



ANNUAL REVIEW

(2024/05/01 – 2025/04/30)

Operational Compliance Report - SSD 7268

Thomas Foods International Bourke Pty Ltd

28 July 2025

Prepared by: Lahiru Udage Arachchige

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Document Control

Version	Date	Revision	Author	Reviewed by
V1	25/07/2025	28/07/2025	LAHIRU UDAGE ARACHCHIGE	ANDREW MANNING

Name of Operation	The Bourke Small Stock Abattoir
Name of Operator	Thomas Foods International Bourke Pty Ltd
Development Consent #	SSD-7268
Name of holder of Development Consent/Project Approval	Thomas Foods International Bourke Pty Ltd
Environmental Protection License (EPL) #	20918
Name of Holder of EPL	Thomas Foods International Bourke Pty Ltd
Water License #	N/A
Annual Review Start Date	01 May 2024
Annual Review End Date	30 April 2025

I, LAHIRU UDAGE ARACHCHIGE, certify that this annual review is a true and accurate record of the compliance status of the Bourke Small Stock Abattoir for the period of 01 May 2024 to 30 April 2025 and that I am authorized to make this statement on behalf of Thomas Foods International Bourke Pty Ltd.

Note

- a) The Annual Review is an environmental audit for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (intention to defraud by false or misleading statement – maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents –maximum penalty 2 years imprisonment or \$22,000, or both).

Name of authorized Reporting Officer	LAHIRU UDAGE ARACHCHIGE
Title of authorized Reporting Officer	Environment Advisor, Thomas Foods International Bourke Pty Ltd
Signature of authorized Reporting Officer	
Name of Site Manager	MARK MILLER
Signature of Site Manager	
Date	29/07/2025

1. Statement of Compliance

As at the end of the reporting period, the operation was not compliant with its relevant approval conditions as follows:

Were all conditions of the relevant approval(s) complied with?	
Development Consent SSD-7268	No

The summary of non-compliance item is identified in the **Table 1** below. Detailed assessment and corrective and/or preventative actions are discussed in relevant Sections below.

Risk Level	Color Code	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
Administrative Non-compliance		Non-compliances which don't result in any risk of environmental harm (e.g. submitting a report to government later than required under approval condition

Table 1: Summary of non-compliances of SSD-7268 and EPL 20918 observed during the reporting period

Condition of Consent Number	Compliance Requirement	Compliance Status	Actions
Development Consent SSD 7268			
D8	Within 24 hours of the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant shall notify the Secretary and any other relevant agencies of the incident. Within seven (7) days of the detection of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Non - compliant	An incident of wastewater spillage at the plant was reported to the EPA on 29/05/2024, a team from the EPA visited the site to have a meeting. TFI team explained the actions and measures taken and a Correspondence letter was received from the EPA with the conclusion of investigation. The required preventive measures were implemented to avoid such incidents. The effluent pump station is regularly inspected and effluent water pit is cleared by removing any accumulated solid content.

2. Project Background

The Bourke Small Stock Abattoir project entails constructing and running a cutting-edge export slaughterhouse processing plant that can handle up to 6,000 small stock (a mix of sheep and goats) per day. Figure 1 below shows the location of the abattoir, which is about 14 km north of Bourke. The initiative is intended to help Bourke and the farming community while achieving several potential in the goat and sheep markets, especially in terms of meeting demand in foreign markets.

Figure 1: Regional context of Bourke Small Stock Abattoir (BSSA)



The names and contact details for key personnel currently responsible for the environmental management of the operation during the review period are mentioned Table 2 below.

Table 2: Contact Details of key personnel responsible for the environmental management

Name	Position	Email	Phone
Mark Miller	Northern Operations Manager	mark.miller@thomasfoods.com	0419 869 511
Lahiru Udage Arachchige	Environment Advisor- TFI Bourke	lahiru.arachchige@thomasfoods.com	0436 444 577
Andrew Manning	General Manager Environment	andrew.manning@thomasfoods.com	0429 832 165

3. Development Completed During Reporting Period

As per Condition D7 (a), this section describes the Development that was carried out during the reporting period. Works completed during this reporting period are as follows:

- Installation of onsite power generator system
- Major modification and repair of hot process water ring main
- Renovation of onsite car park and ground floor staff office area

4. Development Activities Proposed over next Reporting Period

As per Condition D7 (a), this section describes the Development that is proposed to be carried out over the next reporting period (01 May 2025 to 30 April 2026) as follows:

- Construction of bunded hardstand for storing manure onsite until spreading at irrigation area.
- Conducting Wastewater treatment plant performance review
- Installation and replacement of the existing LPG storage facility

5. Approvals

The following approvals are held by Thomas Foods International Bourke for operation and development of BSSA:

- 1- Condition C31 – Storm water storage facilities – amend condition to remove the requirement of a 900 mm compacted clay liner with permeability of less than 1×10^{-9} m/s
- 2- Mass carcass disposal pit – remove requirement for construction of pit and requirement for a rubber liner in the pit.
- 3- Manure stockpile area – remove requirement for rubber membrane liner

The response to the modification of state significant development – SSD 7268 is attached in Appendix 8.

6. Summary of Abattoir Operations in Reporting Period

The Bourke Small Stock Abattoir (owned by Thomas Foods International Bourke Pty Ltd) continued its production for the reporting year started from 01 May 2024 to 30 April 2025.

Maximum livestock held onsite per day	6,000
Maximum livestock processed per day	4,187

TFI is committed to comply with its obligations under SSD 7268 and regular maintenance onsite is performed. Also, ongoing pollution monitoring is recorded as per OEMP requirements.

