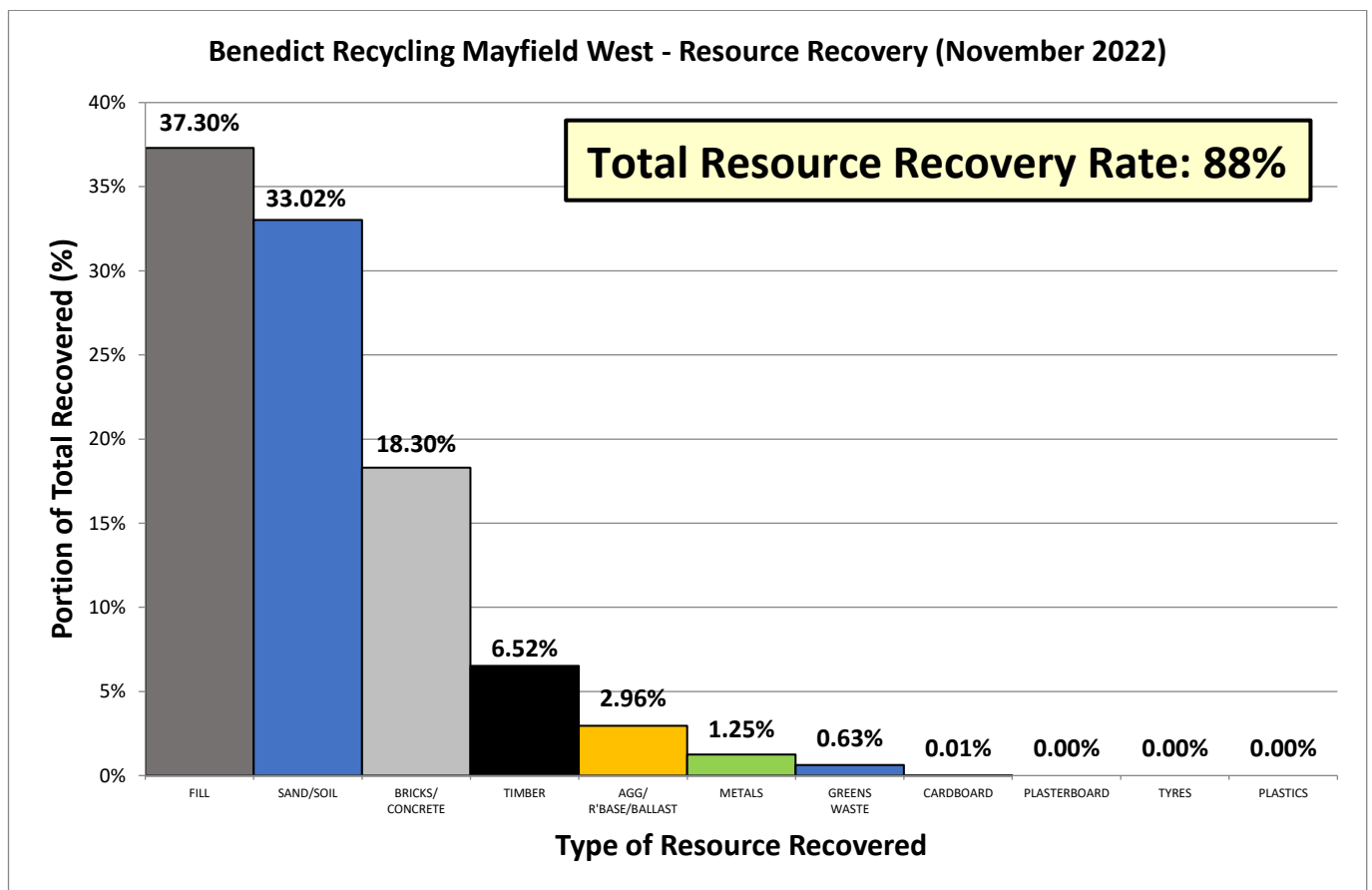


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: November 2022

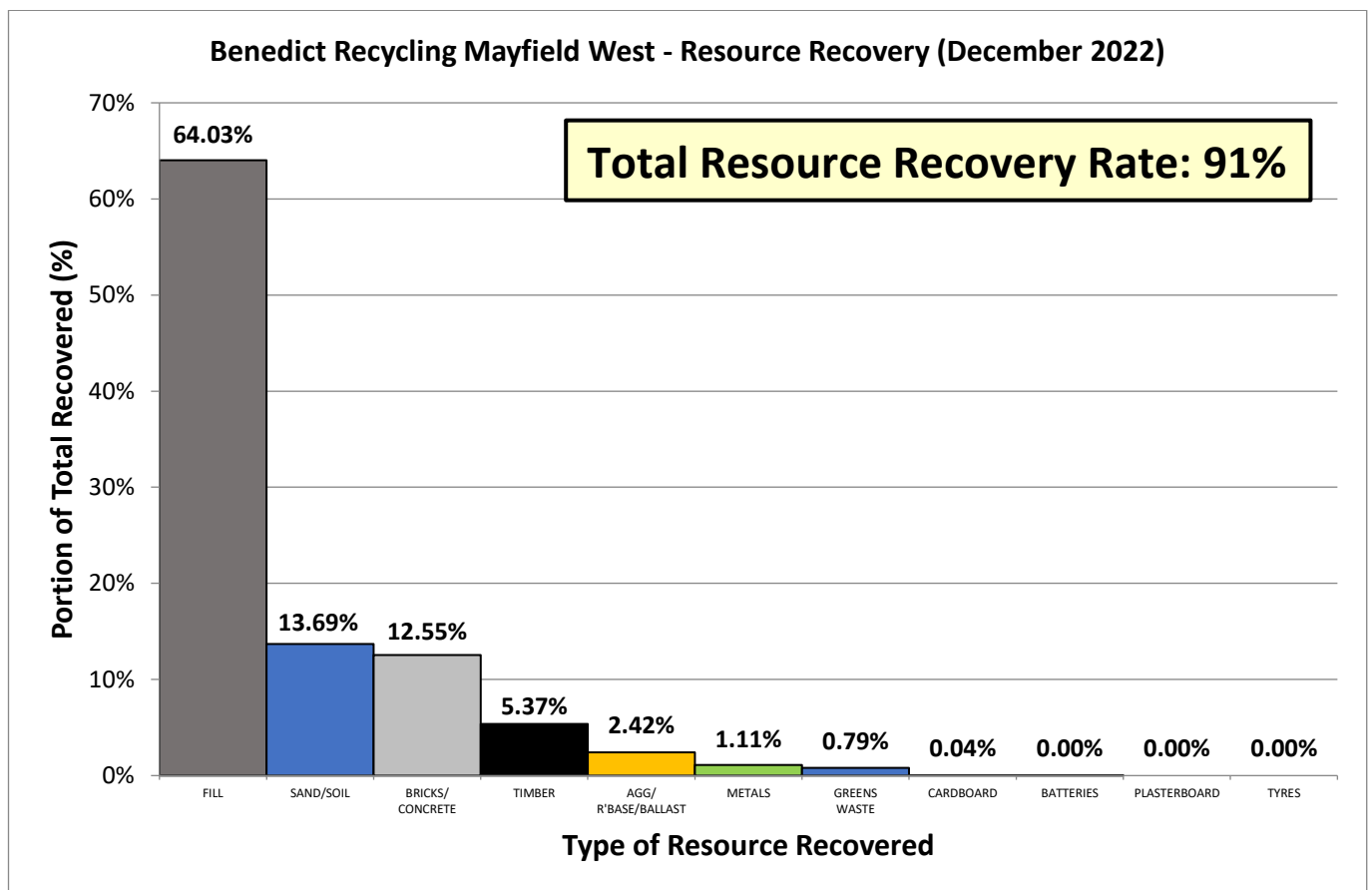


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: December 2022

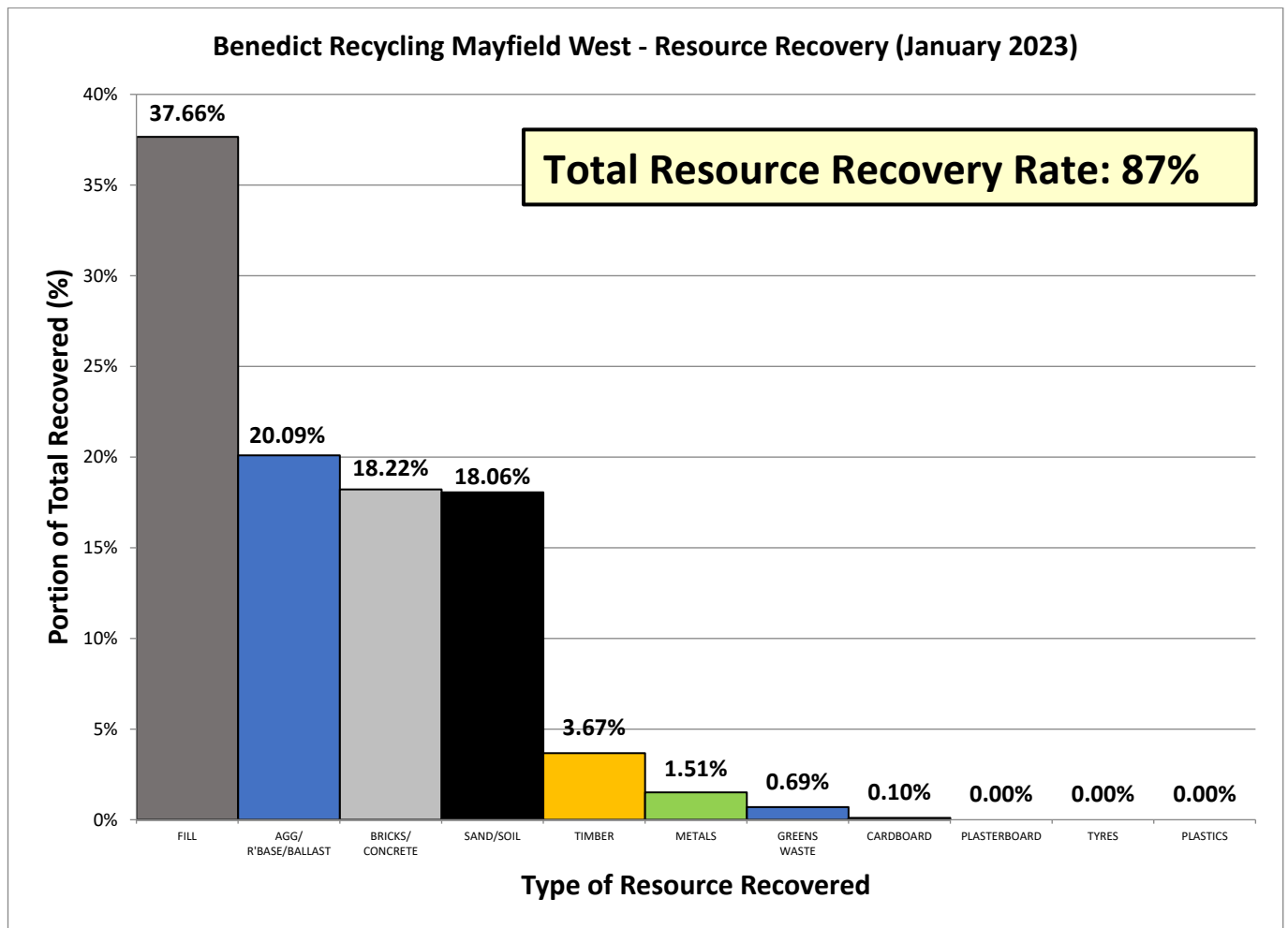


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: January 2023

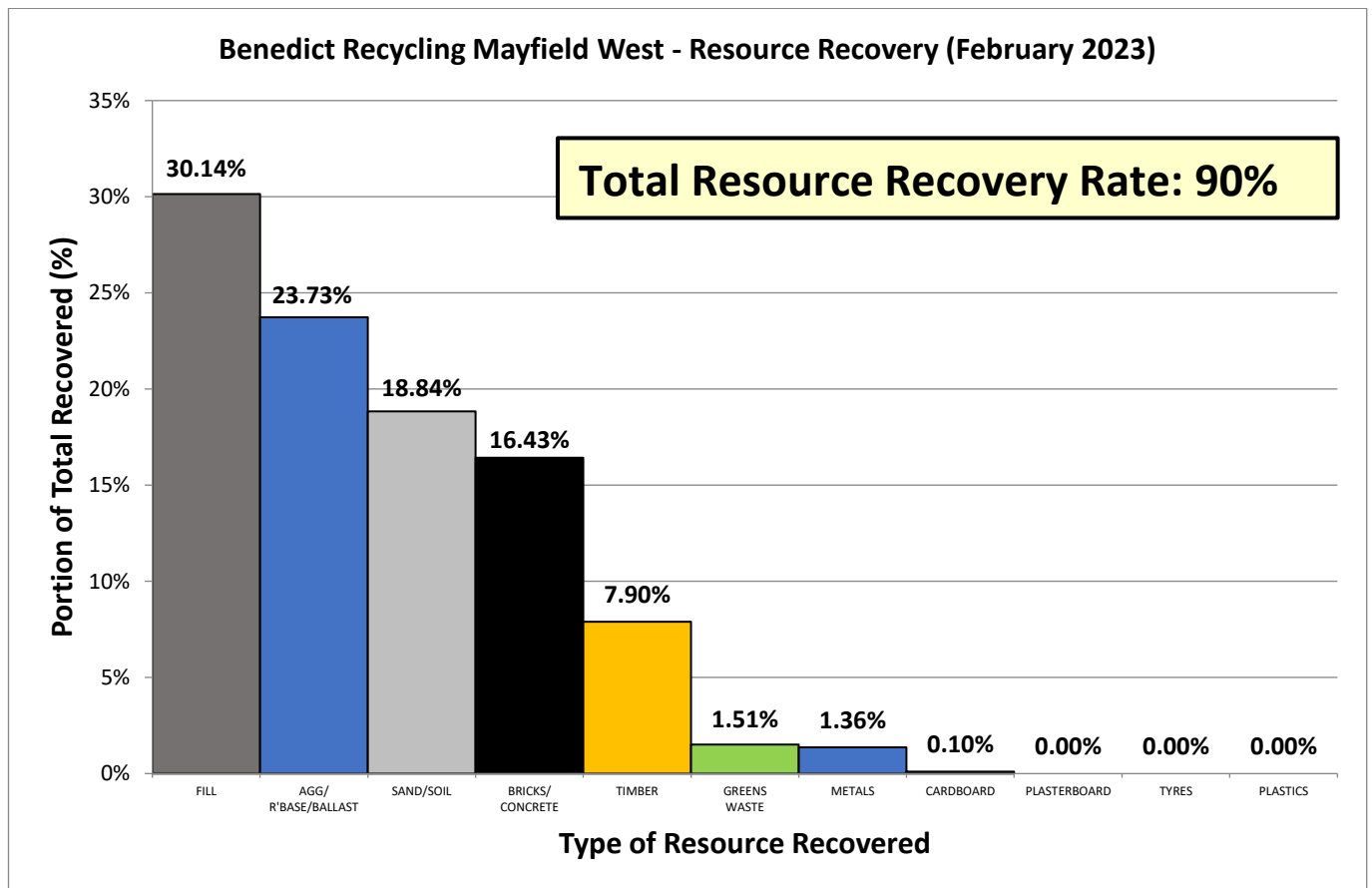


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: February 2023

