Independent Environmental Audit: Proponent's Response to Audit Findings

SSD-9394 Baiada Oakburn Integrated Processing Facility

Table 1: Response to Independent Audit Non-Compliances

Unique Finding Identifier	Aspect	Recommendation	Proponent's Proposed Action / Action Taken / Response (as applicable)	Proposed Action Due Date (if applicable)
AUDIT NON-COMPLIANCES				
NC1	C23 - Public Access to Information	1) Update the Baiada project website with the required information. 2) Review compliance management processes to ensure the required information is uploaded and checked on a regular basis and within any required timeframes.	1) Current Statutory Approvals including the below documents were uploaded 11th Feb 2025 • EPL 7566 and Liquid Trade Waste Services Agreement - 2021-26. • Construction Environmental Management Plan (CEMP) – CEMP - current version Revision 2, dated 26 July 2024 (approved 7 August 2024) not updated to the website. • Odour Management Plan – current version Issue 7, dated 14/9/23 not updated to the website 2) Compliance processes are robust for the regular review and update of information but staffing unavailability led to this non-conformance. Additional training for back up staff has been and will continue to be completed to ensure monitoring continues despite staff changes.	COMPLETED 11th February 2025 all amended documents loaded to website.
OPPORTUNITIES FOR IMPROVEMENT				
OFI1	B60 – Dangerous Goods	Update Section 14 of the OEMP to reflect current maximum Dangerous Goods storage quantities as per Condition B60 of SSD-9394 MOD1.	This will be completed as part of the next review that is currently scheduled for completion in Feb / March 2025	OEMP review completion by 31st March 2025
OFI2	C10	In any future modification of SSD-9394, include a request for Condition C10 to be deleted from the Development Consent, due to it being a duplicate of Condition C7.	Noted this will be requested	Request to be submitted to Department of Planning, Housing & Infrastructure with application for modification of SSD-9394 prior end of June 2025
OFI3	C18 – Compliance Reporting	Consider the inclusion of a summary table within future Compliance Reports to provide an overview of the appraisal of the facility's performance against the actual vs predicted impacts of the development.	Noted this will be considered when developing the 2024-25 Compliance Report	1st May 2025
OFI4	C23 - Public Access to Information	Consider applying to the Department for clarification, and/or apply in a future modification application to clarify the period for which project activity records such as performance data, monitoring results and complaints need to be made publicly available. It is suggested that these timeframes be aligned with industry practices and requirements for provision and retention of information, including with conditions of EPL 7566 and other applicable statutory approvals that apply to the project.	Baiada agrees with the auditor recommendations and would appreciate the additional clarity around this condition. Clarity and consistency for this condition shall be requested with the next modification	Request for clarification to be submitted to Department of Planning, Housing & Infrastructure prior end of June 2025