7. Actions Required From the Previous Annual Review

Below mentioned actions from previous annual review are addressed and updated in the Table 3.

Table 3: Actions from previous annual review to be updated

Activities	Outcome	Comments
Provide the quantity of waste removed, effluent monitoring data and effluent irrigation data	This has been completed	The details related to waste disposal and effluent monitoring data and irrigation volumes in the reporting period are mentioned in environmental performance and water management sections. The daily records are provided in Appendix 9.
Website content update with current statutory approvals, complaint register and annual reviews of the development	This has been completed	The modified SSD-7268 development consent, EPL 20918, updated compliance register and the previous annual review have been uploaded to the website https://thomasfoods.com/community/
Incidents reported occurred during the reporting period	This has been completed	The occurred incidents during reporting period are mentioned in Section 11 reporting incidents.
Update on the actions arising from the latest Independent Environmental Audit of the development	This is in progress.	The details of the updates of IEA 2023 August has been shown in section 13.

8. Environmental Performance

This section summarizes the environmental outcomes intended for the reporting period for The Bourke Small Stock Abattoir, and the Review's assessment of performance against each outcome. The Table 4 highlights the environmental performance aspects, their outcomes, and whether these outcomes have been achieved during the review period.

A review of the Environmental Monitoring Summary, and comparison between actual impacts with Environmental Impact Statement (EIS) against predicted impact that are relevant to the current reporting period have been included. Any reference to monitoring data in Section 8 refers to monitoring results for the reporting period. TFI is committed to undertake effluent monitoring monthly and soil and groundwater monitoring annually.

Table 4: Environmental Performance during the reporting period

Environmental Aspect	Outcome	Status	Comments
Air Quality Discharges	Development Consent SSD 7268 Condition C1: C1 – The Applicant shall ensure the Development complies with all load limits, air quality criteria and air quality monitoring requirements as specified in the EPL for the site.	Achieved	As per the OEMP, fortnightly environmental inspections are conducted to report on environmental impacts of the project. Refer to Appendix 6 for examples of the environmental checklist and Appendix 2 for ongoing climate monitoring data and its associated analysis.

Pollution of Waters	L1.1 Except as may be expressly provided in any other condition of this license, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Achieved	No discharges of polluted water from the site were observed and no person has been identified to pollute water.
Concentration Limits-sediment dam	L2.1 For each monitoring/discharge point or utilization area specified in the table(s) below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table. L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges. L2.3 To avoid any doubt, this condition does not authorize the pollution of waters by any pollutant other than those specified in the tables. L2.4 Water and/or Land Concentration Limits – Total suspended solids must not exceed 50 milligrams per litre.	Achieved	As per the EPL, these concentration limits are related to monitoring Point 3 (i.e., sediment dam). Evidence of no discharge has been verified through no discharge incidence reported and no adverse observation.
Waste (also refer to “Waste” section below	L3.1 The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing,	Achieved	

and Consent conditions C17- C21)	Reprocessing or disposal of any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the license. This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises under the Protection of the Environment Operations Act 1997.		For 24/25 reporting year, general waste was taken offsite by a third party contractor of Bourke Shire Council. All the organic waste was transported from TFI to licensed waste processing facility.
Noise Limits	L4.1 Noise generated at the premises that is measured at each noise monitoring point established under this license must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2 (refer to EPL noise limits table under section L4.1) L4.2 For the purposes of condition L4.1: • Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays. • Evenings is defined as the period from 6pm to 10pm.	Achieved	Noise monitoring is only required in the event a noise complaint or incident. As there have been no complaints recorded in the complaints register or evident during the current reporting period, compliance with this condition has been met.

	Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.		
Blasting	L5.1 Blasting at the premises is prohibited.	Achieved	No blasting activities occurred on site during the reporting period.
Hours of Operation	L6.1 Unless otherwise specified by any other condition of this license, all construction activities are: a) restricted to between hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1pm Saturday; and c) not to be undertaken on Sundays or Public Holidays L6.2 Works outside of the hours identified in condition L6.1 may be undertaken in the following circumstances: a) works that are inaudible at the nearest receivers; b) works agreed to in writing by the Department of the NSW Department of Planning and Environment; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; d) Where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	Achieved	For the duration of the reporting period, all works were undertaken during the permitted hours only.

	L6.3 Unless otherwise specified by any other condition of this licence, scheduled activities are permitted to operate 24 hours a day Monday to Sunday.		
Potentially Offensive Odour	L7.1 The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises. L7.2 No condition of this license identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.	Achieved	No operational or development work was carried out onsite to generate the emission of offensive odour beyond the boundary of the premises.
Odour	Development Consent SSD 7268 Condition C2: C2- The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour, as defined in the POEO Act (Development Consent Condition C2).	Achieved	No operational or development work was carried out onsite to generate the emission of offensive odour beyond the boundary of the premises.
Dust Management	Development Consent SSD 7268 Condition C3 and C4: C3 – The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development. C4 – During construction and operation of the Development, the Applicant shall ensure that: a) all vehicles on-site do not exceed a speed limit of 60 kilometres per hour; b) all loaded vehicles entering or leaving the site have their loads covered;	Achieved	Refer to Appendix 4 for photos of proper signage onsite and observations of proper load coverage.

	c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and d) all heavy vehicles do not use engine brakes.		
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ANIMAL WELFARE AND BEST PRACTICE			
Environmental Aspect	Outcome	Status	Comments
Animal welfare and best practice	Development Consent SSD 7268 Condition C5: C5 - The Applicant shall ensure the Development complies with the relevant requirements for the welfare of livestock, particularly health, housing, watering, feeding, handling and transport, including but not limited to those listed in: a) National Animal Welfare Standards for Livestock Processing Establishment; b) Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock; c) Australian Industry Welfare Standards and Guidelines for Goats; d) Australian Industry Welfare Standards and Guidelines for sheep; e) Model Code of Practice for the Welfare of Animals: The Goat; f) Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments; and g) any other relevant document that supersedes the above.	Achieved	TFI has an Animal Welfare Policy in place, a fit-to-load policy for suppliers and stock receive receipts which cover the livestock transport obligations and onsite holding of stock.