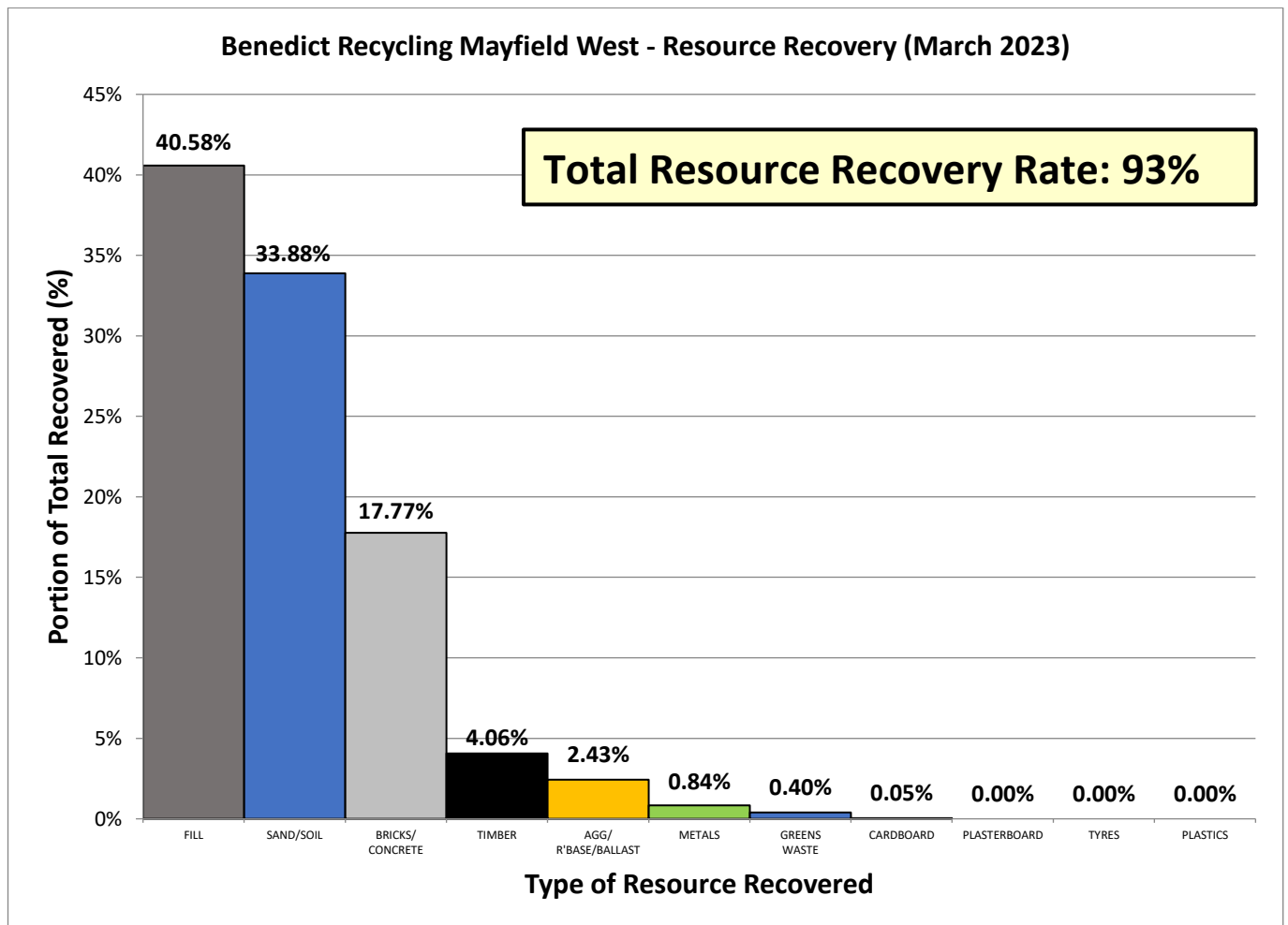


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: March 2023

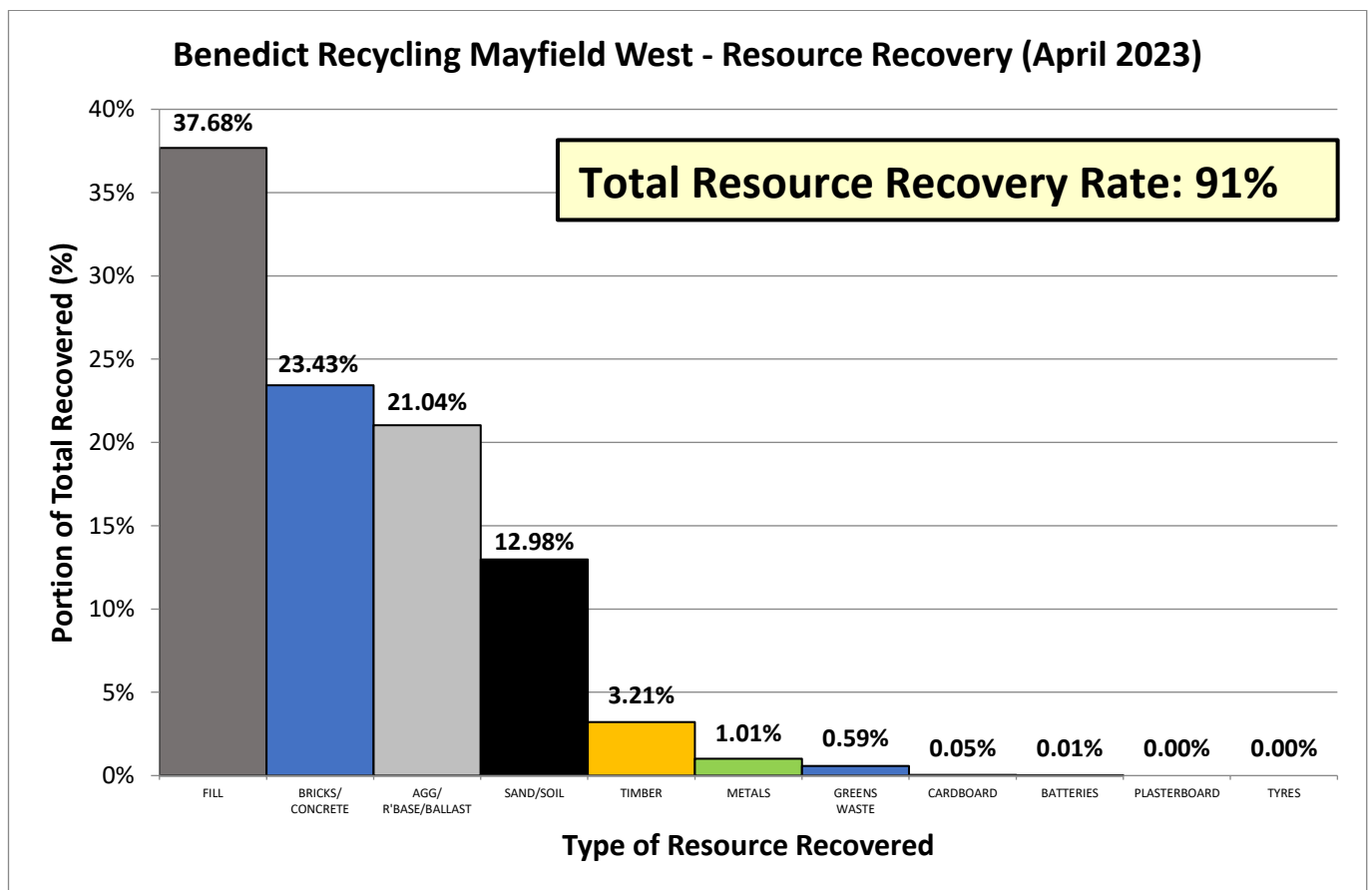


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: April 2023

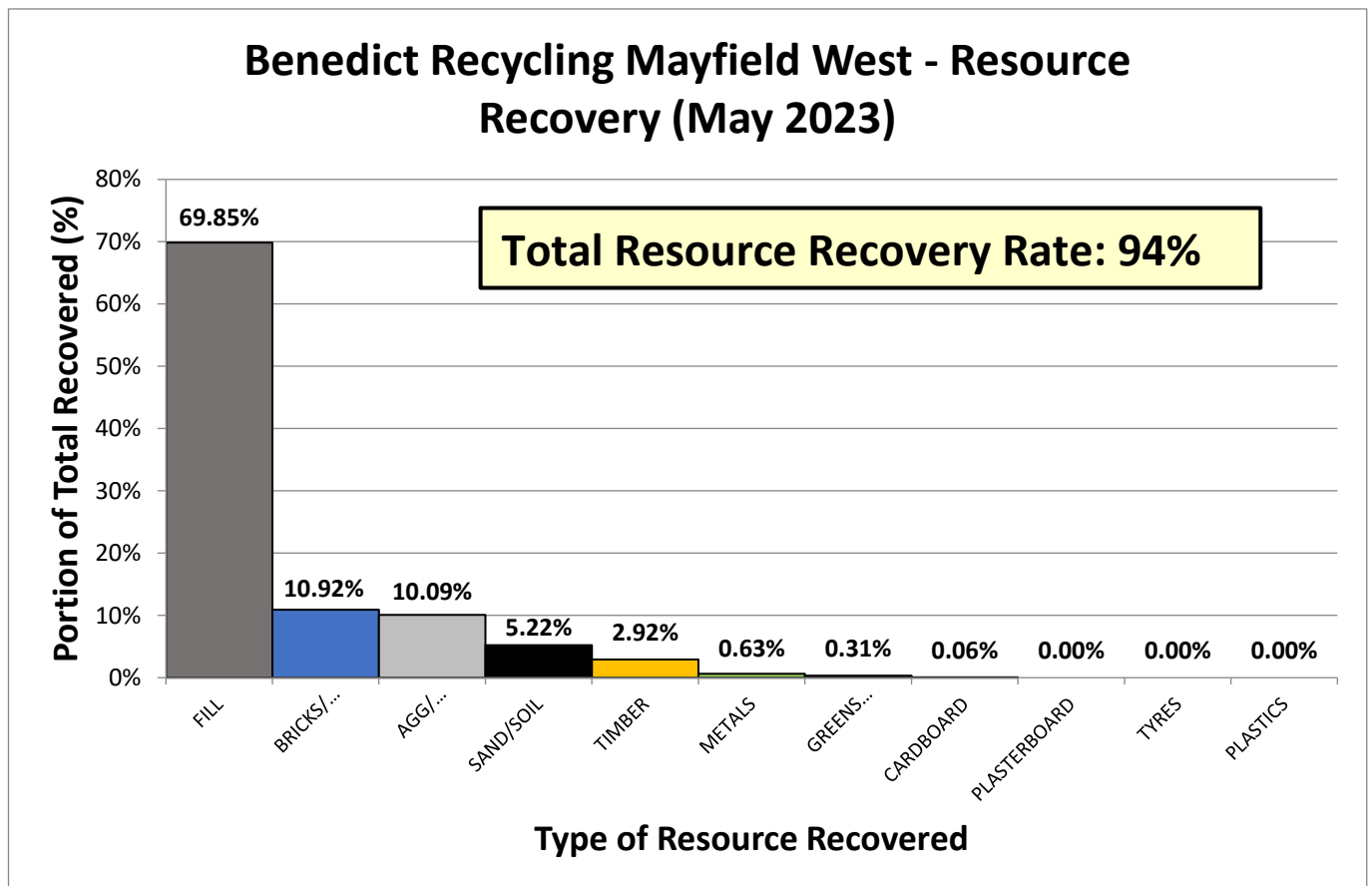


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: May 2023

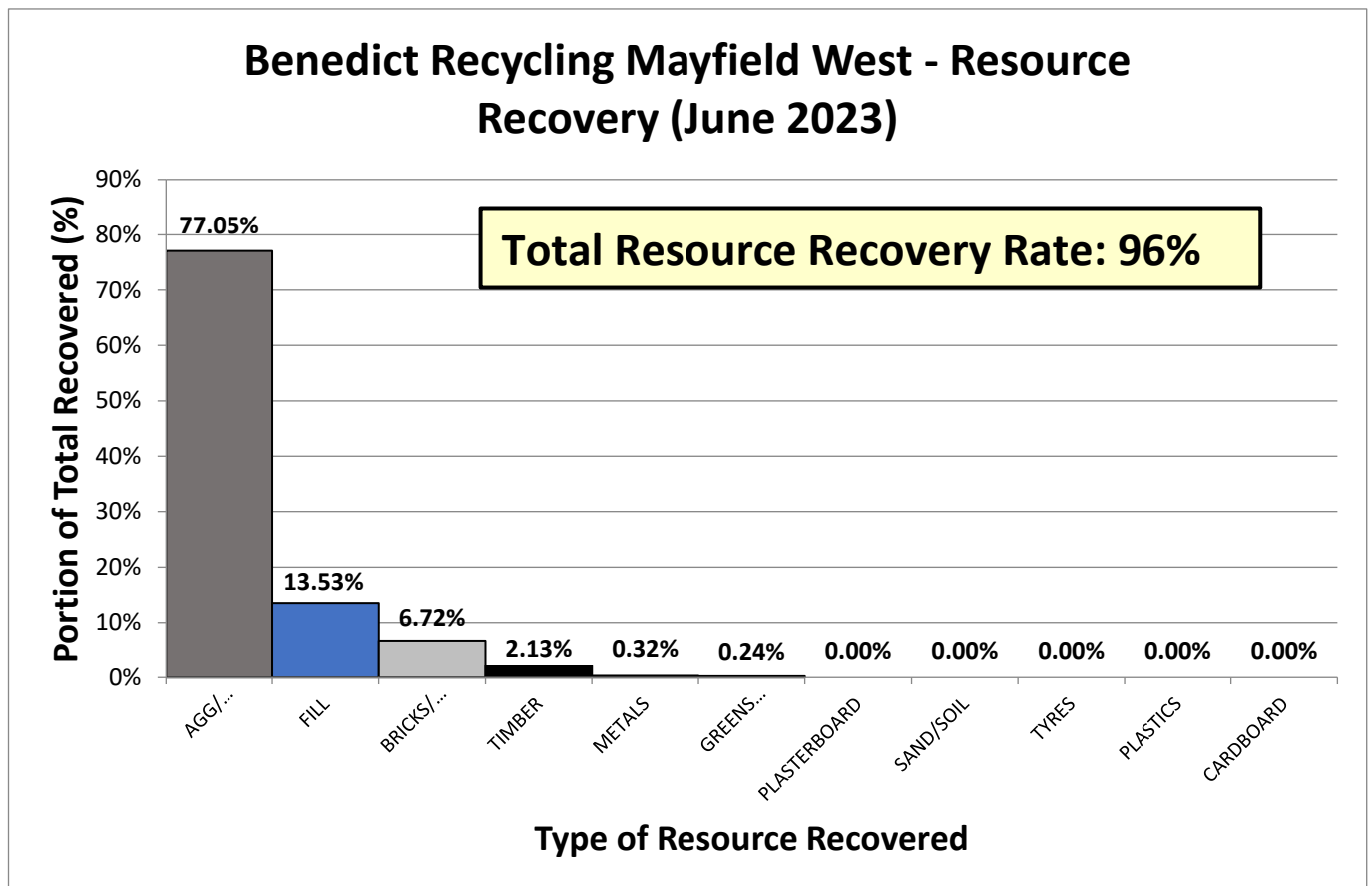


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: June 2023

