

Opal Botany Mill

DA 05_0120

Annual Environmental Monitoring Report (AEMR)

Operation Compliance Report July 2024 – June 2025

Revision: 00

11/08/2024

Prepared by:

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Environment, Testing and Management Systems Manager



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1. Introduction

1.1. Project name and application number

Project Name: Construction of a new paper mill at Amcor's Matraville Plant (Project B9) Application number: 05_0120.

1.2. Project Address

1891 Botany Road, Matraville NSW

1.3. Project Phase

Operation

1.4. Compliance Reporting Period

1st July 2024 to 30th June 2025

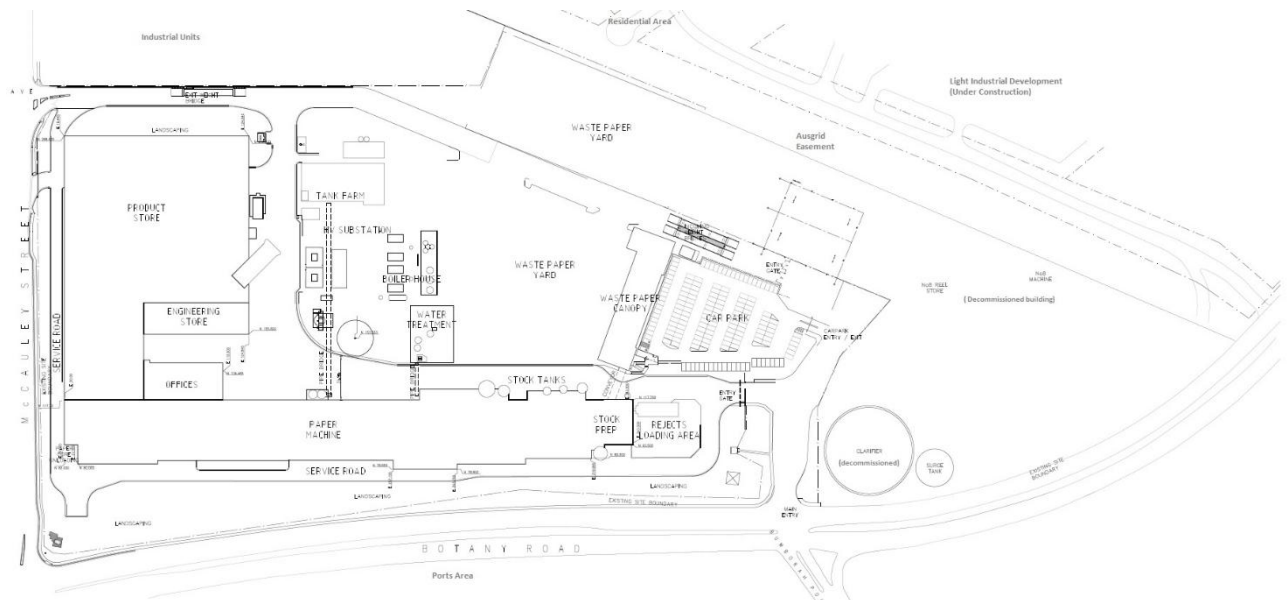
1.5. Project Activity Summary

No works were conducted during the reporting period.

1.6. Site Footprint and context

Figure 1 shows the premises information for the operational site, Figure 2 gives the coordinates around the boundaries of the Opal Botany Mill property, including easements within the property and Figure 3 is a regional context map.

Figure 1: Premises Information





1.7. Key Project Personnel

Robert Carry	Group General Manager, Paper and Recycling
Kerri Baldwin	General Manager, Operations
Karen Jones	Environment, Testing and Management Systems Manager
Harries Pallippuram	Health and Safety Manager

2. Operations Summary

2.1. Production Summary

	Approved Limit* (Tonnes)	2023/24	2024/25	2025/26 (forecast)
Packaging Paper	500,000	450,195	461,485	465,000

*Schedule 2, Condition 5, Project 05_0120 (MOD 9)

2.2. Next reporting period

Construction for Modification 10 works for a new Rejects Waste Handling Facility to increase fibre reuse and reduce waste to landfill may be started in the 2025/26 reporting period.

3. Previous report actions

See Appendix B for the Action Status Summary table for actions recommended by the 2022 Independent Environment Audit Report. An Independent Environment Audit is currently being conducted, however has not yet been completed. Actions from the 2025 Audit will be included in the 2025/26 AEMR.

There were no further actions from previous reports.

4. Compliance Status

4.1. Non-compliance Summary

Total number of non-compliances: 3

Schedule 3,1	
Compliance Requirement	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. 'Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.
Details of non-compliance	62 Odour complaints received by mill and EPA during reporting period.
Agency to which non-compliance was reported	Complaints and action discussed with NSW EPA.
Formal enforcement taken by regulators	A Pollution Reduction Program for Odour Emissions Reduction was added to the site Environment Protection Licence in October 2022. No further enforcement taken by regulators during the reporting period.
Response taken/proposed	During odour modelling of the site, the decanter building was found to contribute approximately 40% of the maximum odour impact in the residential area. An odour reduction unit was installed to reduce the odour from the Decanter building with commissioning completed in August 2024. Testing of the exhaust air from the decanter building in August 2024 showed a 98% decrease compared with the same testing in 2021. Work continues with a focus on improving process ventilation and exhaust efficiency.

Schedule 3,3	
Compliance Requirement	Except as may be expressly provided in an EPL for the Development, the Applicant must comply with Section 120 of the POEO Act 1997
Details of non-compliance	Fire in Wastepaper yard as reported in section 4.5.1 of this AEMR
Agency to which non-compliance was reported	Reported to NSW EPA as a pollution incident and SafeWork NSW as a safety incident. NSW Fire & Rescue called and attended fire.
Formal enforcement taken by regulators	Pollution Reduction Program "Fire Mitigation and Risk Review" added to site Environment Protection Licence in March 2025.
Response taken/proposed	Response detailed in Section 4.5.1 of this AEMR. Fire Mitigation and Risk Review Report submitted to EPA on May 14th 2025

Schedule 4,33

Compliance Requirement	Within seven days of detecting an exceedance of the limits/performance criteria in this Consent, or an incident causing (or threatening to cause) material harm to the environment, the Applicant must report the exceedance/incident to the Department, and any relevant agency. The report must: a) describe the date, time and nature of the exceedance/incident; b) identify the cause (or likely cause) of the exceedance/incident; c) describe what action has been taken to date; and d) describe the proposed measures to address the exceedance/incident.
Details of non-compliance	Fire in Wastepaper yard in October 2024 was reported to the Department of Planning outside the 7-day reporting period.
Agency to which non-compliance was reported	To allow adequate time for investigation into the fire incident, the NSW EPA provided an extension to the usual 7-day deadline for the final incident report. Therefore, the same report was submitted to the Department of Planning at the same time.
Formal enforcement taken by regulators	Recorded as a breach by the Department of Planning.
Response taken/proposed	An interim report will be made to the Department of Planning and a request for an extension will be made for future incidents if a full report has not been completed by the end of the 7-day time period.

4.2. Noise

Table 1: Project Approval Noise Limits

ID	Location	Day L _{Aeq,15min} , dB(A)	Evening L _{Aeq,15min} , dB(A)	Night L _{Aeq,15min} , dB(A)	Night L _{Amax} , dB(A)
R1	Corner of McCauley Street and Australia Avenue	46	45	43	55
R2	Australia Avenue	45	45	43	55
R3	Murrabin Avenue	46	45	43	55
R4	Partanna Avenue	42	41	41	55
R5	Corner of Partanna Avenue and Moorina Avenue	42	42	39	55
R6	Moorina Avenue	43	43	39	55

Noise monitoring, as is required by the Botany Mill Environmental Protection Licence (EPL) was conducted on a quarterly basis during the reporting period in July 2024, October 2024, January 2025 and May 2025. These noise monitoring reports can be found on the Opal website: <https://opalanz.com/sustainability/sustainability-performance/>.

Tables 2 to 5 give the noise levels measured during the reporting period at each monitoring point. Comparisons of results from these monitoring periods with criteria and historical monitoring are shown in Figures 4 – 9. While these historical background noise levels are not directly related to the L_{Aeq} criteria from the EPL, they provide an indication of the change in background environmental noise levels corresponding to the regular noise surveys undertaken for the Botany Mill site. No overall trends can be seen in Figures 4 – 9.

The noise consultants conducting each noise survey have stated the following in their reports:

"Regular quarterly noise monitoring surveys have demonstrated that direct measurement of Opal's contribution to the noise environment is not possible because noise emissions from the site are generally lower than the ambient measured L_{Aeq} noise levels, which masks the actual noise from the Opal site"

And

"The influence from Opal on the local noise environment may be better described using the L_{A90} statistical parameter. This additional parameter has been presented in the results summary to be considered in conjunction with the L_{Aeq} noise level when assessing compliance of the Opal site."

Access to location R3 was withdrawn in February 2020, and access to location R4 withdrawn in July 2024 and are unlikely to be available for future noise surveys. This has been discussed with the EPA.