Emergency disposal and biosecurity	Development Consent SSD 7268 Condition C6: C6 - Prior to the commencement of operation, the Applicant shall prepare an Emergency Disposal and Bio- Security Protocol, detailing the procedures for a biosecurity emergency including a mass mortality event, to the satisfaction of the Department. The protocol shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. C6A. The Applicant shall revise the Emergency Disposal and Biosecurity Protocol required under Condition C6 within 3 months of approval of SSD-7268-Mod-2, detailing the procedures for a biosecurity emergency including a mass mortality event, to the satisfaction of the Secretary. The protocol shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5	Achieved	The Emergency disposal and biosecurity protocol was revised and the requirement of construction of the mass carcass disposal pit was removed through the modification of development consent (Appendix 8). The updated Operational Environmental Management Plan (Appendix 11) describes the updated and approved arrangement.
Disease management	Development Consent SSD 7268 Condition C7: The Applicant shall ensure the following key Q-Fever controls are in place during the operation of the Development a) ensuring livestock is rested prior to transport to the Development site; b) a driver protocol is in place to ensure drivers transporting livestock to the Development site do not stop in built up areas when carrying livestock;	Achieved	TFI has fit-to-load policy (Appendix 3), Q fever management protocol and Animal welfare SOP's covering all the components of this condition. It is mandatory for all the workers to receive Q-fever immunization if they haven't received it prior in life. Stock holding yards are maintained and cleaned

	c) the Meat Livestock Australia's guide 'Is it Fit to Load?' is considered before livestock is transported to the Development site; d) implementation of an immunisation program for all abattoir workers; e) ensuring animal waste is removed from the Development in enclosed containers; f) ensuring the design (i.e., irrigation, ventilation, dust suppression, fencing) of the Development meets industry best practice for the control of disease; and g) details of measures for continuous improvement in disease management to be reported in the annual review required under Condition D7.		regularly. The site design (i.e., irrigation ponds, ventilation fans, dust management and fencing) is in place to serve as effective disease intervention.
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BIODIVERSITY

Environmental Aspect	Outcome	Status	Comments
Biodiversity offset strategy	Development Consent SSD 7268 Condition C8 and C9: C8 - Within 12 months of the operation of this development consent, the Applicant shall purchase and retire 2,068 Ecosystem Credits to offset the removal of 55.3 hectares of native vegetation as calculated in the Biodiversity Assessment Report, prepared by EMM (EIS) C9 – Any proposed management activities shall be in addition to other obligations for conservation that are	Achieved	From 01/01/2024 Biodiversity Assessment was transferred to Active Management stage. The Biodiversity Conservation Trust officer had an inspection onsite and several observations were made. The active management annual report of the biobank site for previous reporting year was submitted to BCT NSW along with inspection and photo point monitoring report. (Appendix 1)

	attached to the land such as actions being carried out under a Property Vegetation Plans.		
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TRAFFIC AND TRANSPORT			
Environmental Aspect	Outcome	Status	Comments
Operating Conditions	Development Consent SSD 7268 Condition C16: C16 – The Applicant shall ensure: a) internal roads, driveways and parking (including grade, turn paths, site distance requirements, aisle widths, aisle lengths, and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2; b) the swept path of the longest vehicle entering and exiting the site, as well as maneuverability through the site, is in accordance with AUSTROADS Guide to Road Design;	Achieved	All vehicle movements are properly managed in the designated area with visible signs in accordance with AUSTROADS Guide to Road Design. Heavy vehicles and bins associated with the Development are kept in the designated area at all times. See Appendix 4 for signage in place.

	c) the Development does not result in any vehicles queuing on the public road networks; d) heavy vehicles and bins associated with the Development do not park or stand on local roads or footpaths in the vicinity of the site; e) all vehicles are wholly contained on site before being required to stop; f) all loading and unloading of materials is carried out on site; and g) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.		The car park is regularly cleaned and clear of any obstacles at all times.
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WASTE			
Environmental Aspect	Outcome	Status	Comments
Waste management	Development Consent SSD 7268 Condition C17, C18 and C19: C17 – The Applicant shall ensure any liquid and non-liquid wastes generated on the site is classified in accordance with the Waste Classification Guidelines Part 1: Classifying Waste, (EPA, 2014), or its latest revision. C18 – Prior to the commencement of operation, the Applicant shall provide the Department and the EPA with documentary evidence, including a copy of any executed Waste Agreement(s), confirming it has	Achieved	All waste is being removed offsite to a licensed facility as required. Chemical contaminated waste is organized in regular basis to be transferred to a waste disposal yard by a contractor. General waste is taken offsite by a third part contractor for Bourke Waste Management. (Appendix 5)

	secured a suitably licensed waste collection facility capable of lawfully receiving the relevant waste from the site with consideration to the POEO Act, Protection of the Environment Operations (Waste) Regulation 2014 and the relevant development consents of receiver facilities. C19 – All waste removed from the site shall only be directed to a waste management facility or premises lawfully permitted to accept the waste.		
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Table 5 shows the offal waste removed offsite to a licensed waste collection facility for disposal, for the reporting year.