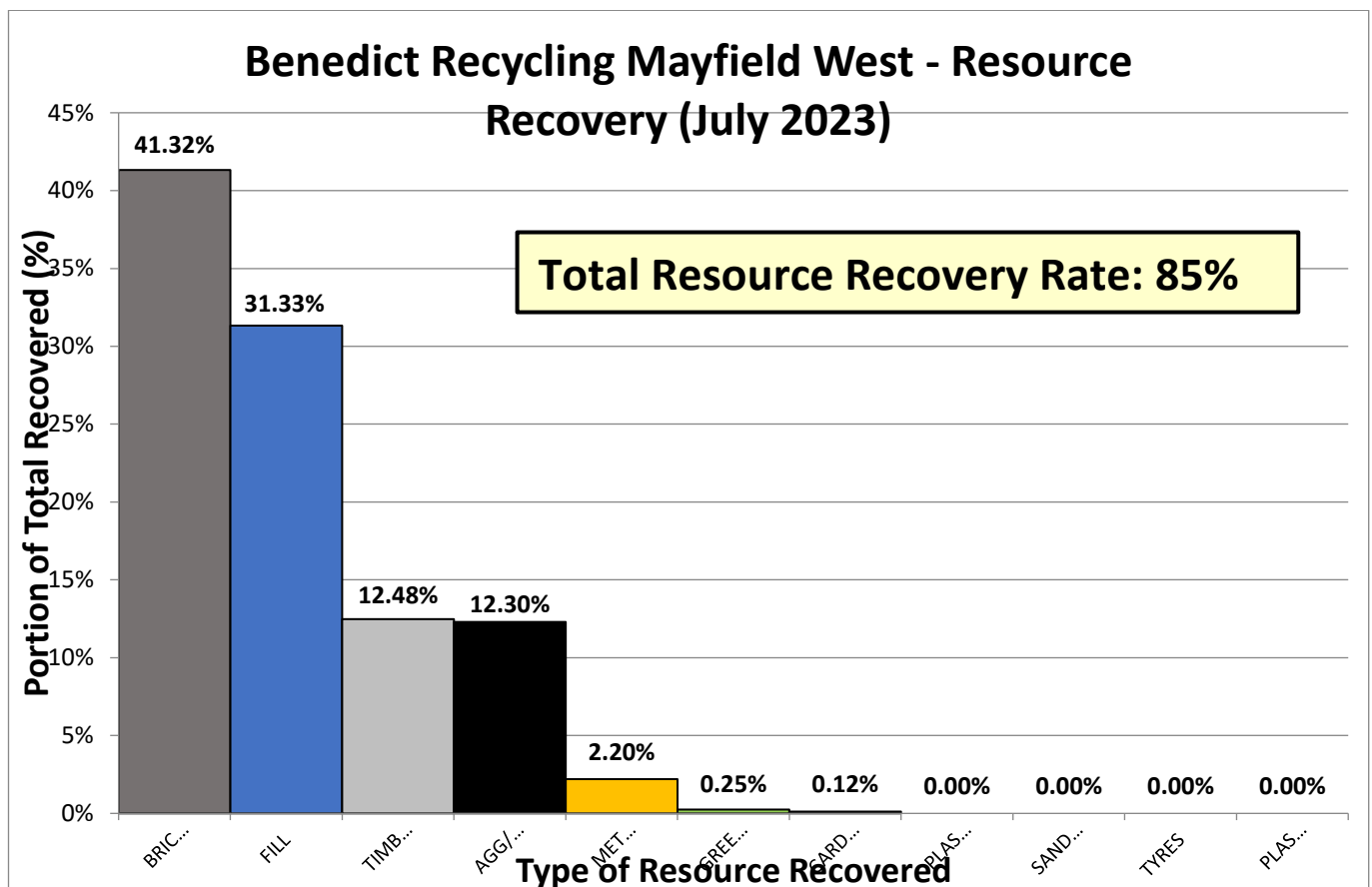


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: July 2023

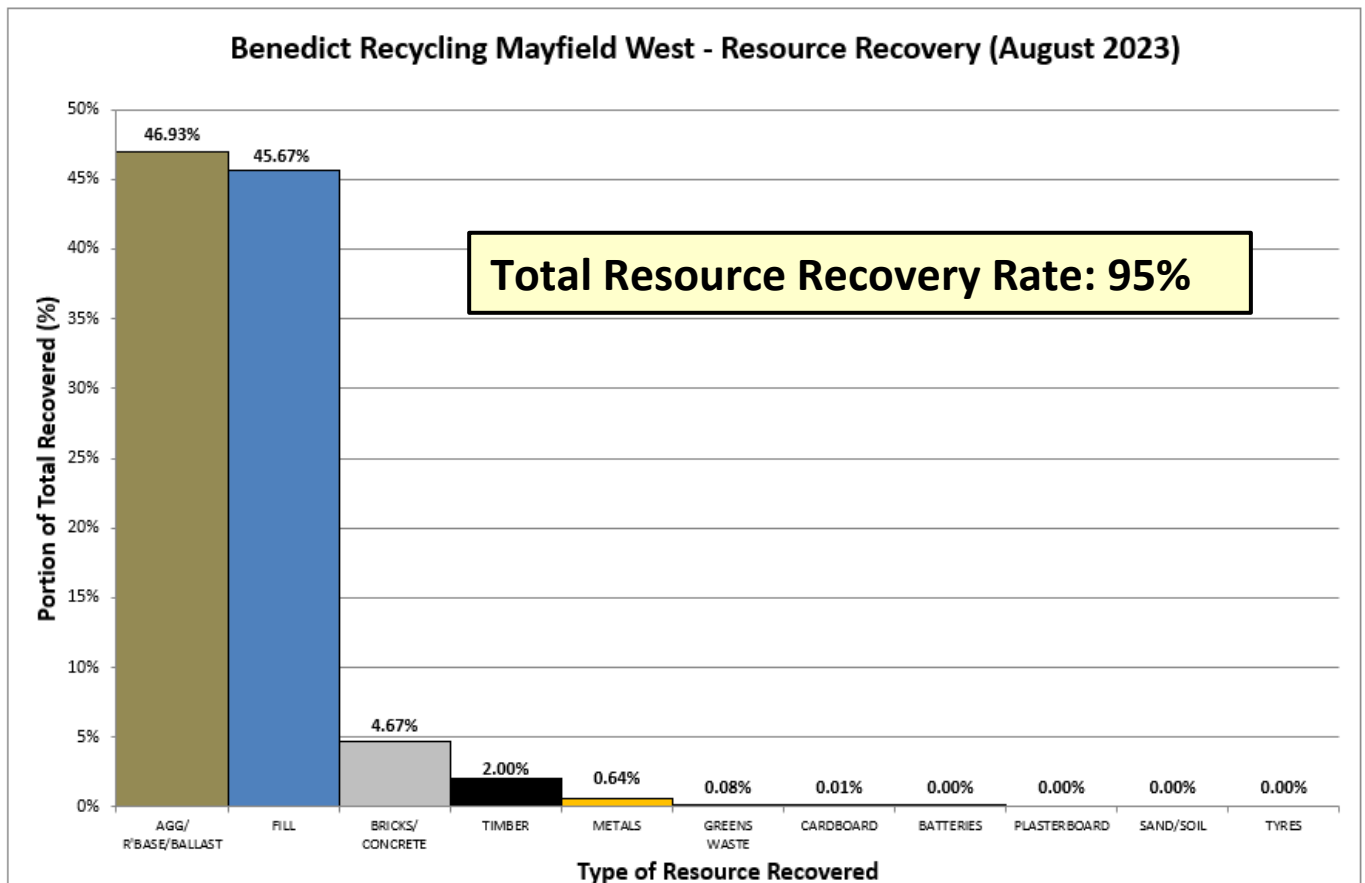


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: August 2023

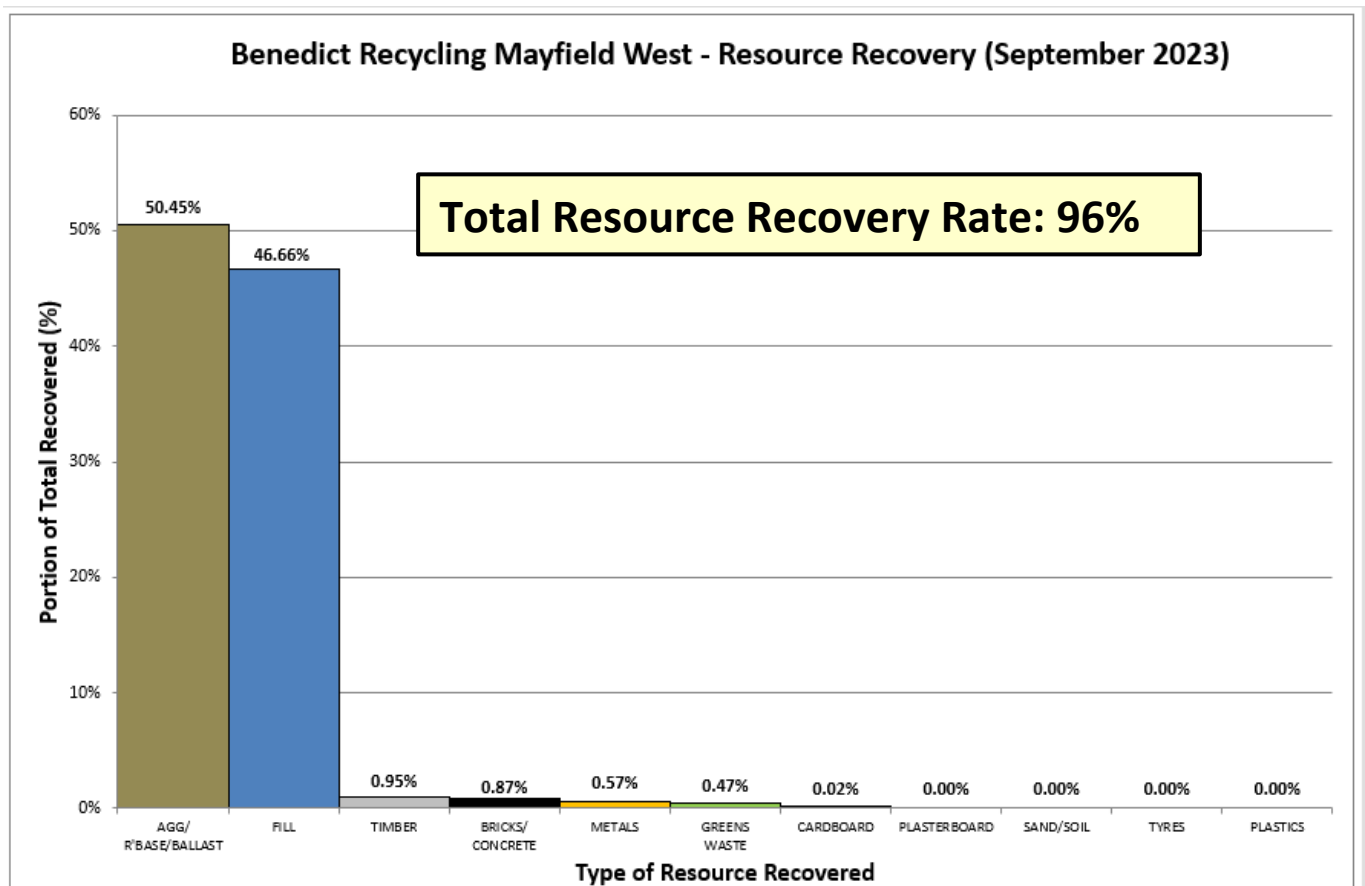


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: September 2023



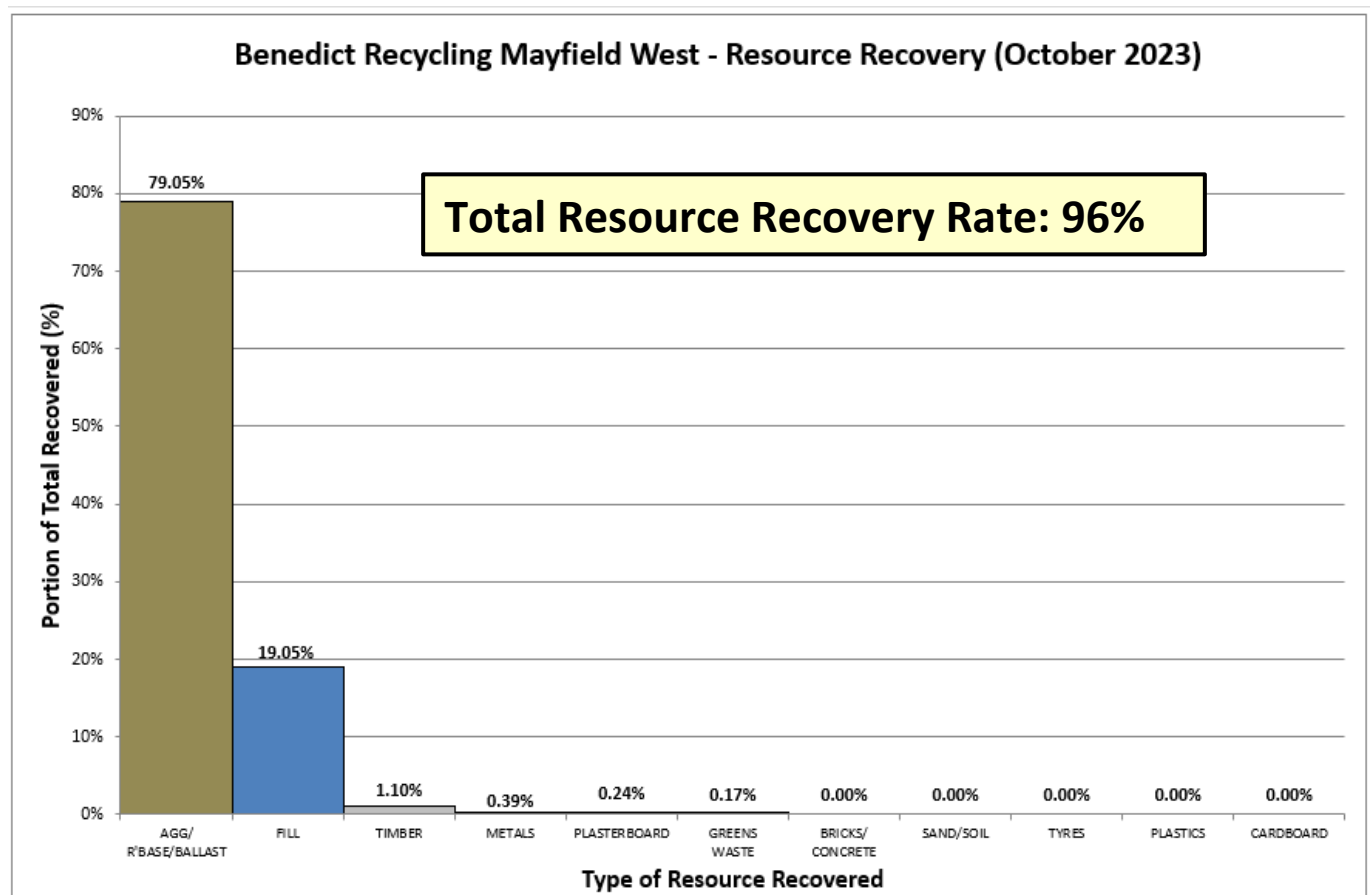
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Total Resource Recovery Rate: 95%