Table 2: Noise levels measured at monitoring point R1

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
July 2024	51.7	48.9	47.2	42.9	43.0	42.2
October 2024	52.1	47.6	46.2	41.0	41.4	39.4
January 2025	52.1	50.5	46.3	43.2	42.7	39.1
May 2025	52.5	50.6	46.4	42.4	43.1	40.9

Table 3: Noise levels measured at monitoring point R2

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
July 2024	55.8	52.8	52.2	49.0	47.9	48.9
October 2024	51.5	51.4	47.8	42.4	43.1	41.2
January 2025	55.2	55.6	47.8	43.1	44.1	40.9
May 2025	54.3	51.0	50.4	42.3	42.9	45.4

Table 4: Noise levels measured at monitoring point R5

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
July 2024	54.1	50.2	49.2	44.4	44.8	44.5
October 2024	53.0	48.1	47.6	41.3	40.0	38.9
January 2025	51.0	50.0	45.7	40.1	38.9	35.1
May 2025	55.2	51.6	48.9	43.4	46.7	42.9

Table 5: Noise levels measured at monitoring point R6

	L _{Aeq} , 15 min dB(A)			L ₉₀ (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
July 2024	51.7	49.5	48.7	45.1	44.6	43.2
October 2024	53.5	50.5	48.4	43.1	42.8	39.8
January 2025	55.8	54.4	46.7	44.8	44.2	37.0
May 2025	52.5	50.1	46.6	43.2	44.5	41.6

The Quarterly noise monitoring report conducted in May 2025 states:

"The L_{Aeq} and L_{Amax} noise levels recorded during the survey period are higher than the EPL criteria at the monitoring locations but are not related to the operation of the Opal site"