Table 5: Offal Waste removed offsite to Landfill during reporting period

Month	Waste Removed (T)
May-24	522
Jun-24	493
Jul-24	609
Aug-24	580
Sep-24	580
Oct-24	575
Nov-24	550
Dec-24	406
Jan-25	500
Feb-25	700
Mar-25	700
Apr-25	525

Waste management plan	Development Consent SSD 7268 Condition C20 and C21: C20 - Prior to the commencement of operation, the Applicant shall prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Department. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. C21 – Waste generate outside the site shall not be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a license under the POEO Act	Achieved	The waste management plan was in place in OEMP v8.1 and an updated WMP was approved by DPE on 04 Apr 2023, as part of updated OEMP v9.0. No waste generated offsite was received at the site in this reporting period.
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HAZARD AND RISK			
Environmental Aspect	Outcome	Status	Comments
Dangerous goods	Development Consent SSD 7268 Condition C22 and C23: C22 - Dangerous goods, as defined by the Australian Dangerous Goods Code, shall 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) <i>the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (EPA, 1997)In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency C23 – The quantities of dangerous goods stored and handled at the site shall be below the threshold quantities listed in the Department of Planning’s <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> (Applying SEPP 33) at all times	Achieved	All dangerous chemicals (i.e., HardChlor, SafeKleena, DuakQUad and bleach) are all safely stored in the chemicals room. All flammable liquids and fuel containers are bunded and caged properly.

NOISE			
Environmental Aspect	Outcome	Status	Comments
Hours of work	Development Consent SSD 7268 Conditions C24 and C25: C24 - The Applicant shall comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Department. <u>Table 1 hours:</u> Earthworks and Construction Mon to Fri – 7am to 6pm Saturday – 8am to 1pm Sunday – Nil Operation Mon to Sun – 24 hours C25 – Works outside of the hours identified in Condition C24 may be undertaken in the following circumstances: a) works that are inaudible at the nearest sensitive receivers; b) works agreed to in writing by the Department; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	Achieved	The conditions were adhered to during this reporting period. No works were undertaken outside allowed hours.

Construction noise limits	Development Consent SSD 7268 Conditions C26 and C27: C26 – The Development shall be constructed with the aim of achieving the construction noise management levels detailed in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures shall be implemented and activities that could exceed the construction noise management levels shall be identified and managed in accordance with the CEMP. C27 – Where feasible and reasonable, operation noise mitigation measures shall be implemented at the start of construction (or at other times during construction) to minimise construction noise impacts.	Achieved	No noise complaints were reported during any construction activities occurred for this reporting period.
Operational noise limits	Development Consent SSD 7268 Conditions C28: C28 – The Applicant shall ensure the noise generated by the operation of the Development does not exceed the noise limits in Table 2 (refer Table 2, Clause C28 of Development Consent SSD 7268).	Achieved	The closest dwelling is 5.5 km away from site (Figure 3.2 and pg. 56 of BSSA Environment Impact Statement) which ensures minimal risk of noise exceeding the approved limits.

SOIL AND WATER

Environmental Aspect	Outcome	Status	Comments
Surface water discharge limits	Development Consent SSD 7268 Conditions C30: C30 – The Applicant shall ensure that all licensed surface water discharges from the site comply with	Achieved	No surface water discharges were observed for the reporting period.

	discharge limits (volume and quality) set for the Development in any EPL or relevant provisions of the POEO Act.		Storm water is managed through graded operational surfaces around the facility and storm water collected from roofed surfaces directed into the onsite storm water detention dam. The Proponent will continue closely monitoring the discharge and will take daily samples should discharges become visible during a run-off event.
Bunding	Development Consent SSD 7268 Conditions C32: C32 – The irrigation area, four process wastewater treatment ponds, mass-burial area and the manure stockpiling area shall be bunded to prevent clean stormwater run-off from entering these areas.	Achieved	All wastewater ponds are lined and bunded. DPE removed the condition of construction of mass carcass disposal pit for OEMP v9.0 update.

WASTEWATER

Environmental Aspect	Outcome	Status	Comments
Irrigation Area	Development Consent SSD 7268 Conditions C34: C34 – The Applicant shall ensure the quantity of wastewater applied to the irrigation area shall not	Achieved	All the wastewater ponds are lined with required permeability. See Appendix 4 for photos.

	exceed the capacity of that area to effectively utilize wastewater. This includes the use of the wastewater for pasture or crop production, and the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material from the wastewater. C34A. The Applicant shall design, construct, operate and maintain all wastewater treatment ponds on site, as shown in Plan 32061-DA.22 Revision B, dated 23 January 2017, with the internal surfaces equivalent to, or better than, a clay liner of permeability 1×10^{-9} m/s or less and a thickness of no less than 900mm, or an equivalent alternative.		The water consumption details for the reporting period is recorded in Section 9, Water management. Cropping irrigation land is planned to start next reporting year.
Design	Development Consent SSD 7268 Conditions C35: C35 – Prior to the commencement of operation, the Applicant shall prepare and implement a Wastewater Management Plan (WWMP) for the development to the satisfaction of the Department.	Achieved	As per Annual Review 2019- 2020, WWMP was included in OEMP v8.0. The plan was updated as part of OEMP v9.0, approved by DPE on 04 Apr 2023.
Monitoring	Development Consent SSD 7268 Conditions C36 and C37: C36 – The Applicant shall undertake a commissioning stage monitoring program in consultation with the EPA for the wastewater treatment system, including details on the effluent volume and quantity. C37 – The Applicant shall undertake a soil and water monitoring program during operation of the Development, in consultation with the EPA and as may be included in the EPL for the Development, for irrigation water (volume and quality), soils, groundwater and crops based on risk factors that aim	Achieved	Effluent commissioning plan is part of the approved OEMP and was in place for the reporting period. Soil and ground water monitoring was completed for the reporting year. As per the variation application to the EPL submitted to EPA, a set of new soil monitoring points were proposed and based on that soil and ground water monitoring testing was performed in November 2024.

	to detect when specific water quality, soil or crop sustainability trigger values are nearing or have exceeded, trigger figure values.		
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Table 7 shows the treated discharge wastewater monitoring results obtained for the reporting year.