Resource Recovery Rate Summary Report

Site: Newcastle

Period: October 2023

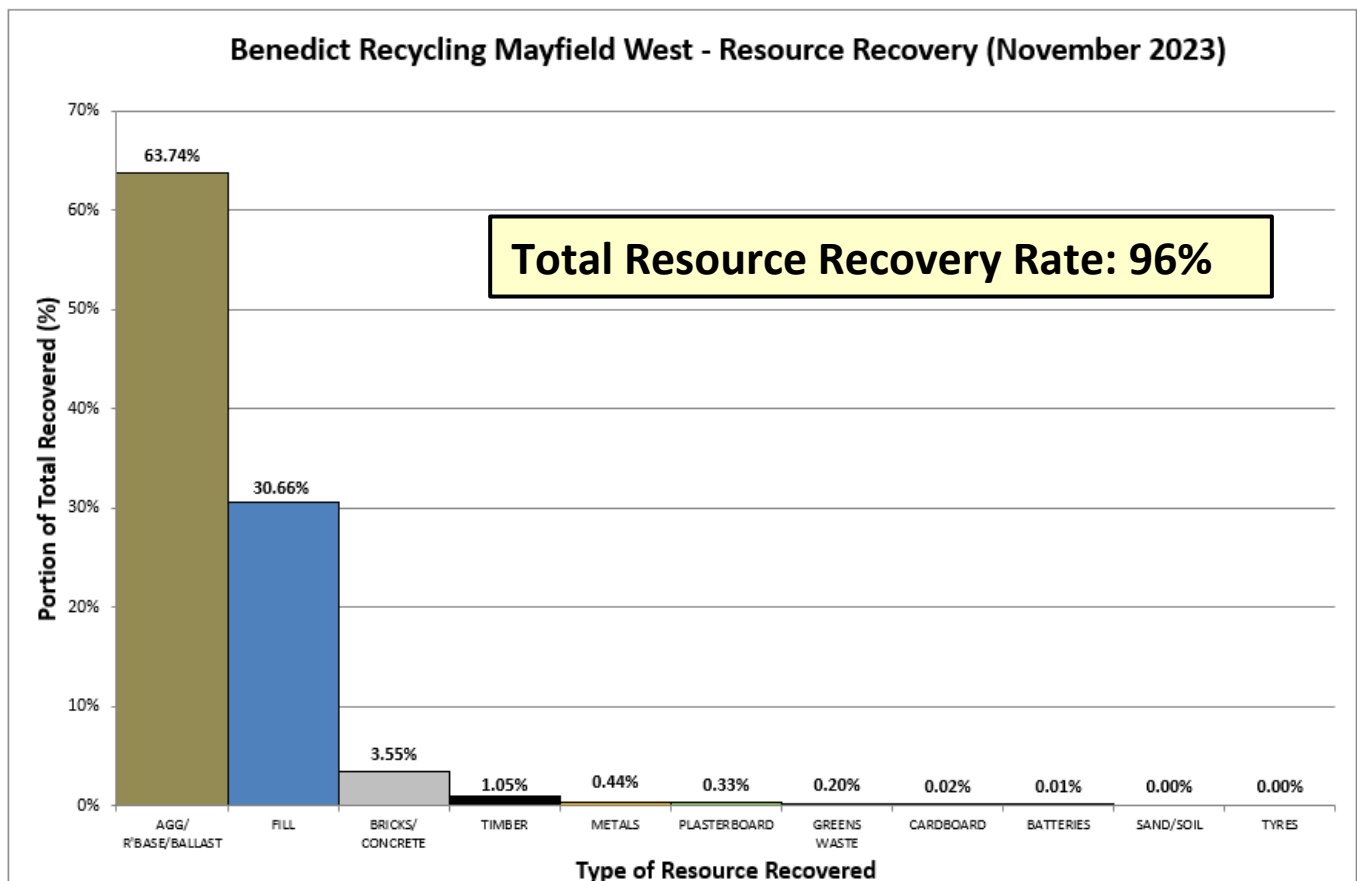


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: November 2023

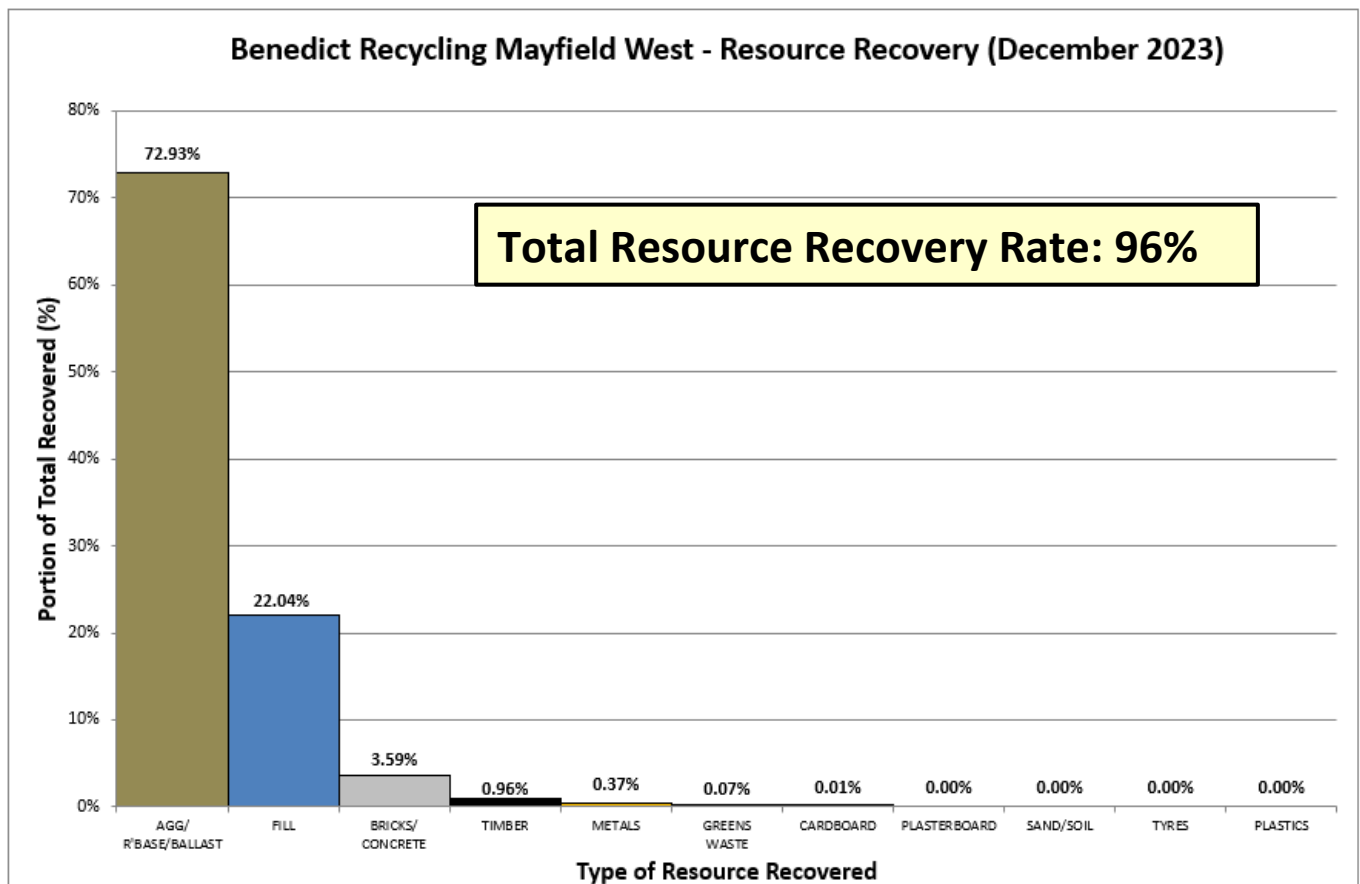


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: December 2023

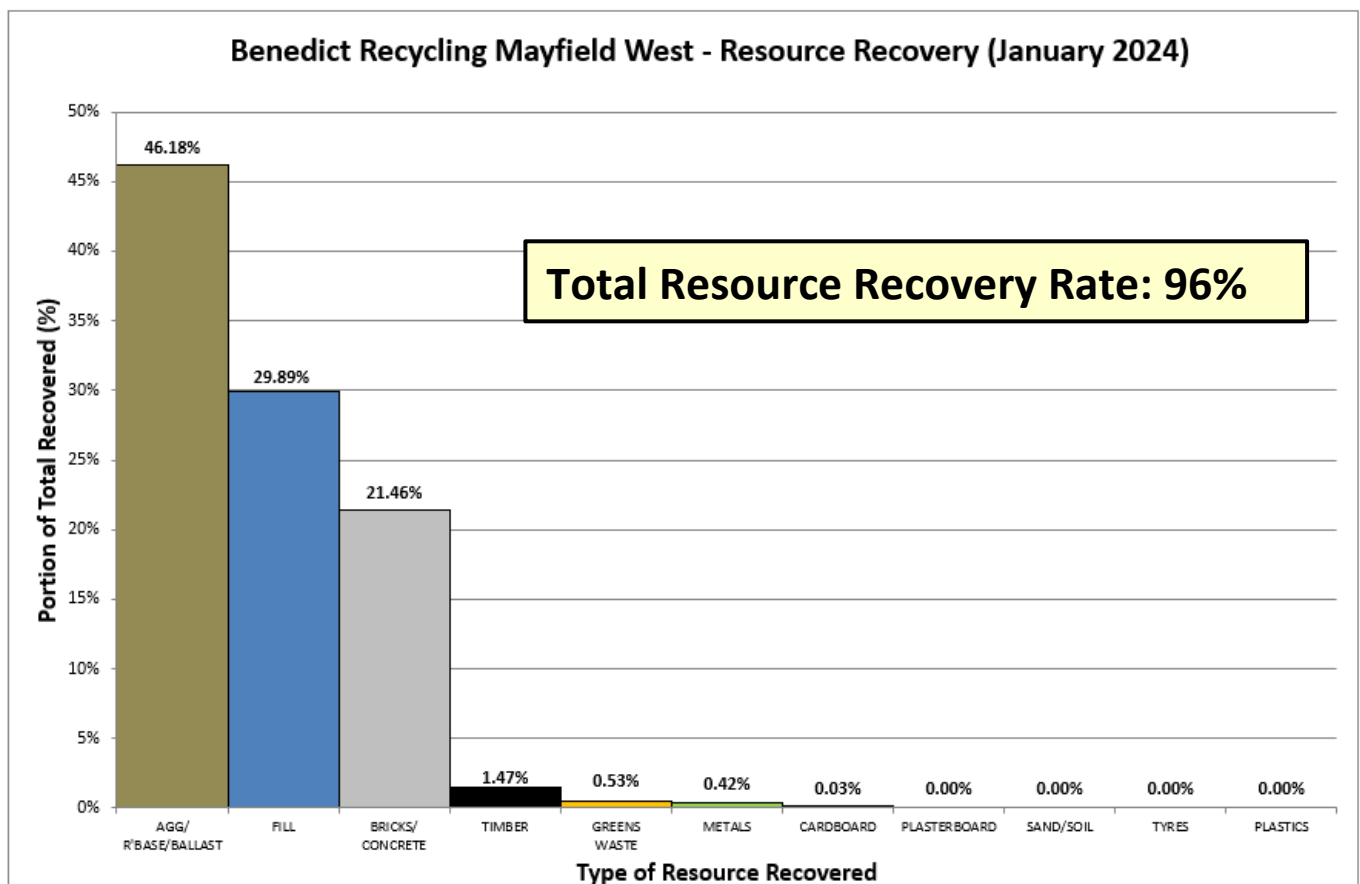


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: January 2024

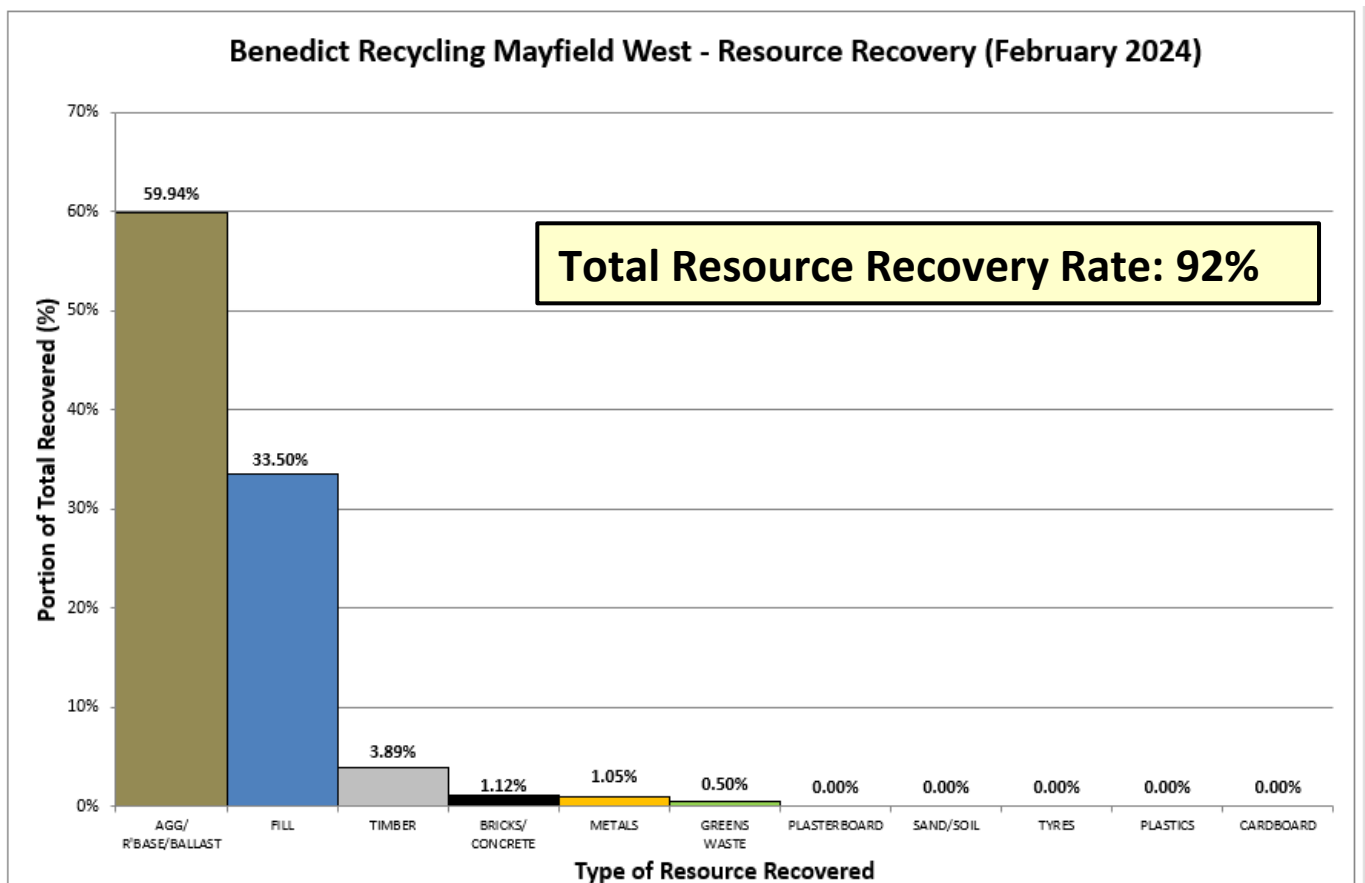


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: February 2024

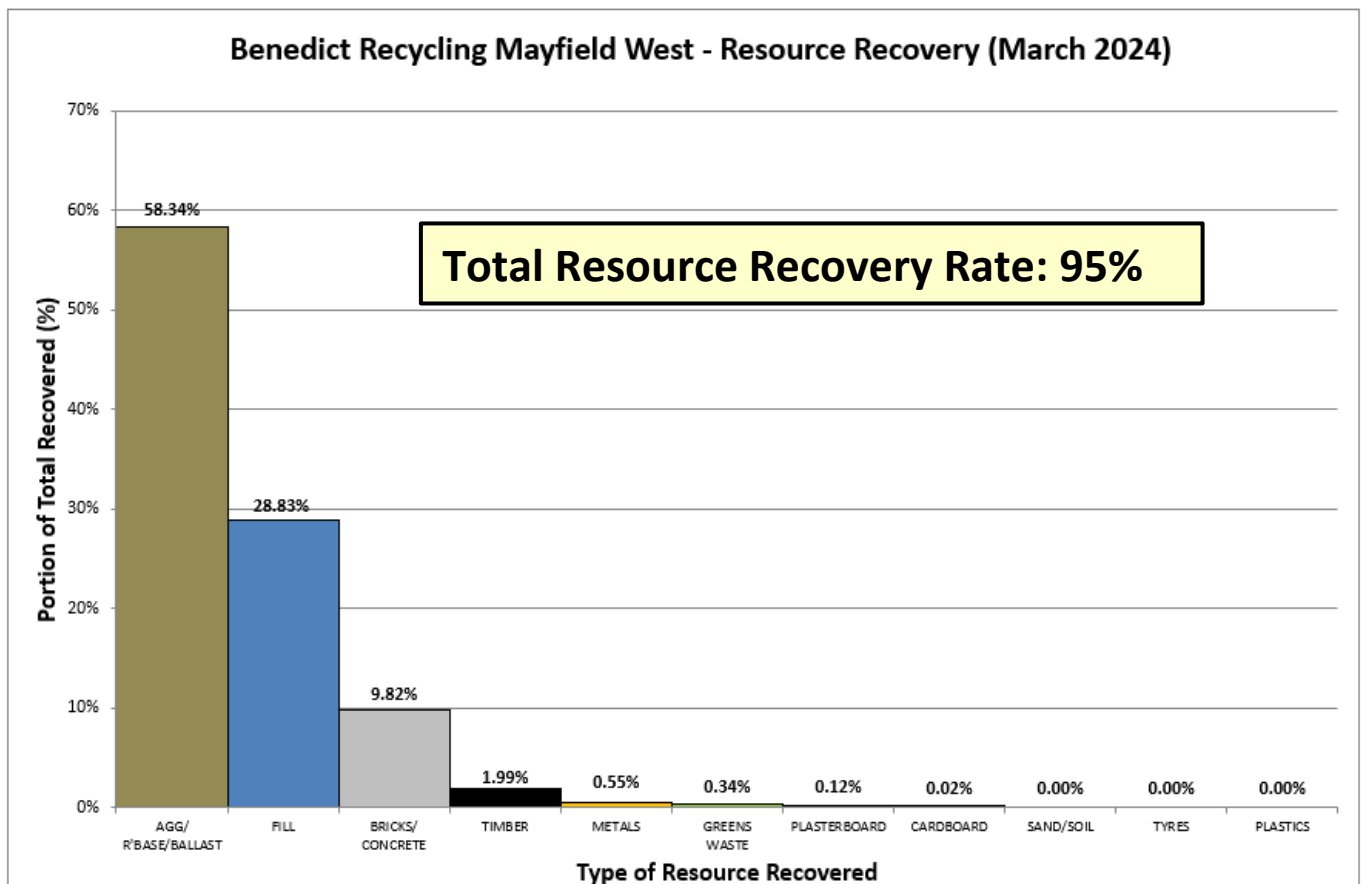


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: March 2024