Figure 4: Historical background noise levels at R1

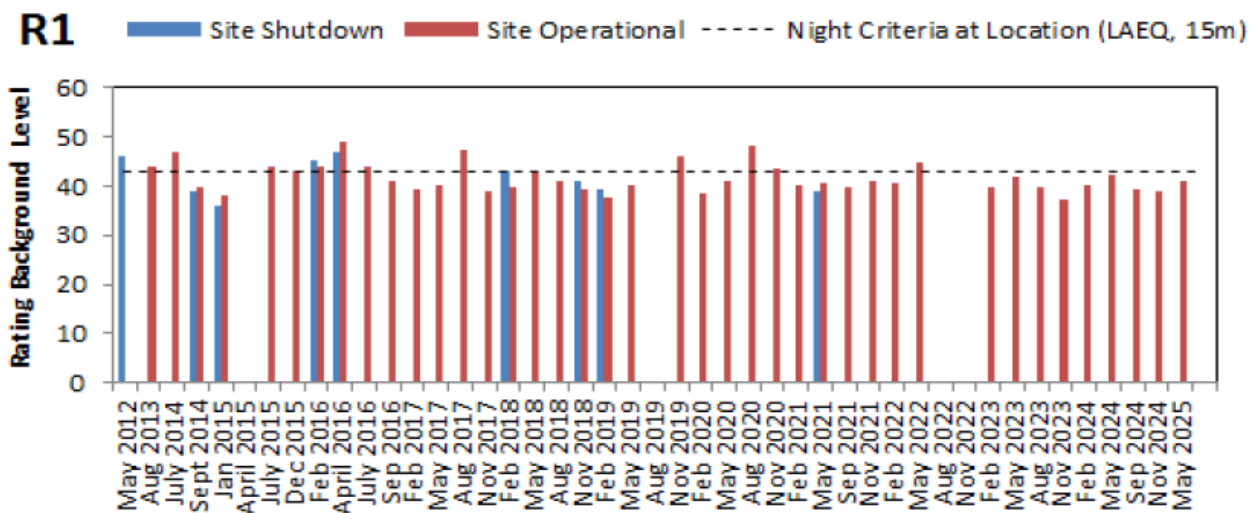


Figure 5: Historical background noise levels at R2

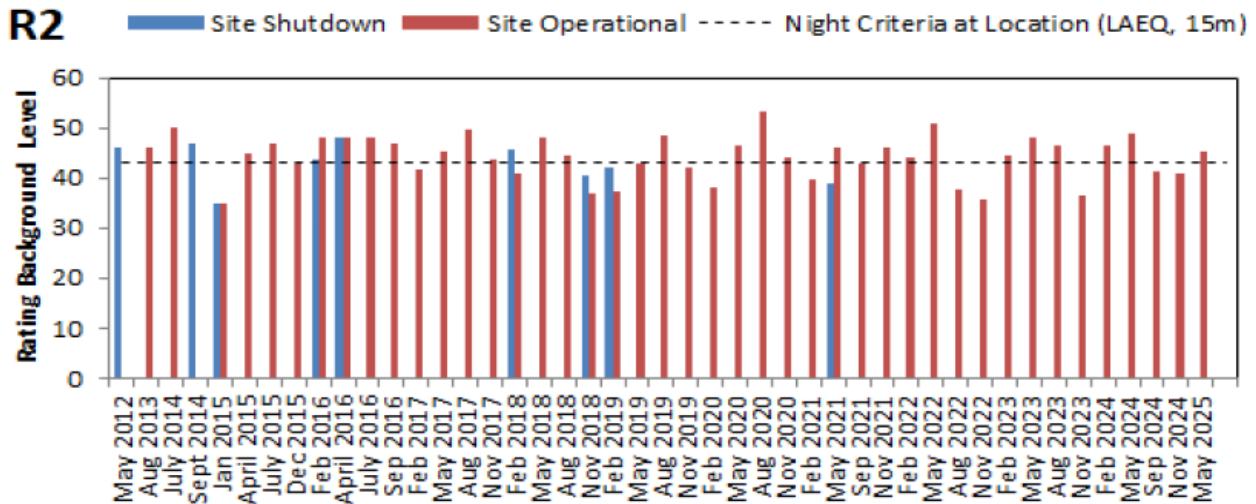


Figure 6: Historical background noise levels at R3



Figure 7: Historical background noise levels at R4

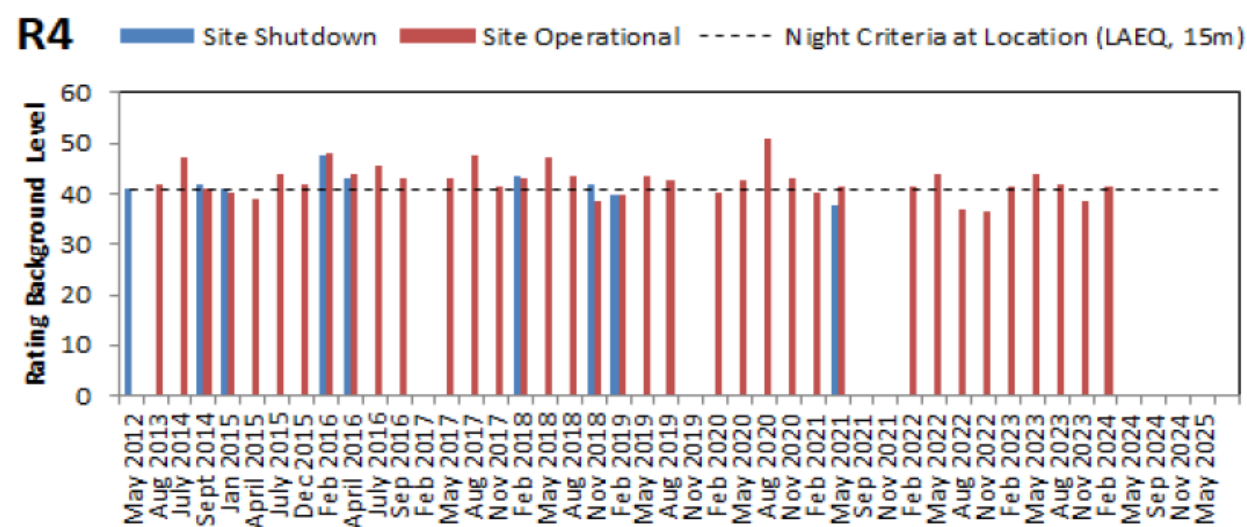


Figure 8: Historical background noise levels at R5

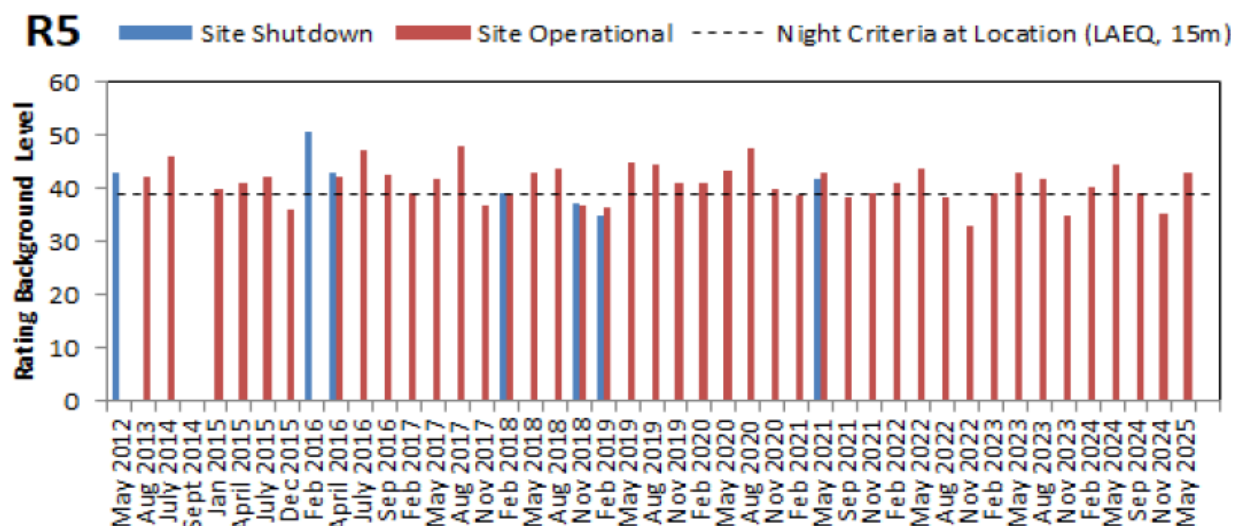
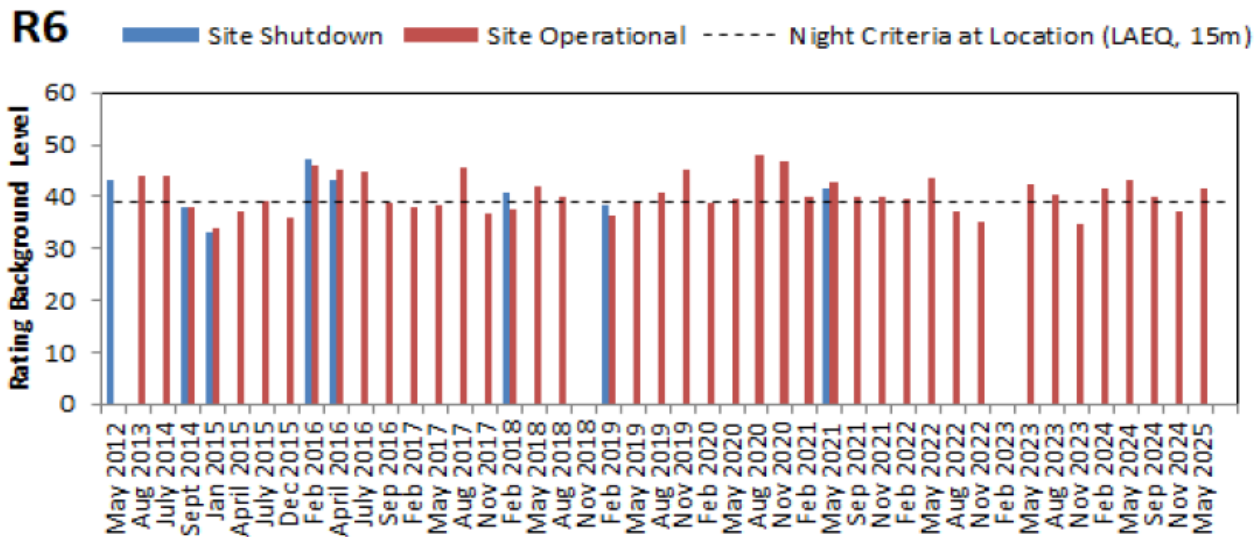


Figure 9: Historical background noise levels at R6



4.2.1. Noise Model Predicted noise levels

As required by Condition U1.2 in the Opal Botany Mill Environmental Protection Licence (EPL), an acoustic model of the Botany Mill site was developed and updated in 2022 to predict noise levels at the key receiver locations detailed in the EPL. Table 6 presents the predicted noise levels against the nighttime noise criteria as these are the most stringent for the site operating conditions. These predicted noise levels are for periods of worst-case site activity under adverse meteorological conditions, where the likelihood of actual impacts under these conditions is expected to be infrequent at best.

Table 6: Predicted noise levels from Botany Mill Noise model

Location ID	EPL Noise Goals dB(A)		Predicted Noise levels dB(A)	
	Night L _{Aeq} 15 min	Night L _{Amax}	Night L _{Aeq} 15 min	Night L _{Amax}
R1	43	55	38	46-48
R2	43	55	39	47-49
R3	43	55	40	48-50
R4	41	55	40	48-50
R5	39	55	37	42-44
R6	39	55	35	44-46

4.3. Water Use

Botany Mill currently has the following water access licence (WAL) and Approval for extracting groundwater:

- WAL 36382
- Approval 10WA118709

Usage for the reporting period was within licence limits. The site used a total of 2,019 ML/yr, where the licence limit is 2,920 ML/yr.

Water use predicted by the EA was up to 12 ML/day of fresh water. During the reporting period the site used an average of 5.5 ML/day of groundwater.

4.4. Sydney Water Trade Waste

Opal Botany Mill holds a Consent to Discharge Industrial Trade Wastewater (the Consent) with Sydney Water for effluent from site. A new Consent was signed on 11th April 2024. The pollutant limits are set out in Table 7. In addition, pH and temperature of the effluent must be within the range 7.0 to 10.0 and below 38 degrees Celsius respectively.

Effluent testing was performed, with results sent to Sydney Water as per the Consent to Discharge Industrial Trade Wastewater.

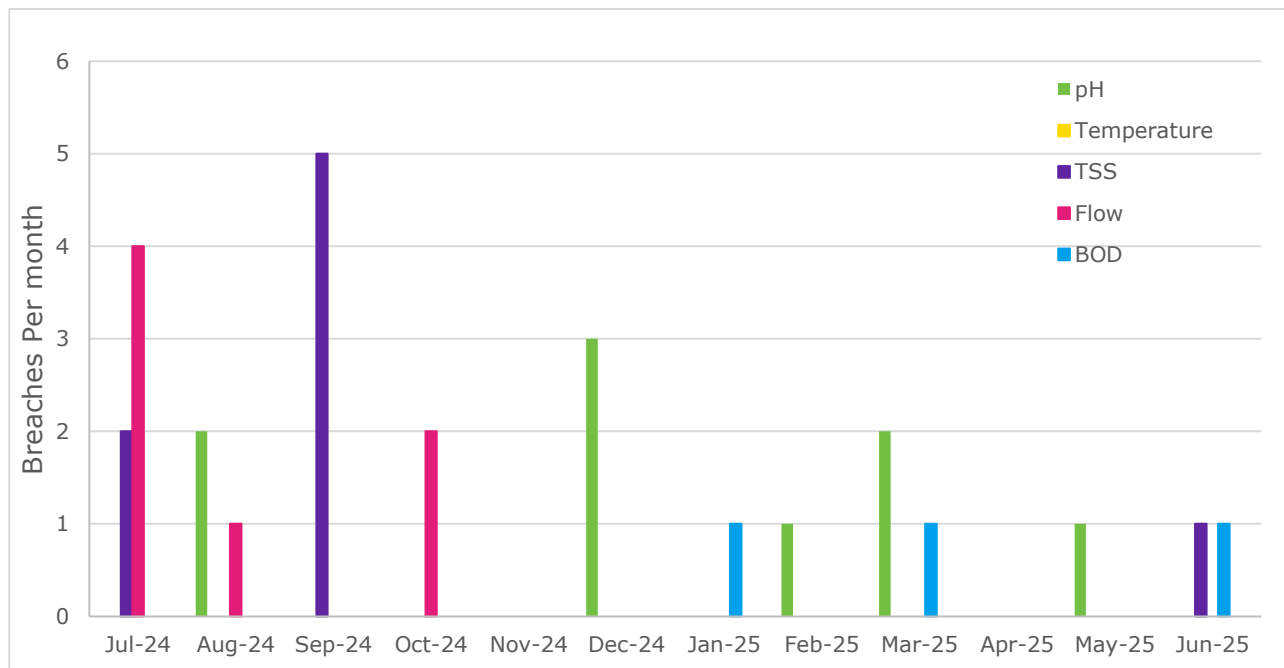
Table 7: Sydney Water Trade Wastewater Consent Pollutant Limits

Substance	Daily Mass (kg/d)	Concentration (mg/L)
Biological Oxygen Demand	30,000	N/A
Suspended Solids (TSS)	5,370	600
Total Dissolved Solids	26,000	10,000
Phenolic Compounds	7	1

An effluent flow of 4.3 ML/day was predicted in the EA for an assumed paper production rate of 345,000 T/year. During the reporting period, the site produced 461,485 Tonnes and released an average of 7.3 ML/day of effluent to the Sydney Water sewer.

Eight breaches of TSS were recorded during 2024/25, compared with fifteen breaches during the previous reporting period.

Figure 10: Breaches of Consent to Discharge Industrial Trade Wastewater in 2024-25



Figures 11 to 14 show historical trends for the relevant pollutant test results. The variation in BOD₅ results is due to the secondary water treatment plant (SWTP) commissioning in 2018, followed by unreliable running of the SWTP in 2019, and recommissioning in 2020 after significant maintenance works.