Table 7: Sample Test results of treated discharge wastewater tested in reporting period

Month	Date	Wastewater Parameters Tested - 2024/2025														
		pH	Conductivity	TSS	BOD	COD	Nitrogen (Ammonia)	Nitrogen (Nitrite)	Nitrogen (Nitrate)	Nitrogen (Total)	SAR	Total Phosphorus	Exchangeable Calcium	Exchangeable Magnesium	Exchangeable Sodium	Exchangeable Potassium
Apr-23	26/04/2023	7.94	1630	25.00	<2	83.00	0.31	2.00	45.4	60.80	5.66	6.61	52.00	36.00	217.00	34.00
May-23	27/05/2023	7.94	1630	25.00	<2	83.00	0.31	2.00	45.4	60.80	5.66	6.61	52.00	36.00	217.00	34.00
Jun-24	3/06/2024	8.00	3200	220.00	150.00	530.00	230.00	<0.005	0.009	230.00	9.40	29.00	31.00	14.00	250.00	38.00
Sep-24	12/09/2024	7.40	3400	480.00	950.00	2200.00	320.00	<0.005	0.04	330.00	6.60	44.00	25.00	14.00	170.00	39.00
Oct-24	23/10/2024	7.90	3600	280.00	530.00	980.00	270.00	<0.005	<0.005	300.00	8.30	44.00	30.00	16.00	230.00	50.00
Nov-24	28/11/2024	7.90	3900	170.00	500.00	890.00	230.00	0.009	0.01	360.00	9.70	34.00	34.00	15.00	270.00	54.00
Dec-24	20/12/2024	8.10	3400	180.00	120.00	560.00	200.00	<0.005	0.006	270.00	11.00	32.00	36.00	18.00	320.00	46.00
Jan-25	21/01/2025	8.00	3400	210.00	290.00	610.00	200.00	0.016	<0.005	210.00	10.00	34.00	41.00	27.00	340.00	63.00
Feb-25	18/02/2025	8.10	3600	320.00	260.00	690.00	220.00	<0.005	0.005	390.00	12.00	38.00	37.00	22.00	390.00	57.00
Mar-25	21/03/2025	8.10	3600	370.00	170.00	770.00	140.00	<0.005	<0.005	260.00	11.00	37.00	29.00	18.00	300.00	46.00

Figure 2 shows the deviations of each parameter of treated discharge wastewater with required limits according to the OEMP during the reporting period.