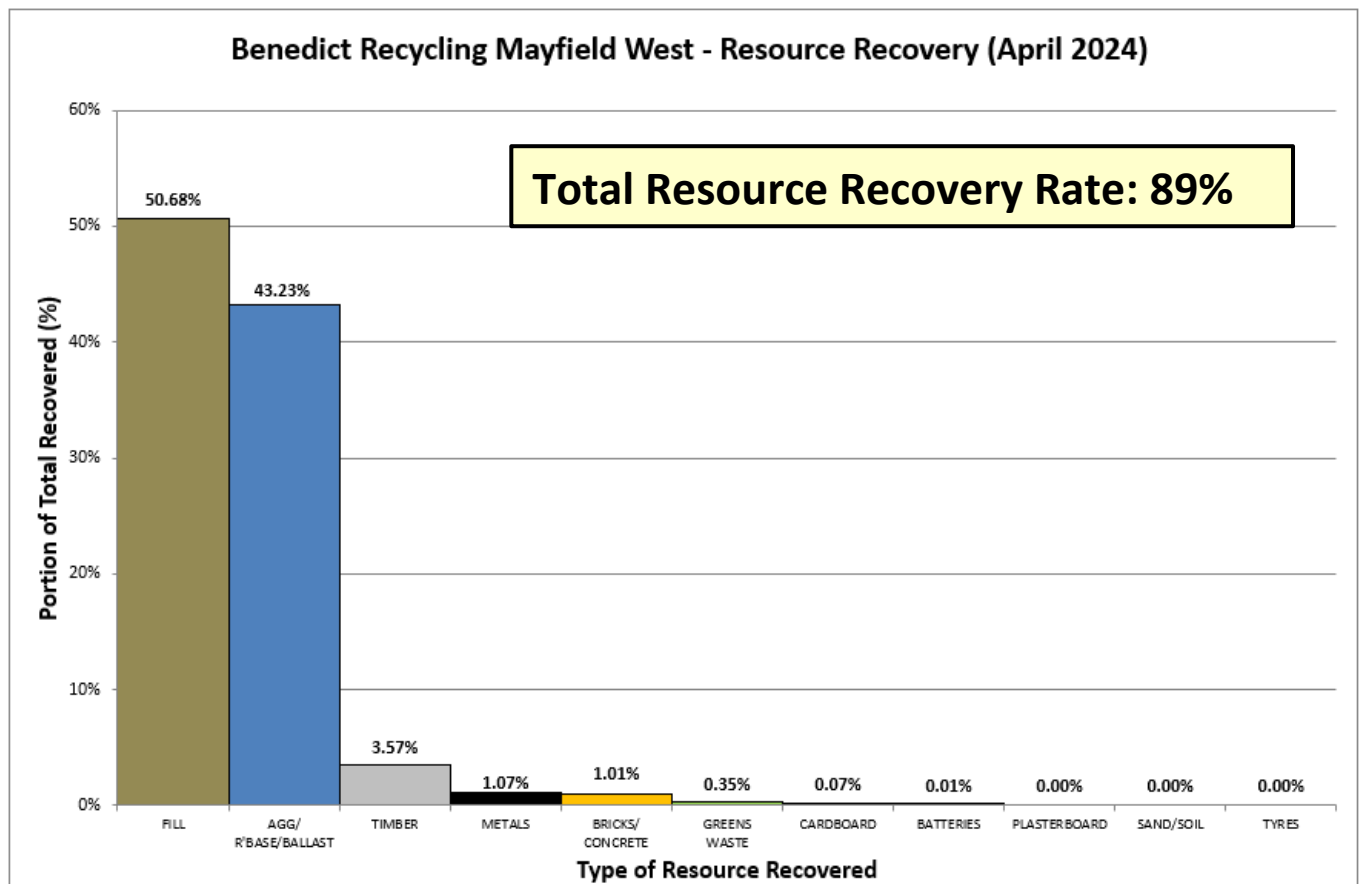


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: April 2024

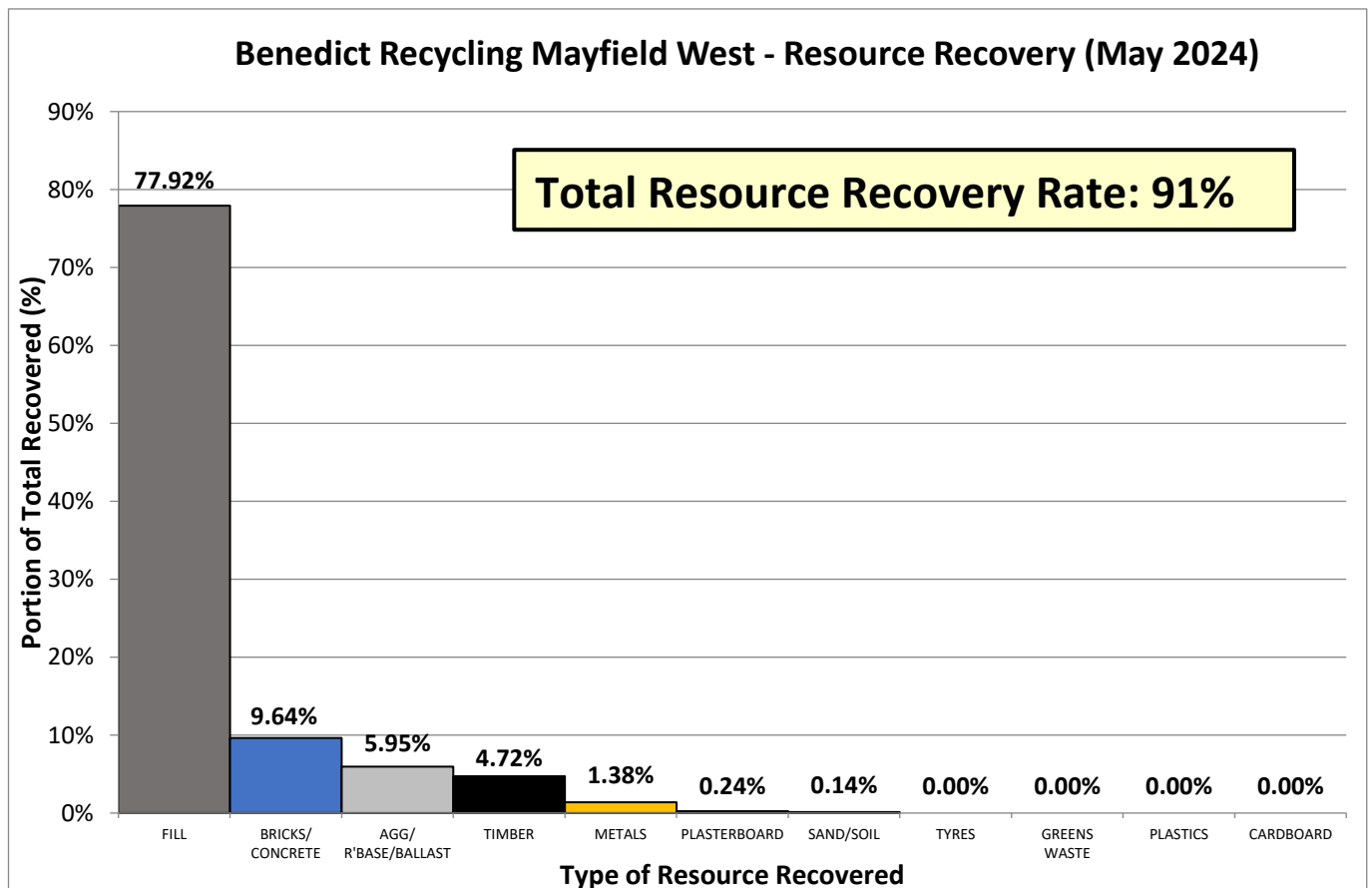


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: May 2024

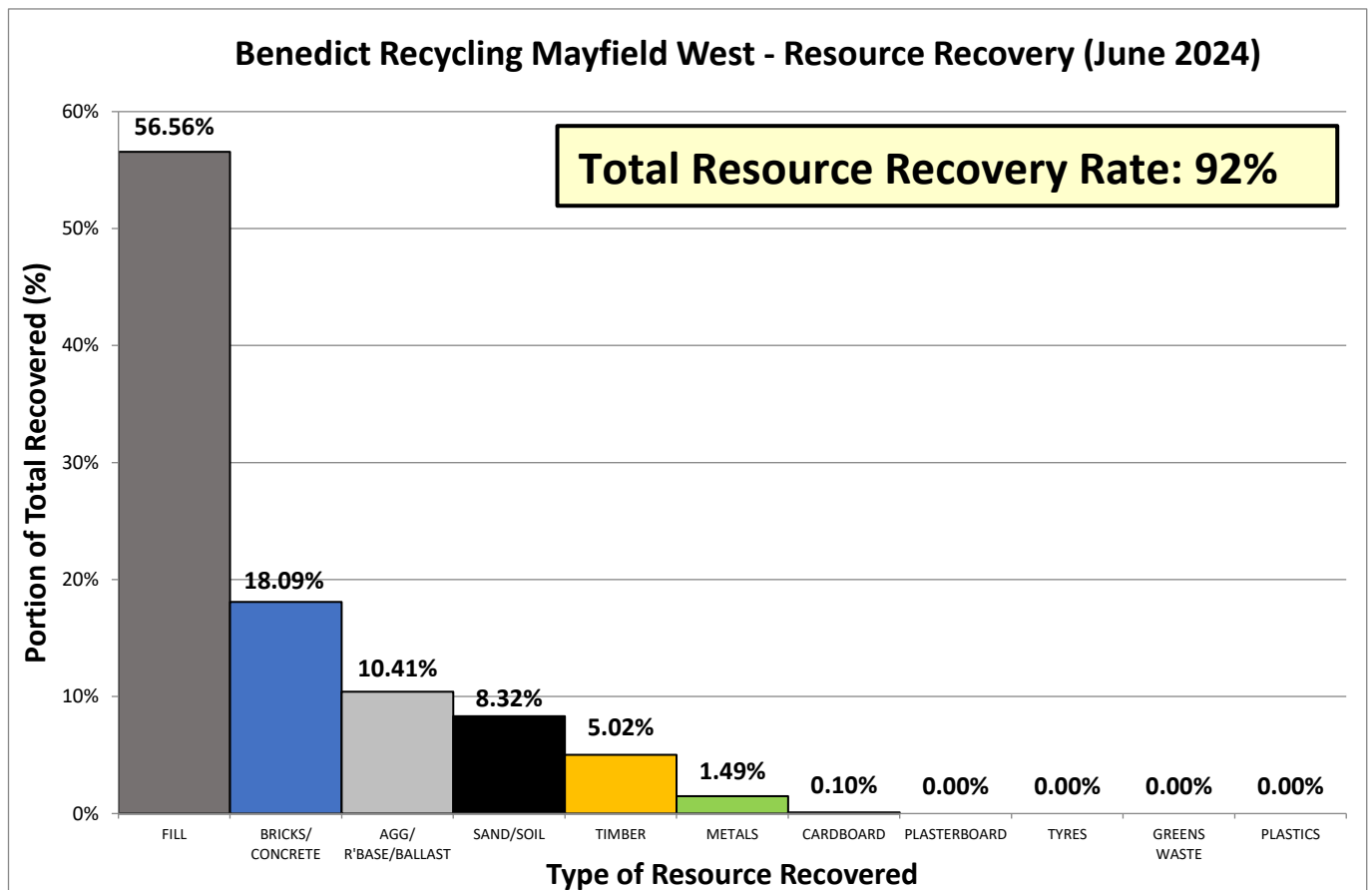


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: June 2024

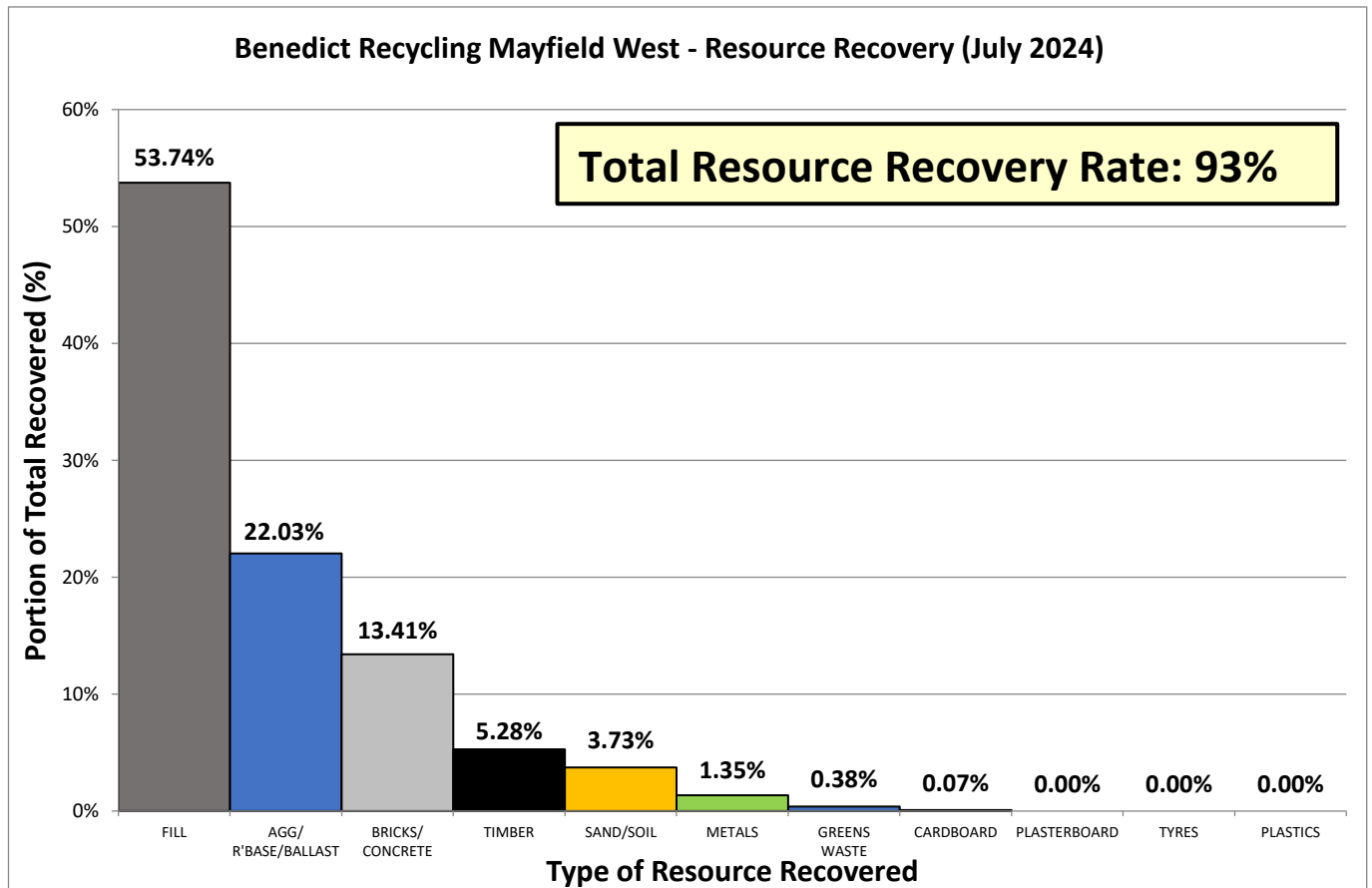


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: July 2024

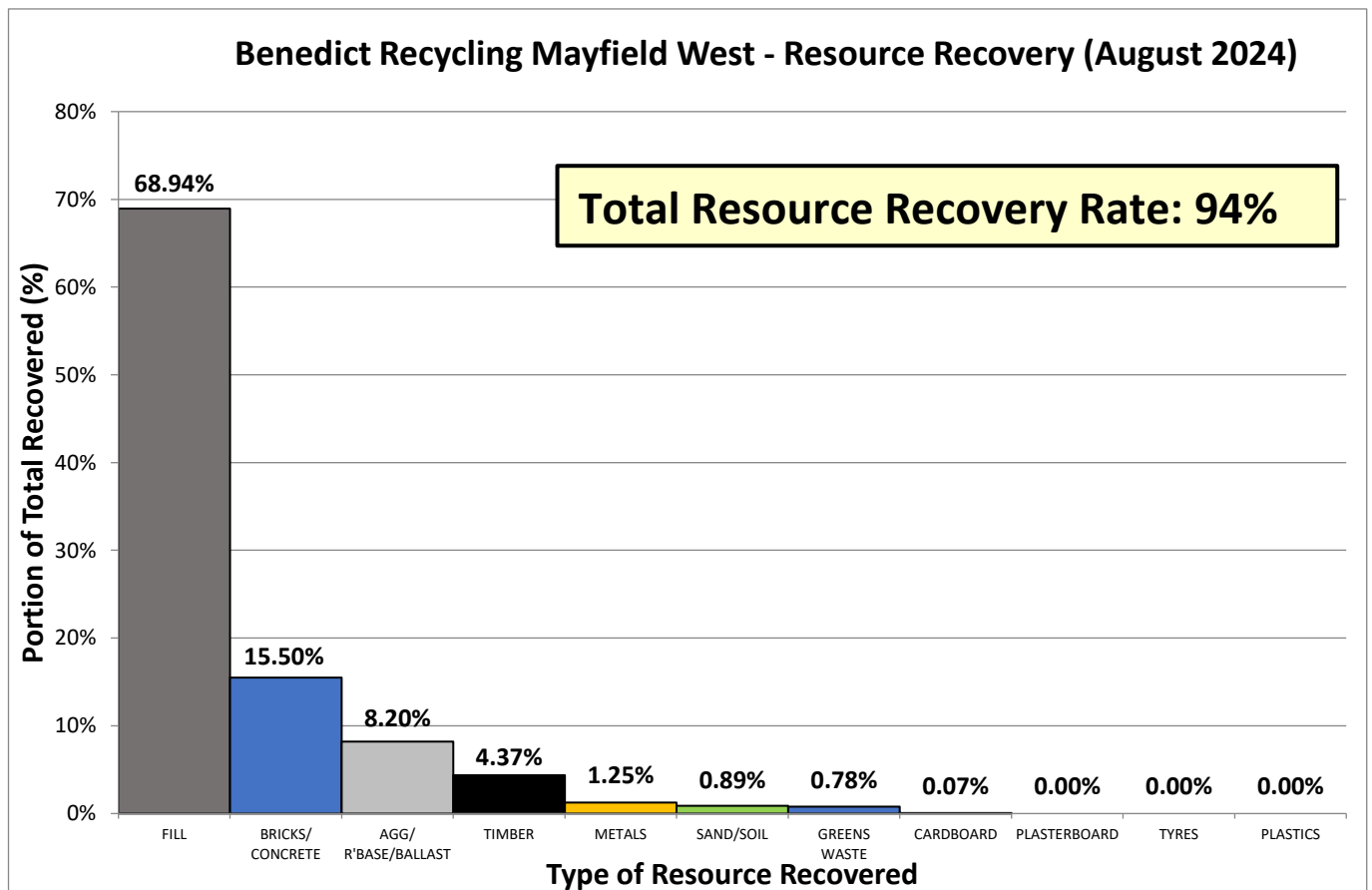


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: August 2024

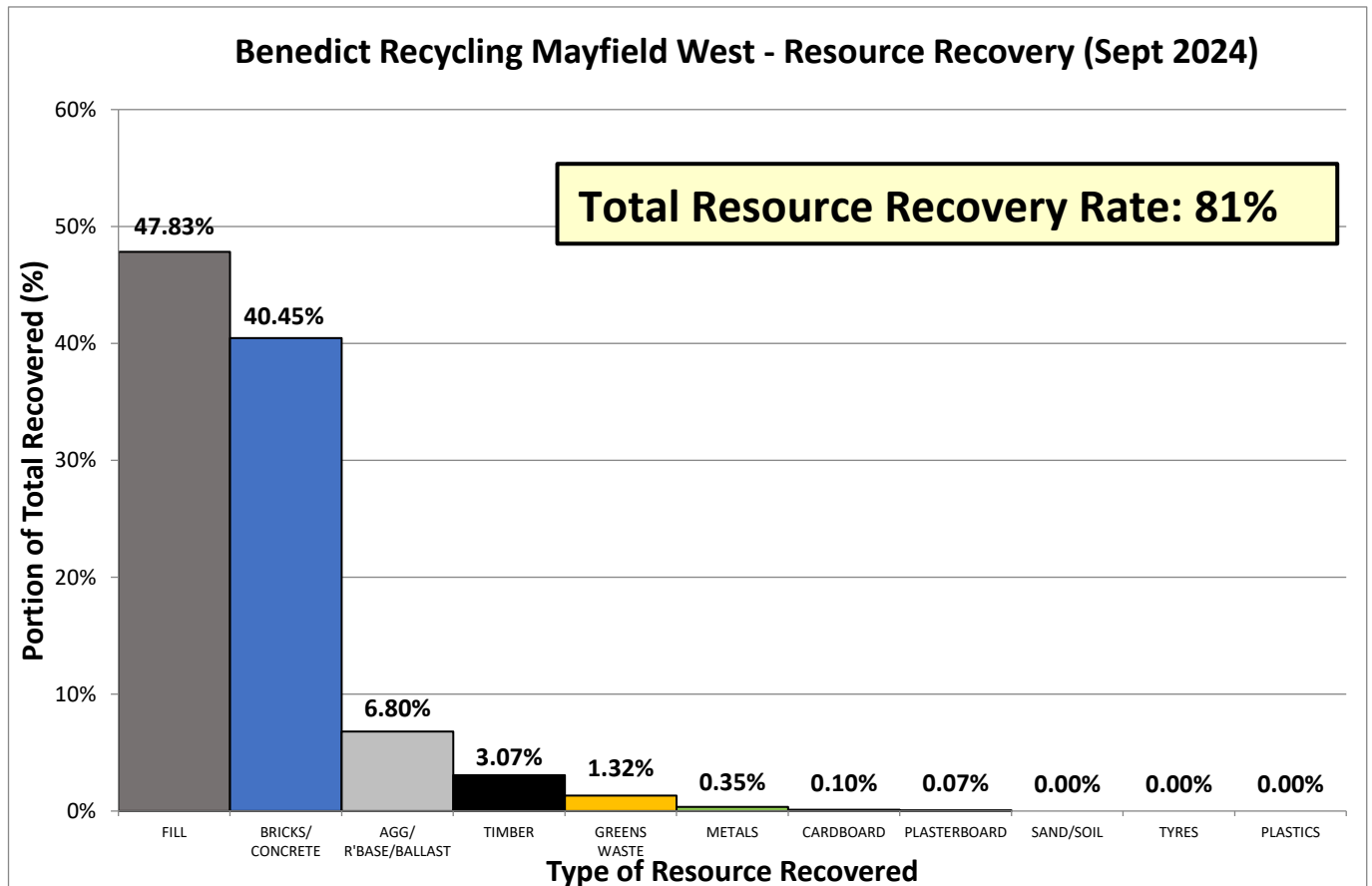