Figure 11: Biological Oxygen Demand in effluent – historical data

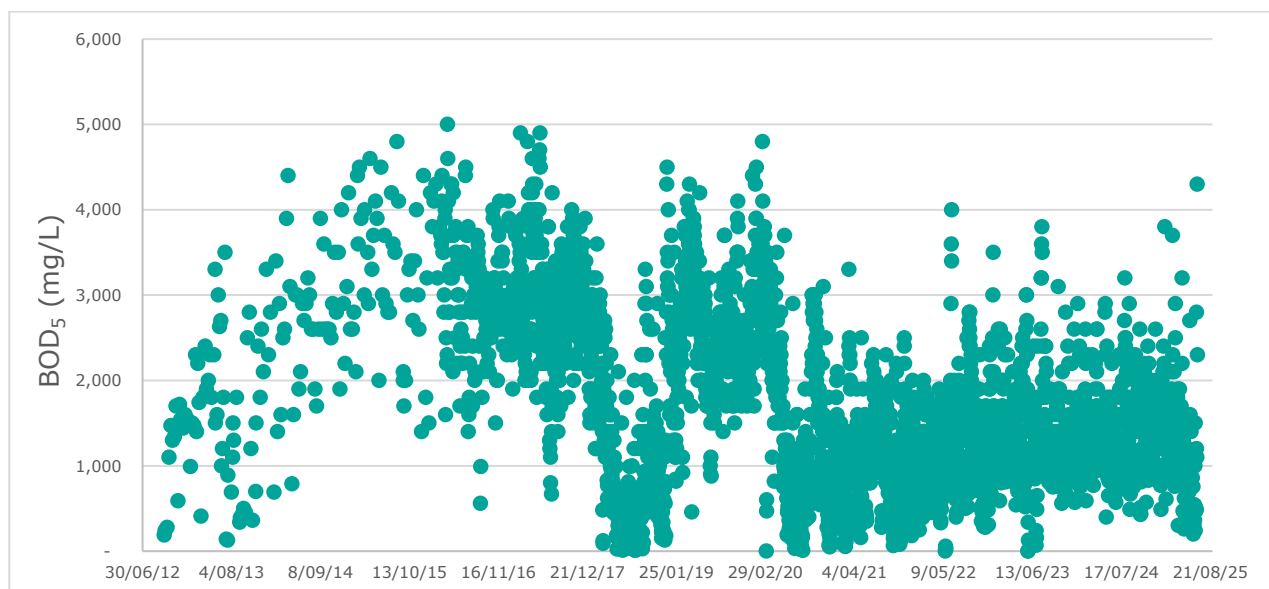


Figure 12: Suspended Solids in effluent – historical data

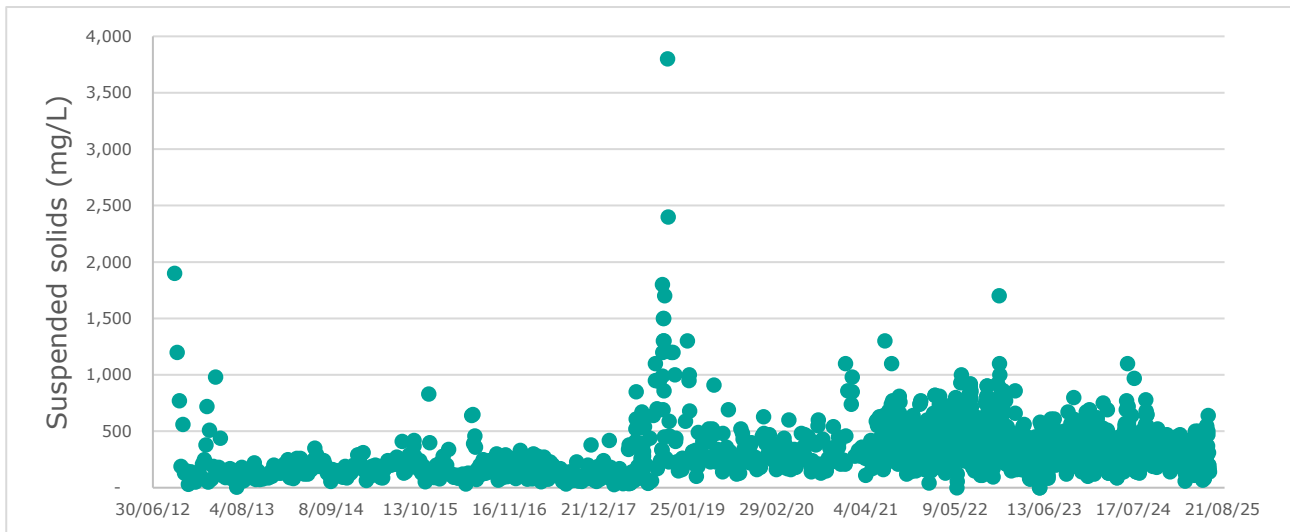


Figure 13: Total Dissolved Solids in effluent – historical data

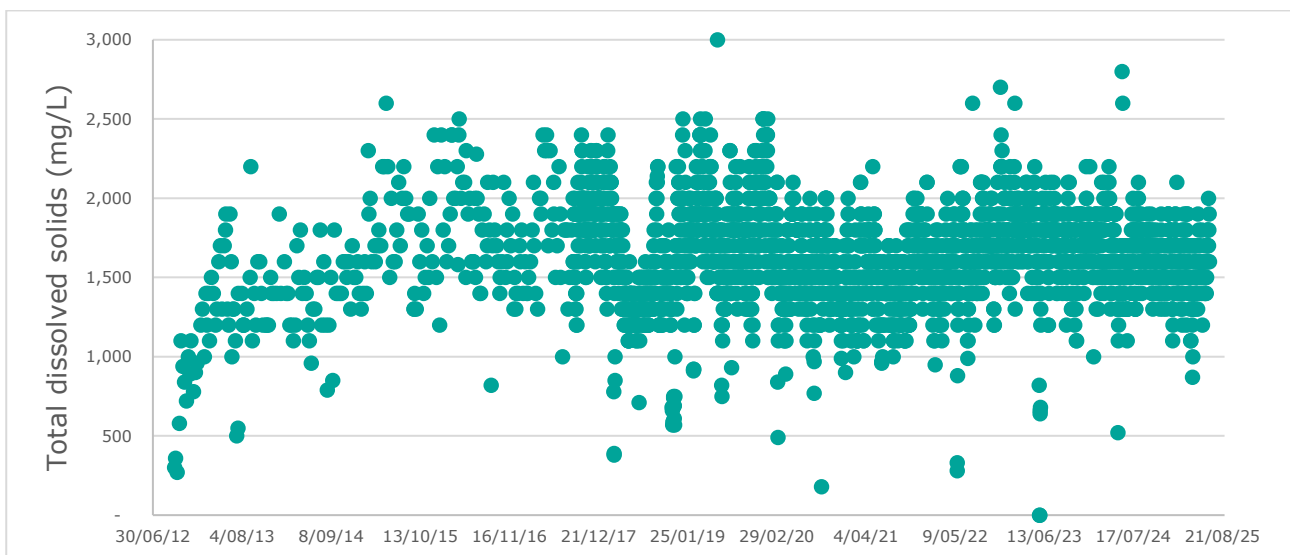
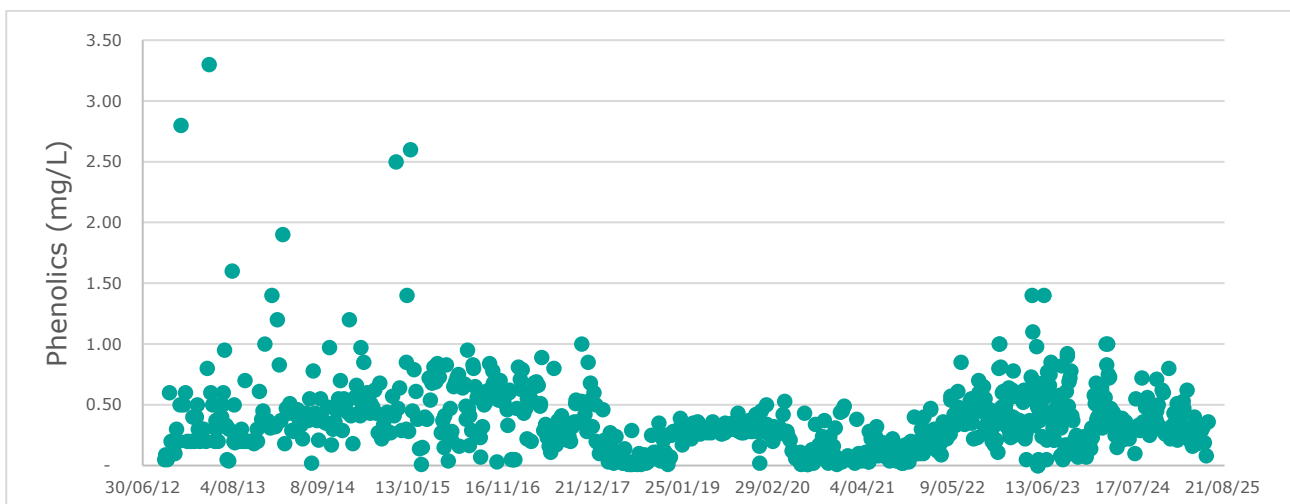


Figure 14: Phenolic compounds in effluent – historical data



4.5. NSW EPA Environmental Protection Licence (EPL)

The EPL was amended in August 2024 and March 2025.