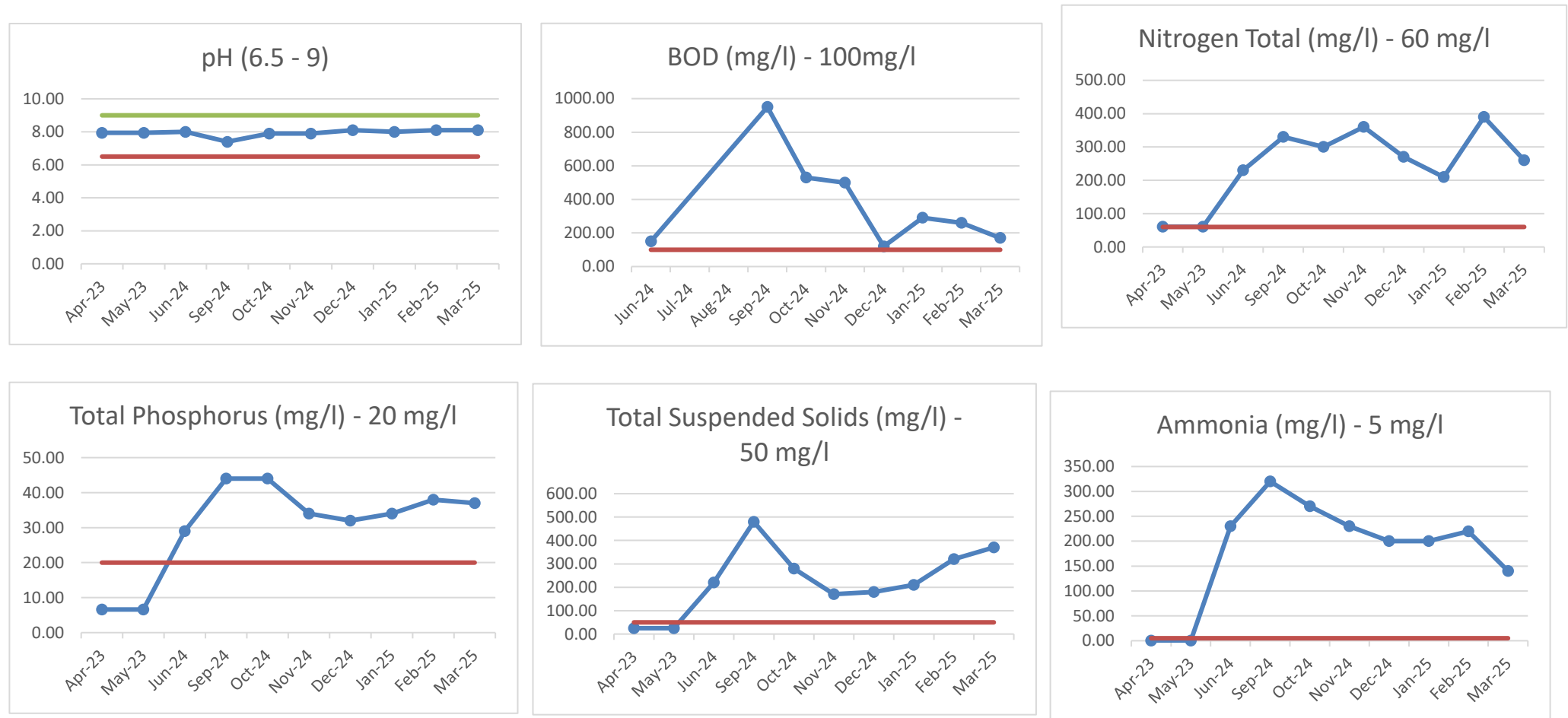


Figure 2: Deviation of treated wastewater parameters

Table 8 shows the ground water monitoring results obtained for the reporting year.

Table 8: Sample Test results of Groundwater tested in reporting period

Parameters	Units	GM1		GM2	
		2023	2024	2023	2024
pH Value	pH Unit	Ground water bore was damaged and unable to sample	6.93	7.18	6.37
Electrical Conductivity	µS/cm		20,200	20,000	38,000
Total Dissolved Solids	mg/L		13,100	13,000	24,700
Nitrate as N	mg/L		1.37	1.16	1.61
Total Nitrogen as N	mg/L		1.9	1.3	1.6
Total Phosphorus as P	mg/L		0.11	0.06	0.03

Table 9 shows the soil monitoring results obtained for the reporting year.

Table 9: Sample Test results of soil samples tested in reporting period

		2023						2024					
Parameters	Units	BH 1	BH 3	BH 11	BH 12	BH 13	BH 6	SM1	SM2	SM3	SM4	SM5	SM6
Moisture Content	%							<1.0	2.4	2.6	3.1	1.2	1
pH	pH Unit	8.13	8.93	8.5	9	8.57	9.03	8.4	8.1	8.4	8.2	7.5	8
Electrical Conductivity (1:5)	µS/cm	185.57	262.7	353.33	408.7	376	325	237	523	499	755	179	295
ECe	µS/cm							2,03	4,49	4,29	6,49	1,53	2,53
								8	8	1	3	9	7
Exchangeable Calcium	meq/100 g	10.87	11.83	11	10.97	7.63	11.87	10.7	13.3	9.8	15.2	10.9	6.4
Exchangeable Magnesium	meq/100 g	5.07	3.57	3.5	3.63	2.63	2.13	1.5	3.3	3.2	2.5	5.2	1.7
Exchangeable Potassium	meq/100 g	0.4	0.83	0.67	0.53	0.73	0.37	1.7	2	2.4	1.3	1.7	1.6
Exchangeable Sodium	meq/100 g	2.2	2.65	1.4	2.3	1.3	1.87	0.4	0.8	1.4	0.9	1.4	1

Cation Exchange Capacity	meq/100 g							14.3	19.4	16.9	19.9	19.2	10.7
Exchangeable Sodium Percentage (ESP)	%	2.2	9.47	7	12.3	8.4	10.5	2.6	4.4	8.2	4.4	7.2	9.2
Nitrogen (Nitrite)	mg/kg							0.3	0.9	0.8	0.4	0.1	0.2
Nitrogen (Nitrate)	mg/kg	6.3	1.6	8.3	7.53	10.2	3.9	15.7	90.8	57.8	128	34	20.5
Nitrogen (total)	mg/kg	200	316.7	490	423.3	610	390	840	900	760	820	640	640
Phosphorus (total)	mg/kg	81	92	142.3	123.7	137	126	172	188	179	151	136	181
Reactive Phosphorus as P	mg/kg	0.17	0.6	0.9	0.4	0.57	0.2	0.6	2.8	4.7	0.7	1	1.5
Total organic Carbon	%	0.5	0.67	0.73	0.57	0.83	0.77	1.2	0.7	0.7	0.8	<0.5	<0.5

Irrigation management	Development Consent SSD 7268 Conditions C38: C38 – Prior to the commencement of operation, the Applicant shall update the Irrigation Management Plan (IMP) (refer to Appendix K of the EIS) to the satisfaction of the Department.	Achieved	This condition was met for OEMP v8.0 and was updated for OEMP v9.0 on 04 Apr 2023.
Water management Plan	Development Consent SSD 7268 Conditions C39: C39 – Prior to the commencement of operation, the Applicant shall prepare a Water Management Plan (WMP) to the satisfaction of the Department. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5.	Achieved	This condition was achieved for OEMP v8.0 and later updated for OEMP v9.0. Water inspection is included as part of the fortnightly environmental checklist (Appendix 6). Surface water samples are not required as there has been no discharge occurring at the monitoring point.

VISUAL AMENITY			
Environmental Aspect	Outcome	Status	Comments
External Lighting	Development Consent SSD 7268 Conditions C40: C40 – The Applicant shall ensure the lighting associated with the Development: a) complies with the latest version of AS 4282 (INT) – Control of Obtrusive Effects of Outdoor Lighting; and 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.	Achieved	No obtrusive effects of outdoor lighting have been observed or reported during the operation.