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: September 2024

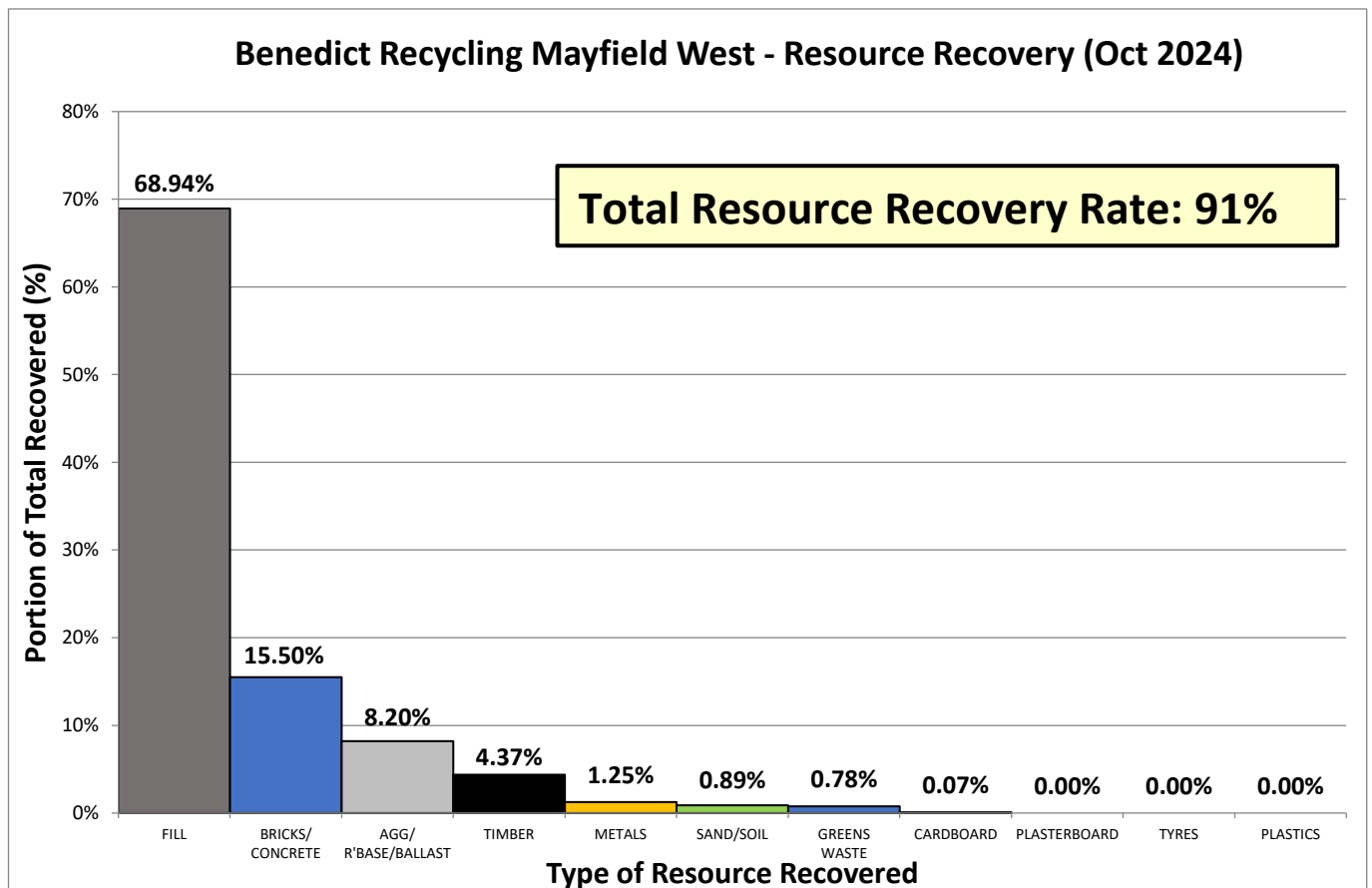


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: October 2024

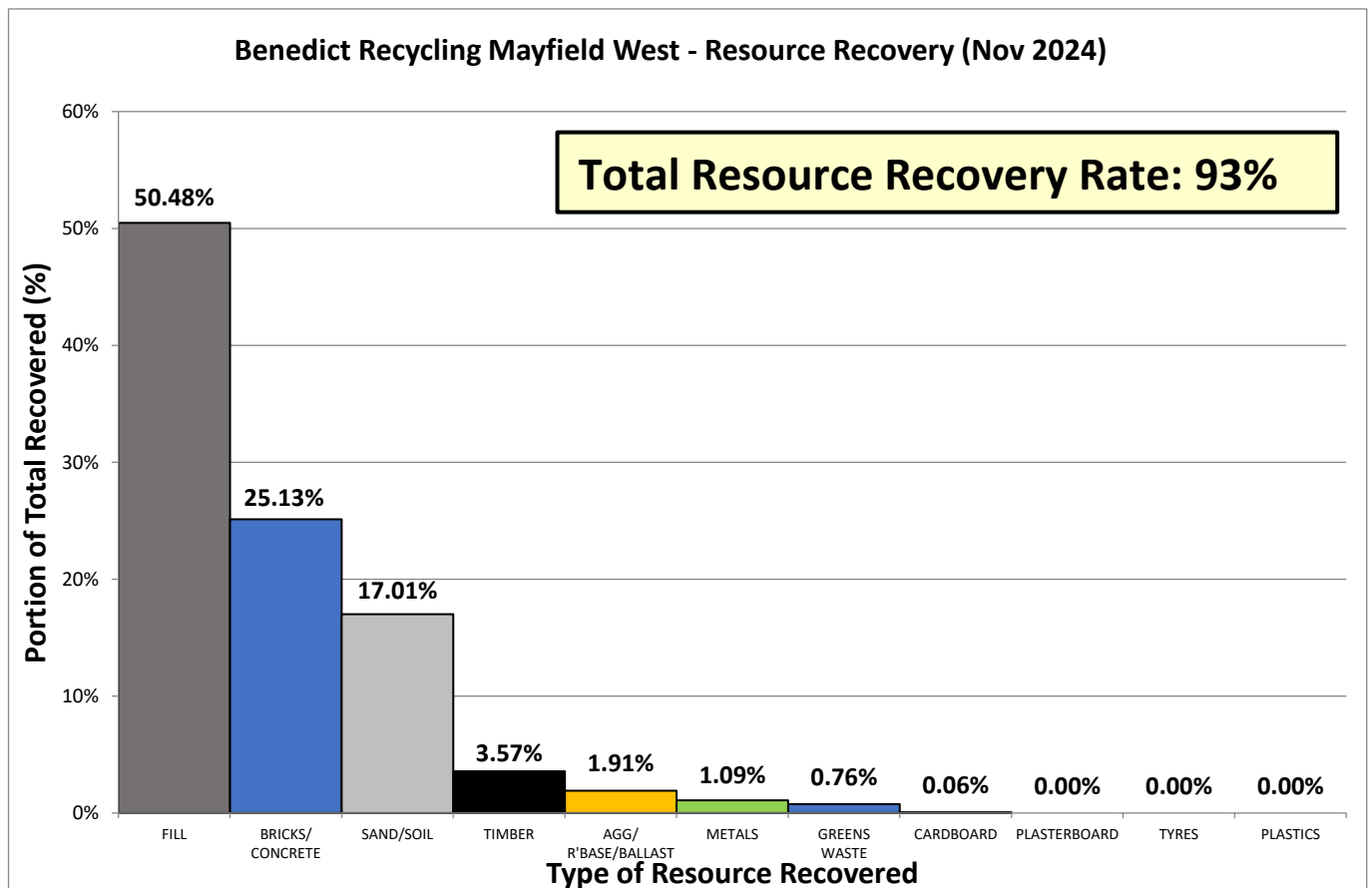


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Period: November 2024

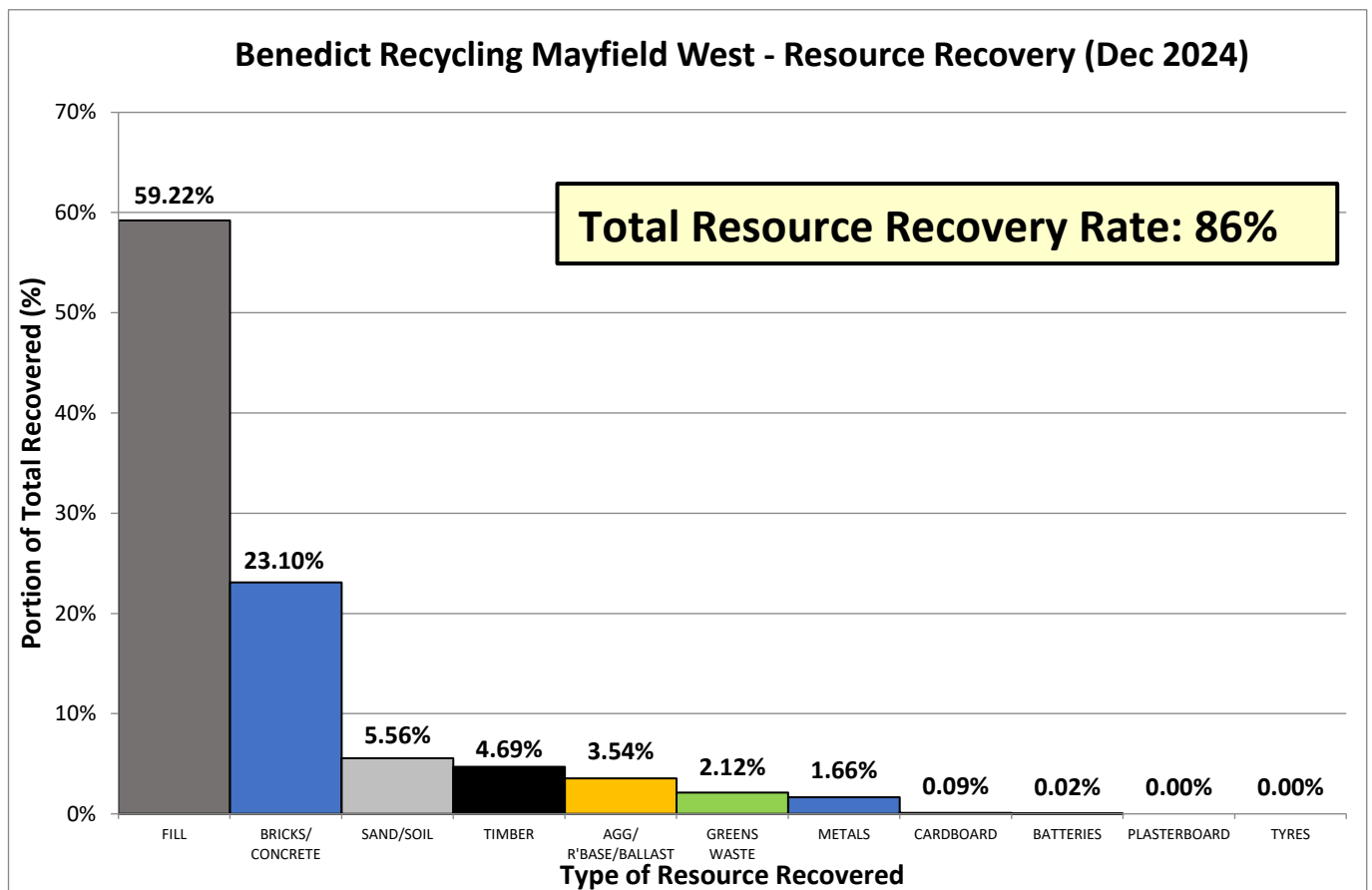


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: December 2024

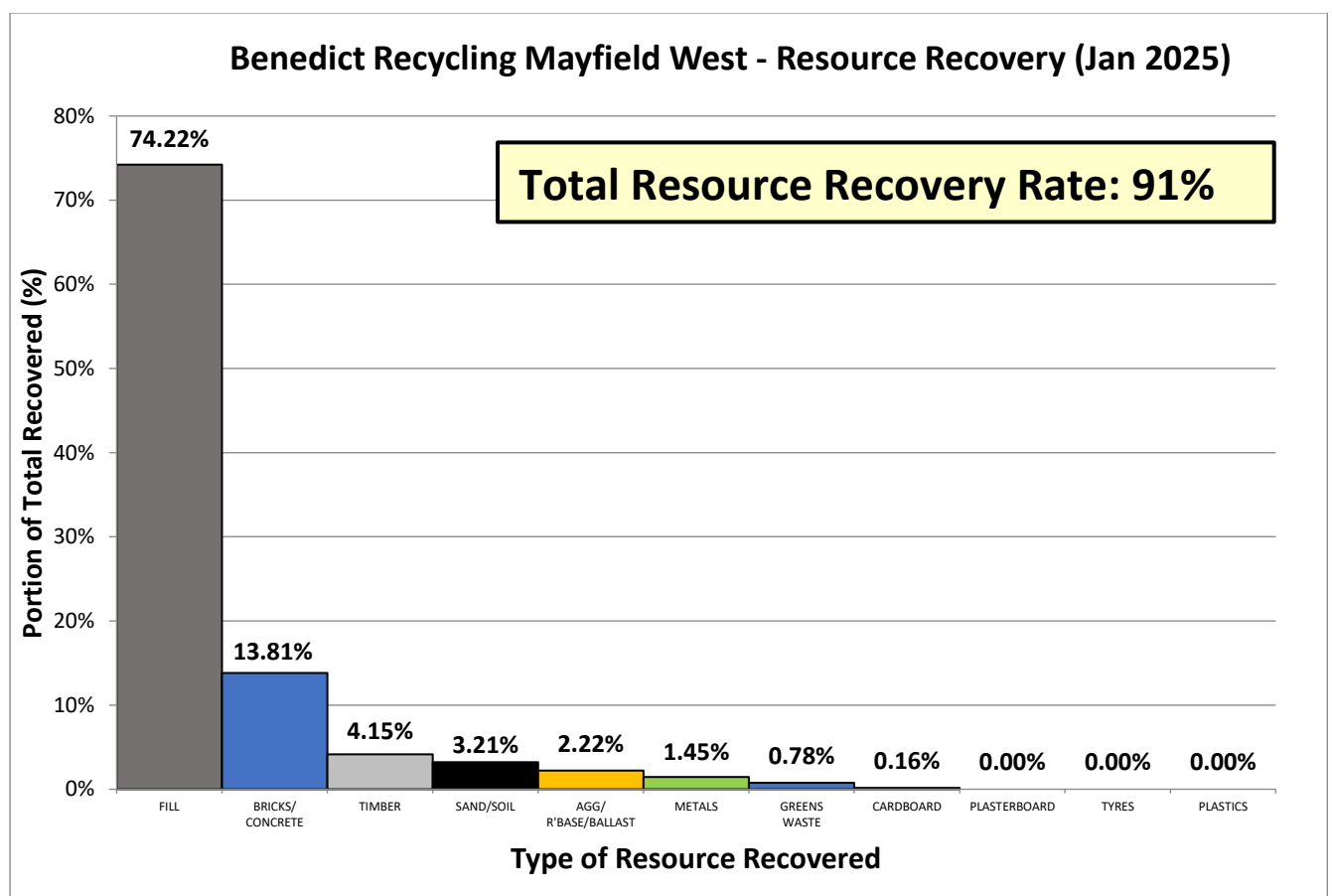


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: January 2025

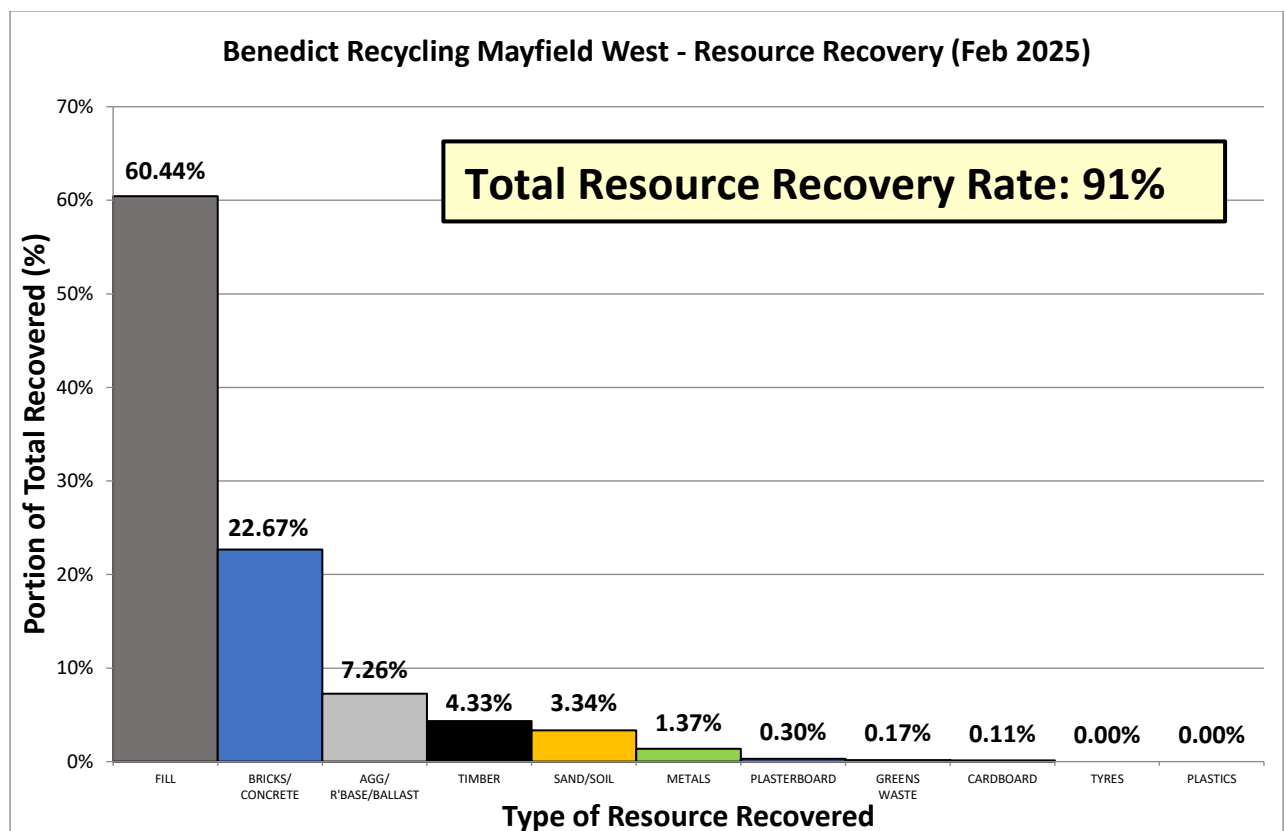