In August 2024, Special Condition E1 "Gas Engine Mitigation Investigation" was removed, and concentration limits and monitoring requirements were added for the gas engine.

In March 2025, Condition U2 "Fire Mitigation and Risk Review" was added.

The Annual return for the Botany Mill EPL 1594 was submitted in April 2025 for the 12-months licence reporting period as required. Two non-compliances were reported for the EPL reporting period, however one of these has already been reported in the previous AEMR for 2023-24, as it occurred in March 2024. The non-compliance for the AEMR reporting period is detailed below in 4.5.1.

4.5.1. EPL non-compliances

One pollution incident was reported to the NSW EPA during the reporting period, for a fire in October 2024.

On 26th October 2024 a fire was noticed in some stored bales of wastepaper in the wastepaper yard at Opal Botany Mill. Opal personnel worked with Fire and Rescue NSW to bring the fire under control using fresh water (bore water and drinking water). The run-off from the firefighting went into the site stormwater drains.

Action taken to mitigate adverse effects of the fire:

- The site stormwater system contains silt and oil arrestors (Humeceptors and Duoceptor) at each exit point on the site. These are designed to capture and remove over 80% of total suspended solids down to 10 microns.
- The stormwater drains near the storage bays where the fire broke out drain to two locations: the mill's bore water storage dam – Long Dam, located in the Bunnerong Stormwater Channel, and the Saltwater Outfall pit, on the Botany Road side of the mill.
- Most of the firewater that went to Long Dam was re-used on site in the production process, with the combined bore water/fire water flow from Long Dam to the mill between 80 and 120 L/s. The level at the weir at Long Dam was above 100% until around 4pm on Monday October 28th, however any water that flowed out to Botany Bay would have been significantly diluted by the 108 L/s of bore water that was flowing into Long Dam during that time.
- The Saltwater outfall pit holds approximately 45m³ of water. Once the level reaches 15%, pumps start which return 5 L/s of water collected to the paper-making process for re-use.
- A portable diesel pump was set up in the stormwater drain between the wastepaper yard and the Saltwater Outfall on Monday 28th October to capture and return an additional flow of up to 500 m³/hr back to the process to further reduce any off-site impacts of the fire water.

Action taken, to prevent a recurrence of the fire:

- A fire consultant was engaged to give recommendations on how to improve the storage of baled wastepaper in the Storage Bay areas to reduce the fire risk in this area.
- While long-term improvements to the wastepaper storage bay area are being investigated, the interim plan is to use only Storage Bays A, C, E and G. This is the most effective and immediate method Opal can employ in the storage of wastepaper to prevent a fire spreading.
- Emergency procedures were reviewed with improvements made to the incident response process.
- Specified in site procedures that impacted industrial and commercial neighbours, not just residential neighbours, should be included in community notification strategies such as doorknocking.
- Project approved to provide additional fire water cannons in the wastepaper yard, including a mobile firefighting unit.
- Modification made to bale storage stacking guidelines.

4.6. Traffic

There has been no significant change in traffic performance for the site since the last reporting period. Current traffic volumes remain well under the vehicle numbers predicted in Modification 9.

Table 8: Predicted and current daily heavy vehicle traffic performance

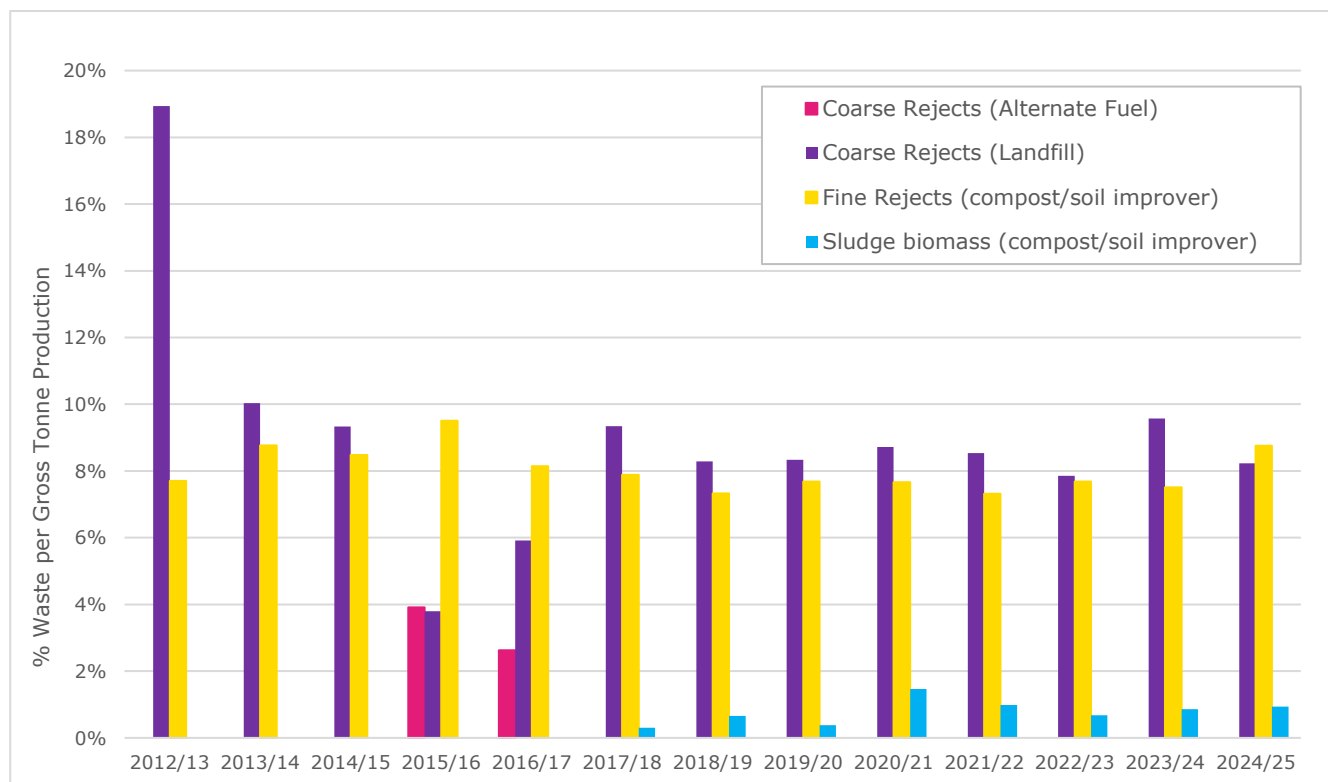
Load type	Predicted Traffic Volumes Mod 9	Current Performance
Wastepaper deliveries	133	111
Starch/Chemical Deliveries	4	3
Finished Product Despatch	62	46
Solid Waste Removal	12	10
General Waste	1	1
Total Heavy Vehicles	212	156

4.7. Waste

Table 9: Comparison of predicted and actual waste generation

Waste stream	Waste Management Plan	Current Performance	Management
Coarse Rejects	47,000 T	37,979 T	Landfill
Fine Rejects	36,000 T	40,413 T	Composting and re-use as soil improver under EPA exemption
Sludge Biomass	9,000 T	4,319 T	Composting and re-use as soil improver under EPA exemption
Waste Oil	20,000 L	12,000 L	Recycled

Figure 15: Process Waste Trends



4.8. Contaminated Land Management

Inspections were carried out as listed below:

Area	Number of Inspections
Remediated Land Landscaping Inspection	Six
Ground Floor Slab & Exterior Pavement Condition	One
Metals containment cell – Capping integrity & leachate level	Two

All audits have shown good integrity of all remediated land, pavement, slab, and capping. There were no accidental breaches or penetration of the capping requirements, and no water ingress into the metals containment cell.

5. Incidents

The fire in the wastepaper yard in October 2024 is detailed in Section 4.5.1 of this report.

6. Community Contacts

6.1. Complaints

During the reporting period, Botany Mill received sixty-nine complaints via the mill Environment Hotline and the NSW EPA.