HERITAGE (ABORIGINAL AND NON-ABORIGINAL)			
Environmental Aspect	Outcome	Status	Comments
Aboriginal cultural heritage management plan	Development Consent SSD 7268 Conditions C45: C45 – Prior to the commencement of operation, Applicant shall prepare an Aboriginal Cultural Heritage Management Plan (ACHMP) to the satisfaction of the Department.	Achieved	The ACHMP was approved by the Department and formed as part of the OEMP and has been implemented. The OEMP v9.0 is available on https://thomasfoods.com/community/
Gurri tree removal and compensatory planting	Development Consent SSD 7268 Conditions C46: C46 – Prior to the commencement of operation, the Applicant shall compensate for the removal of one Gurri tree through:	This condition has not been met	Gurri trees were not planted in this reporting year.

	a) the purchase of 12 Gurri trees and funding of the necessary resources for planting the trees, soil and fertiliser, drip line irrigation and maintenance; and b) ensuring the trees are planted in location that enable continued access to the Aboriginal community for educational and cultural usage, following consultation with the Registered Aboriginal Parties (RAPs) identified in the EIS.		
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9. Water Management

For the reporting period from 1 May 2024 to 30 April 2025, the portable water consumption, effluent water generation and irrigated water volumes are mentioned in the table below.

Table 10: Water consumption details in reporting period

Month	Portable Water Consumption	Effluent Water Generation	Irrigated Amount of Water
May-24	11,065.00	Effluent flow meter was not installed during this period	4,170.00
Jun-24	8,094.00		3,820.00
Jul-24	11,958.00		3,160.00
Aug-24	11,544.00		6,860.00
Sep-24	10,968.00		8,250.00
Oct-24	11,851.00		9,110.00
Nov-24	12,646.00		7,390.00
Dec-24	9,836.00		8,710.00
Jan-25	13,535.00	3,380.00	4,880.00
Feb-25	15,825.00	7,680.00	9,330.00
Mar-25	17,749.00	10,610.00	12,160.00
Apr-25	13,558.00	9,330.00	8,670.00

The report is available in appendix 9 which contains the daily water consumption records.

10. Erosion and Sediment Control

TFI undertook all the necessary sediment control measures mentioned in the last Annual Review (2024-2025). There has been no significant rain during this reporting period hence minimal erosion risk.

Daily Summary - 2024-05-01 00:00 to 2025-04-30 00:00
Summarized - None

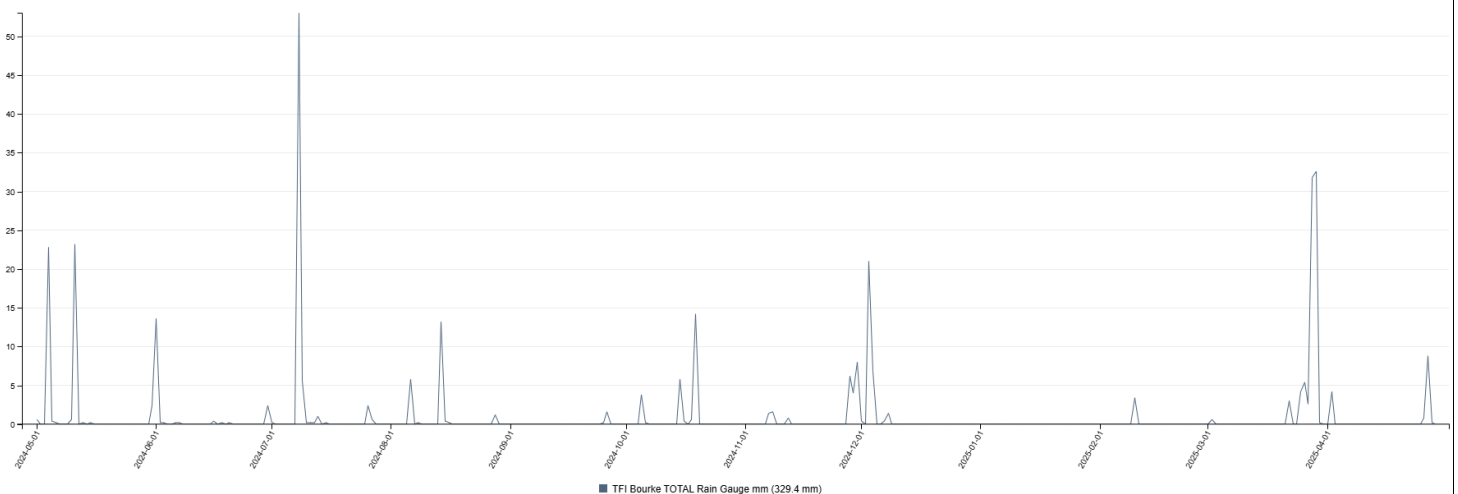


Figure 3: Total rain gauge

11. Incident Reporting

The incidents occurred during the reporting period have been summarized below Table 11.

Table 11: Recorded incidents in the reporting period

Date	Description of the Incident	Cause of the incident	Extent of Impact	Corrective Actions taken
29/05/2024	A Spillage of wastewater was observed from the drain openings under Ammonia chilling plant, Offal room and drain opening outside liarages. The overflowed water spread over the product loadout platform and refrigeration plant.	The pipeline directed from effluent pit to the Trommel Screener was blocked with solid waste particles in the bend which caused stopping the pump and overflowing effluent through the openings.	Product loadout platform, refrigeration plant area were affected	The discharge pipe was found that it was internally blocked with solid particles at a pipe connection flange, and cleaned it properly before fixing it again in the pipe. Preventive maintenance plan is placed to perform effluent pit cleaning work in regular intervals by JR Richards to remove accumulated solid content in the effluent pit.

12. Community

Below mentioned onsite environmental complaints was recorded during this reporting period.