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: February 2025

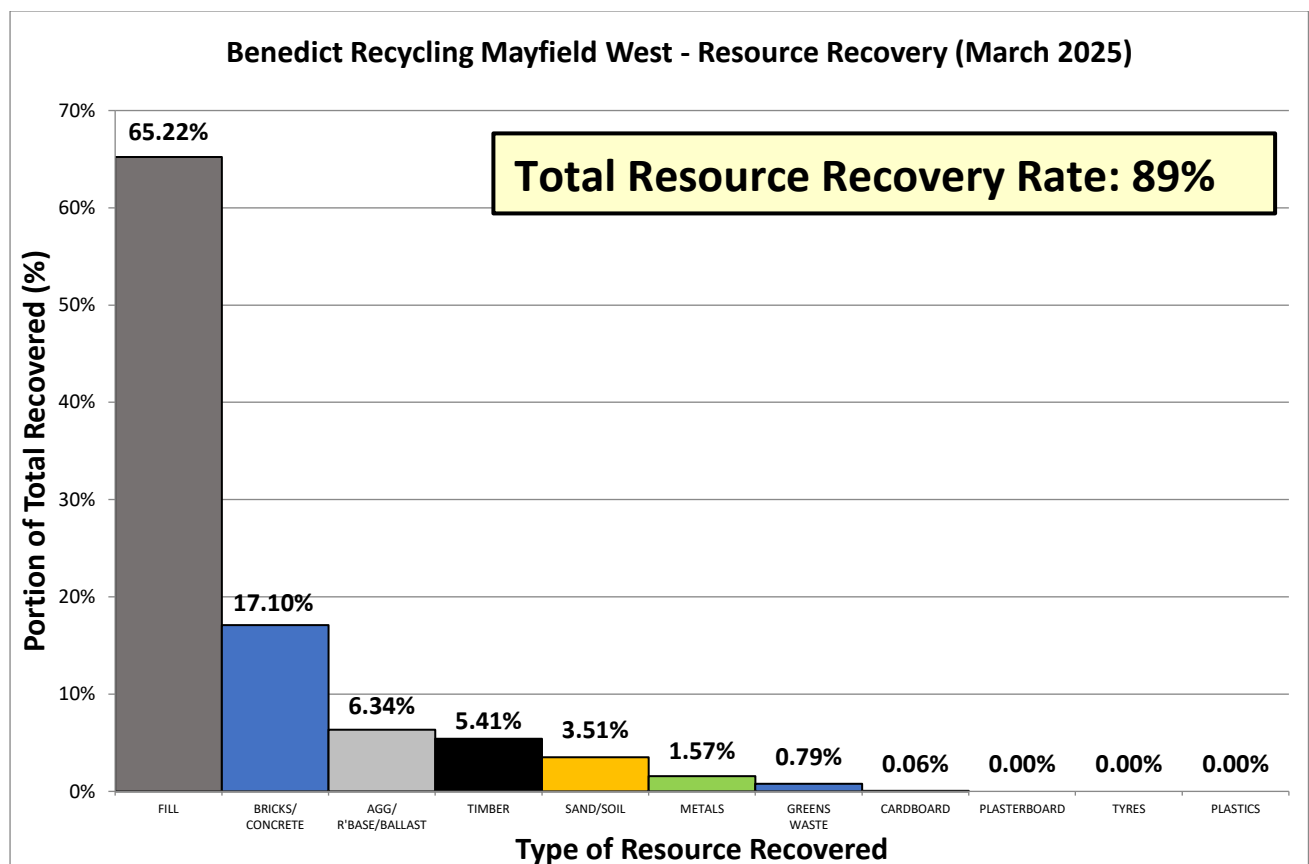


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: March 2025

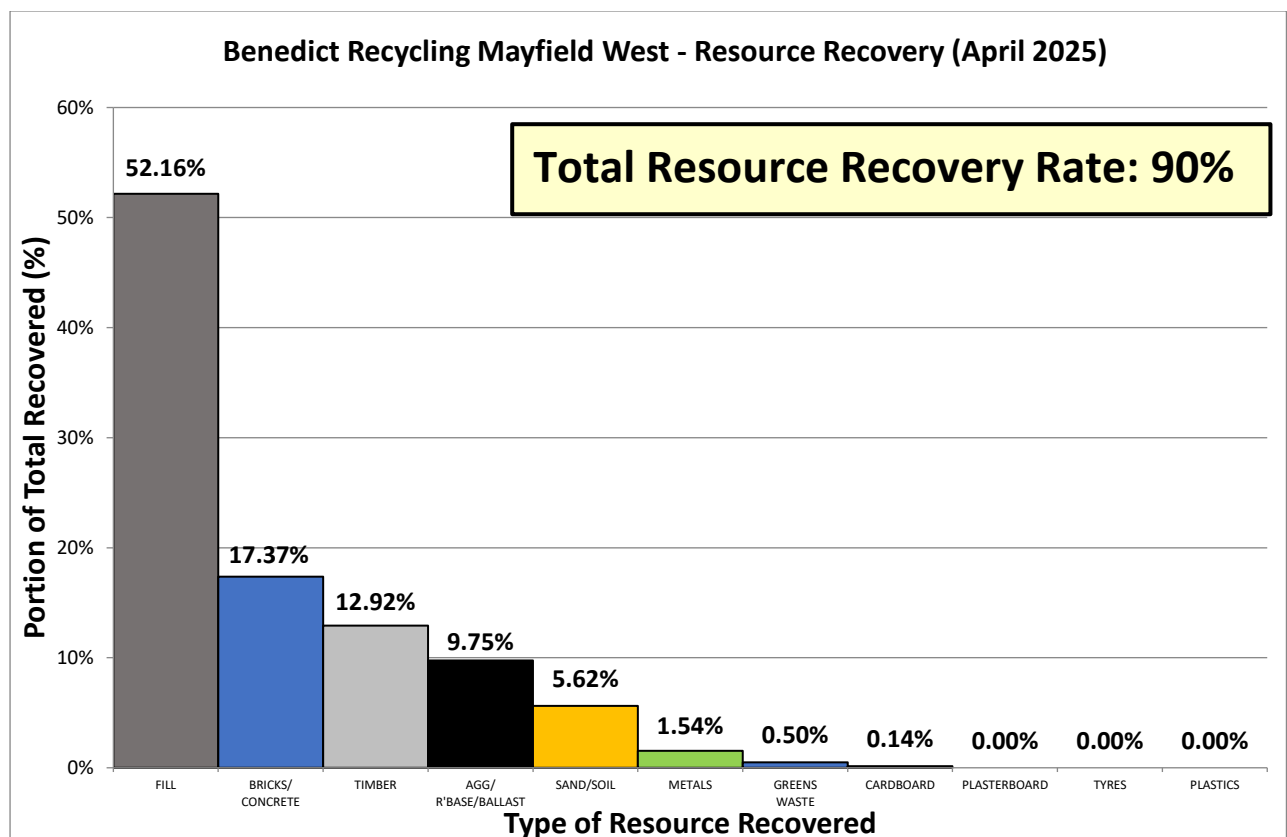


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: April 2025

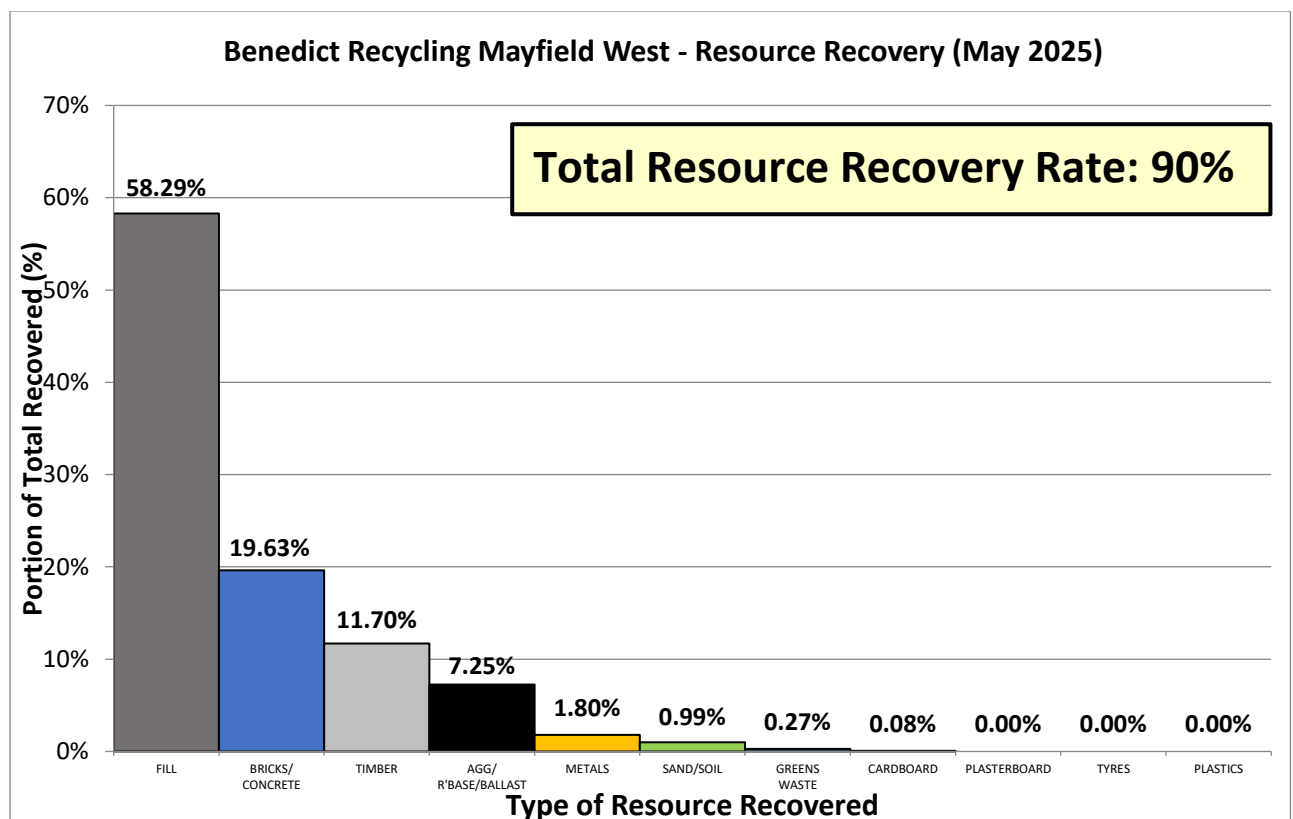


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Resource Recovery Rate Summary Report

Site: Newcastle

Period: May 2025



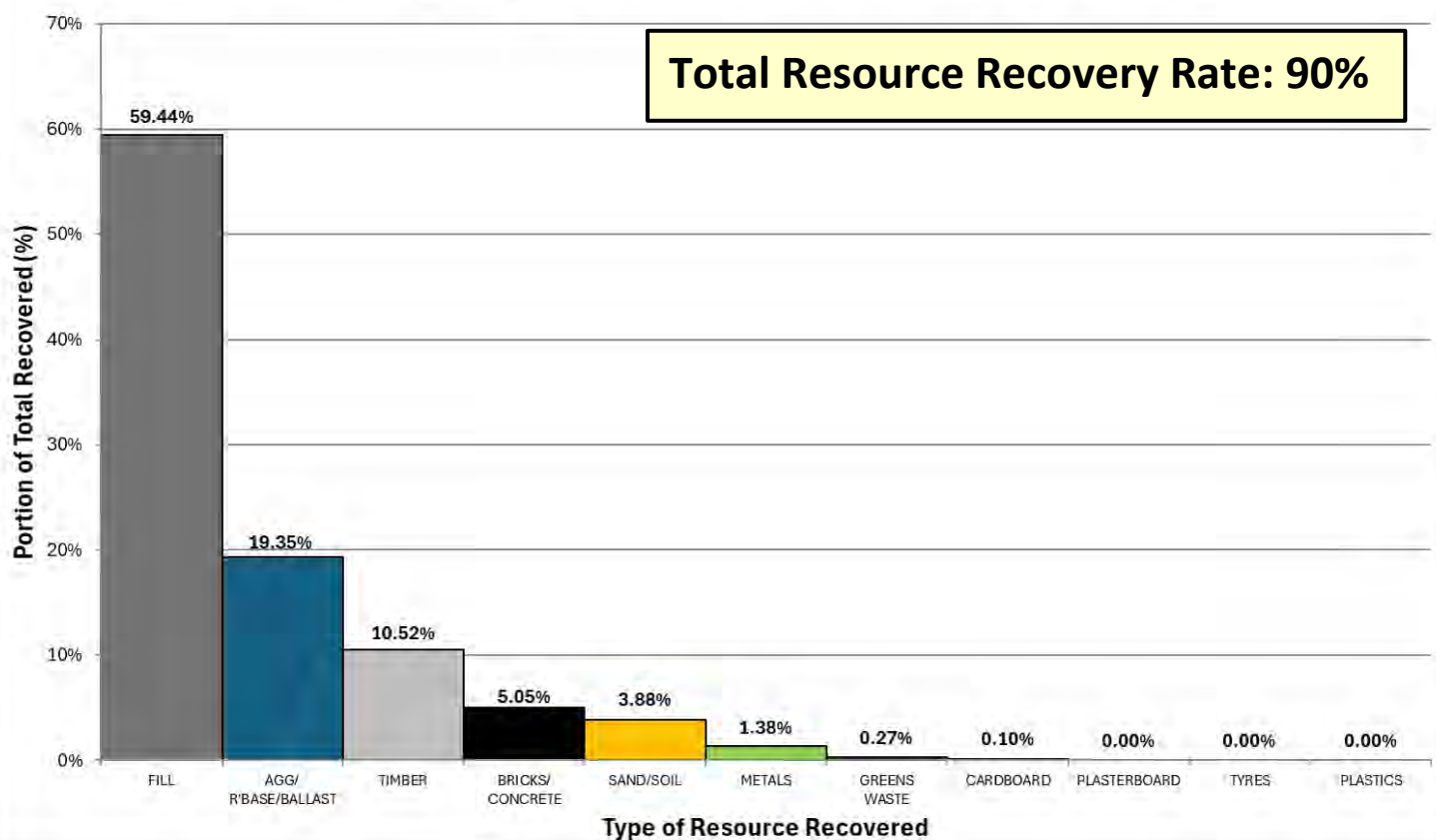
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Resource Recovery Rate Summary Report

Site: Newcastle

Period: June 2025