Table 40: Summary of complaints

Nature of complaint	Total Number	No. of complainants
Odour	62	Unknown
Noise	1	1
Waste	1	1
Other	5	4

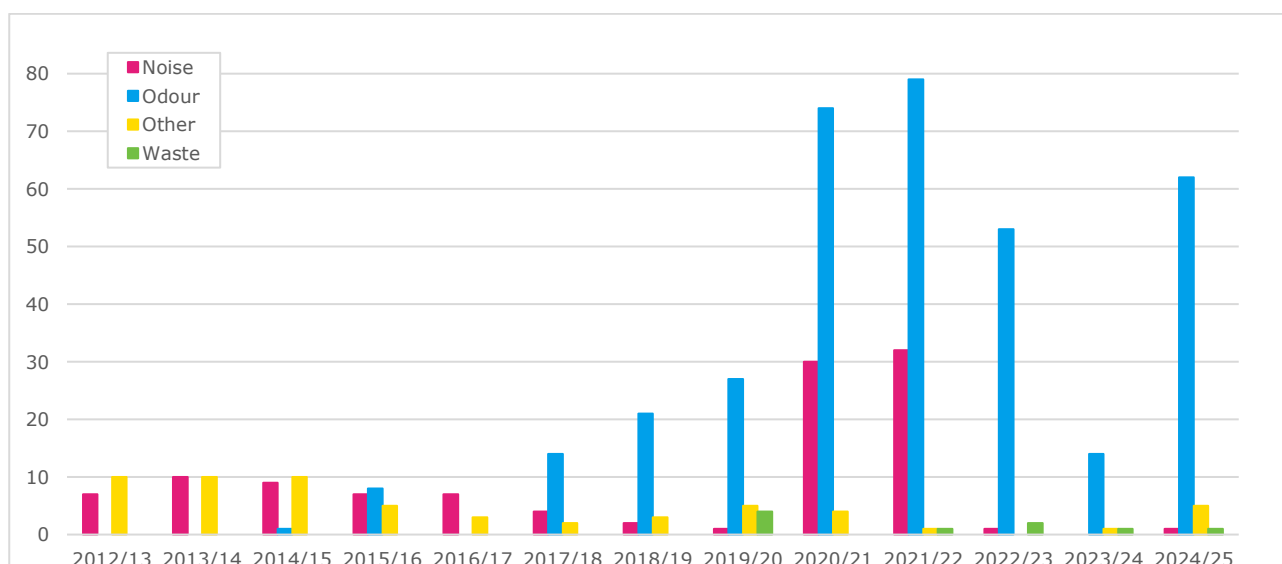
Of the sixty-two odour complaints received over the twelve-month period, seven were made directly to the paper mill, and fifty-five to the EPA. The mill does not receive the details of complainants that call the EPA, only the street in which they were made from, therefore it is unknown how many complainants made reports regarding odour, however twenty-three were from Partanna Ave in Matraville, twenty-four from Moorina Ave in Matraville, and five from Dampier St in Chifley.

The description of the odour in the complaints was generally reported as “strong chemical”, “sour” or “foul”.

The cause of the odour complaints has not been linked to any process conditions or upsets. Actions to reduce odour are outlined below.

- The odour study report previously submitted to the EPA identified the decanter building as the source of approximately 40% of the odour impact on the closest residences. Botany Mill invested over \$600,000 on odour reduction equipment consisting of a biotrickling and carbon filter which was commissioned in August 2024. Testing of the exhaust air from the decanter building in late August 2024 showed a 98% decrease in odour emissions compared with the initial odour study results.
- Monitoring and measuring of mill ventilation and exhaust systems continues to improve ventilation and exhaust efficiency across the process.

Figure 16: Environmental Complaints to Mill and EPA



6.2. Community Liaison group meetings and Community Contact

Three Community Liaison Group meetings were held during the reporting period: 30th July 2024, 26th November 2024 and 8th April 2025. All of these meetings were held in person at Botany Mill.

Information relating to the progression of works, future site plans, production performance, site issues, odour strategy and environmental complaints were presented and discussed.

In addition, a mill tour was offered to local council and state parliament representatives in April 2025, as well as a number of tours offered to the waste and sustainability team from Randwick City Council throughout the reporting period, but no offers were taken up.

7. Appendices

Appendix A – Compliance Table

Schedule	Unique ID	Compliance Requirement	Development phase	Monitoring methodology	Evidence & comments	Compliance	Details of non-compliance
Schedule 2: Administrative Conditions	Schedule 2, 1	The Applicant must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the Development.	Operation	Environmental Management System	Environmental Management System records	Compliant	N/A
	Schedule 2, 2	The Applicant must carry out the Development generally in accordance with the: a) EA b) site plan contained in Appendix A c) submissions report d) statement of commitments; and e) Modification application 05_0120 Mod 2 with supporting documents titled Environmental Assessment Report: B9 Development - New Paper Mill - Revised Modification # 2, Subdivision and Site Layout, 16 February 2010, prepared by SKM and Response to Submissions from Exhibition of Environmental Assessment Report, May 2010, prepared by SKM; f) Modification request 05_0120 Mod 3 with supporting documents titled New Paper Mill Modification Report # 3 - Completion of McCauley Street and Botany Road / McCauley Street Intersection, dated 12 October 2012, and prepared by Sinclair Knight Merz Pty Ltd; g) Modification request 05_0120 Mod 4 with supporting documents titled New Paper Mill Modification Report #4 - completion of McCauley Street and Botany Road / McCauley Street Intersection and use of B-Doubles on McCauley Street, dated January 2013, and prepared by Sinclair Knight Merz Pty Ltd; h) Modification request 05_0120 Mod 5 with supporting documents titled Modification Report - Demolition of B7 and Minor Subdivision, dated November 2014, prepared by Jacobs Group (Australia) Pty Ltd and Submission Report - Modification #5, dated 29 May 2015, prepared by Jacobs Group (Australia) Pty Ltd and statement of commitments for MP 05_0120 Mod 5 contained in Appendix B; and i) conditions of this Consent; j) Modification request 05_0112 MOD 7 and accompanying Environmental Assessment Report, dated August 2016 and prepared by ConsultInfra; k) Modification application 05_0120 MOD 8 and supporting documentation titled Statement of Environmental Effects - Reel Store Demolition & Extension of Noise Barrier, dated 4 June 2018, prepared by Elton Consulting and; B7 Reel Store Demolition & Extension of Noise Barrier Response to DPE Request for Information, dated 1 August 2018, prepared by Elton Consulting; l) Modification application 05_0120 MOD 9 with supporting documentation titled Environmental Assessment Report - Modification #9 - Increase in Paper Mill Maximum Production dated 10 May 2019 and Response to Submissions dated 28 June 2019 both prepared by Elton Consulting; (m) Modification application 05_0120-Mod-10 with supporting documentation titled Statement of Environmental Effects to support Modification #10: Rejects Waste Handling Facility and Finished Products Store Extension dated 31 August 2021 and Response to Request for Information dated 16 November 2021, both prepared by Elton Consulting.	Operation	As described throughout table.	Works and reports submitted as required.	Compliant	N/A
	schedule 2, 3	If there is any inconsistency between the plans and documentation referred to in Condition 2 above, the conditions of this Consent, then the most recent documents must prevail to the extent of the inconsistency	Operation	N/A	N/A	Compliant	N/A
	Schedule 2, 4	The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this Consent; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	Operation	Requests sent to Opal email address.	Requests for information are fulfilled.	Compliant	N/A
	Schedule 2, 5	The Applicant must ensure that the Development does not produce more than 500,000 tonnes of paper per annum	Operation	Daily/monthly/annual production records.	Gross production in 2024/25 was 461,485 Tonnes of paper.	Compliant	N/A
	Schedule 2, 6	With the Consent of the Secretary the Applicant may submit any management plan or monitoring program required by this Consent on a progressive basis.	Operation	N/A	N/A	Compliant	N/A
	Schedule 2,13	The Applicant must ensure that all plant and equipment used on the site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	Operation	Maintenance Program in SAP. Statutory requirements for maintenance entered into SAP for automatic reminders. Continuous improvement program for operational efficiency.	Pressure vessel checks, Electrical safety management plan lodged with Ausgrid, maintenance records in SAP.	Compliant	N/A