Table 12: Complaints register for the reporting period

#	Date Reported to TFI	Date of Event	Detail of Complaint	Location	Feedback to Complainant	Notes on Progress
1	29/05/2024	29/05/2024	A complaint received to the EPA regarding blood contained water spread over the open ground close to refrigeration plant and waste loading area. Images of the incident have been shared with the EPA by a third party.	TFI Bourke	A team of the EPA visited the plant on 01/10/2024 and had a meeting regarding the issue and the precautionary actions taken on the incident, printed images of the incident were presented to observe by the EPA.	EPA Correspondence letter was received with conclusion of investigation considering the preventive measures taken onsite.

Appendix 12 summarizes examples of site records. Site attendance and BSSA Biosecurity Risk Assessment for Visitor are managed on site at the entrance where a sign-in station is available to be signed in by each visitor.

The Proponent will continue to ensure the complaints register is actively managed onsite.

13. Actions on Independent Environmental Audit (IEA – 2023

August)

Table 13 shows the progress of actions on the non-compliances identified in Independent Environmental Audit- August 2023.

Table 13: Water consumption details in reporting period

Condition Number	Assessment Requirement	Compliance Status in the IEA	Progress of the Actions
C32	The irrigation area, four process wastewater treatment ponds, mass- burial area and the manure stockpiling area shall be bunded to prevent clean storm water run-off from entering these areas.	Non-compliance	The irrigation area development works were completed with the construction of downslope catchment drains and tail-water pond. The Emergency disposal and biosecurity protocol was revised and the requirement of construction of the mass carcass disposal pit was removed through the modification of development consent. The bunding wall construction of manure hardstand is completed. This is compliant.
C37	The Applicant shall undertake a soil and water monitoring program during operation of the Development, in consultation with the EPA and may be included in the EPL for the Development, for irrigation water (volume and quality), soils, groundwater and crops based on risk factors that aim to detect when specific water quality, soil or crop sustainability trigger values are nearing or have exceeded, trigger values.	Non-compliance	The license variation to the EPL 20918 was issued to TFI with the changes made to the soil monitoring points after irrigation area system upgrade, and groundwater and soil monitoring tests were conducted for the reporting period in November 2024. This is compliant.
D9	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Non-compliance	TFI has uploaded the environmental performance data with the EPA <i>Requirements for Publishing Pollution Monitoring Data on</i> https://thomasfoods.com/community This is compliant.
D10	The Applicant shall make the following information publicly available on its website and keep the information up to date: (a) The EIS; (b) Current statutory approvals for the Development; (c) Approved strategies, plans or programs; (d) A complaints register, updated on an annual basis; and (e) Any other matter required by the Secretary.	Non-compliance	TFI has uploaded (a), (b), (c) and (d). (e) is also included as part of OEMP uploaded on website. The complaints register is already present on website. This is compliant.
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this license:	Non-compliance	These data and information have been kept in site records.

	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.		Wastewater samples are monthly tested by an external laboratory. The samples are collected by the environmental officer from each pond and, the collected point, date and time are recorded. Soil and ground water sampling and testing is conducted annually by external environmental service provider and sample collection point, date and time are recorded. This is compliant.
M2.1	For each monitoring/discharge point or utilization 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.	Non-compliance	TFI Bourke monitor the concentration of each pollutant at specified points in the EPL 20918 according to the specified sampling method, units of measure and the frequency and all the testing results are recorded onsite. This is compliant.
M2.4	The monitoring required by Condition M2.1 at points 6 to 15 is only required once the irrigation system is installed and there is sufficient treatable effluent for the irrigation system to be commissioned. Monitoring at these points must commence prior to any irrigation.	Non-compliance	EPA NSW approved new soil monitoring points are included in the EPL 20918 after the variation application was processed and testing was conducted for the samples in the reporting year. The new soil monitoring sampling locations are mentioned as SM1, SM2, SM3, SM4, SM5 and SM6 in the EPL 20918. This is compliant.
M3.1	Subject to any express provision to the contrary in this license, monitoring for the concentration of a pollutant discharged to waters or applied to a utilization 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.	Non-compliance	TFI Bourke monitors the concentration of each pollutant at specified points according to the specified sampling method, units of measure and the frequency as mentioned in M2.1 This is compliant.
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 license.	Non-compliance	TFI has established a clear telephone complaints line for the purpose of receiving any complaints from members of the public. As described in Operational Environmental Management Plan, the onsite Complaints management system ensures any complaint received is recorded and kept correctly, investigated, and options for avoiding

			recurrence. This is compliant.
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.	Non-compliance	The public can make the complain through the complaint form available in the security office or they can contact TFI Bourke reception through the telephone number. As described in Operational Environmental Management Plan, the onsite Complaints management system ensures any complaint received is recorded and kept correctly, investigated, and options for avoiding recurrence. This is compliant.

14. Management and Mitigation Measures

Review of actions and records provided by the Proponent suggests that the Proponent is mostly compliant with the EIS and Response to Submissions (RTS) commitments outlined in Appendix A of the Development Consent SSD 7268. For non-compliances, please refer to Table 1 for latest status updat

Appendices

Below is the list of Appendices referenced throughout the Annual Review document.

- Appendix 1 – Biodiversity Monitoring and Annual Reports
- Appendix 2 – Environmental Monitoring Summary
- Appendix 3 – TFI's Fit to Load Policy
- Appendix 4 – Site Photos
- Appendix 5 – Waste Agreement
- Appendix 6 – Environmental Checklists
- Appendix 7 – DPE Approval for OEMP Update
- Appendix 8 – MOD 2 Communication
- Appendix 9 – Water Consumption Records
- Appendix 10 – TFI Bourke Complaint Form
- Appendix 11 – Operational Environmental Management Plan
- Appendix 12 – Site Records