Benedict Recycling Mayfield West - Resource Recovery (June 2025)



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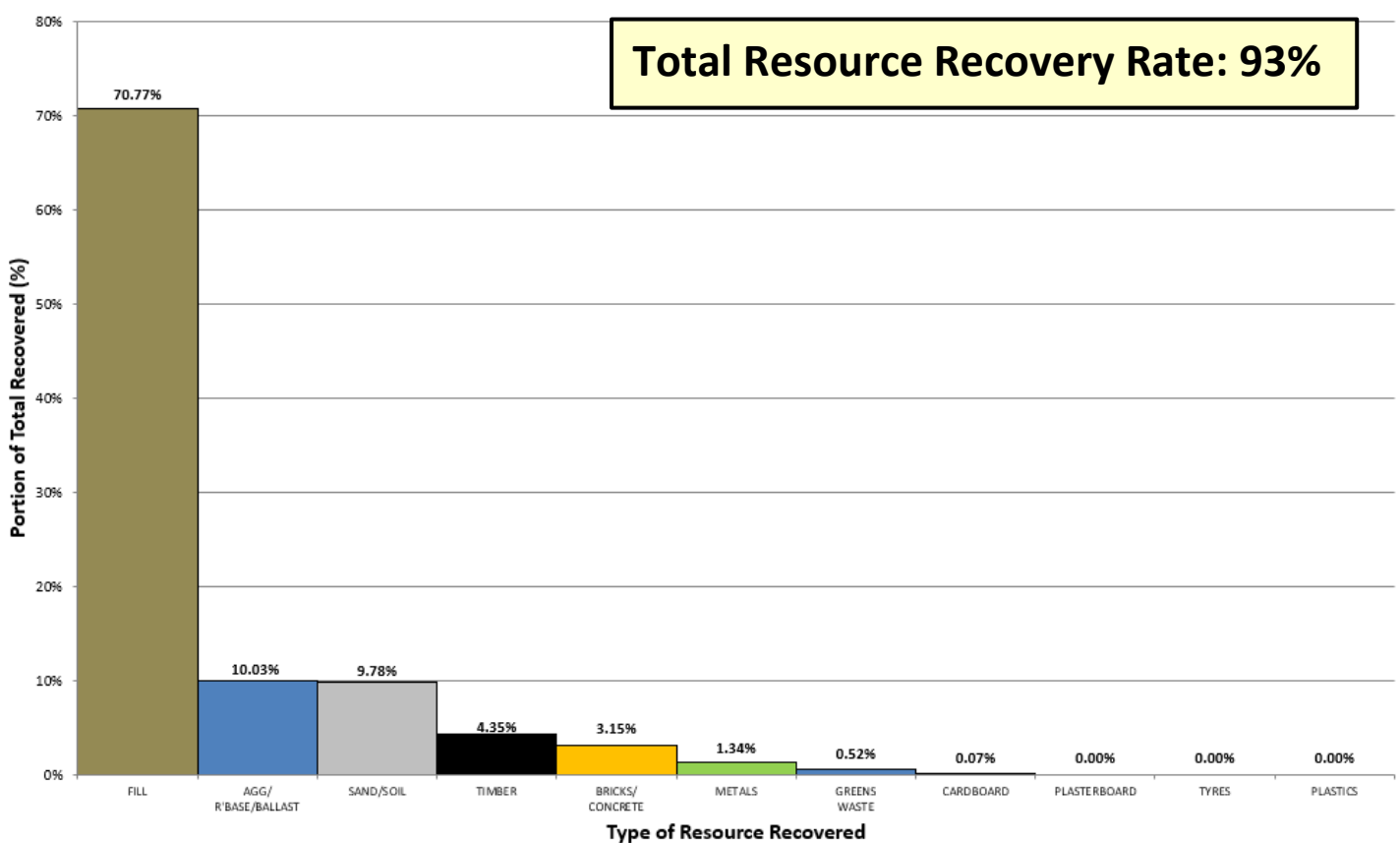
Actual figures within groupings and specific projects may vary from time to time.

Resource Recovery Rate Summary Report

Site: Newcastle

Period: July 2025

Benedict Recycling Mayfield West - Resource Recovery (July 2025)



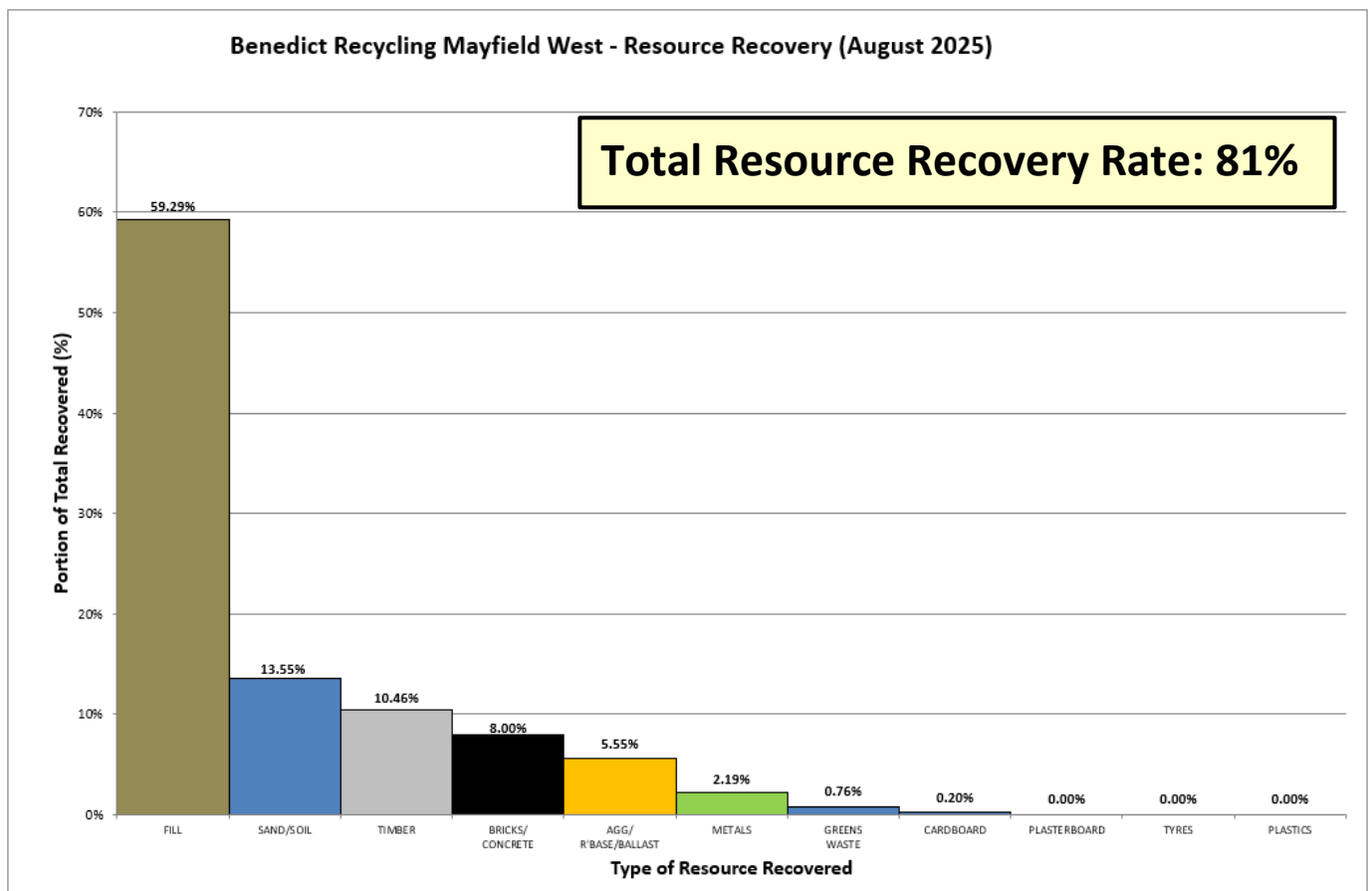
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Resource Recovery Rate Summary Report

Site: Newcastle

Period: August 2025



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