Schedule 3: Specific Environmental Conditions

Schedule 3,1	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. 'Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Operation	Monthly odour surveys, water quality testing, complaint recording/monitoring, gas detectors.	Complaints hotline and incident records. Ongoing biocide program for water quality control, odour surveys, Odour study conducted.	Non-compliant	62 Odour complaints received by mill and EPA during reporting period.																																										
schedule 3,2	During the life of the Development, the Applicant must carry out all reasonable and feasible measures to minimise the dust generated by the Development.	Operation	Complaints monitoring. Construction/demolition work to include dust management strategies.	Any piles of material likely to cause dust is wet down at appropriate frequencies.	Compliant	N/A																																										
Schedule 3,3	Except as may be expressly provided in an EPL for the Development, the Applicant must comply with Section 120 of the POEO Act 1997	Operation	Stormwater sampling.	Stormwater separators installed. Stormwater Management Procedure.	Non-compliant	Wastepaper yard fire in October 2024																																										
schedule 3,6	All chemicals, fuels and oils must be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) must be designed and installed in accordance with: a) the requirements of all relevant Australian Standards; and b) the DECC's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	Operation	Regular bunding audits. Approval system for introduction of new chemicals on site.	Audit reports. Chemical Approval documents.	Compliant	N/A																																										
Schedule 3, 9	The Applicant must prepare and implement a Water Management Plan for the site to the satisfaction of the Secretary. The Plan must: a) be submitted to the Secretary for approval prior to commencement of operation; b) include: * a Water Supply Strategy for the site including a report on the sustainability of groundwater extraction from the Snape Park borefield and the impact on the Botany Sands Aquifer. The strategy should also assess options for alternative water supply, and should be undertaken in consultation with the DWE; * A Stormwater Management Scheme for the site that has been prepared in accordance with the requirements of Sydney Water and Council, and generally in accordance with the Managing Urban Stormwater: Council Handbook (DECC); * a Wastewater System for the site prepared in accordance with the requirements of Sydney Water. The system should include details of discharge rates, wastewater quality and automated controls for monitoring discharges to the Southern and Western Sydney Ocean Outfall Sewer (SWSOOS).	Construction/Operation	As per Water Management Plan, Operational Trade Waste Management Procedure, Storm water management procedure, monthly bore water flow checks and original documentation submitted prior to commencement of operation.	Ongoing Trade Waste Agreement with Sydney Water, Stormwater quality test results, Groundwater Access Licence for bores.	Compliant	N/A																																										
schedule 3,10	<p>The Applicant must ensure that noise from the operation of the Development does not exceed the noise limits presented in Table 1:</p> <table> <tr> <th>ID</th> <th>Location</th> <th>Day L_{Aeq} (15 minute) dB(A)</th> <th>Evening L_{Aeq} (15 minute) dB(A)</th> <th>Night L_{Aeq} (15 minute) dB(A)</th> <th>Night L_{Amax} dB(A)</th> </tr> <tr> <td>R1</td> <td>Cnr. McCauley St and Australia Ave</td> <td>46</td> <td>45</td> <td>43</td> <td>55</td> </tr> <tr> <td>R2</td> <td>Australia Avenue</td> <td>45</td> <td>45</td> <td>43</td> <td>55</td> </tr> <tr> <td>R3</td> <td>Murrabin Avenue</td> <td>46</td> <td>45</td> <td>43</td> <td>55</td> </tr> <tr> <td>R4</td> <td>Partanna Avenue</td> <td>42</td> <td>41</td> <td>41</td> <td>55</td> </tr> <tr> <td>R5</td> <td>Cnr. Partanna and Moorina Avenues</td> <td>42</td> <td>42</td> <td>39</td> <td>55</td> </tr> <tr> <td>R6</td> <td>Moorina Avenue</td> <td>43</td> <td>43</td> <td>38</td> <td>55</td> </tr> </table>	ID	Location	Day L _{Aeq} (15 minute) dB(A)	Evening L _{Aeq} (15 minute) dB(A)	Night L _{Aeq} (15 minute) dB(A)	Night L _{Amax} dB(A)	R1	Cnr. McCauley St and Australia Ave	46	45	43	55	R2	Australia Avenue	45	45	43	55	R3	Murrabin Avenue	46	45	43	55	R4	Partanna Avenue	42	41	41	55	R5	Cnr. Partanna and Moorina Avenues	42	42	39	55	R6	Moorina Avenue	43	43	38	55	Operation	Quarterly noise monitoring. Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Quarterly noise monitoring reports. Although noise surveys report noise levels above the Project Noise Limits, ambient noise is a product of the combined influence of all noise sources within the Port Botany area. Noise modelling predicts noise emissions from the Opal site to be below EPL noise limits.	Compliant	N/A
ID	Location	Day L _{Aeq} (15 minute) dB(A)	Evening L _{Aeq} (15 minute) dB(A)	Night L _{Aeq} (15 minute) dB(A)	Night L _{Amax} dB(A)																																											
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R6	Moorina Avenue	43	43	38	55																																											
Schedule 3, 10F	The Applicant must prepare a Long-term Noise Barrier Plan for the Development. The Plan must: a) identify the Applicant's long-term plan for noise mitigation to nearby sensitive receivers; b) address the planning and implementation strategy for the long-term noise barrier solution, including timeframes for implementation; c) include a procedure for the removal of all or part of the noise barrier if new structures are erected on the site which would perform a suitable noise attenuation function; d) be prepared in consultation with the Department, EPA and Council; and e) be submitted to the Department by 30 June 2021 for Consent by the Secretary.	Construction/Operation	Long-term noise barrier plan completed	Long-term noise barrier plan submitted and approved by DPE 19/4/23	Compliant	N/A																																										
schedule 3,12	The Applicant must ensure that noise from reversing alarms is minimised at all times.	Operation	Monthly noise observations, complaint recording/monitoring.	Reversing alarms replaced with white noise quackers. No noise complaints for reversing alarms.	Compliant	N/A																																										

Schedule 3: Specific Environmental Conditions	Schedule 3, 14A	Within 3 months of the installation of the Stage 2 Noise Barrier, the Applicant must submit a Noise Verification Study to the Secretary. This study must: a) be undertaken by a suitable qualified acoustical expert and in accordance with the NSW Industrial Noise Policy; b) validate the predictions made in the EA and supporting documents for MP 05_0120 Mod 5; c) demonstrate compliance with the noise limits in Table 1 of Conditions 10; and d) describe the contingencies that would be implemented, and the timing for implementation, should non-compliances be detected.	Demolition	Study undertaken by acoustic experts, Hutchison Weller.	Report submitted to Department on 6th October 2020	Compliant	N/A
	Schedule 3, 14C	Within three months of completion of works associated with 05_0120 MOD 8 the Applicant must submit an updated Noise Verification Study required by Condition 14A. The updated study must: a) be undertaken by a suitable qualified acoustic expert in accordance with the Noise Policy for Industry 2017; b) validate the predictions made in the SEE and supporting documentation for 05_0120 MOD 8; c) demonstrate compliance with the limits in Table 1 of Condition 10; d) describe the additional noise mitigation measures that would be implemented and the timing for implementation should non-compliances be detected; and e) be submitted to the Department for Consent by the Secretary.	Demolition	Study undertaken by acoustic experts, Hutchison Weller.	Report submitted to Department on 6th October 2020	Compliant	N/A
	Schedule 3, 14D	Within 3 months of the commencement of operations associated with 05_0120 MOD10, the applicant must prepare a Noise Verification Study in consultation with the EPA and to the satisfaction of the Secretary. This study must: (a) be undertaken by a suitably qualified acoustic expert; (b) include a verified operational source emission inventory developed from on-site monitoring of all plant and equipment associated with 05_0120 MOD 10; (c) establish environmental performance in accordance with the requirements of the Noise Policy for Industry 2017; (d) confirm the predicted noise impacts made and adequacy of noise mitigation measures specified in the SEE and supporting documentation for 05_0120 MOD10; and (e) describe the additional noise mitigation measures to be implemented and the timing for implementation should non-compliances with the noise limits specified in Table 1 of Condition 10 be detected.	Operation			Not triggered	Operations associated with Modification 10 have not yet commenced.
	schedule 3,20	The Applicant must ensure that: a) the internal road network and parking on site complies with the Australian Standards AS 2890.1:2004 and AS 2890.2:2002; b) site related vehicles do not queue on any public roads; c) heavy vehicles are restricted from using McCauley Street north of Raymond Avenue; and d) any changes to site access, including new access points and closure of existing access points are notified to the Secretary prior to commencement of operation.	Operation	McCauley street exit designed for right-hand turn only.	No reports of heavy vehicles using McCauley Street north of Raymond Avenue. No trucks lined up on Botany Road.	Compliant	N/A
	schedule 3,24	The Applicant must prepare and implement a Operational Hazard Plan for the site to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified independent person approved by the Secretary; b) be submitted for Consent prior to the commencement of commissioning; and c) include a : *Emergency Plan that has been prepared in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines and * Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System must be developed in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.	Operation	Botany Mill Safety Management System. Botany Mill Emergency Plan	Operational Safety procedures and Emergency Plan submitted to the Secretary as they were prepared.	Compliant	N/A
	Schedule 3, 24E	Twelve months after the commencement of operation of the upgraded WTP and every three years thereafter, or at such intervals as the Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the facility as modified and within one month of each audit, submit a report to the Secretary. The audit must be carried out at the Applicant's expense by a qualified person or team, independent of the Development, approved by the Secretary prior to commencement of the audit. The Hazard Audit must be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No 5, "Hazard Audit Guidelines". The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	Operation	Audit conducted by an Independent Auditor approved by the Secretary.	Audit scheduled for July 2025.	Compliant	N/A
	Schedule 3, 24F	The Applicant must comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 24A to 24E inclusive, within such time as the Secretary may agree.	Operation	Response submitted to requests as required.	Response submitted to requests as required.	Compliant	N/A
	schedule 3,25	The Applicant must ensure that all waste generated on the site during demolition, construction and operation of the Development is classified in accordance with the DECC's Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes and disposed of to a facility that may lawfully accept the waste.	Operation	Waste Management Plan	Waste Records and Receipts	Compliant	N/A
	schedule 3,27	For the life of the Development, the Applicant must: a) Monitor the amount of waste generated by the Development; b) Investigate ways to minimise waste generated by the Development; and c) Implement reasonable and feasible measures to minimise waste generated by the Development to the satisfaction of the Secretary.	Operation	Waste Management Plan	Waste records	Compliant	N/A
	schedule 3,28	The Applicant must prepare and implement an Energy Savings Action plan for the Development to the satisfaction of the Secretary. This plan must be prepared in accordance with the requirements of the DWE and the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Secretary for Consent.	Operation	Monthly energy and greenhouse gas monitoring/tracking.	Electricity and gas intensity reductions since commissioning	Compliant	N/A

Schedule 4: Environmental Management and Monitoring	Schedule 4, 29	The Applicant must prepare and implement an Environmental Management Strategy for the Development, the satisfaction of the Secretary. This strategy must be submitted to the Secretary prior to the demolition commencing. The plan must be updated as required throughout construction and must: a) provide the strategic context for environmental management of the Development; b) identify the statutory and other obligations that apply to the Development; c) describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management of the Development; and d) describe the procedure that would be implemented to: * keep the local community and relevant agencies informed about the construction, operation and environmental performance of the Development; * receive, handle, respond to, and record complaints; * resolve any disputes that may arise during the course of the Development; * respond to any non-compliance * report on monitoring results; and * respond to emergencies.	Operation	Environmental Management System	Legal compliance register, community liaison group meetings, community update newsletters, 24-hour complaints hotline, emergency procedure	Compliant	N/A
	Schedule 4, 30	Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission an Independent Environmental Audit of the Development. This audit must: a) be carried out by a suitable qualified, experienced and independent audit team, that contains an odour specialist, noise expert and wastewater specialist, whose appointment has been endorsed by the Secretary; b) assess the environmental performance of the Development; c) assess whether the Development is complying with the conditions of both this Consent and the EPL for the Development; d) review the adequacy of any strategy/plan/programme required under this Consent, and if necessary, recommend measures or actions to improve the environmental performance, and or any strategy/plan/programme required under this Consent.	Operation	Audit conducted by an Independent Auditor approved by the Secretary.	Audit conducted March - July 2025. Report not yet received.	Compliant	N/A
	Schedule 4, 31	Within two months of completing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, with a response to any recommendations contained in the audit report.	Operation	Audit and response submitted to DPE	Audit submitted and approved by DPE	Compliant	N/A
	Schedule 4, 32	Within three months of submitting the audit report to the Secretary, the Applicant must review and if necessary revise the strategies/plans/programs required under this Consent.	Operation	Document reviews and updates conducted according to audit actions and recommendations.	Updated documents submitted to Department via Major Projects Portal.	Compliant	N/A
	Schedule 4, 33	Within seven days of detecting an exceedance of the limits/performance criteria in this Consent, or an incident causing (or threatening to cause) material harm to the environment, the Applicant must report the exceedance/incident to the Department, and any relevant agency. The report must: a) describe the date, time and nature of the exceedance/incident; b) identify the cause (or likely cause) of the exceedance/incident; c) describe what action has been taken to date; and d) describe the proposed measures to address the exceedance/incident.	Operation	Incident reporting system at Botany Mill. PIRMP in place.		Non-compliant	Fire in October was reported to the Department outside the 7-day reporting period.
	Schedule 4, 34	Within 12 months of this Consent, and annually thereafter, the Applicant must submit an Annual Environmental Monitoring Report (AEMR) to the Secretary and relevant agencies. This report must: a) identify the standards and performance measures that apply to the Development; b) describe works carried out in the last 12 months; c) describe the works that will be carried out in the next 12 months; include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; e) include a summary of monitoring results for the Development during the past year; f) include an analysis of these monitoring results against the relevant: * impact assessment criteria/limits; * monitoring results from previous years; and * predictions in the EA; g) identify any trends in the monitoring results over the life of the Development; h) identify any non-compliance during the previous year; and i) describe what actions were, or are being, taken to ensure compliance.	Operation	Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Report submitted on 14th August 2024.	Compliant	N/A
	Schedule 4, 35	Subject to confidentiality, the Applicant must make all documents required under this Consent available on a web site.	Operation	Relevant documents forwarded to Opal communications team for uploading.	Documents available on https://opalanz.com/sustainability/sustainability-performance/	Compliant	N/A
	Schedule 4, 36	Within 3 months of: a) an annual independent environmental audit submitted under Condition 30; b) an incident report submitted under Condition 33; or c) the Consent of a modification to the Development Consent, the Applicant must review, and if necessary revise, the strategies, plans and programs required under this Consent to the satisfaction of the Secretary.	Operation	As required	As per Condition 32.	Compliant	N/A

Appendix B – Action Status Table

Table 51: Independent Environment Audit Report Recommendations 2022

Recommendation	Non-compliance	Response/Actions to be taken	By when	Complete
The monthly odour surveys should include a brief statement or standardised evaluation of whether the assessor considers offensive odour was observed, as recommended by the Odour Survey Protocol.	N	Statement on whether odour was offensive or not was included in the August odour survey. Odour survey template to be modified to ask for a statement as to whether any odours observed were considered offensive to ensure the statement is always included.	31/12/2022	Y
Persons completing the odour surveys should consider becoming a certified odour assessor in accordance with AS4323.3 to confirm that they fall within the recommended range of odour sensitivities for the n-butanol reference.	N	Consider whether Environment Manager should become a certified odour assessor.	31/12/2023	Y. Karen Jones and Jun Wu certified odour assessment completed and passed in March 2025.
The complaints log includes a column used to "justify" or verify odour complaints. This is not always filled in for odour. Opal should consider ways to verify the odour complaints and document them in the complaints register. Where odour complaints cannot be verified, this should be noted in the register.	N	Most odour complaints come via the EPA and so are received by the site several days after the complaint was made. This makes it very difficult to "justify" or verify the complaints as no investigation is able to be completed at the time of the complaint. Notes to this effect will be made in the complaints log going forward.	31/10/2022	Y
For noise compliance, unattended monitoring would normally not be considered acceptable or would be supplemented by additional attended measurements at receivers and sometimes at intermediate locations with additional calculations or modelling to confirm compliance. The adoption of the LA90 or Rating Background Noise Level (RBL) is not appropriate to measure compliance with a level varying noise source and intermittent external activities. The quarterly noise monitoring reports do not come to any clear conclusion about Compliance with LAeq limits, compliance with LAmax limits, tonal characteristics, and level varying characteristics. The adoption and implementation of Special Condition U1.1 and U1.2 site verification modelling is key in conjunction with receiver and site attended noise monitoring to demonstrate noise compliance with EPL and conditions of approval.	Y	Special Condition U1.1 and U1.2 - Site noise model verification has been completed and submitted to the EPA on 30th June 2022. The model showed that the site noise contribution at the nearest residences under the worst-case scenarios are less than the EPL limits. Discuss with Noise Consultants the appropriateness of attended measurements.	30/11/2022	Y. Attended noise measurements do not add any value - hence the reason for going to a noise model. You cannot determine where the noises are coming from, even if you are at the monitoring location.
The noise mitigation wall was completed in January 2019 using an innovative re-use of shipping containers. In order for the wall to operate effectively, all gaps between containers must be filled. A site inspection confirmed a number of gaps between the containers.	N	Refill gaps between shipping containers in noise wall.	31/12/2022	Y
The facility has prepared a Water Supply Strategy, a Stormwater Management Procedure and a Trade Waste Management procedure but does not currently have a Water Management Plan which meets contemporary benchmarks. It is recommended that a Water Management Plan is prepared that (in addition to those matters currently included) - describes relevant consent and EPL conditions, works approvals and water access licences; - describes the water supply, stormwater and waste management systems; - describes how relevant development consent, EPL conditions and water regulations are addressed; and - describes monitoring programs and how associated monitoring data is used to progressively review, and where necessary improve the water management system.	Y	Prepare Water Management Plan.	1/06/2023	Y. Uploaded to SAP DMS
Employ periodic checks for storage of materials in areas expressly marked to be kept clear	N	Housekeeping checked in Workplace Inspections.	Complete	Y
Update the Opal ANZ website with the documents that were on the Orora website as required under the consent.	Y	Relevant documents uploaded to Opal website.	Complete 11/8/22	Y
Update the Statement of Commitments for the development. For example the production capacity of the paper mill has been update in the consent conditions, but not the Statement of Commitments.	Y	Determine whether the Statement of Commitments needs to be updated (or was it a one-off document at the beginning of the project). Update if required.	31/03/2023	The Statement of Commitments as recorded on the Dept of Planning Consolidated Development Consent does not include the production limit as reported by the auditors. It only relates to demolition aspects, and therefore does
Submit the Long-term Noise Barrier Plan	Y	Long-term noise barrier to be submitted to the Dept of Planning. Draft Long term noise barrier plan submitted to the Dept of Planning on	31/12/2022	Y. Approved by DPE 13/4/23
Renew the Aerobic Biomass waste exemption with the EPA.	Y	Opal have also applied for an exemption for the Anaerobic biomass (in addition to the Aerobic biomass). The EPA are in the process of combining the Aerobic biomass and Anaerobic biomass exemptions into the one new exemption and have released it as a draft document. Opal and EPA are currently reviewing draft.	Modifications in progress	Y. Combined digestate RRE/RRO finalised 13/4/23

Appendix C – Compliance Declaration Form


Project Name	Construction of a new paper mill at Amcor's Matraville Plant (Project B9)
Project Application Number	05_0120
Description of Project	Construction and Operation of Recycled Paper Mill
Project Address	1891 Botany Road, Matraville
Proponent	Opal Packaging (Previously Orora and Amcor)
Title of Compliance Report	Annual Environmental Monitoring Report – Operational Compliance Report
Date	11/08/2025

I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

- i. the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- ii. the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;
- iii. the findings of the Compliance Report are reported truthfully, accurately and completely;
- iv. due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- v. the Compliance Report is an accurate summary of the compliance status of the development.

Notes:

- 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) 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
- 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 Authorised Reporting Officer	Karen Jones
Title	Environment, Testing & Management Systems Manager
Signature	
Qualification	Bachelor of Engineering, Chemical
Company	Opal Packaging
Company Address	1891 Botany Road, Matraville 2036